



ARIZONA DEPARTMENT OF EDUCATION

Title I, Part A Comparability

FAQs

1. Which LEAs must demonstrate compliance for comparability?

Comparability requirement applies to all LEAs that accept Title I-A funds with the exception of any LEA that does not have more than site per grade span or LEAs with fewer than 100 students enrolled on October 1 (any school with fewer than 100 students may be excluded from comparability calculations). Even if an LEA is exempt from full comparability calculations, it is still required to complete the assurance task in EMAC by attesting to the comparability assurances for 1) LEA-wide salary schedule; 2) Written policy ensuring equivalence in teachers, administrators, and other staff (regardless of Federal funding), and 3) Written policy ensuring equivalence in the provision of curriculum and instructional materials (regardless of Federal funding).

2. How is comparability demonstrated?

To demonstrate compliance, LEAs must choose one of three testing methods to be compliant, such as student to instructional-staff ratio, student to instructional-staff salary ratio, and per pupil expenditure. All comparability testing methods must include AzEDS October 1 Enrollment, and staffing reports. When a school does not demonstrate comparability using these methods, the LEA must reallocate funds or resources until the school is comparable.

3. When should an LEA begin the process of determining comparability?

LEAs should begin the process at the time school budgets are discussed since decisions are made to allocate local and State resources well before comparability is due and must use current year data. To meet the target date of January 18, 2026, the LEA should collect the comparability report information by October 1 of each school year (using the AzEDS October 1 Enrollment Report). This will allow the LEA sufficient time for allocation, placement, and/or realignment of staffing in Title I-A schools prior to December 29th.

4. On what date should student enrollment and staff assignments be counted?

Student enrollment must be counted on October 1. LEAs must use the October 1 AzEDS October 1 Enrollment Report for student enrollment.

5. Which schools should be included when demonstrating comparability?

All schools within a LEA that accept Title I-A funding are required to complete annual fiscal test for comparability to demonstrate that all schools are “substantially comparable”. This is true for LEAs with ONLY Title I-A schools and LEAs with BOTH Title I-A and Non-Title I-A schools.

6. Which students are included when demonstrating comparability?

All students enrolled in K-12 on October 1 in all Title I-A and non-Title I-A schools must be included.

7. What staff information needs to be collected and reflected when demonstrating comparability?

When comparing student/instructional staff ratios, the LEA must consistently include the same staff members in the ratios for both Title I-A schools and the comparison of non-Title I-A schools. Calculate the FTE numbers of certified and non-certified instructional staff paid with State and local funds assigned to each school listed. Instructional staff have a function code of 1000 and have a primary instructional focus (see FY25 Requirements). Staff members whose full salaries are paid with Federal dollars should not be included in this report. For staff who are proportionally paid with Federal, State and /or local dollars, count only the portion of the staff salary that is State and locally funded.

8. Should substitutes be included when demonstrating comparability?

Long-term substitute teachers may be included in the count for comparability. Short-term substitutes temporarily replacing an FTE (for example, a teacher on leave) should not be counted, but the official teacher (on leave or open position) should be counted.

9. Should any staff be excluded when demonstrating comparability?

When determining compliance with comparability, an LEA, in accordance with Section 1120A(c)(5), may exclude State and local funds expended for bilingual education for emergent bilingual students and excess costs of providing services to children experiencing disabilities as determined by the LEA.

10. When does a Title I-A school need to meet the comparability requirements?

The deadline to submit comparability in EMAC is January 18, 2026.

11. What calculation assures that the Title I-A school meets comparability requirements?

If the LEA has both Title I-A funded schools and non-Title I schools, to demonstrate comparability each Title I school's calculated per student ratio (whatever method used) is not greater than 110 percent or is less than 90 percent of the average per student ratio of non-Title I-A schools. For example, if the average ratio of students to instructional staff is 20 to 1 for an LEA's non-Title I-A schools, the ratio at each Title I-A school can be no higher than 22 to 1 or less than 18 to 1. Instructional staff have a function code of 1000 and/or have a primary instructional focus.

If the LEA has only Title I-A funded schools, to demonstrate comparability by grade span, each Title I school's calculated per student ratio is compared to the average per student ratio calculated for the grade span of Title I-A schools.

12. What happens if the school does not meet comparability?

All Title I-A funded schools in an LEA must demonstrate that they are comparable by January 18, 2026. If a school cannot demonstrate comparability, Title I-A funds will be placed on hold until comparability is resolved. In order to meet the target date of January 18, 2026, the LEA should collect the comparability report information by October 1 of each school year (using AzEDS October 1 Enrollment Report). This will allow the LEA sufficient time for allocation, placement, and/or realignment of staffing in Title I-A schools prior to January 18th.

13. What documentation needs to be maintained?

All supporting data including but not limited to student counts, staffing FTE, a list of staff by name and position, and budget code should be kept with the LEA. In cases where initial information indicates an LEA is out of compliance with comparability requirements, the LEA should retain documentation to demonstrate the specific actions taken to achieve Title I-A comparability of services in all Title I-A schools.

14. When may non-federal (state/local) supplemental funds be excluded for determining compliance with comparability of services requirement?

The following may be excluded when calculating comparability across schools:

- Language instruction for emergent bilingual students
- Excess costs of providing services to students experiencing disabilities
- Staff salary differentiates for years of employment
- Any State or local funds used for supplemental purposes meeting the same intent and purpose as Title I-A (such as MOWR, State Tutoring program, State grants, tax credits, etc.)

15. The LEA erroneously selected the incorrect comparability test methodology on EMAC and now needs to delete and choose another methodology? How can we do this?

A submission in the EMAC is a permanent record. There is no delete feature. Reach out directly to the ESEAInbox@azed.gov or call 602-364-1958 for support. ADE will reassign the correct EMAC test methodology form for completion so that the LEA may complete and submit a new comparability test methodology into EMAC.