Texas Education Agency

To the Administrator Addressed

Commissioner Mike Morath

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DATE:	**October 1, 2026**
SUBJECT:	**Upcoming Deadline: 2026–2027 Title I, Part A Comparability of Services Requirement**
CATEGORY:	**Compliance and Funding Implications**
NEXT STEPS:	**School systems must submit Comparability Assurance Documents (CAD) and, if applicable, the Comparability Computation Forms (CCF) by November 13, 2026**

Each year, school systems that receive Title I, Part A funds must 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 funds must complete and submit the CAD to the Texas Education Agency (TEA). School systems that do not meet any of the defined exemption criteria must also complete and submit the CCF to TEA.

The CAD is available for completion and submission through the 2026–2027 CAD Survey.

The deadline for submitting the CAD and CCF (if applicable) is **November 13, 2026**.

The CAD Survey, CCF, and instructions 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.

Background

Under Section 1118(c) of the Elementary and Secondary Education Act of 1965, as amended by ESSA (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, the school system must use state and local funds to provide services that, taken as a whole, are substantially comparable in each Title I, Part A campus.

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

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 Computation Form (CCF) Exemption

A school system is exempt from completing and 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 overlap of grade levels but no Title I, Part A campuses in the

grade-span group.
- The school system uses allowable exclusion criteria to exclude one or more campuses, resulting in no basis for comparison.

Grade-span groups should match the basic organization of campuses 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 2026–2027 CAD 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 **2026–2027 current school year budget 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 and submit the 2026–2027 CAD Survey by **Friday, November 13, 2026**.
- 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 13, 2026**.

For Further Information

For information on the comparability of services requirement 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.

If you have questions, please contact the FFCR Division at compliance@tea.texas.gov.