

DATE:	September 25, 2025
SUBJECT:	Upcoming Deadline: 2025-26 Title I, Part A Comparability of Services Requirement
CATEGORY:	Compliance and Funding Implications
NEXT STEPS:	School systems to submit Comparability Assurance Documents (CADs) and Comparability Computation Forms (CCFs) by 11/14/25, as applicable

Each year, school systems that receive Title I, Part A funding are required to document their compliance with the Title I, Part A Comparability of Services requirement under the Every Student Succeeds Act (ESSA). All school systems that receive Title I, Part A funding are required to complete and submit the CAD survey to the Texas Education Agency (TEA). School systems that do not meet one of the defined exemption criteria must also complete and submit the CCF to TEA.

The CAD is available for completion and submission electronically through an online survey.

The CCF, along with instructions for completing/submitting that form and the instructions for completing/submitting the CAD survey, are available on the Title I, Part A Comparability of Services page of the TEA website and through the Grants and Federal Fiscal Compliance Reports and Data Collections (GFFC Reports) secure application, accessible through TEAL. The deadline for submitting the CAD and CCF, if applicable, is November 14, 2025.

Background

Under ESSA, Section 1118(c), known as the comparability of services requirement, school systems may receive Title I, Part A funds only if state and local funds will be used in Title I, Part A campuses to provide services that are at least comparable to the services provided in non-Title I, Part A campuses. If the school system serves all its campuses with Title I, Part A funds, it must use state and local funds to provide services that, taken as a whole, are substantially comparable in each Title I, Part A campus.

For more information, refer to the *Title I, Part A Comparability of Services Guidance Handbook*, available on the [Title I, Part A Comparability of Services](#) page.

Comparability of services is one of three federal fiscal accountability requirements applicable to school systems that receive Title I, Part A funding. School systems that receive Title I, Part A funding are also required to comply with maintenance of effort and supplement, not supplant requirements.

Comparability Computation Form (CCF) Exemption

A school system is exempt from completing/submitting the CCF if it meets any of the following criteria:

- The school system has only one campus per grade-span group.

- The school system has multiple campuses in the grade-span group, but no overlap of grade levels.
- The school system has an overlap of grade levels, but no Title I, Part A campuses in the grade-span group.
- The school system uses exclusion criteria to exclude one or more campuses, resulting in no basis for comparison.

Note: Grade-span groups should match the basic organization of schools in the school system. For example, a school system with elementary, middle and high school campuses would have three grade-span groups. If there is any overlap in grades, the campuses with the same grades should be tested in the same grade-span group. If there is no overlap in grades, the campuses may be separately tested.

An exempt school system *is required* to complete and submit only the CAD via the online survey. For a detailed description of the exemption criteria and the basis for excluding campuses, refer to the *Title I, Part A Comparability of Services Guidance Handbook*, available on the Title I, Part A Comparability of Services page of the TEA website.

Completing the Comparability Computation Form (CCF)

School systems that do not meet any of the exemption criteria listed above are required to conduct comparability of services testing by completing the CCF. The school system must use its 2025–26 *current school year budgeted data* to complete the CCF.

Refer to the *Title I, Part A Comparability of Services Guidance Handbook*, available on the Title I, Part A Comparability of Services page of the TEA website, for instructions on accessing, completing, and submitting the CCF to GFFC Reports within the TEAL application.

Deadline for completing the CAD and CCF

- All school systems that receive Title I, Part A funds must complete/submit the CAD via the online survey by Friday, November 14, 2025.
- School systems that do not meet any of the allowable exemption criteria must also complete and submit the CCF to GFFC Reports by Friday, November 14, 2025.

For Further Information

For information on the comparability of services requirements and detailed instructions on how to complete the CAD and CCF, refer to the resources posted on the Title I, Part A Comparability of Services page.

With any further questions, email the Federal Fiscal Compliance and Reporting Division at compliance@tea.texas.gov.