

Title I-A Comparability Refresher Training

Rhode Island Department of Education

October 26, 2023



Agenda

- Comparability Basics
- LEA Procedures and Sample Scenarios
- Reporting Tips and Instructions
- Questions



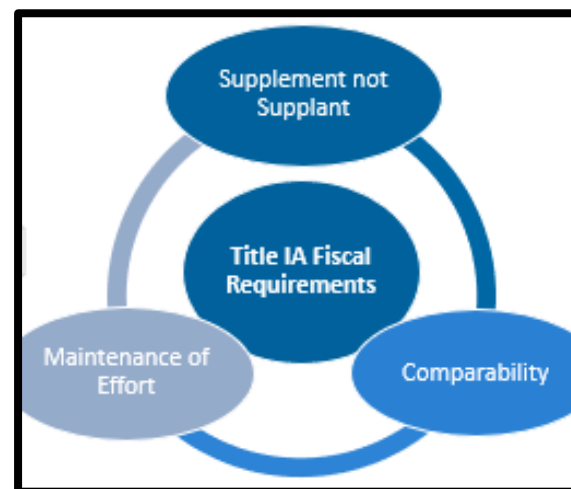
Comparability Basics



What is the Comparability Requirement?

Comparability is one of three fiscal tests required by Sec. 1118 of ESSA, for recipients of Title I-A funds:

1. Maintenance of Effort
2. Supplement not Supplant
3. Comparability of Services



Demonstrating comparability is a **prerequisite** for an LEA to receive Title I-A funds.

[ESEA Sec. 1118\(c\)](#)



What is the Purpose of Comparability?

An LEA may receive Title I-A funds **only if** it uses State and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in non-Title I schools.

If an LEA serves all its schools with Title I funds, then it must use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.

Because Title I allocations are made annually, comparability is an **annual requirement**.

ESEA Sec. 1118(c)



Important Notes



The Comparability requirement does not apply if the LEA has **only one school**; or has only **one school per grade span**.

In calculating comparability, an LEA may exclude schools that have **fewer than 100 students**.

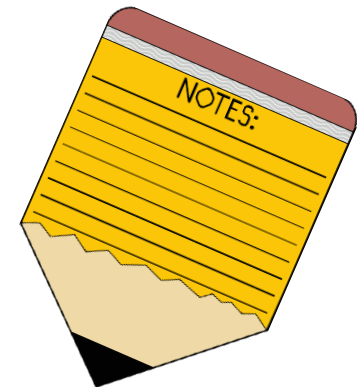
Generally, **preschool** staff and student enrollment should not be included unless the State considers preschool to be part of elementary and secondary education.



Important Notes Contd.

Any **“skipped” schools** (i.e., coded “F” in Annual Ranking) must be treated as Title I participating schools when demonstrating comparability.

An LEA does not need to include **unpredictable changes** in student enrollment or personnel assignments that occur after the beginning of the school year in determining comparability.



Allowable Methods for Demonstrating Comparability

1. **Student-Instructional Staff Ratio**
2. Student-Instructional Staff Salary Ratio
3. Per Pupil Expenditures
4. Resource Allocation Plan based on student characteristics

RI uses this method!

The LEA only needs one method, and the State Education Agency can choose the method.



Comparability At a Glance

		Exceptions
Which LEAs?	All public school LEAs that accept Title I-A	LEAs with one building per grade span or only one school
Which Schools?	All schools in the LEA, including charter schools with multiple sites	A school with fewer than 100 students
Which Students?	All K-12 students in the LEA, whether enrolled in a Title I-A or non-Title-I-A school	
Which Staff	All certified and non-certified instructional staff who are paid with state and local funds	Non-instructional/paraprofessionals whose full salary is paid with federal dollars



LEA Procedures and Sample Scenarios



LEA Procedures

The LEA must develop procedures for complying with comparability requirements.

Procedures must be in writing and should, at a minimum, include:

1. LEA's timeline for demonstrating comparability
2. Identification of responsible parties for making comparability calculations
3. Measures and processes used to determine whether schools are comparable; and
4. How and when adjustments will be made if schools are not comparable.



