The web-based NCLB Title I Comparability system gives users these capabilities:

1. Electronic Access to the NCLB Title I Comparability form
2. Timely Submission of the data to ISBE

This guide provides instructions on reporting and submitting the NCLB Title I Comparability data to ISBE.
Getting Started

Before using the NCLB Title I Comparability System, you will need an IWAS account.

If you do not have an existing IWAS account, please register for one by accessing the IWAS homepage through the IWAS link at this address: www.isbe.net. Once you have an account, you will need to request access to the NCLB Title I Comparability System. Instructions for registering for an IWAS account and obtaining authorization for the NCLB Title I Comparability System are included in the IWAS User Guide which is located on the IWAS homepage. Please contact the ISBE Help Desk at 217/558-3600 if you need assistance.

If you already have an existing IWAS account, with access to the NCLB Title I Comparability System, you are already set-up to get to the NCLB Title I Comparability Form. The following steps provide guidance on how to access the form:

1. Login to IWAS (You need a “login” name and password.)
2. Select **System Listing** from the left menu of the IWAS Message screen shown below:
When you click on “System Listing” the “My Systems Screen” will appear as shown below.

3. In the “My Systems” screen, click on NCLB Title I Comparability which is a subtitle of the “Annual” section under the “Reporting” heading. Clicking on the “NCLB Title I Comparability Documentation” will bring you to the NCLB Title I Comparability Main Menu.

**Note:**
If you do not see the NCLB Title I Comparability Documentation option you may have to “sign up” for this application using the link in the lower right corner that says, “Want to Signup for Other Systems?” Or, you may contact the ISBE Help Desk at 217/558-3600 for assistance.

*My Systems Screen*
The Main Menu screen will list all Title I Comparability applications that have been started or submitted to ISBE. If the current year application has yet to be started, click on the link ‘click here to create it’. The Status, Last Submit Date, and Last ISBE Review Date will also be appropriately displayed for each application. To begin/continue work on an application, click on the ‘Select’ link next to it.

Status Descriptions:

1. Doc Author – application has been created at the lowest IWAS user level and is waiting to be completed and submitted to the RCDT Admin for review.
2. Admin – application has been created at the RCDT Admin level or is awaiting review and submittal to ISBE.
3. ISBE Review – application has been submitted to ISBE but is waiting for review/approval.
4. Returned for Changes – ISBE has sent the application back to the district for changes.
5. ISBE Approved – application has been reviewed and tentatively approved by ISBE. During an on-site review, the documentation used to support the Comparability analysis will be verified.
Overview Screen

The **Overview** screen provides a short description about the overall process of providing NCLB Title I Comparability data to ISBE. All Local Educational Agencies (LEAs) receiving Title I funds must complete and submit this form for review by November 30th every year. Districts required to submit a Comparability analysis include:

- LEAs that have only one attendance area per grade span (select “district is exempt” then “save” on the district information page and “submit” on the main menu.).
- LEAs that operate regular-year projects.
- LEAs that operate only summer projects (calculated the same as if regular year).
- Each LEA that is a part of a multidistrict or consolidated application.

FTEs paid with federal funds must be excluded from the analysis. Districts using the pupil/salary ratio for comparison must also exclude any longevity in their school’s salary totals.

All the schools in the district must be accounted for through either a comparison method or exclusion for being unique or being exempt. Should a district demonstrate an inability to make needed changes in the distribution of fiscal and human resources to achieve a comparable level of staff and expenditures throughout the district, an audit citation will be issued and the district’s eligibility to receive future allocations of Title I funding will be in question. A process will also be employed to retrieve the Title I funding allocated for the affected schools.
The District Information screen identifies the program contact information for the district. If the contact information is incorrect, changes must be made in the eGMS NCLB Consolidated Application in the IWAS system in the Active Grants section. Only after the Consolidated Application is “approved” will the information be transferred to the Comparability District Information page. It is not necessary for this information to be filled in for submittal. Only the grey box on the right is accessible to document users. Select the District Status as “District is Exempt” or “District is not Exempt.” If “not Exempt,” identify the method of comparison to be used for your district. If “Exempt,” the application process is complete and the district may submit the form to ISBE by navigating to the main menu page and selecting “submit.” Program Contact Information on this page does not need to be filled in for submittal purposes.

