Topics

- What is comparability?
- Comparability of services requirement
- Exempt local educational agencies (LEAs)
- Exemption criteria
- Exemptions illustrated
- Comparability Assurance Document (CAD) for exempt LEA
- CAD for non-exempt LEA
Topics (continued)

- Non-exempt LEAs
- Comparability testing steps
- Grade span grouping considerations
- Completing the Comparability Computation Form (CCF)
- Reviewing CCF test results
- GFFC Reports and Data Collections
What Is Comparability?

- Annual fiscal compliance requirement for receiving Title I, Part A federal grant funds
- Every Student Succeed Act (ESSA) made no changes to the comparability of services requirement
- Title I, Part A campuses and skipped campuses must receive the same level of services through state and local funds as campuses that are not receiving Title I, Part A funding
Comparability of Services Requirement

- Per Public Law 115-64, Section 1118. Fiscal Requirements(c)

COMPARABILITY OF SERVICES, LEAs are required to:
- Annually demonstrate comparable services at all campuses
- Annually provide assurance of equivalence
- Develop procedures for compliance
- Update and maintain the records biannually
Comparability of Services Requirement

- Requirement: Annually demonstrate comparable services at all campuses
  - Services provided with state and local funds in Title I, Part A schools must be comparable to the services in schools that do not participate in the Title I, Part A program.
  - If an LEA serves all schools with Title I, Part A funds, services provided with state and local funds must be “substantially comparable” in each Title I, Part A school.
Comparability of Services Requirement

- Requirement: Annually demonstrate comparable services at all campuses
  - Demonstrate compliance with this requirement by completing and submitting the Comparability Computation Form (CCF).
  - The requirements for completing and submitting the CCF can be found in the Comparability Instructions and the Title I, Part A Comparability of Services Guidance Handbook which are posted on TEA’s Title I, Part A – Comparability of Services Requirement webpage.
Comparability of Services Requirement

- Requirement: Annually provide assurance of equivalence
- All LEAs receiving Title I, Part A funds must establish:
  - an LEA-wide salary schedule,
  - a policy to ensure equivalence among schools with regard to teachers, administrators, and other staff, and
  - a policy to ensure equivalence among schools in provision of curriculum materials and instructional supplies.
Comparability of Services Requirement

- Requirement: Annually provide assurance of equivalence
  - Submit a Comparability Assurance Document (CAD) survey to assure that it has established these items.
  - The requirements for completing and submitting the CAD can be found in the Comparability Instructions which are posted on TEA’s Title I, Part A – Comparability of Services Requirement webpage.
Comparability of Services Requirement

- Requirement: Develop procedures for compliance
  - Develop written procedures for complying with the comparability requirements:
    - Identify timeline
    - Identify who is responsible for calculations
    - Describe process used to determine if Title I, Part A schools are comparable, and how and when LEA makes adjustments in Title I, Part A schools that are not comparable.
Comparability of Services Requirement

- Requirement: Update and maintain the records biannually
  - LEA-wide salary schedule
  - Policy to ensure equivalence among schools with regard to teachers, administrators, and other staff
  - Policy to ensure equivalence among schools in provision of curriculum materials and instructional supplies
  - Procedures for complying with the comparability requirements
**Exempt LEAs**

- **LEA meets at least one exemption criteria**
- **Requirement:**
  - Submit Comparability Assurance Document (CAD) to claim exemption and to assure that the LEA has established and implemented districtwide salary schedule and policies related to equal resources among schools.
Exemption Criteria

1. No Title I, Part A funding
2. One campus per grade span group
3. Multiple campuses in the grade span group, yet no overlap of grades levels
4. Overlap of grade levels but no Title I, Part A or skipped campuses in the grade span group
5. Excluding a campus or campuses results in no basis for comparison
Exemptions Illustrated

- One campus per grade span group
  (one elementary, one middle school, one high school)

<table>
<thead>
<tr>
<th>Grades at Campus</th>
<th>Grade Span Group</th>
<th>Title I, Part A or Skipped</th>
</tr>
</thead>
<tbody>
<tr>
<td>PK-5</td>
<td>Elementary</td>
<td>Yes</td>
</tr>
<tr>
<td>6-8</td>
<td>Middle School</td>
<td>Yes</td>
</tr>
<tr>
<td>9-12</td>
<td>High School</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Exemptions Illustrated

