

Comparability

ESSA Sec. 1118(c)

Comparability of Services

Comparability

- LEA may receive Title 1 Part A funds only if it uses State and local funds to provide services in Title 1 schools that are at least comparable to services provided in non Title 1 schools
- All schools served with Title 1 funds?
 - use State and local funds to provide services that are substantially comparable in each Title 1 school
- So there are two 'levels' of Comparability

Comparability (2)

- at least comparable: Title 1 and non Title 1 schools
 - ‘one bookend’
 - Title 1 student/instructional staff/salary ratio does not exceed 110% of the average of non Title 1 schools
- substantially comparable: all Title 1 schools
 - ‘two bookends’
 - Title 1 student/instructional staff/salary ratio is at least 90% and does not exceed 110% of the average student/instructional staff/salary ratio

Comparability (3)

- Prerequisite for receiving Title 1 Part A funds
- Annual allocations thus ANNUAL requirement
 - Collected with Consolidated Grant application via Grant Management System

Two Funding Streams



- Title 1A funds intended for *extra* resources to poorly performing students above and beyond that provided through state and local funding
- If Title 1A money spent on the basics, students won't receive extra resources the law intended them to have

YES!

- 1 or more Title 1 schools with >100 students in grade span with 2 or more schools

NO!

- LEA does not take Title 1A funding
- LEA does take Title 1A funding **BUT**
 - only one school per grade span (EMH)
 - 2 or more schools in grade span but any with 100 or fewer students

Criteria for Meeting Comparability

Under statute, a LEA has met requirement via:

Written Assurance

- district-wide salary schedule
- policy to ensure equivalence among schools in teachers, administrators, staff
- policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies

KEEP RECORDS

Other Measures to Determine Comparability

LEA *may also* meet the requirement using other measures for determining compliance such as:

**Only
one is
needed**

- Student/instructional staff ratios
- Student/instructional staff salary ratios
- Expenditure per pupil
- Resource allocation plan – poverty, English proficiency, disability, etc.

WDE has flexibility in establishing reasonable variances with comparisons between Title 1 and non Title 1 schools



- ▶ Student/instructional staff/salary ratio does not exceed 110%
- ▶ Student/instructional staff/salary ratio is at least 90%

Instructional Staff - FTE

Include full and part-time classroom teachers paid from State and local funds

▫ Direct instructional services: music, art, physical education, math, reading, guidance counselors, speech therapists, librarians, social workers, psychologists, special education, paraprofessionals

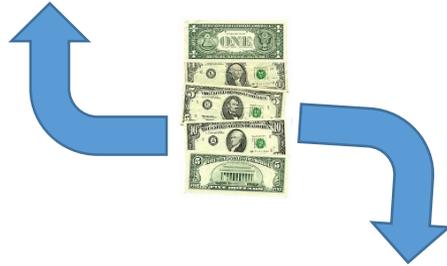
Exclude

- Any federally funded FTE *not* paid with Title 1 funds.
- Aides not involved in providing instructional support

BE CONSISTENT!!

If all schools in a grade span are Title 1, each must be *substantially comparable* to the average student-teacher ratio





Not all schools in a grade span are Title 1? Each must be *at least comparable* to the average non Title 1 student-teacher ratio

- Exclude staff salary differentials for years of employment
- Exclude unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year
- Exclude schools with fewer than 100 students
- Determine: district-wide or a grade-span basis
- **SAME DAY COUNT! YOU PICK THE DAY!**

When determining compliance for Comparability

LEA may exclude State and local funds expended for:

- Language instruction educational programs
- Excess State and local costs of providing services to children with disabilities as determined by the LEA

Remember, you are calculating:

→Comparability of Title 1 schools **not**
non Title 1 schools

BUT

→analyze **non** Title 1 school ratios/expenditures
to calculate comparability of Title 1 schools

THUS

→two funding streams: review use of *State and local funds* to effectively receive Title 1A funds

7 of 11 Elementary Schools receive Title 1 Services

1

7
Schools

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Title I Elementary Schools					
Beaufort Elementary	KG - 5	528	70.2	7.5	YES
Broad River Elementary	KG - 5	510	49.4	10.3	YES
Davis Elementary	KG - 5	417	38.7	10.8	YES
Shanklin Elementary	KG - 5	726	59	12.3	YES
Port Royal Elementary	KG - 5	189	16	11.8	YES
St. Helena Elementary	KG - 5	808	58	13.9	YES
Shell Point Elementary	KG - 5	673	60	11.2	YES
Non-Title I Elementary Schools					
Hilton Head	KG - 5	1,764	114.5	15.4	
Lady's Island	KG - 5	757	70.0	10.8	
MC Riley	KG - 5	1,005	88.0	11.4	
Mossy Oaks	KG - 5	484	42.0	11.5	
Total		4,010	314.5	12.8	
110% of Student/FTE ratio for non-Title I schools *				14.1	