Written Assurances for Comparability

The LEA must assure that it has established and implemented the following:

1.

A district-wide salary schedule

2.

A policy to ensure equivalence among schools in teachers, administrators, and other staff

3.

A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies



Let's look at some scenarios!



One elementary school, grades K-5
(Title I-A schoolwide)



One middle school, grades 6-8
(Title I-A targeted assistance)



One high school, grades 9-12
(non-Title I-A)

This district is **NOT required** to complete the Comparability Report because there is only one school per grade span.



Three elementary schools, grades K-5
(all Title I-A schoolwide)



One middle school, grades 6-8
(Title I-A targeted assistance)



One high school, grades 9-12
(Title I-A targeted assistance)

This district **is required** to complete the Comparability Report to demonstrate comparability among the **elementary schools only**. The district is not required to complete the Comparability Report for the middle and high school because there are no other schools in those grade spans to which they can be compared.





One elementary school, grades PK–5
(Title I-A schoolwide)



One middle school, grades 6–8
(Title I-A schoolwide)



One high school, grades 9–12
(Title I-A targeted assistance)



One alternative high school, grades 9–12
(non-Title I-A)

This district **is required** to complete the Comparability Report **only if the alternative high school has an enrollment greater than 100 students.**





Two elementary schools, grades PK–2 and 3–5 (both receive Title I-A Funds and are the only two elementary schools)*



One middle school, grades 6–8
(may or may not be Title I)



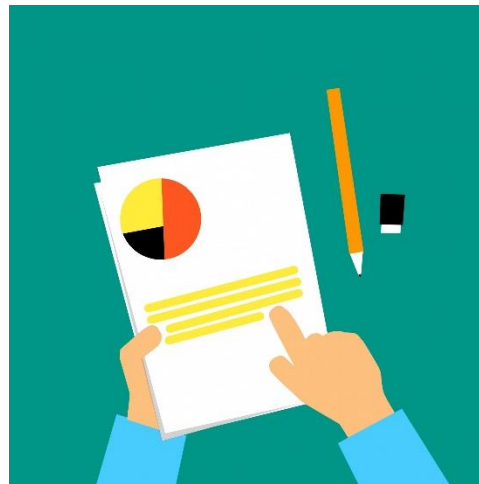
One high school, grades 9–12
(may or may not be Title I)

This district is **NOT required** to complete the Comparability Report because the grade spans in the elementary schools do not overlap.

***This scenario includes four grade spans.**



Reporting Tips and Instructions



Comparability Report Basics

In order to meet the annual target date of **December 1st**, an LEA should collect the Comparability Report information by **October 1st** of each school year

NOTE: **October 1st** is a target date for the data collection to inform the report. We recommend that you work with your data manager during the time period on or after Oct 1st to secure the most accurate data possible.

The information on the Comparability Report needs to match the information on the grade spans in the Title I-A Program Matrix in AcceleGrants

Once completed, the district's Comparability Report is accompanied by an Assurance document, signed by the LEA's Superintendent



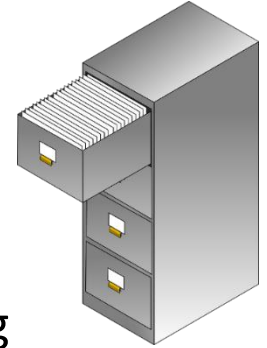
Which Reporting Form?

- ❑ If grade span(s) contain both Title I and non-Title I schools, then the LEA must complete the **Participating/Non-Participating** report.

- ❑ If all schools in grade span(s) are Title I schools, LEA must select one of two reporting options:
 1. **High/Low Poverty** – compares higher poverty schools within grade span to comparison group of lower poverty schools
 2. **Grade Span Average** – compares each school to the average of all schools within grade span



Preparing to Complete Your Report



To complete your Comparability report you will need the following documents:

- A list of all schools in the LEA by grade span
- Enrollment data for each Title I and non-title I school from **one consistent point in time** for the 2023-2024 year (see note below)
- A school-based list of instructional staff by position, FTE equivalent, and funding source **NOTE: All data used for enrollment and FTEs must be from the same day of the year (e.g., October 1st, 2023) Vacant positions cannot be counted as FTEs for this report.**
- A blank copy of the Comparability report (supplied to you by RIDE)

The Process to Complete the Report

(for applicable grade spans)

1.