- Multiple campuses in the grade span group, yet no overlap of grade levels

<table>
<thead>
<tr>
<th>Grades at Campus</th>
<th>Grade Span Group</th>
<th>Title I, Part A or Skipped</th>
</tr>
</thead>
<tbody>
<tr>
<td>PK-1</td>
<td>Elementary</td>
<td>Yes</td>
</tr>
<tr>
<td>2-3</td>
<td>Elementary</td>
<td>Yes</td>
</tr>
<tr>
<td>4-5</td>
<td>Elementary</td>
<td>Yes</td>
</tr>
<tr>
<td>6-8</td>
<td>Middle school</td>
<td>Yes</td>
</tr>
<tr>
<td>9-12</td>
<td>High school</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Exemptions Illustrated

- Overlap of grade levels but no Title I, Part A or skipped campus in the grade span group

<table>
<thead>
<tr>
<th>Grades at Campus</th>
<th>Grade Span Group</th>
<th>Title I, Part A or Skipped</th>
</tr>
</thead>
<tbody>
<tr>
<td>K-2</td>
<td>Elementary</td>
<td>Yes</td>
</tr>
<tr>
<td>3-5</td>
<td>Elementary</td>
<td>Yes</td>
</tr>
<tr>
<td>6-8</td>
<td>Middle school</td>
<td>No</td>
</tr>
<tr>
<td>6-8</td>
<td>Middle school</td>
<td>No</td>
</tr>
<tr>
<td>9-12</td>
<td>High school</td>
<td>No</td>
</tr>
</tbody>
</table>
Exclusions Illustrated

- Excluding a campus or campuses results in no basis for comparison

<table>
<thead>
<tr>
<th>Grades at Campus</th>
<th>Grade Span Group</th>
<th>Enrollment</th>
</tr>
</thead>
<tbody>
<tr>
<td>EE-05</td>
<td>Elementary</td>
<td>100</td>
</tr>
<tr>
<td>06-08</td>
<td>Middle School</td>
<td>340</td>
</tr>
<tr>
<td>06-08</td>
<td>Middle School</td>
<td>340</td>
</tr>
<tr>
<td>09-12</td>
<td>High School</td>
<td>570</td>
</tr>
</tbody>
</table>
# Comparability Assurance Document

<table>
<thead>
<tr>
<th>EXEMPT LEAS</th>
<th>NON-EXEMPT LEAS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit a completed CAD through the online survey system</td>
<td>Submit a completed CAD through the online survey system</td>
</tr>
<tr>
<td>From the Type of Certification pull-down list, select “Exempt”</td>
<td>From the Type of Certification pull-down list, select “non-exempt”</td>
</tr>
</tbody>
</table>
Non-exempt LEAs

- LEA does not meet any exemption criteria
- Requirement to submit:
  1. Comparability Assurance Document (CAD) survey that assures LEA has established and implemented districtwide salary schedule and policies related to equal resources among schools, and
  2. Comparability Computation Form (CCF) to demonstrate Title I, Part A and skipped campuses are receiving fair share of state and local resources.
Comparability Testing Steps

1. Choose *one* test to demonstrate compliance:
   - Test 1 – Comparison of state and local expenditures per pupil
   - Test 2 – Comparison of per pupil expenditures for state and local base salaries
   - Test 3 – Ratio of pupils to non-federally funded instructional staff
Comparability Testing Steps

2. Determine grade span groupings* to be tested:
   
   • Elementary campuses
   • Middle school campuses
   • High school campuses

*LEA may be eligible to subdivide a grade span group into high-enrollment and low-enrollment grade span groupings.
Comparability Testing Steps

3. Gather data for chosen test:
   - Test 1: Campus enrollment and campus state and local expenditures
   - Test 2: Campus enrollment and campus base salaries for non-federal instructional staff
   - Test 3: Campus enrollment and campus non-federal instructional staff full-time equivalents (FTEs)
Comparability Testing Steps

4. Determine exclusions from testing data:
   - Campus or campuses that meet specific criteria
   - Supplemental state and local funds
   - Staff salary differential for years of employment
Grade Span Groupings Considerations

- Subdivided Grade Span Group (High and Low Enrollment)
  
  If an LEA has a grade span grouping with a substantial difference in enrollment between the largest and smallest campus, then the LEA may subdivide the grade span grouping into a high enrollment group and a low enrollment group.

