

Comparability of Services

Title I, Part A



Working Together for Student Success



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ESSA: Section 1118

Statutory Requirement: Section 1118

[Section 1118 of ESSA](#) states a local educational agency may only receive

Title I, Part A funding if state and locally funded services are at least comparable in Title I schools when compared to non-Title I schools.

Intent

The intent of this compliance measure is to ensure that state/locally funded services are comparable among schools within the same LEA so that Title I truly adds to the services provided within the eligible school.



Supplemental Services

Title I funds provide additional learning opportunities to children in need of *supplementary* instructional assistance.

The intent of the compliance measure is to ensure Title I funds provide extra services to eligible children identified as having the greatest need for additional assistance.



Comparability Reporting Requirements

- All LEAs must complete comparability ***annually*** and submit information to the State Education Agency (SEA) every two years for compliance with the comparability requirement.
- Title I LEAs must develop procedures for compliance with the comparability requirement and implement procedures ***annually***.
- All LEAs should complete and submit the report by October 30. However, only LEAs whose corporation number ends in either zero (submits on even numbered years) or five (submits on odd numbered years) will be reviewed and approved by IDOE. (Example: LEA #1640 will submit School Year 2021-22 as Comparability 2022.)
- The date for meeting comparability for schools not in compliance on October 30 is December 30.
- A revised comparability report must be completed and submitted to the SEA along with evidence of how comparability has been met (i.e., contract) as documentation.



Data Collection

Current year data must be used to complete the district's Comparability Report.

Data used are based on fall counts (enrollment and staff).

Two criteria must apply:

- 1) The date used by the LEA may be no later than October 1 of the comparability reporting year;
- 2) All data the LEA uses in the Comparability Report must reflect conditions as they currently exist on the date from which the LEA bases comparability.



Online Comparability Report Submission

Title I Application Center

1. Log in.
2. Click on *Corp Reports*.
3. Click on *Comparability Report*.
4. Type Corp # in Corporation Search box.
5. Click *Get Reports*.
6. Click on *Begin New Comparability Report*.

Note: When reporting online, a copy of your Comparability Report and supporting documentation must also be on file at the LEA. Comparability Reports will be reviewed during on-site monitoring visits.



Step 1: Schools in the District

You will begin on the welcome screen. Click  in the bottom right corner to advance to the next page.

Complete the contact information for the person responsible for completing this report.

You will need to validate that the information on the Schools in the District page is correct and make any changes in order to make this accurate to the best of your knowledge.

- Enrollment counts should be the current school year's October counts. (*Slight variations in enrollment when compared to the Eligible School Summary page in the Title I Application will trigger a warning on this page that can be ignored.*)
- If a school no longer exists or a new one has been opened recently, please contact your Federal Grants Specialist to modify your list of schools.



Step 2: School Grouping

On this page, schools need to be grouped by grade spans*. The system does this automatically. However, you can move a school into another grade span by clicking the Change Group link next to each one.

**See the next slide: Grade Spans for additional information.*



Grade Spans

There is no limitation on the number of grade spans an LEA may use; the number should match the basic organization of schools in the corporation.

Typical grade span groupings might include: *KG-04, K-3, K-6, 7-9, and 9-12*.

If a school serves grades in more than one group, the LEA may consider including that school:

- In the group where the school has the most grade levels in common, or in the group that includes the lower grade levels, if the school has the same number of grade levels in common with two or more groups.
- The school may not be placed in a separate grade span in order to exclude the ability to compare it to other schools with at least one overlapping grade.



Step 3: Enrollment Grouping

On this page, schools may be grouped by enrollment size ranges. The system does this automatically.

You may choose to leave all schools in the "Smaller" group. *Extra enrollment grouping is not required; it is optional process.*

In order for a school to move into the "Larger" enrollment group, a school must have more than twice as many students as the smallest school in the grade span group. If a school in a grade span is moved to the "Larger" group, all schools in the same grade span which are larger than this school must also be moved to the "Larger" group.

See next slide: Size-Split Option for additional information.



Size-Split Option

If the district chooses to use the *size-split option*, the district will exclude schools with an enrollment of 100 or less from the enrollment size range.

*Using this method does not allow the corporation to exclude any school from meeting comparability requirements. A corporation cannot size-split in order to create a grouping whereby a Title I school is not obligated to be compared to a non-Title I school.



Step 4: Comparability using FTE

The staff/student ratios in Title I schools are comparable to ratios in non-Title I schools.

In the case where all buildings within a grade span are Title I schools, the staff/student ratios in schools with the highest concentrations of low-income students are comparable to ratios in schools with the lowest concentrations of low-income students.

The LEA gathers enrollment data and staff FTEs (full-time equivalencies) to complete the required calculations.

