

ESSA Title I Comparability Documentation

Agenda

- Purpose
- IWAS Access
- District Information
- Report Data
- Frequently Asked Questions
- Resources

ESSA Title I Comparability Documentation Purpose

Purpose

Local Education Agencies (LEAs) may receive Title I, Part A funds only if:

- An LEA uses state and local funds for participating schools to provide services that, taken as a whole, are “at least comparable” to services in schools that do not participate in the Title I program.

If an LEA serves all attendance areas with Title I funds:

- The LEA must use state and local funds to provide services that, taken as a whole, are substantially comparable in each participating school.

ESSA Title I Comparability Documentation IWAS Access

IWAS



Illinois State Board of Education

Dr. Steven Isoye, *Chairman* Dr. Tony Sanders, *State Superintendent of Education*

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Hello Denise, you last logged in 8/25/2023 7:51:30 AM.

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We have your email address listed as:

dblaney@isbe.net

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News Items

Changes in IWAS Administrative Accounts

Many organizations that do electronic business with ISBE have new administrators that officially take effect on July 1...

More...

No Mid-Year FY 2023 Grant Periodic Reporting System Reports

Due to a technical issue, bi-annual Grant Periodic Reporting System (GPRS) reports were inadvertently generated. GPRS Reports were moved to annual reports for FY23 and are not due until the end of July. Contact gata@isbe.net with questions.

Keep Your IWAS Account Active!

Please keep your IWAS account active. By logging into your account more often, you can avoid the account being deactivated for lack of use. Thank you!!

Changing an Access Level in IWAS

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ARP - LEA American Rescue Plan (ESSER III)					Authorized
Consolidated District Plan					Authorized
Elementary and Secondary School Emergency Relief Grant					Authorized
Elementary and Secondary School Emergency Relief II Fund					Authorized
Emergency Assistance to Nonpublic Schools (EANS)					Authorized
ESEA of 1965 As Amended					Authorized
Organizational Risk Assessment					Authorized
Rural and Low Income Grant					Authorized
Title I Delinquent					Authorized
Title I N/D Juvenile and Adult Corrections					Authorized
Title I Neglected					Authorized
Surveys					
Survey Builder - Manager					Authorized
Reporting					
Grant Periodic Reporting System					Authorized
Annual					
ESEA Performance Report					Authorized
ESSA Title I Comparability Documentation					Authorized
Nonpublic School Application for Recognition Renewal					Authorized
ISBE Internal					
Entity Profile System (Internal)					Authorized
Retired Applications					
NCLB/ESSA Monitoring Instrument					Authorized
Grants					
Expired Funding					
GATA Risk Assessment					Authorized
NCLB Consolidated Application					Authorized
Title I District Plan					Authorized

: System Description - Detailed
 : Due Dates
 : Profile


[Want to Signup for Other Systems?](#)

IWAS

ISBE Web Security Module - App x ISBE ESSA Title I Comparability - x +

← → ↻ 🏠

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 Illinois State Board of Education

ESSA Title I Comparability

Main Menu

SESSION 57:16
TIMEOUT

RCDT: 11087004026


Fiscal Year Select

Select an application from the list(s) below. If you do not see the current year application (2022), [click here to create it.](#)

	Year - Documentation	Status	Last Submit Date	Last Review Date
Select	2021 - Title I Comparability	ISBE Approved	11/09/20	11/24/20
Select	2020 - Title I Comparability	ISBE Approved	11/12/19	11/18/19
Select	2019 - Title I Comparability	ISBE Approved	11/29/18	06/07/19
Select	2018 - Title I Comparability	ISBE Approved	11/01/17	11/01/17
Select	2017 - Title I Comparability	ISBE Approved	10/04/16	10/04/16
Select	2016 - Title I Comparability	ISBE Approved	10/01/15	10/01/15
Select	2015 - Title I Comparability	ISBE Approved	11/05/14	11/05/14
Select	2014 - Title I Comparability	ISBE Approved	10/16/13	10/16/13

ESSA Title I Comparability Documentation District Information

District Information



Illinois State
Board of Education

ESSA Title I Comparability
District Information

ISBE
Report

ISBE: E100100004

Form: Liberty C10102

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District Information

Program Contact Person:

Program contact information is prepopulated from the ESBA of 1965 Consolidated application and revisions must be completed in the application.