- Review each list of school-based staff.

2.

- Cross off **ALL** federally funded FTEs (*not just Title I*).
TIP - If the position is split-funded, exclude only the federally funded portion of the FTE.

3.

- Calculate the FTEs for State/local funded instructional staff in each building. (*Some examples include teachers, librarians, school counselors, and school social workers*)

4.

- On the RIDE Comparability Report, enter the school name, enrollment, and State/local funded instructional staff FTE for each school within the grade span.



The Process Contd.

5.

- The form will calculate the student/instructional staff ratio for each school and the allowable tolerance range.

6.

- The form will indicate whether each school is comparable or not comparable.

7.

- If all schools are comparable, then the report is complete.

8.

If some schools are not comparable, explore taking allowable exclusions before making staffing adjustments.



Allowable Exclusions

An LEA may **exclude** from comparability calculations State or locally funded staff for:

- State or local supplemental programs in any school attendance area or school that meet the intent and purposes of Title I, Part A (i.e., “Title I-Like” programs);
- Language instruction programs for English Learners, and/or;
- Excess State or local staff for providing services to students with disabilities.

Definition of Title I-Like Programs



- Serve only students who are failing, or most at risk of failing, to meet state standards;
- Provide supplementary services designed to meet the educational needs of students who are participating in the program in order to support academic achievement towards meeting the standards, or;
- Use the state assessment system to review program effectiveness.



Process for Taking Exclusions

1. Review each list of school-based staff and take one exclusion at a time (e.g., staff for language instruction programs for ELs). ***Exclusion must be taken across all schools in the grade span.***
2. Enter adjusted FTEs into the RIDE Comparability Report.



If schools are still not comparable, test another exclusion (e.g., State or locally funded staff for “Title I-Like” programs, such as reading teachers).

Process for Taking Exclusions Contd.

3. Try taking different combinations of exclusions, if necessary, to demonstrate comparability.



If schools are still not comparable after all exclusions have been tried, then the LEA is required to make **immediate staffing adjustments**. Contact RIDE program staff to discuss process and next steps.



Let's Walk Through a Sample Report



Comparability Reporting Instructions

TITLE I COMPARABILITY REPORT PARTICIPATING / NON-PARTICIPATING SCHOOLS 2023-2024

An LEA must demonstrate that it uses State and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in non-Title I schools. If all of the schools in an LEA's grade span(s) receive Title I services, the LEA must use State and local funds to provide services that are substantially comparable in each

The Title I Comparability Report provides a means of annually demonstrating and documenting compliance with this requirement.

Reports Due: Friday, November 17, 2023

To complete this report, you will need:

1. A list of all schools in the district and grade spans for each school.
2. Enrollment data for each school from a consistent point in time (e.g. October 1).
3. A school based list of instructional staff by position, FTE equivalent, and funding source.

Instructions:

Enter data in yellow cells only. Blue cells will calculate and fill information automatically.

Cover: Enter LEA, date, and contact information for official responsible for report. For each grade span with Title I participating schools, enter the number of participating and non-participating schools.

Assurances: Signed assurances must be submitted as part of the Comparability Report. Assurances may be scanned and e-mailed to kim.chouinard@ride.ri.gov

Non-Participating Schools:* Enter name of school(s), grade span, number of pupils enrolled, and number of FTE instructional staff. Program will calculate school/instructional staff ratio (column 5) and tolerance average.

Participating Schools:* Enter name of Title I participating school(s), grade span, number of pupils enrolled, and number of FTE instructional staff. Program will calculate school/instructional staff ratio (column 5) and determine comparability status (column 6).

Please indicate if optional exclusions were taken from among staff assigned to schools.

