



TITLE I, PART A – COMPARABILITY OF SERVICES

2011-2012 WEBINAR

Division of Federal Program Compliance

October 2011

Presenter: Cindy Watson, Program Specialist

2

WELCOME

QUESTIONS

- Q&A after webinar presentation concludes
- Answer in order received, as time allows
- Detailed questions should be emailed to:
FPC_Compliance@tea.state.tx.us

4

HISTORY

History

5

- Past two years, the Comparability requirement was the responsibility of the Division of No Child Left Behind under Cindy Watson, Program Specialist
- This year, the Comparability requirement is the responsibility of the Division of Federal Program Compliance under the Compliance Team

6

INTRODUCTIONS

Division of Federal Program Compliance

7

- Compliance Team
 - ▶ Dina Hernandez
 - ▶ Cindy Watson
 - ▶ Julie Barron
 - ▶ Dewey Lawhon
 - ▶ Trisha Murray
 - ▶ Martha Rodriguez
 - ▶ Norma Yanez

- Questions/inquiries by phone or email may be responded to by any member of the Compliance Team.

8

WHAT IS COMPARABILITY?

What is Comparability?

9

- Federal Law* requires that campuses receiving Title I, Part A funding must receive the same level of services through state and local funds as campuses that are *not* receiving Title I, Part A funding.

*The No Child Left Behind Act of 2001 (NCLB) - Public Law 107-110, Section 1120A[c]

What is Comparability? (con't)

10

- Federal Law* requires that campuses receiving Title I, Part A funding must:
 - (i) a local educational agency-wide salary schedule;
 - (ii) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and
 - (iii) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

*The No Child Left Behind Act of 2001 (NCLB) - Public Law 107-110, Section 1120A[c]

What is Comparability? (con't)

- If *all* campuses in a school district or open enrollment charter school are receiving Title I, Part A funds, then the district or charter school must ensure that state and local funds used to provide services at their:
 1. Title I, Part A campuses are substantially comparable, taken as a whole, at each Title I campus; or
 2. Title I, Part A campuses with higher percentages of low-income students are equal to or greater than the services provided at their Title I, Part A campuses with lower percentages of low-income students.

12

COMPARABILITY REQUIREMENT

Comparability Requirement

13

- Title I, Part A participating local education agencies (LEAs) are required to annually submit comparability data by conducting comparability testing on an electronic form provided by TEA—the Title I, Part A Comparability Computation Form (CCF).
- LEAs will use their latest budgeted data.
- The deadline for submitting the CCF for school year 2011-2012 is **November 11, 2011**.

14

COMPARABILITY EXEMPTIONS

Comparability Exemptions

15

- An LEA that does not participate in Title I, Part A
- An LEA that has only one campus per grade span.
 - ▶ For example, an LEA receiving Title I, Part A funds that has one campus serving elementary grades (K-5), one campus serving middle school grades (6-8), and one campus serving high school grades (9-12) is not required to prove comparability of services in any of these campuses because there is only one campus per grade span group. ***There must be at least two campuses per grade span group in order to perform comparability testing.***

Comparability Exemptions (con't)

16

- Example One:
- LEA has the following campuses and grade spans:

Campus	Grade Span
Campus A	K-3
Campus B	4-5

- ▶ These campuses are exempt – there is only one campus per grade span (no overlap)

Comparability Exemptions (con't)

17

- Example Two:
- LEA has the following campuses and grade spans:

Campus	Grade Span
Campus A	K-3
Campus B	3-5

- ▶ These campuses are not exempt – there is not one campus per grade span (there is an overlap of grade 3)

Comparability Exemptions (con't)

18

- If the LEA has only one campus per grade span group or does not participate in Title I, Part A, the LEA must notify TEA by completing and submitting the Title I, Part A - Comparability of Services Requirement Assurance Document by November 11, 2011.
- [Assurance Document \(in MS Word form-fill format\)](#)

19

SIMILAR GRADE SPANS

Similar Grade Spans

■ Similar Grade Spans

- ▶ The grade span groupings should match the basic organization of schools in the LEA. For example, if the LEA's organization includes elementary, middle, and senior high schools, the LEA would have three grade span groupings. If there is any overlap in grades, the campuses must be grouped together. If there is no overlap in grades, the campuses may be considered separately.

Similar Grade Spans (con't)

■ Examples – Elementary Schools

- ▶ LEA has the following grade spans at the Elementary school campuses: K-3, PK-5, and 4-5. All three campuses must be grouped together as “Elementary” due to the overlap in grades.
- ▶ LEA has the following grade spans at the Elementary school campuses: PK-1, 2-3, and 4-5. Due to no overlap in grades, the campuses may be considered separately; therefore, the campuses are exempt from comparability.

Similar Grade Spans (con't)

22

■ Examples – Middle Schools

- ▶ LEA has the following grade spans at the Middle school Campuses: 5-7; 6-8; 7-8, and dedicated 6th grade campus. All four campuses must be grouped together as “Middle” due to the overlap in grades.
- ▶ LEA has the following grade spans at the Middle School Campuses: dedicated 6th grade campus, and 7-8. Due to no overlap in grades, the campuses may be considered separately; therefore, the campuses are exempt from comparability.

