



Title I, Part A – Comparability of Services

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

Texas Education Agency
Division of Federal Fiscal Compliance and Reporting
compliance@tea.texas.gov
(512) 463-9127





Agenda

- What is comparability?
- Exempt local educational agencies (LEAs)
- Exemption criteria
- Exemptions illustrated
- Comparability Assurance Document (CAD) example for exempt LEA
- CAD example for non-exempt LEA
- Non-exempt LEAs
- Comparability testing steps





Agenda

- Grade span grouping considerations
- Completing the Comparability Computation Form (CCF)
- Reviewing CCF test results
- GFFC Reports and Data Collections





What Is Comparability?

- No Child Left Behind (NCLB) federal fiscal requirement (Public Law 107–110, Section 1120A(c))
- Compliance requirement if LEA receives Title I, Part A federal grant funds
- 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





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)

Grades at Campus	Grade Span Group	Title I
PK-5	Elementary	Yes
6-8	Middle School	Yes
9-12	High School	Yes





Exemptions Illustrated

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

Grades at Campus	Grade Span Group	Title I, Part A
PK-1	Elementary	Yes
2-3	Elementary	Yes
4-5	Elementary	Yes
6-8	Middle school	Yes
9-12	High school	Yes





Exemptions Illustrated

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

Grades at Campus	Grade Span Group	Title I, Part A
K-2	Elementary	Yes
3-5	Elementary	Yes
6-8	Middle school	No
6-8	Middle school	No
9-12	High school	No





Exemptions Illustrated

Excluding a campus or campuses results in no basis for comparison

Grades at Campus	Grade Span Group	Enrollment
EE-05	Elementary	100
06-08	Middle School	95
06-08	Middle School	340
09-12	High School	570



CAD Example for Exempt LEA

Complete LEA Information

Complete Contact Info

Complete Section A

Complete Section C

Signature and Date



Division of Federal Fiscal Compliance and Reporting Comparability Assurance Document (CAD) 2015-2016 School Year

Deadline: November 12, 2015

Submit the CAD via the GFFC Reports and Data Collections application in TEASE/TEAL. For instructions and additional guidance, visit the [Title I, Part A Comparability of Services Requirement](#) webpage of the TEA website.

Local Educational Agency (LEA) Information

Name of LEA County District Number

LEA Primary Contact Information

Name Phone Ext Email

Section A - Exempt Certification (complete Section A or Section B, not both); complete Section C.

☒ The LEA is exempt from the comparability testing requirement based on one of the following criteria:

- No Title I, Part A funding
- One campus per grade span group
- Multiple campuses in the grade span group yet no overlap of grade levels
- Overlap of grade levels but no Title I, Part A campuses in the grade span group
- Exclusion of campus or campuses results in no basis for comparison

Section B - Non-Exempt Certification (complete Section B or Section A, not both); complete Section C.

☐ The LEA is not exempt and has conducted testing to demonstrate compliance with the requirement in the submission of a Comparability Computation Form (CCF) for the grade spans indicated below:

- ☐ Elementary school campuses
- ☐ Middle school campuses
- ☐ High school campuses

Note to LEA: the Comparability Computation Form (CCF) is available in the GFFC Reports and Data Collections section of TEAL

☐ The data provided on the submitted CCF are accurate and represent the configuration of the LEA. The superintendent or chief operating officer of the Title I, Part A participating LEA has reviewed and approved the submission of the completed CCF.

Section C - LEA General Assurances and Signature (required by all LEAs)

☒ The LEA receiving Title I Funds assures it has established and implemented the following:

- An LEA-wide salary schedule
- A written policy to ensure equivalence among schools in teachers, administrators, and other staff
- A written policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies

☒ The signatory is the duly authorized superintendent or charter school operating officer for the LEA:

Name of Superintendent or Chief Operating Officer (typed)

Original Signature Date

CAD Example for Non-exempt LEA

Complete LEA Information

Complete Contact Info

Complete Section B

Complete Section C

Signature and Date



Division of Federal Fiscal Compliance and Reporting Comparability Assurance Document (CAD) 2015-2016 School Year

Deadline: November 12, 2015

Submit the CAD via the GFFC Reports and Data Collections application in TEASE/TEAL. For instructions and additional guidance, visit the [Title I, Part A Comparability of Services Requirement](#) webpage of the TEA website.

Local Educational Agency (LEA) Information

Name of LEA County District Number

LEA Primary Contact Information

Name Phone Ext. Email

Section A - Exempt Certification (complete Section A or Section B, not both); complete Section C.

☐ The LEA is exempt from the comparability testing requirement based on one of the following criteria:

- No Title I, Part A funding
- One campus per grade span group
- Multiple campuses in the grade span group yet no overlap of grade levels
- Overlap of grade levels but no Title I, Part A campuses in the grade span group
- Exclusion of campus or campuses results in no basis for comparison

Section B - Non-Exempt Certification (complete Section B or Section A, not both); complete Section C.

☒ The LEA is not exempt and has conducted testing to demonstrate compliance with the requirement in the submission of a Comparability Computation Form (CCF) for the grade spans indicated below:

- ☐ Elementary school campuses
- ☒ Middle school campuses
- ☐ High school campuses

Note to LEA: the Comparability Computation Form (CCF) is available in the GFFC Reports and Data Collections section of TEAL

☒ The data provided on the submitted CCF are accurate and represent the configuration of the LEA. The superintendent or chief operating officer of the Title I, Part A participating LEA has reviewed and approved the submission of the completed CCF.