A district is exempt if:
- They have only one attendance center in the district.
- All the attendance centers are unique grade spans (for example, the district has a K-5 for one, 6-8 for another, 9-12, etc.).
- The two attendance centers with the same grade span have enrollments where one center is twice the size of the other (for example, one of the district’s two K-5 schools has 250 and 560 for the other).
- The attendance centers have enrollment of less than 100.

A district is not exempt if:
They have multiple attendance centers with similar grade spans and similar student enrollments. This includes districts with less than 1000 students. (For example, if a district with less than 1000 students but has several Title I and non-Title I attendance centers with the same grade spans and enrollments of 100 or more, they must compare their schools.) A district must select a comparison methodology choosing either “Pupil/Staff,” “Salary/Pupil” or “Expenditure/Pupil” ratio.
Written Procedures

Written Procedures screen

The **Written Procedures** screen requires a district to identify their procedures for complying with the comparability requirements. As provided for in Title I Part A – Sec. 1120A (C)(3)(A), an LEA must develop procedures for complying with the comparability requirements. Those procedures should be in writing and should, at a minimum, include the LEA’s timeline for demonstrating comparability, identification of the position responsible for making comparability calculations, the measure and process used to determine whether schools are comparable, and how and when the LEA makes adjustments in schools that are not comparable.

The district’s written procedures should contain enough specificity for an auditor to replicate the process and come up with the same results. These procedures will be instrumental when personnel changes occur and someone different must take over the responsibility of completing the analysis. The LEA must also maintain source documentation to support the calculations as well as documentation to demonstrate that any needed adjustments to staff assignments to achieve comparability among schools have been made. [Section 1120A(c)(3)(B); Section 443 of the General Education Provisions Act (GEPA); and 34 CFR 76.730, and 80.42]

A sample set of written procedures may be found on the ISBE – Federal and State Monitoring Website.

Written procedures are only required for “non-exempt” districts that compare schools.
The *Salary Schedule* screen requires a district to identify their current salary schedule. You may “cut and paste” a *txt*, *Word* or any text type document or highlight the appropriate cells from an *Excel* spreadsheet representing your salary schedule and paste that in this window. You will not be able to “paste” copies of a pdf. formatted document. This application interprets pdf. formats as pictures and it will not accept pictures. It will however accept a wide range of text data.
The Equivalence Policies screen requires a district to identify their policy for ensuring equality among the schools within their district. Districts must have a policy ensuring equivalence among schools in teachers, administrators and auxiliary personnel. Districts must also have a policy ensuring equivalence among schools in the provision of curriculum materials and instructional supplies. The Illinois Association of School Boards (IASB) Website contains sample policies for districts that are members. The IASB reference number for Equivalency policies is 6:170 - Title I Programs.
The *Comparisons* screen will initially list all the schools within a district. Each school should be classified according to grade span and/or size. A district may identify its school classifications by clicking on the ‘*Need to define Comparison Classifications? Click here*’ link. Provide enrollment data for each school as well as the appropriate Title I or non-Title I designation. It is important to correctly identify all the schools that are recipients of Title I funding by placing a check mark in the correct column. The type of comparison within a group will depend on whether or not the school receives Title I funding.

If a school is to be excluded from any comparison, mark as such by checking the box in the first column of its row. A reason for its exclusion will be required on the next screen. These reasons may include: “the school has a unique grade span” or; “the enrollment size is twice that of other schools within that grade span” or; “the school has less than 100 students.” Charter and other Special Schools (i.e. Special Education, magnet, alternative, etc.) are not excluded unless they have fewer than 100 students or there are no other Charter or special schools to compare to.

An LEA must include all schools with 100 or more students if that school receives Title I funding. They must be compared with other schools with similar enrollments and grade spans regardless of that school’s Title I funding status (Title I or non-Title I). A separate classification comparison may be completed for two or more of the same special schools with similar student populations (i.e. Magnet, Charter, Alternative, Special Ed schools, etc.). See the section “Classification Maintenance” on how to set up a variety of school groupings or classifications.