Similar Grade Spans (con't)

23

■ Examples – High Schools

- ▶ LEA has the following grade spans at the High School Campuses: 9-12, 10-12, and dedicated 9th grade campus. All three campuses must be grouped together as “High” due to the overlap in grade spans.
- ▶ LEA has the following grade spans at the High School Campuses: dedicated 9th grade campus and 10-12 campus. Due to no overlap in grades, the campuses may be considered separately; therefore, the campuses are exempt from comparability.

24

COMPARABILITY TESTING

Comparability Testing Requirement

25

- Only an LEA that is participating in Title I, Part A and has more than one campus per grade span group is required to conduct comparability compliance testing to ensure that the comparability of services requirement is met.

- An LEA that is participating in Title I, Part A and has more than one campus per grade span must complete and submit the following documents by **November 11, 2011**:
 - ▶ [Title I, Part A Comparability of Services Requirement Assurance Document](#) and
 - ▶ [Title I, Part A Comparability Computation Form \(CCF\)](#)

26

COMPARABILITY EXCLUSIONS

Exclusions

27

- Campuses with 100 or fewer students may be excluded from comparability determination.
- If an LEA has a grade span grouping with no Title I, Part A campuses, the LEA does not have to calculate comparability of services requirement for that grade span grouping.

Exclusions (con't)

- Certain services, such as services for limited English proficient students and services for students with disabilities, are designed specifically for each student. Expenditures for those services could vary greatly from campus to campus depending on the student populations. Therefore, for the purpose of determining compliance with the comparability of services requirement,

Exclusions (con't)

29

an LEA may exclude **supplemental state and local funds expended for:**

- ▶ Bilingual education for children with limited English proficiency;
- ▶ English as a second language (ESL);
- ▶ Excess costs of providing services to children with disabilities as determined by the LEA; and/or
- ▶ State or local funds used for programs that meet the exclusion requirements described in 34 CFR 200.79 (Refer to Appendix 1 at the end of the User Manual).

Exclusions (con't)

	Column A Total State & Local Funds	Column B <u>Supplemental State & Local Funds</u>	Column C Funds for Comparability Calculations (Col A - Col B)
Campus 1	\$120,000	\$10,000	\$110,000
Campus 2	\$150,000	\$25,000	\$125,000

- Campus 1 has total State and Local Funds of \$120,000 (Column A) which includes \$10,000 (Column B) in Supplemental State and Local Funds. Campus 2 has total State and Local Funds of \$150,000 (Column A) which includes \$25,000 (Column B) in Supplemental State and Local Funds. By reducing the amount in Column A by the amount in Column B, the Funds for Comparability Calculations (Column C) figure is correctly identified.

Exclusions (con't)

31

- If an LEA has a group of campuses with the same grade span and **one** of the campuses in the grouping has an enrollment that is substantially lower or higher than the enrollment of the other campuses in that grade span grouping, that campus may be excluded from the comparability calculation.

Exclusions (con't)

	Similar Grade Span	Enrollment
Campus 1	6-8	1592
Campus 2	6-8	599
Campus 3	7-8	1481

- In the example above, Campus 2 has an enrollment of less than half the number of students as the other campuses shown. Campus 2 may be excluded in the comparability calculation as shown in example below:

	Similar Grade Span	Enrollment
Campus 1	6-8	1592
Campus 3	7-8	1481

Exclusions (con't)

- If there are only two campuses being compared in a grade span grouping and one campus has an enrollment that is substantially larger than the enrollment of the other campus, then that entire grade span may be excluded from comparability determination.

Exclusions (con't)

34

	Similar Grade Span	Enrollment
Campus 1	9-12	1592
Campus 2	9-12	614

- ▶ In the example above, there is no basis for comparison because of the disparity in enrollment between the two campuses. Campus 1 has more than twice the enrollment of Campus 2.

35

ADDITIONAL INFORMATION

Additional Information

■ Specific Grouping Situations

- ▶ If an LEA has a group of campuses with similar grades served and there is a significant difference in enrollment between the largest and smallest campus in the group (e.g., the largest campus has an enrollment of at least two times the enrollment of the smallest campus), then the LEA may choose to subdivide the group into larger campuses and smaller campuses.

Additional Information (con't)

37

	High School Grade Span	Enrollment
Campus 1	9-12	300
Campus 2	9-12	400
Campus 3	8-12	800
Campus 4	8-12	850
Campus 5	8-12	900

- In this example, the LEA may divide the five campuses shown in the chart above into two groups, as is illustrated in the chart below.
- *NOTE: When entering the data on the CCF for this type of grouping, the LEA should distinguish between these grade spans as illustrated below.*

	High School Grade Span (Small)	Enrollment
Campus 1	9-12-Small	300
Campus 2	9-12-Small	400

	High School Grade Span (Large)	Enrollment
Campus 3	8-12-Large	800
Campus 4	8-12-Large	850
Campus 5	8-12-Large	900

Additional Information (con't)

38

- An LEA may only have one division in a grade span group (small campuses and large campuses). The LEA has discretion as to where the division occurs, but there can only be one division (regardless of the enrollments), as illustrated in the chart below:

	High School Grade Span (Small)	Enrollment
Campus 1	9-12-Small	150
Campus 2	9-12-Small	225
Campus 3	9-12-Small	260
Campus 4	9-12-Small	310
Campus 5	9-12-Small	400

	High School Grade Span (Large)	Enrollment
Campus 6	9-12-Large	650
Campus 7	9-12-Large	1000
Campus 8	9-12-Large	1330
Campus 9	9-12-Large	1850
Campus 10	9-12-Large	2900
Campus 11	9-12 Large	3500