Last Name:
Bunch

First Name:
Katie

Middle Init:
S

Address 1:
505 N. Park St.

Address 2:

City:
Liberty

State:
IL

Zip Code:
62947

Phone Number:
617 545 5433 ext

Fax Number:

Summer Phone Number:

Email Address:
katie.bunch@libertyschool.net

District Superintendent:

Email Address:
katie.bunch@libertyschool.net

Select your District Status:

☐ District is not Exempt

☒ District is Exempt

If your district is not exempt then select the method of comparison below. Charter and other special schools may be compared using a different method.

☐ Pupil Staff Ratio

☐ Salary/Pupil Ratio

☐ Expenditure/Pupil Ratio

Name:
Mrs. Katie Bunch

District Information

- If district is not exempt, select “District is Not Exempt” and choose a comparison methodology:
Pupil/Staff Ratio
Salary/Pupil Ratio
Expenditure/Pupil Ratio
- If district is exempt, select “District is Exempt” and submit to ISBE.

District Information

- District is not exempt if it has:
 - Multiple attendance centers with similar grade spans.
 - Similar student enrollments. This includes districts with fewer than 1,000 students.
- District is exempt if:
 - There is only one attendance center.
 - All the attendance centers are unique grade spans (e.g., the district has one K-5 , one 6-8, and one 9-12, etc.).
 - The two attendance centers with the same grade span have enrollments where one center is twice the size of the other (e.g., one of the district's two K-5 schools has 250 students and the other has 560).
 - The attendance centers have enrollment of fewer than 100 students.

ESSA Title I Comparability Documentation Report Data

District Information

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Overview

Federal statute and Title I rules and regulations regarding comparability require that Local Education Agencies (LEAs) document services that are provided with state and local funds in Title I schools within the LEA boundary are comparable to those provided in non-Title I schools. LEAs must use state and local funds for participating schools to provide services that, taken as a whole, are "at least comparable" to services in schools that do not participate in the Title I program (Every Student Succeeds Act (ESSA) Section 1118(c)(1)(A)). LEAs on a districtwide or grade-span basis must use state and local funds to provide services in project areas that, taken as a whole, are at least comparable to services being provided in school attendance areas that are not receiving Title I funds. An LEA that serves all of its attendance areas in the district with Title I funds must use state and local funds to provide services that, taken as a whole, are substantially comparable in each participating school (ESSA Section 1118(c)(1)(B)).

LEAs may subdivide attendance centers when determining comparability. Determination may be made on grade span-by-grade span basis or by school size (ESSA Section 1118(c)(1)(C)).

It is important to note that when comparing services in attendance areas, LEAs must exclude federal funding from the calculations. Salaries paid from federal funds must be excluded from a comparison using pupil/salary or pupil/expenditure ratios. Vacant positions cannot be used to calculate the pupil/staff ratios.

A district will implement written procedures for correcting an imbalance if a school is not comparable. Non-comparable Title I comparability documentation will not be approved. LEAs must correct non-comparability in schools using written procedures and submit the analysis to ISBE by November 30. If districts do not submit documentation with an exempt status or demonstrate comparability within all applicable schools, the LEA will receive notification of non-compliant status and must submit corrected documents. Title I funding will be frozen until revisions are made and correct documentation for non-compliant LEAs is submitted. Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Non-compliance with comparability documentation could result in the reduction of current or future Title I funds.

An LEA that is a single school building or has unique grade spans in each building is exempt. Exempt LEAs select the "district is exempt" option on the Information Page, then navigate to the Main Menu and select the "submit" link.

Report Data -- Written Procedures

- The district must develop procedures to meet comparability requirements. The procedures must be in writing and, at minimum, include:
 - Timeline for demonstrating comparability,
 - Position responsible for calculating comparability,
 - Measurement and process used to determine comparability, and
 - How and when adjustments will be completed for schools that do not meet comparability.

Report Data -- Salary Schedule

- Enter the district salary schedule.
- Identify the district's current salary schedule. If a district does not utilize a salary schedule, it should detail a salary plan.
“Cut, copy, and past” a TXT, Word, or other text type document or highlight the appropriate Excel spreadsheet cells representing the salary schedule and paste into the field.
- Note: “Paste” copies of an Adobe PDF document cannot be inserted.