Section C - LEA General Assurances and Signature (required by all LEAs)

☒ The LEA receiving Title I Funds assures it has established and implemented the following:

- An LEA-wide salary schedule
- A written policy to ensure equivalence among schools in teachers, administrators, and other staff
- A written policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies

☒ The signatory is the duly authorized superintendent or charter school operating officer for the LEA:

Name of Superintendent or Chief Operating Officer (typed)

Original Signature Date



Non-exempt LEAs

- LEA does not meet any exemption criteria
- Requirement to submit:
 1. Comparability Assurance Document (**CAD**) 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 employees





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:

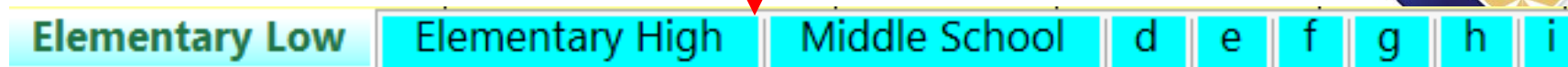
Reminders

Testing Tabs (a through i)

Excluded Campuses



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

Report grade span group

Enter Test 1, 2 , or 3 Input data

Form must contain at least two campuses. Enter current school year budget data. For further information, review the instructions				Grade Span Group [Elementary, Middle, or High]				Title I, Part A
								NonTitle I, Part A
								Title I, Part A, Comparable
				Middle Grade Span Group				Title I, Part A, Not Comparable
#	required Campus #	required Campus Name	required Title I, Part A or Skipped Campus? (enter Y for Yes leave blank for No)	required Campus Enrollment	Campus State/Local Expenditures	Campus Base Salaries for Non-Federal Instructional	Test 3 Input Campus Non Federal Instructional Staff FTE's	
Grade Span Totals				2,413	\$10,820,302	\$7,216,159	177	
1	043	Happy Middle	Y	767	\$3,564,834	\$2,522,218	61.34	
2	044	Joy Middle	Y	790	\$3,639,694	\$2,377,529	60.17	
3	045	Excel Middle		856	\$3,615,774	\$2,316,412	55.60	



Reviewing CCF Test Results

		"A" Section Test Results		
required Campus Name	required Title I, Part A or Skipped Campus? (enter Y for Yes leave blank for No)	TEST 1 Exp / Enroll	TEST 2 Base Sal / Enroll	TEST 3 Enroll / FTE's
	Grade Span Totals	3,801.63	2,435.48	16.94
Happy Middle	Y	yes	yes	yes
Joy Middle	Y	yes	yes	yes
Excel Middle				

Review "A" section if
Grade span group
contains
Title I, Part A/Skipped
and Non-Title
campuses
(**Y and blank**)

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

		90%	Grade Span (GS) Base	110%	90%	Grade Span (GS) Base	110%	90%	Grade Span (GS) Base	110%
		"B" Section Test Results								
		TEST 1			TEST 2			TEST 3		
required Campus Name	required Title I, Part A or Skipped Campus? (enter Y for Yes leave blank for No)	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
	Grade Span Totals		5,016.94			3,375.17			10.84	
Marvel Elementary	Y	yes	5,022.23	100.567%	yes	3,284.01	97.780%	yes	10.80	99.930%
Honey Elementary	Y	yes	5,229.86	104.724%	yes	3,569.79	106.289%	yes	10.21	94.411%
First Elementary	Y	yes	5,174.22	103.610%	NC	3,713.65	110.573%	yes	9.74	90.087%
Absolute Elementary	Y	yes	4,641.43	92.942%	NC	2,933.25	87.337%	NC	12.59	116.472%



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 Assurance Document or 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 CAD or the CCF.
8. Select Upload Document.





Contact Information

Texas Education Agency

Division of Federal Fiscal Compliance and Reporting

compliance@tea.texas.gov

(512) 463-9127



DIVISION OF
FEDERAL FISCAL COMPLIANCE
& REPORTING

Copyright Information

Copyright © Notice. The materials are copyrighted © and trademarked ™ as the property of the Texas Education Agency (TEA) and may not be reproduced without the express written permission of TEA, except under the following conditions:

1. Texas public school districts, charter schools, and Education Service Centers may reproduce and use copies of the Materials and Related Materials for the districts' and schools' educational use without obtaining permission from TEA.
2. Residents of the state of Texas may reproduce and use copies of the Materials and Related Materials for individual personal use only without obtaining written permission of TEA.
3. Any portion reproduced must be reproduced in its entirety and remain unedited, unaltered and unchanged in any way.
4. No monetary charge can be made for the reproduced materials or any document containing them; however, a reasonable charge to cover only the cost of reproduction and distribution may be charged.

Private entities or persons located in Texas that are not Texas public school districts, Texas Education Service Centers, or Texas charter schools or any entity, whether public or private, educational or non-educational, located outside the state of Texas MUST obtain written approval from TEA and will be required to enter into a license agreement that may involve the payment of a licensing fee or a royalty.

For information contact: Texas Education Agency, 1701 N. Congress Ave., Austin, TX 78701-1494; email: copyrights@tea.state.tx.us.