*** NOTE:** *Include State and locally funded FTEs only. Staff paid with private or Federal funds are not part of the FTE entry.*

Additional Grade Spans: There are additional Grade Spans forms for LEAs that are required to demonstrate comparability in Title I schools across multiple grade spans. Please note that the LEA is not required to complete forms for grade spans that do not have any Title I participating schools.



Cover Tab

Enter district name and date. This will then prepopulate on the Grade Span Pages.

Be sure to indicate the Responsible Official and their contact information.

Enter Grade Spans.

This will also pre-populate in the corresponding grade spans

Enter number of schools in each category

When report is complete and you can show comparability, check the "Yes" box.

A	B	C	D	E	F	G	H
TITLE I COMPARABILITY REPORT PARTICIPATING / NON-PARTICIPATING SCHOOLS 2023-2024							
LEA	District ABC					Date Submitted	11/15/2023
Responsible Official							
Name	Michael Jones						
Phone	401-222-0000						
E-mail	mjones@email.com						
As documented within this report, we are in compliance with ESEA Title I requirements for Comparability of Services.						<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Grade Spans							
The district's school groupings are as follows:							
		Actual Grade Span of Schools	# of Title I Schools	# of Non-Title I Schools			
Grade Span 1:		K-5	2	2			
Grade Span 2:							
Grade Span 3:							

Assurances Page

Enter School District and Date

Must be signed by the Superintendent for report to be considered complete.

TITLE I COMPARABILITY ASSURANCES 2023-2024	
<p>(1) The school district has established and implemented:</p> <ul style="list-style-type: none">* A district-wide salary schedule;* A policy to ensure equivalence among schools in teachers, administrators, and other staff, and* A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies; <p style="text-align: center;">and</p> <p>compliance such as student/instructional staff ratios or student/instructional staff salary ratios;</p> <ul style="list-style-type: none">* Staff salary differentials for years of employment shall not be included in such determinations.* An LEA need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of service.	
<hr/> Name of School District	<hr/> Superintendent's Signature
<hr/> Date	

Sample Report Page

Enter the information to complete the report which will automatically calculate and determine if schools are comparable.

If you have more than one grade span, follow the same steps for Grade Spans 2 and 3.

TITLE I COMPARABILITY REPORT					
PARTICIPATING / NON-PARTICIPATING SCHOOLS					
2023-2024					
LEA	District ABC		This sheet is only for grade span K-5		
Instructional Staff:					
a) means staff members who provide instruction to children or who assist or supervise those staff members who provide instruction;					
b) includes teachers, principals, consultants, supervisors of instruction, librarians, guidance and psychological personnel; and					
c) includes aides, clerical personnel, and other para-professionals who are employed to assist other instructional staff members who provide instructional services. Does not include janitors, lunch aides, and non-teaching nurses who are not instructional in nature.					
If every Title I Participating School is at or below the Tolerance Average, then the LEA has complied with Title I Comparability requirements.					
1	2	3	4	5	6
Title I Participating Schools	Actual Grade Span of School	Pupils Enrolled	FTE Instructional Staff	Student/ Instructional Staff Ratio	School Comparability
School 1	K-5	325	25	13.00	Comparable
School 2	K-5	300	20	15.00	Comparable
Non-Participating Schools					
School 3	K-5	225	15	15.00	
School 4	K-5	280	19	14.74	
Totals		505	34.00	14.85	
Tolerance Average (110% of Avg Ratio for Non-Participating Schools)				16.34	
Optional Exclusions Taken					
If schools are not comparable, an LEA may take allowable exclusions to achieve comparability. If exclusions are taken, they must be taken consistently across all schools within the grade span. Please check all exclusions taken from among staff assigned to schools within the grade span.					
Local Compensatory Education Programs	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	
Language Instruction Education Programs	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	
Excess Costs for Special Education Programs	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	

If you need to use any exclusions to get to comparable, be sure to indicate in the boxes at the bottom of the sheet.