39

SKIPPED CAMPUSES

Skipped Campuses

- A “skipped” campus is a campus that is not receiving Title I, Part A funds, but is eligible and other same-grade-span campuses in the LEA with lower poverty percentages *are receiving Title I, Part A funds.*
- A campus is considered “skipped” if an LEA is providing Title I, Part A services to campuses in rank order and a campus does not receive Title I, Part A services even though it has a higher percentage of poverty than a campus that *is receiving Title I, Part A services.*

Skipped Campuses (con't)

41

■ Example:

Campus	Grade Span	Title I or Non Title I, Part A	Low-Income %
Campus 1	K-5	Non-Title I, Part A	64%
Campus 2	K-5	Title I, Part A	50%
Campus 3	K-5	Title I, Part A	42%
Campus 4	K-5	Title I, Part A	35%

- Campus 1 is considered “skipped” because it is not receiving Title I, Part A services while Campuses 2, 3 and 4 that have a lower percentage of poverty *are receiving Title I, Part A services.*

Skipped Campuses (con't)

42

- A campus is considered “skipped” if it is a campus in a Multiple Attendance Area that has a low-income percentage exceeding 75 percent, but is not receiving Title I, Part A funds while another campus(es) with a *lower percentage of low-income students is served, regardless of grade spans.*

Skipped Campuses (con't)

43

■ Example:

Campus	Grade Span	Title I or Non Title I, Part A	Low-Income %
Campus 1	K-5	Non Title I, Part A	76%
Campus 2	6-8	Title I, Part A	50%

- Campus 1 is considered “skipped” since it is not receiving Title 1, Part A services while Campus 2, even though a different grade span, is receiving Title 1, Part A services.

Skipped Campuses (con't)

- If a campus is “skipped” by the LEA as documented on Schedule SC5000 of the NCLB Consolidated Application - Title I, Part A Campus Selection, the LEA is responsible for ensuring that each of the following conditions *is met*:
 - ▶ The “skipped campus” meets the comparability requirement just as if it were a Title I, Part A campus;
 - ▶ The “skipped campus” receives supplemental funds from other state or local sources that are spent according to the school-wide or targeted assistance requirements; and
 - ▶ The funds expended from such other sources equal or exceed the amount that would be provided under Title I, Part A.

45

COMPARABILITY DATA

Data for Tests to Determine Compliance

46

- Using the TEA-provided electronic CCF for school year 2011-2012, the LEA will enter the data found on Page 7 of the 2011-2012 User Manual
 - ▶ county-district number
 - ▶ district name
 - ▶ grade span grouping (e.g., Elementary, Middle School, High School-Small, High School-Large, etc.)
 - ▶ campus number and campus name
 - ▶ whether the campus is a Title I, Part A, a “skipped” campus, or a non-Title I, Part A campus (enter Y if Title I, Part A or “skipped”; leave blank if non-Title I, Part A)
 - ▶ campus enrollment
 - ▶ total annual state and local expenditures for the campus
 - ▶ total base salaries for non-Federally-funded instructional staff
 - ▶ non-federally funded staff—number of FTEs

47

CCF INSTRUCTIONS

CCF Instructions

48

- The LEA will enter information for each grade span on one individual MS Excel worksheet.

Comparability Computation Form

County District Number: 123456

CD Name: Example

#	Campus # (REQ'd)	Campus Name	Title 1, Part A or Skipped	Title I Expenditures (optional)
				All tests
				0
1				
2				
3				
4				

Ready

CCF Instructions (con't)

49

- ▶ The MS Excel workbook you downloaded contains 16 MS Excel worksheets that can be used.
- ▶ Use one for each grade span within your LEA.
- ▶ Use only the MS Excel worksheets you need.

#	Campus # (REQ'd)	Campus Name	Title 1, Part A or Skipped	Title I Expenditures (optional)
Gradespan Totals				0
1				
2				
3				
4				

- ✓ If additional sheets are needed, the sheets may be copied and added by right clicking on the tab

CCF Instructions (con't)

50

- You may change each worksheet name to the grade span being tested by right-clicking on the worksheet tab and choosing Rename.

Comparability Computation Form

County District Number: 123456

CD Name: Example

#	Camp # (REQ)	Name	Title 1, Part A or Skipped	Title I Expenditures (optional)
				All tests
				0
1				
2				
3				
4				

Ready

CCF Instructions (con't)

51

- Now, you will complete a worksheet for each grade span within your LEA.

Comparability Computation Form

County District Number: 123456

CD Name: Example

3									
4									
5									
6									
7									All tests
8									
9									
10		#	Campus # (REQ'd)	Campus Name			Title 1, Part A or Skipped		Title I Expenditures (optional)
11				Gradespan Totals					0
12		1							
13		2							
14		3							
15		4							

a b c d e f g h i j k l m n o p

Ready

CCF Instructions (con't)

52

- There are four areas on this screen:

The screenshot shows a spreadsheet titled "Comparability Computation Form". It includes fields for "County District Number:" and "CD Name:". A table at the top right shows "GS (GRADESPAN)" with columns for "Title 1, Part A", "NonTitle 1, Part A", and "Title 1, Part A, Comparable". A summary row shows "30% GS Bas". The main data table has columns for "Campus", "Title 1, Part A or Skipped", "Title 1 Expenditures (optional)", "Campus Enrollment", "State", "TEST", "TEST 3A", and "TEST". A row of zeros is visible: "0 0 \$0 \$0 0.00".