For each grade span group and enrollment-size range created, select the type of comparison to be made for each school.

1. If there are both Title I schools and non-Title I schools in the grouping (grade span and enrollment-size range), a comparison is needed. Check the box in the column “Title I with Non-Title I.”
2. If there are two or more schools in the grouping, and all of the schools are Title I schools, a comparison is needed. Check the box in the column “Title I with other Title I.”
3. If there is only one school in the classification, no comparison is needed. Check the box in the last column entitled, “No comparison needed.”

Click the ‘Save and Continue’ button at the bottom of the screen when all the schools have been assigned a classification, enrollment, Title I designation and type of comparison.
The Classification Maintenance screen allows a district to define its own set of comparison classifications. For example, if there are both large and small elementary schools with similar grade spans the district may want to create both large and small classifications in that grade span. However, the large school classification must have an enrollment that is at least twice the size of the smaller classification. Another classification an LEA may consider is higher and lower degrees of poverty or Special Education enrollment. Schools with higher degrees (60% or more) of poverty may be compared with each other while schools with lower poverty levels (40% or less) may be placed in their own classification. Such classifications can be used in future application comparisons. You may create a classification for “Charter,” “Alternative” and other special schools.

To add a new classification, enter its description as shown above and click the ‘Add’ button. To modify an existing classification, click the ‘Edit’ link next to its row. Make the description change and then click the ‘Update’ link next to its row. To exit the Classification Maintenance screen, click on “Cancel” in the description bar. Note: Making changes to an existing description will affect all applications that have used the classification in previous years.

Comparisons – Exclusions

Exclusions screen

The Exclusions screen will list all schools that were identified as being excluded from any comparisons. If a school was accidently identified as being excluded, mark it to be included by checking the box in the first column next to its row. Otherwise, enter a reason for the exclusion for each school that appears on this page. Click the ‘Save and Continue’ button once complete.
Comparisons – FTEs

**FTE Staff** – Develop a list of the full-time equivalent (FTE) instructional staff paid with state and local funds that are regularly assigned to each school listed in your main Comparison screen. However, you need not include FTEs from schools that are not to be compared or have been excluded. FTEs paid in full with federal funds must be excluded from the pupil/staff ratio. However, portions of their salaries that are paid for with local and state funds may be represented in the analysis by an equivalent percentage. For example, if the staff person is paid with both state/local and federal funds, and the portion paid with local/state is 50%, enter .5 FTE for that person. Enter data to the nearest tenth. **Vacant positions cannot be used in the calculation.** “Instructional staff” is a staff member who provides direct instruction to children or who assists or supervises staff members who provide instruction, including:

a. Teachers, Principals and Consultants  
b. Supervisors of instruction  
c. Librarians, Music, Art and Physical Education instructors  
d. Guidance and psychological personnel  
e. Other personnel assigned to schools to provide direct instructional services such as music, art, speech therapy, school social work, and physical education  
f. Aides, clerical personnel, and other paraprofessionals assisting other instructional staff members providing instructional services.

Superintendents, assistant superintendents, and their staff should not be included in the calculations.

Uploading large numbers of FTE information can be done by utilizing comma separated values formats. The order of the FTE information should follow the following sequence:

*Certified Staff:* School Code, IEIN (Illinois Educator Identification Number), Position, FTE  
*Non-Certified Staff:* School Code, Last Name, First Name, Position, FTE

txt. or csv. file

A txt. or csv. file can be used for this purpose. If the FTE is a certified staff, you may use their IEIN and the Comparability document will load their name into the analysis automatically. You may put both certified and non-certified staff on the same comma-separated list. An Excel worksheet with personnel data may be saved as a csv. file. Your school codes are also located on your main “Comparisons” page in the column entitled “Unit Number.” Files identified as pdf. or picture formats will not work when uploading FTE data.
Our application will look for the individual IEIN within our data systems and download that individual’s name which will be added to the information you provide. These personal identification numbers are required for federal and state reporting requirements and are used for verification and to ensure transparency and validity in the analysis. This should also prove to be an easier and less time consuming way for districts to load large numbers of FTE data into the analysis all at one time.

