A background image showing a female teacher with dark hair and glasses, wearing a white shirt, sitting on the floor and reading a book to a group of young students. The students are also sitting on the floor, and the scene is set in a classroom with bookshelves in the background.

# Title I, Part A Comparability of Services General Overview

## Every Student Succeeds Act (ESSA)

Texas Education Agency  
Federal Fiscal Compliance and Reporting Division



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# Topics

- What is Title I, Part A Comparability of Services (Comparability)?
- Comparability of Services requirement
- Exempt School Systems
- Exemption criteria
- Exemptions illustrated
- Comparability Assurance Document (CAD)



# Topics (continued)

- Non-exempt School Systems
- Comparability testing steps
- Grade span grouping considerations
- Completing the Comparability Computation Form (CCF)
- Reviewing CCF test results
- GFFC Reports and Data Collections
- Contact Information



# What Is Title I, Part A Comparability of Services (Comparability)?

- Annual fiscal compliance requirement for school systems receiving Title I, Part A 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 grant funds



# Comparability of Services Requirement

Public Law 115-64, Section 1118(c), requires school systems to:

- Annually demonstrate comparable services at all campuses
- Annually provide assurance of equivalence
- Develop procedures for compliance
- Update and maintain the records annually



# Comparability of Services Requirement (2)

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 a school system 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 (3)

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 webpage](#).



# Comparability of Services Requirement (4)

Requirement: Annually provide assurance of equivalence

All school systems receiving Title I, Part A funds must establish:

- a school-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 (5)

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 webpage](#).



# Comparability of Services Requirement (6)

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 the school system makes adjustments in Title I, Part A schools that are not comparable.



# Comparability of Services Requirement (7)

Requirement: Update and maintain the records annually

- School system-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 School Systems

A school system is exempt if it meets at least one of the following 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

**Important:** Exempt School Systems **must** submit the Comparability Assurance Document (CAD), including an assurance that the school system has established and implemented districtwide salary schedule and policies related to equal resources among schools in order to claim exemption.



# Exemptions Illustrated: #2 One Campus Per Grade Span Group

- In the example below the school system is exempt from Comparability testing as there is one campus per grade span group.

Grades at Campus	Grade Span Group	Title I, Part A or Skipped
PK–5	Elementary 1	Yes
6–8	Middle School 1	Yes
9–12	High School 1	Yes



# Exemptions Illustrated: #3 Multiple Campuses Per Grade Span Group, Yet No Overlap of Grades Levels

- In the example below the school system is exempt from Comparability testing as while there are multiple campuses per grade span group, there is no overlap of grade levels.

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





# Exemptions Illustrated: #4 Overlapping Grade Levels But No Title I, Part A or Skipped Campuses in Grade Span Group

- In the example below the school system is exempt from Comparability testing as while there is an overlap of grade levels in Middle Schools 3 and 4, neither campus is a Title I, Part A or skipped campus (and the Elementary Schools 5 and 6 do not have overlapping grades, and there is only one high school campus).

Grades at Campus	Grade Span Group	Title I, Part A or Skipped
K–2	Elementary 5	Yes
3–5	Elementary 6	Yes
6–8	Middle school 3	No
6–8	Middle school 4	No
9–12	High school 3	No



# Exemptions Illustrated: #5 Excluding One or More Campuses Results in No Basis for Comparison

- In the example below the school system is exempt from Comparability testing as while there is an overlap of grade levels in Middle Schools 5 and 6, the enrollment of Middle School 6 is more than twice that of Middle School 5, so both campuses are excluded from testing. In addition, there is only one Elementary School and one High School.

Grades at Campus	Grade Span Group	Enrollment
EE-05	Elementary 7	100
06-08	Middle School 5	95
06-08	Middle School 6	340
09-12	High School 4	570



# Comparability Assurance Document

## Exempt School Systems

- Submit a completed CAD through the online survey system
- From the Type of Certification pull-down list, select: “Exempt”

## Non-Exempt School Systems

- Submit a completed CAD through the online survey system
- From the Type of Certification pull-down list, select: “Non-Exempt”



# Non-exempt School Systems

If a school system does not meet any exemption criteria they must submit **both** of the following:

1. Comparability Assurance Document (**CAD**) survey that assures that the school system 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)

## 2. Determine grade span groupings\* to be tested:

- Elementary campuses
- Middle school campuses
- High school campuses

\*School system may be eligible to subdivide a grade span group into high-enrollment and low-enrollment grade span groupings.