District data entry

Individual campus data entry

Displays running totals of campus comparability results

Displays individual campus data results

Division of Federal Program Compliance

October 2011

CCF Instructions (con't)

- Enter data for the campuses in the grade span you are testing.

Comparability Computation Form

GS (GRADESPAN) from to

Enter campus name

Enter the campus Title I, Part A Expenditures (Optional)

Enter campus number

Enter "Y" if the campus receives Title I, Part A funds or is a "skipped" campus. Otherwise, leave blank.

10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
Compur # (REQ'D)	Compur Name	Title I, Part A or Skipped	Title I Expenditures (optional)	Compur Enrollment	Compur State	Compur Federal	Compur Non-Federal Instructional Staff	Compur Non-Federal Instructional Staff FTE's	Exp / Enroll	Base Sal / Enroll	Enroll / FTE's	Comp or NC	State / Local Expenditures per Pupil		
1			0	0	\$0	\$0	0.00								
2															
3															
4															
5															

D E F G H I J K L M N O P CAPS NUM

CCF Instructions (con't)

■ Students, teachers, and dollars

	All tests	test 1-Input	test 2-Input	test 3-Input
	Campus Enrollment	Campus State/Local Expenditures	Campus Base Salaries for Non-Federal Instructional Staff	Campus Non Federal Instructional Staff FTE's
0	0	\$0	\$0	0.00

Enter TOTAL number of students for each campus

Enter the TOTAL state and local expenditures for each campus

Enter the TOTAL base salaries for non-federally funded instructional staff for each campus

Enter the TOTAL number of non-federally funded FTEs for each campus

CCF Instructions (con't)

An example of completed data entry

Texas Education Agency
Division of Federal Program Compliance
Comparability Computation Form

Use a separate worksheet for each Grade Span Group

County District Number: **123456** [Elementary, Middle, or High] **GS (GRADESPAN)**
CD Name: **Example** Middle Grade Span Group

		All tests		All tests	test 1-Input	test 2-Input	test 3-Input	Comparator												
								Total	5	5	5	5	5	5	5	5	5			
								Title 1, Part A	4	4	4	4	4	4	4	4	4			
								NonTitle 1, Part A	1	1	1	1	1	1	1	1	1			
								Title 1, Part A, Comparable	4	4	4	4	4	4	4	4	4			
								Title 1, Part A, Not Comparable	0	0	0	0	0	0	0	0	0			
								90%	GS Base	110%	90%	GS Base	110%	90%	GS Base	110%				
								4,655.31	5,172.56	5,689.82	3,628.95	4,032.16	4,435.38	11,248	12,498	13,748				
#	Comparator # (REQ'D)	Comparator Name	Title 1, Part A or Skipped	Title I Expenditures (optional)	Comparator Enrollment	Comparator State/Federal Expenditures	Comparator Base Salaries for Non-Federal Instructional Staff	Comparator Non-Instructional Staff FTE's	TEST 1A	TEST 2A	TEST 3A	TEST 1B			TEST 2B			TEST 3B		
									Exp / Enroll	Base Sal / Enroll	Enroll / FTE's	Comp or NC	Comp State & Local Expenditures per Pupil	Campus to GS Base	Comp or NC	Campus Base Salary per Pupil	Campus to GS Base	Comp or NC	Campus Pupil per FTE's	Campus to GS Base
Grade span Totals				2,365,060	4,308	\$25,386,942	\$11,783,858	392.71	#####	3,526.30	14.31	5,299.05	4,068.15	12.41	13.43	107.448%				
1	045	Barnard-Gown	Y	1,256,364.3	384	5,115,185	4,244,627	84.50	yes	yes	yes	yes	5,188.36	100.493%	yes	4,313.64	106.381%	yes	11.64	93.176%
2	044	RJ Kincaid Community		0	1,236	5,365,626	4,842,731	35.00												
3	042	Thirman Milner	Y	370,452	340	4,616,302	3,524,441	70.00	yes	yes	yes	yes	4,311.60	34.355%	yes	3,749.41	32.387%	yes	13.43	107.448%
4	043	Dominick Burns	Y	398,734	879	4,858,808	3,853,241	77.50	yes	yes	yes	yes	5,527.65	106.865%	yes	4,330.43	108.887%	yes	11.34	90.752%
5	041	Henry Dwight	Y	395,874	863	4,830,421	3,318,750	65.71	yes	yes	yes	yes	5,558.60	107.463%	yes	3,819.04	34.715%	yes	13.22	105.817%

Note: To erase an entry, use the delete key.

CCF Instructions (con't)

- Now it's time to review your results!