Once you have uploaded your FTEs you may make changes to the staff assignments, names, positions or FTE portions. You may also sort the list of personnel by clicking on the title of the column. For example, by sorting the FTEs by the IEIN number, you will be able to see where there are duplications of that IEIN number and determine if the total amount of FTE for that person is no more than 1.0. If there are duplications or the staff person is no longer employed in the district, you may use the “delete” action in the first column by the name of the staff person you want to remove.

For individual new certified staff entries, select the school where the individual will be assigned and enter the IEIN for that person as illustrated below along with FTE amount, and select the “Add FTE” button if all the information you entered is correct. If not, you may use the “Clear” button to remove the information you just entered.

**FTE screen**

Each school will have an FTE screen. To change the school use the drop down menu. A new feature this year allows you to “Browse” for the txt. or csv. file containing the list of FTEs for this school. When you have located the file as illustrated below, click on “Open.” The file name will appear in the box next to the Browse button. Then click on the Upload button. The school code, IEINs, positions and FTEs will load for that school.

**Uploading FTEs**
If there is a problem with your file, an error message will appear telling you what the problem is. Usually it is because you are attempting to load FTEs for schools that are not part of the analysis. You will need to correct the school codes that are part of your file by deleting or changing the codes to one of the schools being compared in the analysis. The upload function will not load your FTEs until you have corrected all the code issues. After which you will get a message that the upload has been successful.

It is important that you initially have your FTEs segregate by the school code as illustrated on the right and load each school’s FTEs separately. This will prevent you from having to transfer large numbers of FTEs to other schools before you submit the form. You will be able to transfer them once you have them loaded should your analysis require transfers to achieve comparability. If IEINs are incorrect, the system will provide an error list and you will need to validate the numbers.

You may use the same IEIN number at different times when loading your FTE files. This will allow staffs who have several positions in several schools to separate the total FTE time among the schools.

To transfer personnel from one school to another select that name and use the drop down menu from the “Assigned to School” list (as shown below) to select a new school for that person. You may edit their name if there is a name change. FTE portions and positions may be modified should staff change subject matters and the amount of time in those positions. A person could have several positions at different schools as long as their total FTE is not more than “1.0.”

**FTE – Transferring Personnel**

After you have located and selected the new school, changed the name, position or FTE portion, you can complete the changes by clicking on the Update button.

To ensure you have not duplicated a staff person’s position, or, to check the totals of their FTE amounts, you may use the “View all FTE” feature next to the School drop down menu and then sort the names alphabetically. This will group all occurrences of a person’s name into one area where you can determine if an error has been made.
In the above illustration we have sorted the FTEs by Name. The name for a staff person has occurred in two different schools and positions. The total FTE for any one person can’t exceed 1.0. While the individual can work in both schools, their FTE will have to be adjusted in each school so that the total FTE is 1.0 or less. If the individual no longer works in one of the schools, the listing in the school that is in error can simply be deleted once you go back to the individual school FTE listing. In the illustrations of all the FTE screens shown in this guide you will note that the first column of the FTE screen is a “Delete” function by each of the individual staff.

The system will add all the FTE amounts and transfer them to the Comparison Detail screen which will determine the school’s pupil/staff ratio. When changes to the FTEs for all the schools have been completed you may select the “Continue” button at the bottom of the page.

For the purpose of determining comparability, a district may choose to exclude excess State and local funds (or FTEs) expended for bilingual education; for children of limited English proficiency; and excess costs (or FTEs) for providing services to children with disabilities as determined by the district. By excluding these excess costs for the Bilingual and Special Education Schools, the schools can be more effectively compared to other regular schools with similar grade spans and student enrollment.

