Arizona Comparability Handbook

Determining Comparability of Title I Schools
Compliance Guide

Title I Department
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COMPARABLE FUNDING FOR TITLE I SCHOOLS

Purpose

Federal Title I Grants is intended to provide supplemental programs to disadvantaged students and to ensure that these awards are used for additional programs, and fiscal law requires that all Title I schools receive a "fair share" of State and Local education funds.

Non-compliance will cause a Local Education Agency (LEA) to become ineligible for receipt of Title I funds. Consequences also include a hold on grant funds as well as a requirement to return funds.

Requirement

LEAs may receive Title I, Part 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 schools that are not receiving Title I funds. If an LEA serves all of its schools with Title I funds, the LEA must use State and Local funds to provide services that, **taken as a whole compared with all sites**, are substantially comparable in each Title I school.

Criteria Covered In This Guide

- **Writing and annually updating Policy & Procedures** for compliance with the comparability requirement;
- **Annually testing comparability** (if not exempt) of its schools in the fall and adjusting resource allocations to meet compliance, as necessary;
- **Annually documenting compliance**;
- **Reporting an Assurance of Comparability** to the Arizona Department of Education (ADE) by November 30th every two years.

Important Dates for Comparability Criteria

All calculations and documentation should be completed early in the school year. The due date for submitting your calculation or submitting your exemption forms into ALEAT is November 30th. The due date for completing the Assurance of Comparability is also November 30th. **The Assurance of Comparability is found in ALEAT. It is a fillable form that once it's filled out, you print it, sign it, and upload it into ALEAT.** If your LEA is found to be non-comparable, reallocation of resources must be completed. **Reallocations must be completed by December 31st. If non-comparable Title I schools are not corrected in a timely manner to meet compliance, the State may withhold or require repayment of Title I funds**.

REQUIRED CRITERIA

Written Policy & Procedures

All LEAs receiving Title I funds, **regardless if they are exempt from calculating comparability**, must establish procedures in writing. Procedures will have sufficient detail to show a year-round effort to use comparable State and Local funds at all schools. Exempt LEAs and LEAs where any of their sites can be excluded still need to establish policies and procedures which include a timeline for submitting the Assurance of Comparability, the calculation of Comparability, retaining documentation, and reviewing the procedures.

For non-exempt LEAs the following should be explained in your Policy & Procedures:

- An annual timeline for demonstrating compliance.
- Identify the person responsible (including their position) for performing and documenting the calculations.
- Choose and describe which resource (staff, salaries, or expenses) will be compared to the student population to determine comparability.
- A remedy to make resource adjustments if schools are not comparable.

Testing Comparability

Supporting Documentation Guidelines

ADE requires that student counts be the LEAs 40th-day enrollment. The staffing and expense reports must be measured on or near the same date. All staffing reports used for calculations should only consider **Instructional Staff as long as the snapshot being used for each site is within the same context**. Any staffing positions counted must be represented at sites (if applicable) in the district. **Pre-K should be excluded from any student and staffing reports and calculations. Kindergarten students should be counted as whole students (1.0), even if they only attend half day.**

Instructional Staff can include more than just classroom teachers. For example, the following personnel may also be included in the count: other certified staff (principals, guidance counselors, speech therapists, school social workers, specialists, coaches, school psychologists, librarians, etc.), instructional paraprofessionals and instructional support clerical staff. The following personnel may not be included in staffing counts: cafeteria workers, custodians, nurses, playground aides, student teachers, volunteers, etc.

Total staffing counts must then subtract out any and all federally funded staff, (Title I, SPED, ELL, etc.) The net FTE should be all instructional staff paid out of state and local funds. Federally funded positions must be notated on the supporting documentation.

For any expense reports used in calculations, all sources of State and Local funds must be included with the exception of;

- Any State or local funds used for supplemental purposes that meet the same intent and purpose as Title I.
- State and Local expenditures for language instruction educational programs.
- The excess costs of providing services to children with disabilities as determined by the LEA.

Exemptions and Exclusions

An LEA may be exempt only from performing the comparability calculation if it is a single site LEA or the LEA only has one school per grade span. If two or more grades overlap in buildings, the LEA is not exempt and must perform the calculation.

If an LEA is a single site LEA or only has one school per grade span, the LEA is still required to have written policies and procedures which include a timeline. **The only document the LEA is exempt from is the actual calculation of Comparability.**

An LEA may exclude a school from the calculation if the school's 40th-day enrollment is less than 100 students. All exclusions must be addressed in the policies and procedures and supporting documentation must be added to the supporting documents.

A template can be found on ALEAT with guidance on the exemption documentation required.

Using the Worksheet for Calculations

Arizona Department of Education will recognize the following methods of providing comparability that are permissible under the federal law and the February 2008 Federal Non-Regulatory Fiscal Requirements guidance.

The acceptable methods to compare schools include:

1. Pupil/Instructional Staff ratio at Title I schools - *Recommended*
2. Pupil/Instructional Staff ratio at Title I to Non-Title I schools - *Recommended*
3. Pupil/Instructional Staff ratio at Title I schools by grade span
    a. Grade Spans must match the basic organization of the LEA and have school buildings with at least two overlapping grades
4. Pupil/Instructional Staff ratio at Title I schools by large and small schools
5. Pupil/Instructional Staff ratio at Title I schools by poverty level (high to low)
6. State and Local per pupil spending at Title I schools (all expenditures)

Only method two can be used if you are comparing Title I to Non-Title I schools. All of these methods can be further broken down by grade span, school size, or other logical methods as long as supporting documentation can provide justification. **An LEA may not divide schools to exclude a site from a calculation**. **All sites must be included in a calculation unless it has 100 or fewer students**.

If an initial testing method identifies one or more Title I schools that are not comparable, every testing method may be used until the LEA proves comparability. If no methodology is able to show comparability, the LEA should then reallocate resources to make it comparable. **Reallocation of resources must be completed by December 31st**.

Adjusting Allocations to Non-Comparable Title I Schools

Resource reallocation consists of reassigning State and Local funded instructional staff, or of transferring materials and supplies to other schools within the LEA. The LEA should follow its written comparability procedures to correct any imbalance of resources in Title I schools. **Any corrections must be completed by December 31st**. If any non-comparable Title I schools are not corrected in a timely manner, the state may withhold or require repayment of Title I funds.

Documentation

Comparability Calculations

Comparability calculations and supporting documentation must be uploaded into ALEAT every other year. This is reported through ALEAT which is monitored every other year. The biannual reporting schedule is:

- LEAs starting with the letter **A to L** will report on **November 30th** of **odd** calendar years.
- LEAs starting with the letter **M to Z** will report on **November 30th** of **even** calendar years.

The following documentation is required to show annual compliance:

- Written comparability policy & procedures
- LEA 40th day student enrollment counts
- Supporting staff and/or expense records snapshot around the 40th day enrollment period
- Worksheet
- Resource reallocation supporting documentation (if needed)

Assurance of Comparability

The Assurance of Comparability is required by all LEAs receiving Title I funds regardless of exemption status. It notifies the State that its schools are comparable **every year**. Reporting the assurance is only required every other year. The biannual reporting schedule is:

- LEAs starting with the letter **A to L** will report on **November 30th** of **even** calendar years.
- LEAs starting with the letter **M to Z** will report on **November 30th** of **odd** calendar years.

Calculating Comparability is an annual requirement. Every calendar year, the LEA will calculate comparability and every year the LEA will either report the calculations or the Assurance.

If you have any questions, please contact your Title I Specialist or
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