# Comparability Testing Steps (3)

## 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)

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





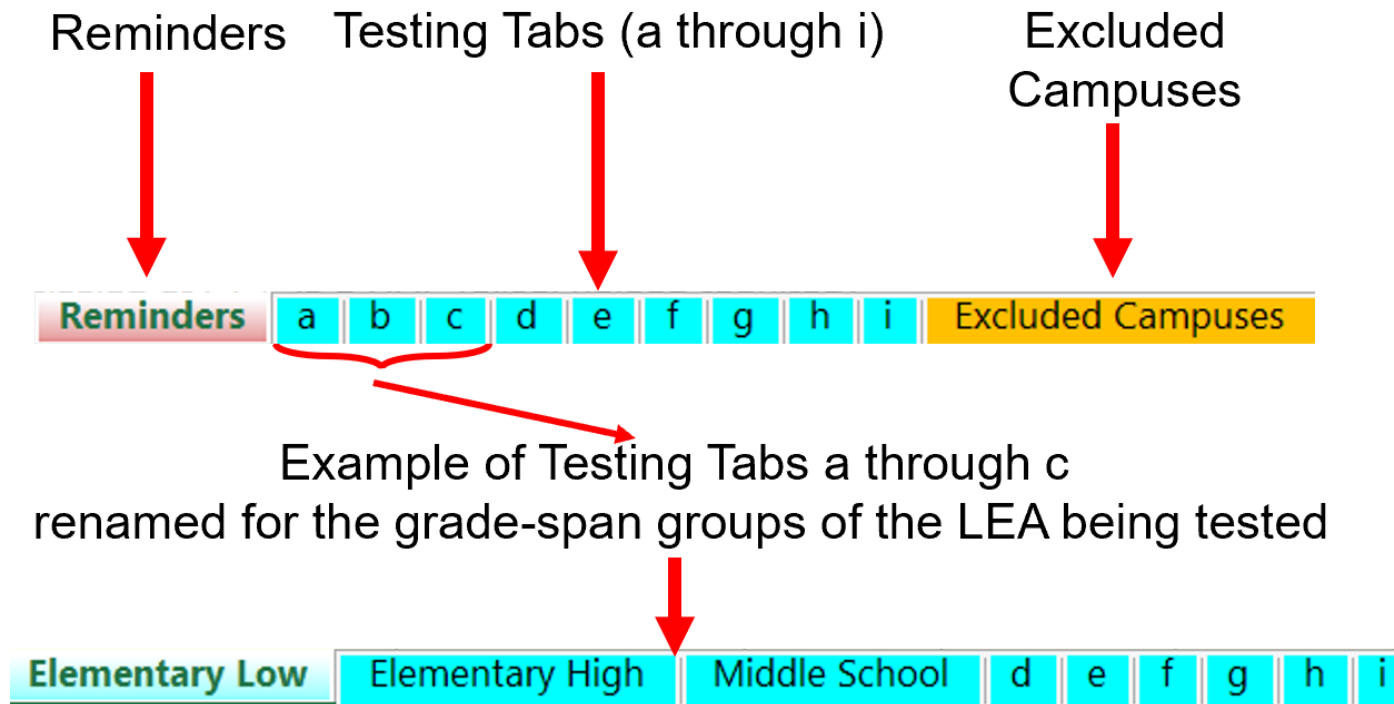
# Grade Span Groupings Considerations

- Subdivided Grade Span Group (High and Low Enrollment)
  - If a school system has a grade span grouping with a substantial difference in enrollment between the largest and smallest campus (highest enrollment campus has at least twice the enrollment of the lowest enrollment campus), the school system 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 school system should place the campus in the grouping that most accurately represents the makeup of the campus (in the majority grade span group).



# Completing the Comparability Computation Form (CCF)

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



# Completing the CCF Testing Tab

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
				Middle Grade Span Group			NonTitle I, Part A
				All tests	Test 1 Input	Test 2 Input	Title I, Part A, Comparable
				Test 3 Input			
#	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	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)



# Reviewing CCF Test Results (2)

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								
required  Campus Name	required  Title I, Part A or Skipped Campus? (enter Y for Yes, leave blank for No)	TEST 1			TEST 2			TEST 3		
		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.
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.
8. Select Upload Document.



# Contact Information

Federal Fiscal Compliance and Reporting Division

[compliance@tea.texas.gov](mailto:compliance@tea.texas.gov)