- Campus Overlaps Grade Span Groups

  If a campus overlaps more than one grade span grouping, the LEA should place the campus in the grouping that most accurately represents the makeup of the campus.
Completing the CCF

- The CCF is an auto-calculating Excel form
- The CCF includes tabs for:

Example of Testing Tabs a through c renamed for the grade-span groups of the LEA being tested.
Completing the CCF Testing Tab

- Enter 3-digit campus number for campuses of the grade span group
- Enter name of the campus
- Enter "Y" or leave blank
- Enter enrollment
- Enter Test 1, 2, or 3
- Report grade span group
- Input data

### Table

<table>
<thead>
<tr>
<th>Campus B</th>
<th>Campus Name</th>
<th>Title I, Part A</th>
<th>Test 1 Input</th>
<th>Test 2 Input</th>
<th>Test 3 Input</th>
</tr>
</thead>
<tbody>
<tr>
<td>043</td>
<td>HappyMiddle</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>044</td>
<td>JoyMiddle</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>045</td>
<td>ExcelMiddle</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grade Span Totals</th>
<th>Title I, Part A</th>
<th>Test 1 Input</th>
<th>Test 2 Input</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,413</td>
<td>$10,620,202</td>
<td>$7,216,159</td>
<td>177</td>
</tr>
</tbody>
</table>

NonTitle I, Part A,
Comparable

Title I, Part A,
Not Comparable

Campus Non-Federal Instructional Staff FTE's
Reviewing CCF Test Results

Review “A” section if Grade span group contains Title I, Part A/Skipped and Non-Title campuses (Y and blank)
Reviewing CCF Test Results

Review “B” section if grade span group contains all Title I, Part A/Skipped campuses (all Y)

<table>
<thead>
<tr>
<th>Campus Name</th>
<th>Title I, Part A or Skipped Campus?</th>
<th>Grade Span [GS] Base</th>
<th>90% Comp or NC</th>
<th>NC Comp or NC</th>
<th>State &amp; Local Expenditures per Pupil</th>
<th>90% Campus to GS Base</th>
<th>NC Campus to GS Base</th>
<th>90% Comp or NC</th>
<th>NC Comp or NC</th>
<th>Salary per Pupil</th>
<th>90% Campus to GS Base</th>
<th>NC Campus to GS Base</th>
<th>Test 2</th>
<th>Test 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marvel Elementary</td>
<td>Y</td>
<td>3,333.33</td>
<td>5,022.23</td>
<td>Yes</td>
<td>100.56%</td>
<td>3,284.01</td>
<td>57.78%</td>
<td>Yes</td>
<td>16.80</td>
<td>99.13%</td>
<td>Yes</td>
<td>11.02</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Honky Elementary</td>
<td>Y</td>
<td>3,693.63</td>
<td>5,229.23</td>
<td>Yes</td>
<td>104.73%</td>
<td>3,908.57</td>
<td>106.36%</td>
<td>Yes</td>
<td>14.21</td>
<td>94.11%</td>
<td>Yes</td>
<td>13.21</td>
<td></td>
<td></td>
</tr>
<tr>
<td>First Elementary</td>
<td>Y</td>
<td>5,174.22</td>
<td>5,071.24</td>
<td>Yes</td>
<td>103.83%</td>
<td>3.718.85</td>
<td>110.57%</td>
<td>Yes</td>
<td>9.74</td>
<td>90.18%</td>
<td>Yes</td>
<td>11.47%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Absolute Elementary</td>
<td>Y</td>
<td>4,841.43</td>
<td>4,841.43</td>
<td>Yes</td>
<td>100%</td>
<td>2,382.25</td>
<td>87.33%</td>
<td>NC</td>
<td>3.73</td>
<td>16.472%</td>
<td>NC</td>
<td>3.73</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Grade Span Totals: 15,980.64
Grants and Federal Fiscal Compliance (GFFC) Reports and Data Collections

1. Log on to TEAL or TEASE.
2. Select GFFC Reports and Data Collections.
3. Select Upload Response Templates.
4. Select the document title (Comparability Computation Form) from the dropdown menu.
5. Select the current school year.
6. Select Response Document from the dropdown menu.
7. Browse for the completed CCF.
Questions

Federal Fiscal Compliance and Reporting Division

compliance@tea.texas.gov

(512) 463-9127
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