Report Data -- Equivalence Policies

- Enter the district equivalence policies.
- Provide the district policy that ensures equality among schools within the district.
- Provide the district policy that ensures school equivalence pertaining to the provision of curriculum materials and instructional supplies.

Report Data -- Comparisons

Comparisons

A comparison is needed if there are both Title I and non-Title I schools with the same grade span/enrollment range, or there are two or more Title I schools (but no non-Title I schools) in the same grade span/enrollment range. Mark excluded schools accordingly.

To make changes to classifications, [Click here](#).

Exclude	Unit Number	Grade Span	School Name / Classification	Enrollment	Title I or Non-Title I		Type of Comparison		
					Title I	Non-Title I	Title I with Non-Title I	Title I with other Title I	No comparison needed
<input type="checkbox"/> 1.	2002	2-5	Lincoln Elementary School Elementary	475	<input checked="" type="checkbox"/>	=	=	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> 2.	2005	2-5	Lincoln Elementary School Elementary	475	<input checked="" type="checkbox"/>	=	=	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> 3.	1054	6-8	Lincoln Middle School Middle School	771	<input checked="" type="checkbox"/>	=	=	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> 4.	2005	P-1	Westbrook Early Learning Ctr Elementary	473	<input type="checkbox"/>	<input checked="" type="checkbox"/>	=	<input type="checkbox"/>	<input checked="" type="checkbox"/>

[Continue](#)

Report Data -- Comparisons

The screenshot shows a web application interface for the Illinois State Board of Education. The header includes the board's logo and name, the title "NCLB/ESSA Title I Comparability", and a sub-header "Classification Maintenance". A navigation bar contains links: Main Menu, Overview, District Information, Written Procedures, Salary Schedule, Equivalence Policies, Comparisons, and User Guide. The "Comparisons" link is highlighted. Below the navigation bar, the page title "Classification Maintenance" is displayed. A descriptive paragraph explains the purpose of the classification: "Define the grouping classification of the schools within your district (Elementary, High School, etc). Once defined, these classifications can be used over multiple years. Keep in mind that modifying an existing description would also affect past years of data that may have used that classification." Below this text is a form with a label "Classification Description:" followed by a text input field containing "Small Elementary", and "Add" and "Cancel" buttons. At the bottom, there is a table with two columns: "Update/Cancel" and "Classification Description". The table contains three rows: "Small Elementary" with an "X" in the update column, "High School", and "Middle School".

Illinois State Board of Education

NCLB/ESSA Title I Comparability

Classification Maintenance

RCODE: 51064015026 Name: Sullivanville CLSD 15

Main Menu Overview District Information Written Procedures Salary Schedule Equivalence Policies **Comparisons** User Guide

Classification Maintenance

Define the grouping classification of the schools within your district (Elementary, High School, etc). Once defined, these classifications can be used over multiple years. Keep in mind that modifying an existing description would also affect past years of data that may have used that classification.

Classification Description:

	Classification Description
Update/Cancel	<input type="button" value="X"/> Small Elementary
<input type="button" value="Edit"/>	High School
<input type="button" value="Edit"/>	Middle School

Report Data -- Comparisons



**Illinois State
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ESSA Title I Comparability
Exclusions

ESSA TITLE I COMPARABILITY HOME | ISBE HOME | LOG OUT

RCDT: 05016225017

Name: Glenbrook HSD 225

SESSION
TIME OUT 18:00

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Exclusions

Include	Unit Number	Grade Spans	School Name / Classification	Enrollment	Reason
<input type="checkbox"/>	3001	9-12	Glenbrook Evening High School High School	0	No enrollment at this time.
<input type="checkbox"/>	3002	9-12	Glenbrook Off Campus High School	0	Enrollment is less than 100 students and this is a therapeutic d

[Continue](#)

[Back to Comparisons](#)

Report Data -- Comparisons

FTE

Enter the FTE for each school within the district. These amounts will populate the FTE amounts on the next screen.

School: [View All FTE](#)

Add FTE Upload List				
Delete Selected	ELN	Name	Position	FTE
<input type="checkbox"/>		APRIL ALLEN	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>		KATHY ANASTAS	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>		ANGIE ALBIS	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		CARSON BOWEN	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>		SHELBY BRENNAN	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		NIKLOS BROCKEMEIER	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		DAVID BROWN	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		CHRISTINA BURTON	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		ALEXIS CARNES	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>		ERICA COBS	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		PATRICIA CORNWELL	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>		SHARON DAVIS	Teachers, Principals and Consultants	1.00

- Include instructional staff paid with state and local funds.
- Do not include FTEs for excluded or not compared schools or federally funded positions.
- Do not include superintendents, assistant superintendents, staff, building maintenance employees, cafeteria and playground employees, or bus drivers.