TEST 1A	TEST 2A	TEST 3A	TEST 1B			TEST 2B			TEST 3B		
Exp / Enroll	Base Sal / Enroll	Enroll / FTE's	Comp or NC	Campus State & Local Expenditures per Pupil	Campus to GS Base	Comp or NC	Campus Base Salary per Pupil	Campus to GS Base	Comp or NC	Campus Pupil per FTEs	Campus to GS Base
*****	3,526.30	14.31		5,299.05			4,068.15			13.97	
yes	yes	yes	yes	5,198.36	100.439%	yes	4,313.64	106.981%	NC	11.64	86.652%
yes	yes	yes	yes	4,911.60	94.955%	yes	3,749.41	92.987%	yes	13.43	99.924%
yes	yes	NC	yes	5,527.65	106.865%	yes	4,390.49	108.887%	NC	17.58	130.815%
yes	yes	yes	yes	5,558.60	107.463%	yes	3,819.04	94.715%	yes	13.22	98.407%

- Test is compliant for 1A, 2A, 1B, and 2B
- Test is not compliant for 3A and 3B

58

COMPARABILITY TESTS

Tests to Determine Compliance

59

- The CCF will run 2 tests against each of 3 sets of campus data—6 tests in all.
 - ▶ The 3 sets of campus data are:
 - state and local expenditures per pupil
 - per-pupil expenditures for state and local base salaries
 - ratio of number of pupils to number of non-Federally-funded instructional staff (FTEs)

Tests to Determine Compliance (con't)

60

▶ The 2 tests are:

- Title I, Part A Campuses vs. Average for Non-Title I, Part A Campuses
- *Title I, Part A Campuses vs. Grade Span Average

- **NOTE: Per the U.S. Department of Education (USDE) Non-Regulatory Guidance issued May 2006, campus test results for the “B” test must fall within the range of 90% to 110% of the grade span average. See Appendix 3 for examples.*

Optional Spreadsheet

61

- For LEAs with all Title I, Campuses
- LEA must have campuses above and below the District's Low Income Percentage
 - ▶ The 2 tests are:
 - Title I, Part A Campuses High Poverty vs. Average for Title I, Part A Campuses Low Poverty
 - *Title I, Part A Campuses vs. Grade Span Average
- Provided by request only.
- Email [FPC Compliance@tea.state.tx.us](mailto:FPC_Compliance@tea.state.tx.us)

62

COMPARISONS

Comparisons

63

- Comparison of State and Local Expenditures per Pupil
 - ▶ Test 1 A: Title I, Part A Campuses vs. Average for Non-Title I, Part A Campuses
 - ▶ Test 1 B: Title I, Part A Campuses vs. Grade Span Average

Comparisons (con't)

64

- Comparison of Per-Pupil Expenditures for State and Local Base Salaries
 - ▶ Test 2A: Title I, Part A Campuses vs. Average for Non-Title I, Part A Campuses
 - ▶ Test 2B: Title I, Part A Campuses vs. Grade Span Average

Comparisons (con't)

65

- Comparison of Pupil/Non-Federally-funded Instructional Staff Ratio
 - ▶ Test 3A: Title I, Part A Campuses vs. Average for Non-Title I, Part A Campuses
 - ▶ Test 3B: Title I Part A Campuses vs. Grade Span Average

COMPARABILITY COMPUTATION FORM

Comparability Computation Form

67

- The CCF will automatically apply all the tests to all the data entered by the LEA. Once completed, the LEA's results for each Title I, Part A campus are shown on the CCF as "Yes" for compliant or "NC" for noncompliant.
 - ▶ The LEA shall then determine which **ONE test it wishes to use, then that test must be applied consistently district-wide to determine compliance with the comparability of services requirement.**
 - ▶ Prior to submitting the CCF to TEA, the LEA must **make appropriate adjustments to bring all of the campuses in that test into compliance.**

COMPARABILITY INSTRUCTIONS

Comparability Instructions

- The “A” series of tests compares the individual Title I, Part A campus results with the average of all non-Title I, Part A campuses combined. (Note: the “A” series of tests will not produce results if there are no non-Title I, Part A campuses in the grade span group – The LEA will need to pass a “B” test)
- The “B” series of tests compares the individual Title I, Part A campus results with the average for the entire grade span.

Comparability Instructions (con't)

70

■ For The “B” Tests

- ▶ The individual campus result **must** be within the **90%** to **110%** range of the total grade span average to achieve compliance.

Comparability Instructions (con't)

- Each "B" test will show:

TEST 1B		
Comp or NC	Campus State & Local Expenditures per Pupil	Campus to GSE Base
yes	4,655.68	94.277%
NC	3,982.12	80.637%

Actual Computation

Compliant ("yes") or Non-compliant ("NC")

Actual computed percentage

Note: A percentage that is OUT of compliance will be highlighted

In order for this campus to be compliant, the % shown must be between 90% and 110%.

Comparability Instructions (con't)

- ▶ The form has automatically applied all the tests to all the data entered.
- ▶ The summary of the results can be found in the peach area at the top of the form.
- ▶ Results for each campus are displayed in the green and blue areas below the summary, under each of the tests.
- ▶ “Yes” for Title I, Part A campuses in compliance.
- ▶ “NC” for Title I, Part A campuses that are non-compliant.

Total	4	4	4		4			4	
Title 1, Part A	3	3	3		3			3	
NonTitle 1, Part A	1	1	1		1			1	
Title 1, Part A, Comparable	0	0	3		3			2	
Title 1, Part A, Not Comparable	3	3	0						
test 3-Input				90%	GS Base	1,501.08	1,667.87	1,8	
Campus Non Federal Instructional Staff FTE's	TEST 1A	TEST 2A	TEST 3A	TEST 1B			TEST 2B		
	Exp / Enroll	Base Sal / Enroll	Enroll / FTE's	Comp or NC	Campus State & Local Expenditures per Pupil	Campus to GS Base	Comp or NC	Campus Base Salary per Pupil	Campus to GS Base
56.00									
11.00	NC	NC	yes	yes	1,666.67	99.928 %	NC	1,000.00	89.935 %
12.00	NC	NC	yes	yes	1,692.31	101.465 %	yes	1,046.15	94.086 %
15.00	NC	NC		yes	1,555.56	93.266 %	yes	1,111.11	99.928 %
18.00									

Summary of campus results

Results of each test by campus

Comparability Instructions (con't)

- With this information, the LEA should determine which one of the tests is most favorable to the LEA - that is, which test will require the least number of adjustments in order to achieve compliance across the grade span –
 - ▶ Test 1A? Test 1B? Test 2A? Test 2B? Test 3A? Or Test 3B?