The following positions in special education can be considered “excess”:
- “one-on-one” or medically fragile assistants
- behavior specialists
- social workers, psychologists
- speech therapists, translators, etc.,

Positions of this nature can represent “excess cost” sense they only serve the special education populations. If you choose to delete these excess positions, the school’s FTE total will automatically adjust as will the pupil/staff ratio for that school. When deleting these “excess” costs or positions, you will want to be consistent in all the schools that have these positions. You should not eliminate them from one school and not the others.

A principle to keep in mind if you choose to delete these positions is to reflect on what you utilize in the regular classrooms. If there is only one teacher per classroom, that should be the case in your special education classrooms. If there is an assistant included in the regular class room, you may want to include one teaching assistant in the special education classroom. Be consistent with the positions you include and exclude in all the schools included in your Comparability analysis. Your written procedures should be expanded to include language about the positions you will include in the analysis.
The Comparison Details screen isolates the comparison analysis by classification. As indicated by the arrow, you may change the screen to show the different classifications by selecting one from the drop down menu. A baseline average should be calculated for all classifications in the district where schools are being compared. In the illustration above, all of the schools are Title I recipients. When Title I schools are being compared with other Title I schools, the analysis will use all of the schools in the grouping or classification to set the baselines. All schools will be automatically selected as part of the baseline.

There will be a high threshold as well as a low threshold. All of the schools will need to fall within those two thresholds to be considered comparable. The higher threshold in this illustration is 15.19 (13.81 x 1.1) and the lower threshold is 12.43 (13.81 x .90). Schools that have a Pupil/Staff ratio that is higher than 15.19 are not considered comparable. Those that fall below the 12.43 are also not considered comparable. Non-comparable schools will appear as red rows.

<table>
<thead>
<tr>
<th>Baseline School</th>
<th>Name of School</th>
<th>Title I</th>
<th>Grade Spans</th>
<th>% Low Income</th>
<th>Enrollment</th>
<th>FTE Staff</th>
<th>Pupil/Staff Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Benjamin Franklin Ele</td>
<td>Y</td>
<td>P-6</td>
<td>82</td>
<td>291</td>
<td>22.65</td>
<td>12.85</td>
</tr>
<tr>
<td>2.</td>
<td>Dennis Elem School</td>
<td>Y</td>
<td>K-6</td>
<td>77</td>
<td>316</td>
<td>21.40</td>
<td>14.77</td>
</tr>
<tr>
<td>3.</td>
<td>Durfee Elem School</td>
<td>Y</td>
<td>K-6</td>
<td>76</td>
<td>306</td>
<td>25.60</td>
<td>11.95</td>
</tr>
<tr>
<td>4.</td>
<td>Enterprise Elem School</td>
<td>Y</td>
<td>K-6</td>
<td>78</td>
<td>256</td>
<td>17.60</td>
<td>14.55</td>
</tr>
<tr>
<td>5.</td>
<td>Mary W French Academy</td>
<td>Y</td>
<td>K-6</td>
<td>79</td>
<td>315</td>
<td>23.73</td>
<td>13.27</td>
</tr>
<tr>
<td>6.</td>
<td>Michael E Baum Elem School</td>
<td>Y</td>
<td>P-6</td>
<td>69</td>
<td>411</td>
<td>28.95</td>
<td>14.20</td>
</tr>
<tr>
<td>7.</td>
<td>Muffley Elem School</td>
<td>Y</td>
<td>P-6</td>
<td>80</td>
<td>394</td>
<td>26.53</td>
<td>14.85</td>
</tr>
<tr>
<td>8.</td>
<td>Oak Grove Accelerated School</td>
<td>Y</td>
<td>P-6</td>
<td>84</td>
<td>301</td>
<td>22.82</td>
<td>13.19</td>
</tr>
<tr>
<td>10.</td>
<td>South Shores Elem School</td>
<td>Y</td>
<td>P-6</td>
<td>82</td>
<td>333</td>
<td>24.50</td>
<td>13.59</td>
</tr>
<tr>
<td>11.</td>
<td>Stevenson Accelerated School</td>
<td>Y</td>
<td>P-6</td>
<td>83</td>
<td>283</td>
<td>19.93</td>
<td>14.20</td>
</tr>
<tr>
<td>12.</td>
<td>William Harris Elem School</td>
<td>Y</td>
<td>P-6</td>
<td>81</td>
<td>280</td>
<td>18.70</td>
<td>14.97</td>
</tr>
</tbody>
</table>