- Instructions: Please use the drop down at the left to ***view each grade span enrollment group*** and ensure each of your schools individually meets comparability with the average of Non-Title I schools in the same group.
- Enter the FTE Staff for each Title I and Non-Title I school.

See next slide: FTE Staff for additional information.



FTE Staff

When calculating staff FTE, the district must consistently apply steps or procedures from school-to-school and from Title I schools to non-Title I schools.

Staff FTEs must be prorated when applicable (e.g., if the music teacher serves three schools equally, that teacher's FTE is .33 for each school).

The LEA is responsible for maintaining copies of documentation to support how calculations were determined and used for reporting.



Staff Included in the FTE Report

Staff members who provide, support, and/or supervise the instruction of students are considered *instructional staff*.

This includes: teachers, principals, consultants, supervisors, and/or coordinators of instruction, librarians, nurses, guidance counselors, and psychological personnel.

It also includes: staff such as aides and other paraprofessional staff who assist instructional staff members in providing instructional services as 0.5 FTE.

For the purpose of comparability alone, the LEA shall report 1.0 FTE non-certified staff as 0.5, as the value of a full-time non-certified staff is not equal to a full-time certified staff member. If a non-certified staff member is 0.5 for FTE, then for comparability the LEA shall report half of that as 0.25.



Staff Excluded in the FTE Report

Staff members funded through federal programs (e.g., Title I staff) are **not** included in the comparability report.

The LEA **should exclude** that portion of FTE staff time paid through State and/or local funds and used to provide services exclusively for special programs:

- At-risk programs for students failing to meet proficiencies,
- English learner programs for students of limited proficiency,
- Special Education programs for children with disabilities or children with specific learning disabilities, or
- State and/or local compensatory education programs designed to meet the needs of low-performing students.



Comparability of Title I Schools to Each Other

If an LEA selects ***all*** school attendance areas as Title I schools, then the LEA is required to demonstrate that local services--as a whole--are substantially comparable in each school.

In order to compare Title I schools to other Title I schools, the LEA must identify some buildings as *program* schools and the other as *non-program* or non-Title I schools.

The buildings classified as non-program or non-Title I become the *comparison* schools.

Instructions: In the Non-Title I schools box, select the Click here link to select a Title I school to act as a non-Title I school.



Federal Regulations: Comparison Schools

Those Title I schools with the *lowest* percentages or numbers of children from low-income families are identified as the comparison (non-program or non-Title I) schools.

- This group of schools (comparison) must include at least one school and may not include more than one-half (50%) of all schools in that grade span grouping (or size-split grouping, if applicable).

Those Title I schools with the *highest* percentages or numbers of children from low-income families are identified as the program schools.



Step 5: Comparability using Salary

*This is an alternative method to FTE

Click on the link “Change this” next to *Comparability using FTE method* in the left corner to select Salary-based for comparability calculations.

The LEA gathers enrollment data and staff salary information to complete the required calculations.

- **Instructions:** Please use the drop down at the left to *view each grade span enrollment group* and ensure that each of your schools individually meets comparability with the average of Non-Title I schools in the same group.
- Enter the Salaries for each Title I and Non-Title I school.

See next slide: *Salaries* for additional information.



Salaries

When calculating staff salaries, the LEA must consistently apply steps or procedures from school-to-school and from Title I schools to non-Title I schools.

The LEA must prorate salaries when necessary (according to the amount of time staff work in the building).

Salaries used for comparability purposes exclude longevity (i.e., length of service), and therefore, base salaries are established for job classifications and used rather than the actual or current salary.

The LEA must distinguish various levels of base salary (e.g., teachers with a bachelor's degree; teachers with a master's degree).

The LEA is responsible for maintaining copies of documentation to support how calculations were determined and used for reporting.



Staff Included in the Salaries Report

Staff members who provide instruction to children, who assist, or supervise staff members who provide instruction, are defined as instructional staff.

This includes teachers, principals, supervisors of instruction, librarians, nurses, guidance counselors, and psychological personnel.



Staff Excluded in the Salaries Report

Staff members funded through federal programs (e.g., Title I staff) are *not* included in the comparability report.

The LEA *should exclude* that proportion of staff salaries paid through State and/or local funds and used to provide services exclusively for the following special programs:

- English learner programs for children of limited proficiency,
- At-risk programs for students failing to meet proficiencies,
- Special education programs for students with disabilities, or
- State and/or local compensatory education program designed to meet the needs of low-performing students.



Final Checks & Submission

If there are errors, you must correct before submission.

Warnings do not prevent submission.

Sign and submit application.



Maintaining Comparability Reports

The corporation is to maintain a copy of the comparability report, as well as documentation that supports the figures submitted in the report. This information may be reviewed during onsite monitoring visits.

The documentation is retained for a period of five years or, if applicable, until pending audits are resolved.

Comparability calculations must be determined each year.



Thank You.

DOE State and Federal Grants and Programs