TEST 1A	TEST 2A	TEST 3A	TEST 1B			TEST 2B			TEST 3B		
Exp / Enroll	Base Sal / Enroll	Enroll / FTE's	Comp or NC	Campus State & Local Expenditures per Pupil	Campus to GS Base	Comp or NC	Campus Base Salary per Pupil	Campus to GS Base	Comp or NC	Campus Pupil per FTEs	Campus to GS Base
NC	NC	yes	yes	1,666.67	99.928%	NC	1,000.00	89.935%	NC	27.27	110.272%
NC	NC	yes	yes	1,692.31	101.465%	yes	1,046.15	94.086%	yes	27.08	109.507%
NC	NC	yes	yes	1,555.56	93.266%	yes	1,111.11	99.928%	yes	24.00	97.040%

Comparability Instructions (con't)

- ▶ Since all Title I, Part A campuses in this test are shown as compliant by using Test 3A, this Example LEA may want to consider that test for use across all grade spans,
- ▶ or, this Example LEA may choose one of the other tests to apply district-wide and simply make the appropriate adjustments to bring the Title I, Part A campuses into compliance.

TEST 1A	TEST 2A	TEST 3A	TEST 1B			TEST 2B		
Exp / Enroll	Base Sal / Enroll	Enroll / FTE's	Comp or NC	Campus State & Local Expenditures per Pupil	Campus to GS Base	Comp or NC	Campus Base Salary per Pupil	Campus to GS Base
NC	NC	yes	yes	1,666.67	99.928%	NC	1,000.00	89.935%
NC	NC	yes	yes	1,692.31	101.465%	yes	1,046.15	94.086%
NC	NC	yes	yes	1,555.56	93.266%	yes	1,111.11	99.928%

Comparability Instructions (con't)

75

■ Control points

To fix:

- Test 1 A/B
- Test 2 A/B
- Test 3 A/B

Adjust:

- State and local expenditures and/or student enrollment
- Non-federally funded Base Salaries and/or student enrollment
- Non-federally funded FTEs and/or student enrollment

Comparability Instructions (con't)

76

- **Important:**

Whichever test the LEA decides to use, that **ONE** test must be applied successfully to prove Title I, Part A compliance **district-wide**.

77

ASSURANCE DOCUMENT

Comparability Assurance Document
Title I, Part A
2011-2012

Name of Local Education Agency: _____

County-District Number: _____

Complete LEA Name

Complete County-District Number

Check One:

- The LEA IS EXEMPT from the Title I, Part A Comparability of Services requirement, OR
- The LEA is NOT EXEMPT. The superintendent or chief operating officer of the Title I, Part A participating LEA has reviewed and approved the submission of the completed Title I, Part A Comparability Computation Form (CCF).

If the LEA is EXEMPT from this requirement--Check the appropriate box(es) in the section below and sign the form.

This LEA is exempt from the Comparability of Services requirement because:

- The LEA has only one campus per grade span.
- The LEA does not receive Title I, Part A funding, and therefore has no Title I, Part A Campuses.

If the LEA is NOT EXEMPT from this requirement, review and check the Statements of Assurance in the box below to confirm that Title I, Part A Comparability of Services testing on the CCF has been completed appropriately and that the required policies have been implemented. Sign the form, scan, and upload into NCLB Reports.

Statements of Assurance:

- The signatory is the duly authorized superintendent or charter school chief operating officer for the LEA.
- The data provided on the submitted Title I, Part A CCF are accurate and represent the configuration of the LEA.
- The LEA is compliant with the Title I, Part A comparability of services requirement as shown in the CCF submission for the following Grade Span groups (Elementary campuses, Middle School campuses, and/or High School campuses.):

- The LEA has established and implemented the following: 1) an LEA-wide salary schedule; 2) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and 3) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

Original Signature of Superintendent or Chief Operating Officer: _____ DATE _____

Printed Name of Superintendent or Chief Operating Officer: _____

Upload document into the NCLB Reports application in TEA's Comparability Assurance Document

Note: If you have questions about this requirement, please consult the Manual Part I, or contact Cindy Watson at cindy.watson@tea.state.tx.us.

Scan and Upload into NCLB Reports

Due Date: November 11, 2011

Assurance Document

78

▶ If you ARE exempt

Check the first box

Check applicable reason for exemption

Sign, print name, and date the form

Comparability Assurance Document
Title I, Part A
2011-2012

Name of Local Education Agency: _____

County-District Number: _____

Complete LEA Name

Complete County-District Number

Check One:

The LEA IS EXEMPT from the Title I, Part A Comparability of Services requirement, OR

The LEA is NOT EXEMPT. The superintendent or chief operating officer of the Title I, Part A participating LEA has reviewed and approved the submission of the completed Title I, Part A Comparability Computation Form (CCF).

If the LEA is EXEMPT from this requirement--Check the appropriate box(es) in the section below and sign the form.

