

Comparability

Title I Fall Administrative Meeting

October 11, 2018

Division of Curriculum, Instructional Improvement and Professional Learning

Office of Title I



Webinar Objectives

1. Overview of Comparability
2. Title I Criteria and Guidelines for Comparability of Services
3. Documentation and Monitoring

MARYLAND STATE DEPARTMENT OF EDUCATION TITLE I CRITERIA AND GUIDELINES FOR COMPARABILITY OF SERVICES



October 2018

Statutory Requirements

Section 1118(c) in ESEA as amended by ESSA *Comparability of Services* requires that local school systems be able to document that services provided with **state and local funds** in Title I schools are comparable to those provided in non-Title I schools.

Statutory Requirements

All Title I funded schools in a LEA must meet the Title I Comparability requirements for each school year. Any Title I school not in compliance with comparability requirement is subject to suspension and withholding of Title I funds.

Purpose of the Annual LEA Title I Comparability Report

Title I School

**Services funded with
State and local funds**



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Non-Title I School

**Services funded with
State and local funds**



Schools to Include

- **All** Title I participating public schools including Charter schools with enrollment over 100.
- Skipped eligible Title I schools are treated as Title I schools.
- All refers to all within the grade span and enrollment size.

Counting Students and Staff & Comparison using PPA

- Use the official September 30th enrollment count.
- Students and teachers are counted on the *same* date.
- Count only staff paid with State and local funds.
- Student count is September 30th official count.
- PPA reported should be based on the use of the adjusted allocation to actual enrollment done early in the school year.

Students to be Included

- All students enrolled must be included in the Report (on the date indicated by LEA).
- The count of children are also FTE.
- Children in half-day Pre-K are counted as a .5FTE.

Staff Reported

- FTE number of instructional staff who are paid with State and local funds that are regularly assigned to each school listed.
- No federally funded staff are counted.

Staff Not Reported

- Staff paid with Federal Funds
- Short-term substitute teachers
- State and local funded staff providing English as a Second Language (ESL)
- Excess cost of providing services to children with disabilities

Using PPA Calculation for Reporting Comparability

- Report the total amount of state and local funds allocated for instruction.
- Exclude all federal funds or compensatory funds, ESL local funds and excess local funds for special educational needs.
- Use the same rules for reporting student count.

Using the student/staff ratio Calculation

- A Title I school is comparable if the school's average student/staff ratio does not exceed 110 percent of the average student/staff ratio of schools not participating in Title I.
- If all schools within the grade span are Title I, the schools must fall in a range of 90 -110 percent of the average.

Using the student/staff ratio Calculation (Con't)

- When all the schools in a grade span are Title I, comparability can be demonstrated by comparing High Poverty Title I Schools and Low poverty Title I Schools.

Or

- Comparability can be demonstrated by comparing large Title I Schools and small Title I Schools.

Using Per Pupil Allocation (PPA) Calculations

- A Title I school is comparable if the school's average PPA is at least 90 percent of the non-Title I school.
- If all schools are Title I then the schools would need to fall between 90 percent and 110 percent of the average.

Comparability Required Documentation

- District wide salary schedule
- Policy ensuring equivalence among schools in *staff/or funding*
- Policy ensuring equivalence for instructional material and supplies
- Submission of Forms A, and B and C workbook or Form A, and D and E workbook

Comparability is a Process

- Each LEA must develop procedures for compliance.
- Maintain records documenting compliance.
- Coordinate and communicate with Finance, Human Resources, Data Team.

Written Procedures for Comparability

Must Address the Following:

- Steps the LEA will take to collect, review, validate and maintain the data;
- Identification of offices/positions responsible for determination;
- Definition of instructional staff & identification of excludable staff (*if reporting student/staff ratio*);

Written Procedures (Con't)

- Written funding procedures and what funds are excluded (if reporting a calculated PPA);
- Procedures to make adjustments in schools that are not comparable before December 1; and
- Validation process to check that all changes occur before December 1, including reporting any changes to MSDE.

Assurance and Signatures Form A

- Assurances verify that an LEA has met comparability requirements using:
 - student/instructional staff ratios *or* average PPA per school, *or*
 - a resource allocation plan can demonstrate the funds were distributed based on the criteria in the plan.

- Preparer's Name

- Title I Coordinator's Signature

- Superintendent's Signature



Submission of Comparability

- FORM A - School Information and **Signature** Document
- FORM B or D - Title I Schools
- FORM C or E – Non-Title I Comparison Schools
- FORM B1&C1 or D1&E1 only if all schools in a grade span are Title I

Documentation Retention

- Three years after the grant period ends
- or*
- Three years after resolution of audit findings related to the grant

Title I schools Meeting Comparability

December 1 of each year

Signed hard copy submission and electronic submission of the Comparability Report are both due to MSDE on or before Dec. 1.



Monitoring for Comparability

Monitoring for Comparability will occur annually regardless of Risk Assessment.

Key Points

1. Maintain your files;
2. Use September 30th enrollment data;
3. Complete sooner than later;
4. Staff Rosters are important;
5. Collaborate with Human Resources, Finance, and Data staff; and
6. Contact MSDE for technical assistance.



Guiding Questions

- 1. What are comparability assurances?***
- 2. What information is contained in Comparability Policy?***
- 3. When should a school system begin the process of determining comparability?***
- 4. Which schools must be included in the Comparability Report?***
- 5. Which students are included in the Comparability Report?***