**Title I with Other Title I schools**

**Salary/Pupil and Expenditure ratios**

**Salaries for the Pupil/Salary ratio** - Enter the total amount of state and local funds spent on salaries for the staff members less the amount of such salaries based on length of service (longevity/salary differentials). Enter the data to the nearest dollar. Do not include salaries paid from federal funds.
Comparisons Detail screen (salary or expenditure/pupil ratio)

The example above, comparing Title I with other Title I schools, calculates the baseline using all of the Title I schools. When all of the schools are Title I, the entire group will be included in the calculation for determining the average high and low thresholds between which all the schools must fit to be considered comparable. Any school that is above or below the threshold averages is not considered comparable. Ratios that are too low reflect an inadequate distribution of the district’s resources compared to the other schools. A ratio that is above the high threshold is indicative of a school receiving excess resources and is not considered comparable to the other schools in that classification. If the line is red, the school is not comparable to the other schools in the group or classification.

In the above scenario, if any of the schools were above or below the thresholds the rows would appear red, the district would need to verify which salaries were being included in the analysis. When the school has a higher ratio than the threshold, the district may look at which salaries may represent excess costs associated with Special Education services or bilingual education in that school if they have not already done so. There may also be salaries that include longevity which should not be included. If the schools have ratios that are too low, the district will need to consider if there are salaries that have been inadvertently omitted but should be included. Other remedies may include transferring existing staff or hiring additional staff to make the schools comparable. Salaries for vacant positions are not to be included in the analysis. All of the salaries used in the analysis will be verified through payroll records and any that is inclusive of longevity or from federal sources will place the school’s entire allocation of Title I funding in question.

Expenses for the Pupil/Expenditure ratio - State and Local funds as reported in the current approved budget for curriculum materials and instructional supplies for the current school year for each school should be entered in the appropriate cell in the “expenses” columns. Salaries or other expenditures paid must be excluded from a comparison using a pupil/expenditure ratio if the salaries and expenditures were from federal sources.

Should your district be audited and you use the Expenditure methodology, the figures will be traced back to your approved budget. Any figures used in the calculations that can’t be verified or are discovered to be from federal sources will be questioned and the allocation for that school will also be questioned will be recovered. These expenditures will be divided by the enrollment for each school to determine a per pupil expenditure. Capital Outlay is not an allowable expenditure. The following chart illustrates those funds that may be included in the expenditures total for each school.
Title I with Non-Title I schools
Pupil/Staff Ratio

When comparing Title I with non-Title I schools, all the non-Title I schools will be automatically selected as the baseline for the comparison. The average for the non-Title schools will be multiplied by 110% to provide a ten percent cushion to help the Title I schools be comparable. In the illustration below the average baseline for the non-Title I schools has been multiplied by 110% creating a threshold of 15.03 pupils per staff person. All the Title I schools should have a lower pupil/staff ratio than 15.03 to be considered comparable. The yellow bar indicates the district elected to use Title I funds in lower poverty schools than one of the higher poverty schools.

Comparisons Detail screen (Pupil/Staff Ratio)
Title I with Non-Title I schools
Salary/Pupil and Expenditure Ratios

When comparing Title I with non-Title I schools all the non-Title I schools must be selected as the baseline for the comparison. The average for the non-Title schools will be multiplied by 90% to provide a ten percent cushion to help the Title I schools be comparable. As long as all Title I schools enjoy a higher Salary/Pupil ratio than the non-Title I schools they are considered comparable. In the illustration below the average baseline expenditure per pupil for the non-Title I schools is $3,485.92. That average is multiplied by 90% for the baseline of $3,137.33. All the Title I schools should have a salary/pupil ratio that is higher than $3,137.33 to be considered comparable.