Sample of a Record to Maintain on File: School-Level Source Documentation



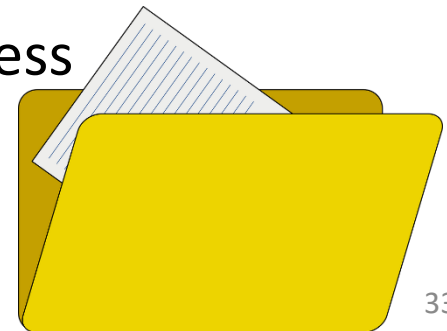
School Name:	Sample Elementary	Enrollment:	278
Grade Span:	K-5	Date Taken:	October 1st
Instructional Staff			
Name	Position Title	FTE	Funding Source
Mr. Washington	Principal	1.0	Local
Mrs. Adams	Principal Support Staff	1.0	Local
Ms. Jefferson	Kindergarten	0.5	Local
Mrs. Madison	Kindergarten	0.5	Local
Mr. Munroe	Grade 1	1.0	Local
Ms. Adams	Grade 2	1.0	Local
Mr. Jackson	Grade 3	1.0	Local
Ms. Van Buren	Grade 4	1.0	Local
Ms. Harrison	Grade 5	1.0	Local
Mr. Tyler	Physical Education	0.6	Local
Ms. Polk	Reading Teacher	1.0	Local
Ms. Taylor	Reading Teacher	1.0	Title I
Mr. Fillmore	Special Education Teacher	0.5	Local
		0.5	IDEA
Ms. Pierce	ELL Teacher	1.0	Local
Mr. Buchanan	ELL Teacher	0.5	Title III
Mrs. Lincoln	Art Teacher	0.5	Local
Ms. Johnson	Librarian	0.8	Local
Mr. Grant	Paraprofessional (Reading)	0.5	Local
		0.5	Title I
Ms. Hayes	Paraprofessional (Spec Ed)	1.0	Local
		Total	16.4
		State and Local Total	13.9
		Student/Staff FTE Ratio	20.0

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What Records Do You Need to Keep on File?

- ❑ School-based list of staff to show instructional staff assignment, FTE equivalents, and funding source(s)
- ❑ Enrollment data for each school collected from one consistent point in time for the current school year
- ❑ Fiscal and program documentation for exclusions, if taken
- ❑ In cases where Title I schools are not comparable, documentation showing adjustments to the allocation of staffing resources that LEA made to ensure that Title I and non-Title I schools are comparable
- ❑ LEA written procedures for comparability process
- ❑ Comparability Report with signed assurances





Submitting the Report

1. Review all calculations for accuracy before submitting.
2. Obtain Superintendent's signature for assurances.
3. Submit completed reports with signed assurances document via e-mail to Kim Chouinard at kim.Chouinard@ride.ri.gov.

Reports are due by November 17th, 2023.

Planning for Comparability Reporting Next Year

Looking ahead to FY24-25, consider carefully reviewing your LEA staffing plan in the spring and summer as you develop your budgets and LEA plans to ensure you will be able to demonstrate compliance to RIDE for this requirement.

Quick Comparability Quiz

1. Which LEAs?

All public school LEAs that accept Title I-A

Any exceptions?

LEAs with one building per grade span or only one school

2. Which Schools?

All schools in the LEA, including charter schools with multiple sites

Any exceptions?

A school with fewer than 100 students



Quick Comparability Quiz

3. Which Students?

All K-12 students in the LEA, whether enrolled in a Title I-A or non-Title-I-A school

Any exceptions?

No

4. Which Staff?

All certified and non-certified instructional staff who are paid with state and local funds

Any exceptions?

Non-instructional/paraprofessionals whose full salary is paid with federal dollars





Wrapping Up

- Comparability is a key fiscal requirement that is calculated on an annual basis.
- The purpose of comparability is to show that, absent all federal funding, participating Title I schools and non-participating schools are comparable in staffing and resources.
- Comparability is an audited item. It is important to keep good documentation for both auditing and monitoring purposes.



Questions?



Contact Kim Chouinard at Kim.Chouinard@ride.ri.gov with questions related to your Comparability report.