This LEA is exempt from the Comparability of Services requirement because:

- The LEA has only one campus per grade span.
- The LEA does not receive Title I, Part A funding, and therefore has no Title I, Part A Campuses.

If the LEA is NOT EXEMPT from this requirement, review and check the Statements of Assurance in the box below to confirm that Title I, Part A Comparability of Services testing on the CCF has been completed appropriately and that the required policies have been implemented. Sign the form, scan, and upload into NCLB Reports.

Statements of Assurance:

- The signatory is the duly authorized superintendent or charter school chief operating officer for the LEA.
- The data provided on the submitted Title I, Part A CCF are accurate and represent the configuration of the LEA.
- The LEA is compliant with the Title I, Part A comparability of services requirement as shown in the CCF submission for the following Grade Span groups (Elementary campuses, Middle School campuses, and/or High School campuses.): _____
- The LEA has established and implemented the following: 1) an LEA-wide salary schedule; 2) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and 3) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

Original Signature of Superintendent or Chief Operating Officer: _____ DATE _____

Printed Name of Superintendent or Chief Operating Officer: _____

Upload document into the NCLB Reports application in TEA's Comparability Assurance Document

Note: If you have questions about this requirement, please consult the Manual Part I, or contact Cindy Watson at cindy.watson@tea.state.tx.us.

Scan and Upload into NCLB Reports

Due Date: November 11, 2011

Assurance Document

79

▶ If you are NOT exempt

Check the second box

List the grade-span groups tested on the CCF (e.g., Elementary, Middle, High School)

Sign, print name, and date the form

Comparability Assurance Document
Title I, Part A
2011-2012

Name of Local Education Agency: _____

County-District Number: _____

Check One: The LEA **IS EXEMPT** from the Title I, Part A Comparability of Services requirement, **OR** The LEA is **NOT EXEMPT**. The superintendent or chief operating officer of the Title I, Part A participating LEA has reviewed and approved the submission of the completed Title I, Part A Comparability Computation Form (CCF).If the LEA is **EXEMPT** from this requirement--Check the appropriate box(es) in the section below and sign the form.This LEA is **exempt** from the Comparability of Services requirement because:

- The LEA has only one campus per grade span.
- The LEA does not receive Title I, Part A funding, and therefore has no Title I, Part A Campuses.

If the LEA is **NOT EXEMPT** from this requirement, review and check the Statements of Assurance in the box below to confirm that Title I, Part A Comparability of Services testing on the CCF has been completed appropriately and that the required policies have been implemented. Sign the form, scan, and upload into NCLB Reports.**Statements of Assurance:**

- The signatory is the duly authorized superintendent or charter school chief operating officer for the LEA.
- The data provided on the submitted Title I, Part A CCF are accurate and represent the configuration of the LEA.
- The LEA is compliant with the Title I, Part A comparability of services requirement as shown in the CCF submission for the following Grade Span groups (e.g., Elementary campuses, Middle School campuses, and/or High School campuses.):

- The LEA has established and implemented the following: **1)** an LEA-wide salary schedule; **2)** a policy to ensure equivalence among schools in teachers, administrators, and other staff; and **3)** a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

Original Signature of Superintendent or Chief Operating Officer _____

DATE _____

Printed Name of Superintendent or Chief Operating Officer: _____

Upload document into the NCLB Reports application in TEASE as the Comparability Assurance DocumentNote: If you have questions about this requirement, please consult the CCF User Manual Part I, or contact Cindy Watson at cindy.watson@tea.state.tx.us.**Due Date: November 11, 2011**

Assurance Document

80

- ▶ The Assurance Document must be completed, signed, scanned, and uploaded into the NCLB Reports application in TEASE by ALL LEAs.

81

COMPARABILITY INSTRUCTIONS

Comparability Instructions

When MS Excel worksheets for all grade spans are complete and all campuses are compliant:

- ▶ Verify that the same test was used across all grade spans, district-wide.
- ▶ Complete the Assurance Document, print and have signed by the superintendent, then scan and upload the document into the NCLB Reports application in TEASE as the Comparability Assurance Document.
- ▶ Upload the Comparability Computation Form (CCF) into the NCLB Reports application in TEASE as the Comparability Computation Form.
- ▶ **NOTE: Without uploading the documents into the NCLB Reports application in TEASE, your LEA may not receive credit for completing the Assurance Document and/or the Comparability Computation Form.**
- ▶ Questions: E-mail FPC_Compliance@tea.state.tx.us

NCLB REPORTS

Uploading into NCLB Reports

84

- LEAs are required to upload the Comparability Documentation through the NCLB Reports application that is available on the TEA Secure Environment (TEASE).

- Documents to be uploaded by LEA:
 - ▶ Completed Comparability Assurance Document
 - ▶ Comparability Computation Form (Completed) – if required

Obtaining Access to NCLB Reports

85

- To request a TEASE account, access the following website and follow the instructions given:
www.tea.state.tx.us/index2.aspx?id=2728
- Please note obtaining access can take up to a week. Please be sure the LEA has access to the system prior to the due date.

Obtaining Access to NCLB Reports

86

- ▶ To add NCLB Reports to an existing TEASE account, log on to TEASE, click on the “Add/Modify Application Access” button, and Select “NCLB Reports” from the drop-down list.