In the above scenario, if any of the Title I schools were below the threshold of $3,137.33 the lines would appear red, the district would need to verify which expenditures were being included in the analysis. If the non-Title I schools reflect a significantly higher ratio making it difficult for the Title I schools to be comparable, the district may look at which salaries are being included in the non-Title I schools. Those salaries which represent excess costs associated with Special Education services or bilingual education in that school may be excluded. If the Title I schools have ratios that are too low, the district will need to consider if there are salaries that have been inadvertently omitted but should be included. Because the poverty levels of the non-Title I schools are above 40% they must meet the salary threshold as well.

Other remedies may include hiring additional staff to make the Title I schools comparable. Salaries for vacant positions are not to be included in the analysis. All of the salaries used in the analysis will be verified through payroll records. Any salaries used in the analysis that are inclusive of longevity or are from federal sources will place the school’s entire allocation of Title I funding in question.

Expenditures for the Pupil/Expenditure ratio - State and Local funds as reported in the current approved budget for curriculum materials and instructional supplies for the current school year for each school should be entered in the appropriate cell in the “expenditures” columns. Salaries or other expenditures paid from State Fiscal Stabilization Funds (SFSF) funds must be excluded from a comparison using a pupil/expenditure ratio if the salaries were used for federal positions.

Should your district be audited and you use the Expenditure methodology, the figures will be traced back to your approved budget. Any figures used in the calculations that can’t be verified or are discovered to be from federal sources will be questioned and the allocation for that school will also be questioned will be recovered. These expenditures will be divided by the enrollment for each school to determine a per pupil expenditure. Capital Outlay is not an allowable expenditure. The Schedule of approved expenditures chart on page 17 illustrates those funds that may be included in the expenditures total for each school.
Submitting the Analysis

Choose each classification (Elementary, Junior High, High School, etc.) in the district from the dropdown box and click on the “Calculate and Save” button at the bottom of the screen. The system will compute the baseline comparison average as well as identify all schools that exceed the baselines. Make certain you have included the percentage of poverty for all the schools in the analysis. Omitting them will result in errors.

All of the schools must be within the average thresholds that are calculated regardless of the method you choose for your analysis. Any schools that are higher or lower than the thresholds the line will turn red. The district must use their written procedures to correct the incomparable schools and re-calculate the classification.

When Title I schools are compared with non-Title I schools, all of the non-Title I schools are automatically selected to be part of the baseline calculation. Non-Title I schools and with poverty levels at 40% or higher must also be within the established ratio. Any schools that are higher than the threshold will turn red. The district must use their written procedures to correct the incomparable schools and re-calculate the classification.

On the Fiscal Year Select screen you will note the “submit” link. If you are the author of the analysis, your submittal will be to the district’s superintendent. The superintendent, or someone signed on the IWAS system as the superintendent, is the only one authorized to submit the form to ISBE. After you click on the ‘submit’ link, the system will perform an “edit check” on the analysis to determine if errors were made.

If there are errors in the analysis, they will be listed and you will be required to address each one before the system will allow you to submit the form; otherwise, a message will display stating “all edit checks passed. Data may be submitted.” If that occurs as illustrated below, you are ready to submit the form.

REVIEW

Basic edit checks must be passed prior to submittal. Click on the 'Perform Edit Checks' button below to run the edit checking program. All errors must be corrected prior to being allowed to submit.

All edit checks passed. Data may be submitted.

The district’s contact information on the District Information tab is not required in order for the district to submit this document. The form is locked on this page and efforts to enter data will be futile. Again, contact information is not required in order to submit the form. District contact information will automatically load once a Consolidated Application is approved. An approved application is not required in order to submit this document.
APPENDIX A

Sec. 1120A (c) of Title I of No Child Left Behind Act, Public Law 107-110

(c) COMPARABILITY OF SERVICES.--
(1) IN GENERAL.--
(A) 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) 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) A local educational agency may meet the requirements of subparagraphs (A) and (B) on a grade-span basis or a school-by-school basis.

(2) WRITTEN ASSURANCE.--
(A) 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) For the purpose of subparagraph (A), 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) 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 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.