Report Data -- Comparisons

FTE

Enter the FTE for each school within the district. These amounts will populate the FTE amounts on the next screen.

School: [View All FTE](#)

Add FTE	Updated List	BUN	Name	Position	FTE
<input type="checkbox"/>			APRIL ALLEN	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>			KATHY ANASTAS	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>			ABIGAIL BLUMS	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>			CARSON BOWEN	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>			SHELBY BRENNAN	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>			NIKLOS BROCKMEYER	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>			DAVID BROWN	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>			CHRISTINA BURTON	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>			ALEXIS CURNES	Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services	1.00
<input type="checkbox"/>			ERICA COBB	Teachers, Principals and Consultants	1.00
<input type="checkbox"/>			PATRICIA CORNWELL	Teachers, Principals and Consultants	1.00

Instructional staff positions may include:

- Teachers, principals, and consultants
- Supervisors of instruction
- Librarians and music, art, and physical education instructors
- Guidance and psychological personnel
- Other personnel assigned to schools to provide direct instructional services, such as music, art, speech therapy, school social work, and physical education
- Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members who provide instructional services

Report Data -- Comparisons

School: Benjamin Franklin Elem School [View All FTE](#)

[Add FTE](#) [Upload List](#) [Close](#)

Would you like to delete all of the FTE in this school before uploading a file?

☒ Yes ☐ No

U:\Thomas Jefferson MS [Browse...](#)

[Upload](#)

Delete Selected		IEIN	Name
<input type="checkbox"/>	Select	414531	Anita L S
<input type="checkbox"/>	Select	952423	ANTHON

Choose File to Upload

Computer > PWILLIAM (\\SPR16\USERDIRS) (U)

Organize New folder

File name: Thomas Jefferson MS non-cert

All Files (*.*)

Open

Report Data -- Comparisons

School: Moulton Elementary School View All FTE

Add FTE

- Main Street Elementary School
- Moulton Elementary School**
- Shelbyville High School
- Shelbyville Kindergarten Center

☒ **Certified** ☐ **Non-Certified**

IEIN: 99591491 Verify

Name: John Adams

Position: Guidance and psychological personnel

FTE: 1.00

Update Clear

Report Data -- Comparisons

The schools highlighted below in red must have a ratio within the created baseline average in order to be considered comparable.

Classification:

Elementary
Middle School
Special

Baseline School	Name of School	Title I	Grade Spans	% Low Income	Enrollment	FTE Staff	Pupil/Staff Ratio
Baseline Comparison Averages					303	25.29	
90% of Pupil/Staff:							10.77
110% of Pupil/Staff:							13.16
<input checked="" type="checkbox"/>	Benjamin Franklin Elem School	Y	P-6	77	287	33.09	10.76
<input checked="" type="checkbox"/>	Burke Elem School	Y	K-6	86	305	30.79	13.02
<input checked="" type="checkbox"/>	Enterprise Elem School	Y	P-6	65	231	18.81	12.28
<input checked="" type="checkbox"/>	Mary W French Academy	Y	K-6	15	305	23.88	12.77
<input checked="" type="checkbox"/>	Michael E Baum Elem School	Y	P-6	72	355	32.48	10.93
<input checked="" type="checkbox"/>	Muffley Elem School	Y	P-6	58	371	31.71	11.70
<input checked="" type="checkbox"/>	Oak Grove Accelerated School	Y	P-6	17	271	22.63	11.98
<input checked="" type="checkbox"/>	Paterson Accelerated School	Y	K-6	19	357	37.00	13.22
<input checked="" type="checkbox"/>	South Shores Elem School	Y	K-6	49	287	24.83	11.56
<input checked="" type="checkbox"/>	Stevenson Accelerated School	Y	P-6	21	251	34.51	10.24
<input checked="" type="checkbox"/>	William Harris Elem School	Y	P-6	45	288	22.47	12.82