The screenshot displays the TEASE (Texas Education Agency System) user interface. At the top left is the Texas Education Agency logo. In the top right corner, there are 'Help' and 'Log Off' buttons. Below these, there are three buttons: 'Change Password', 'Change Info', and 'Add/Modify Application Access', with the latter being circled in red. The main content area is titled 'Application List' and contains a sub-section 'Add/Modify Application Access'. This section includes a dropdown menu labeled 'Select Application' with a 'Continue' and 'Exit' button to its right. The dropdown menu lists various applications, with 'No Child Left Behind Reports' circled in red. To the left of the dropdown, there is a 'Your Applications' section with a dropdown menu currently set to 'NCLBReports - No Child Left Behind Reports' and a 'Launch' button. Below this, there are two application cards: one for 'NCLBReports - No Child Left Behind Reports' featuring an apple icon, and another for 'eGrants - eGrants Production' featuring an 'e' icon. At the bottom of the page, the text 'The Texas Education Agency' is visible.

Templates

87

- The Division of Federal Program Compliance has made available the Comparability Assurance Document and the Comparability Computation Form through NCLB Reports. LEAs may download copies of the template, complete it, and save it to a local computer.

★ TEXAS EDUCATION AGENCY | TEA Home | Search TEA | School District Locator | TEA Divisions

NCLB Reports

View Reports & ISD Responses | **Download Response Templates** | Upload Response Documents | Upload Response Templates | Upload Progress Reviews | Help | Exit

Download Response Templates

School Year ▾	Response Template Title ▲	Doc Type	Date Added	Size
2011-2012	Comparability Assurance Document	Response Temp	2011-10-10T14:05:33	42 kb
2011-2012	Comparability Computation Form	Response Temp	2011-10-07T14:26:10	1.5 mb
2010-2011	TTIPS End of Year Report Part 2	Response Temp	2011-08-01T12:49:02	23 kb

Note: A maximum of 50 rows is displayed.

Submitting Templates

88

- ▶ The LEA will upload the completed templates through NCLB Reports.
- ▶ To upload a template or document, the LEA must select the type of submission, use the “browse” button to indicate the location of the appropriate file, and click on the upload button.

★ TEXAS EDUCATION AGENCY | TEA Home | Search TEA | School District Locator | TEA Divisions

NCLB Reports

View Reports & ISD Responses | Download Response Templates | Upload Response Documents | **Upload Response Templates** | Upload Progress Reviews | Help | Exit

Upload Response Documents

District: Show List by District Number

Response Template Title:

School Year:

Response Doc Type:

Note: Maximum allowable file size is 10 MB.

89

EDUCATION JOB FUNDS

Education Job Funds

- Under normal circumstances, federal funds are not included in the Comparability calculations. However, school personnel salaries paid from Fund Code 287 (Ed Job funds), which ordinarily would be paid from state and/or local funds, should be included in the Comparability calculations.

Education Job Funds (con't)

91

- **How are school personnel who are paid with funds from the Ed Jobs grant treated in determining comparability under section 1120A(c) of the ESEA?**
- In order to make this determination, it is important to consider the purpose of the comparability requirement and the purpose of Ed Jobs. The comparability of services requirement in section 1120A(c) of the ESEA requires an LEA to use state and local funds to provide services in each of its Title I schools that, taken as a whole, are at least comparable to the services it provides in its non-Title I schools. (If all of an LEA's schools are Title I schools, the LEA must use state and local funds to provide services that, taken as a whole, are substantially comparable in each school.)

(source: Initial Guidance for Local Educational Agencies on the Education Job Fund Program, The State of Texas, Texas Education Agency, May 11, 2011)

Education Job Funds (con't)

- Consistent with the purpose of Ed Jobs, the USDE expects that Ed Jobs funds in many cases will be used to rehire school staff (such as teachers) who were previously paid with State or local funds, or to hire new school staff in order to provide an LEA's basic education program. In other words, we expect that many school staff supported with Ed Jobs funds will be staff that an LEA would normally include in its comparability determinations. This circumstance raises the question of how an LEA should consider such staff, who are working in positions that normally would be paid for with non-federal funds but are now supported with federal Ed Jobs funds when the LEA determines whether its Title I schools meet the comparability requirement under section 1120A(c) of the ESEA.

(source: Initial Guidance for Local Educational Agencies on the Education Job Fund Program, The State of Texas, Texas Education Agency, May 11, 2011)

Education Job Funds (con't)

- When determining whether it's Title I schools meet the comparability requirement, **an LEA with staff who are supported with Ed Jobs funds should assess how each position would be funded were Ed Jobs funds not available. School staff paid with Ed Jobs funds who are in positions that would ordinarily be supported with state or local funds and would ordinarily be included in comparability determinations should continue to be included in those determinations.** On the other hand, school staff paid with Ed Jobs funds who are in positions that would otherwise be supported with other federal funds, with the exception of the Impact Aid funds (or funds from the SFSF program when those funds are used for activities authorized by Impact Aid), would continue to be excluded from comparability determinations. An LEA should include an explanation of how it treats school staff paid with Ed Jobs funds in the comparability procedures it is required to develop under section 1120A(c)(3)(A) of the ESEA. Source: USDE Guidance, November 2010

(source: Initial Guidance for Local Educational Agencies on the Education Job Fund Program, The State of Texas, Texas Education Agency, May 11, 2011)

94

ASSISTANCE

Assistance

- The new Download/Upload functions should be fairly self-explanatory; however, if questions related to this new functionality arise, they should be directed to the Division of Federal Program Compliance at FPC_Compliance@tea.state.tx.us

96

BREAK

97

QUESTIONS AND ANSWERS

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