Calculate and Save

Back to FTE

Report Data -- Comparisons

Classification:		Elementary					
Baseline School	Name of School	Title I	Grade Spans	% Low Income	Enrollment	Salaries	Salary per Pupil
Baseline Comparison Averages					303	1114223.45	
90% of Salary/Pupil:							3309.57
110% of Salary/Pupil:							4045.04
<input checked="" type="checkbox"/> 1.	Benjamin Franklin Elem. School	Y	P-6	82	287	1087071.00	4401.00
<input checked="" type="checkbox"/> 2.	Durfee Elem School	Y	K-6	77	365	1228654.00	3366.18
<input checked="" type="checkbox"/> 3.	Enterprise Elem School	Y	P-6	76	231	844700.00	3656.71
<input checked="" type="checkbox"/> 4.	Mary W French Academy	Y	K-6	78	305	1138905.00	3734.11
<input checked="" type="checkbox"/> 5.	Michael E Baum Elem School	Y	P-6	79	355	1389435.00	3913.90
<input checked="" type="checkbox"/> 6.	Muffley Elem School	Y	P-6	69	371	1273289.00	3432.05
<input checked="" type="checkbox"/> 7.	Oak Grove Accelerated School	Y	P-6	80	271	1095230.00	4041.44
<input checked="" type="checkbox"/> 8.	Parsons Accelerated School	Y	K-6	84	357	1184500.00	3317.93
<input checked="" type="checkbox"/> 9.	South Shores Elem School	Y	K-6	80	287	1160650.00	4044.08
<input checked="" type="checkbox"/> 10.	Stevenson Accelerated School	Y	P-6	83	251	956527.00	3810.86
<input checked="" type="checkbox"/> 11.	William Harris Elem School	Y	P-6	81	288	897497.00	3116.31

Report Data -- Comparisons

Classification:		Elementary					
Baseline School	Name of School	Title I	Grade Spans	% Low Income	Enrollment	FTE Staff	Pupil/Staff Ratio
Baseline Comparison Averages					296	24.51	
110% of Pupil/Staff:							13.29
<input checked="" type="checkbox"/> 1.	Mary W French Academy	N	K-6	74	305	23.88	12.77
<input checked="" type="checkbox"/> 2.	Oak Grove Accelerated School	N	P-6	84	271	22.63	11.98
<input checked="" type="checkbox"/> 3.	Parsons Accelerated School	N	K-6	72	357	27.00	13.22
<input checked="" type="checkbox"/> 4.	Stevenson Accelerated School	N	P-6	69	251	24.51	10.24
<input type="checkbox"/> 5.	Benjamin Franklin Elem School	Y	P-6	77	247	23.09	10.70
<input type="checkbox"/> 6.	Durtee Elem School	Y	K-6	76	366	26.70	13.62
<input type="checkbox"/> 7.	Enterprise Elem School	Y	P-6	76	231	18.81	12.28
<input type="checkbox"/> 8.	Michael E Baum Elem School	Y	P-6	78	355	32.48	10.93
<input type="checkbox"/> 9.	Muffley Elem School	Y	P-6	80	371	31.71	11.70
<input type="checkbox"/> 10.	South Shores Elem School	Y	K-6	82	287	24.83	11.56
<input type="checkbox"/> 11.	William Harris Elem School	Y	P-6	76	288	22.47	12.82

ESSA Title I Comparability Documentation Frequently Asked Questions

Questions

- What date should be utilized for comparability data?
 - *The district selects one date and utilizes it consistently for all attendance center and staffing data.*
- What grade levels are included?
 - *Comparability includes Grades K-12. Preschool is not included.*

Questions

- Which staff members are included as “instructional staff”?
 - *An instructional staffer is a staff member who provides direct instruction to students or who assists or supervises other staff members who provide instruction. Staff paid through federal funds are excluded.*
- If the district does not meet comparability in all schools, what is the next step?
 - *The district should 1) review all data to ensure accuracy, 2) select a different comparison method, 3) select data from a different date in the year, and 4) contact ISBE for support.*

ESSA Title I Comparability Documentation Resources

Resources

- [ESSA Title I Comparability User Guide](#)
- [U.S. Department of Education Non-regulatory Guidance Title I Fiscal Issues: Maintenance of Effort, Comparability, Supplement, not Supplant, Carryover, Consolidating Funds in Schoolwide Programs Grantback Requirements](#)

Thank you