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Schools

In order to be comparable, Title 1 student/staff ratio cannot exceed **14.1**

All Title 1 Schools

School District as a Whole					
School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Davis School	PK - 5	371	25.6	14.5	Yes
Devers School	PK - 5	483	33.2	14.5	Yes
Edgar Fahs Smith MS	6 - 8	818	50	16.4	Yes
Ferguson School	PK - 5	484	31	15.6	Yes
Goode School	PK - 5	682	42.4	16.1	Yes
Hannah Penn MS	6 - 8	1,174	64	18.3	No
Jackson School	PK - 5	423	30	14.1	No
McKinley School	PK - 5	482	29.8	16.2	Yes
William Penn HS	9 - 12	1,737	110	Exempt	
Total		6,654	416	16.0	
90% of Student/Instructional Staff Ratio *				14.4	
110% of Student/Instructional Staff Ratio *				17.6	

Comparable - student/staff ratio falls in between 14.4 and 17.6

Recall, if all schools are receiving Title 1 funds, State and local funds must be *substantially comparable* between schools

Elementary Schools						
Davis School	PK - 5	371	25.6	14.5	Yes	
Devers School	PK - 5	483	33.2	14.5	Yes	
Ferguson School	PK - 5	484	31	15.6	Yes	
Goode School	PK - 5	682	42.4	16.1	Yes	
Jackson School	PK - 5	423	30	14.1	Yes	
McKinley School	PK - 5	482	29.8	16.2	Yes	
Total		2,925	192	15.2		
90% of Student/Instructional Staff Ratio *						13.7
110% of Student/Instructional Staff Ratio *						16.7

Comparable: student/staff ratio falls in between 13.7 and 16.7

Middle Schools					
School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Edgar Fahs Smith MS	6 - 8	818	50	16.4	Yes
Hannah Penn MS	6 - 8	1,174	64	18.3	Yes
Total		1,992	114	17.5	
90% of Student/Instructional Staff Ratio *					15.8
110% of Student/Instructional Staff Ratio *					19.3

Comparable: student/staff ratio falls in between 15.8 and 19.3

NOTE: only one high school thus no need to determine comparability for that school!

Elementary Schools

Title 1 Schools	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Desert View Elementary	K-4	283	24.9	11.4	Yes
Desert Elementary	K-6	25	EXEMPT		
Farson-Eden Elementary	K-6	60	EXEMPT		
Northpark Elementary	K-4	283	23.8	11.9	Yes
Overland Elementary	K-4	248	19.9	12.5	Yes
Stagecoach Elementary	K-4	309	22.4	13.8	Yes
Walnut Elementary	K-4	313	22.8	13.7	Yes
Westridge Elementary	K-4	331	28.4	11.7	Yes
Non Title 1 Schools					
Sage Elementary	K-4	307	22.1	13.9	
Total		307	22.1	13.9	

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Schools

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School

110% of average for non Title 1 schools: $13.9(1.1) = 15.3$

To be comparable, the student/instructional staff ratio for each Title 1 school may not exceed 15.3

Elementary Schools					
	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Title 1 Schools					
JES	K-5	275	30.3	9.08	Yes
CES	K-5	335	31.0	10.81	Yes
MMES	K-5	485	38.5	12.60	Yes
Non Title 1 Schools					
WES	K-5	208	18.0	11.56	
JHMS	K-6	680	57.3	11.87	
JHHS	K-5	677	55.1	12.29	
		1565	130.4	12.00	

110% of average for non Title 1 schools: $12.0(1.1) = 13.2$

To be comparable, the student/instructional staff ratio for each Title 1 school may not exceed 13.2

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Schools

Title 1 Schools	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Bar Nunn	K-5	276	14.00	19.71	Yes
Cottonwood	K-5	320	16.00	20.00	Yes
Evansville	K-5	320	16.00	20.00	Yes
Lincoln	K-5	418	21.00	19.90	Yes
Midwest	K-5	124	6.00	20.67	Yes
Journey	K-5	382	19.00	20.11	Yes
Pineview	K-5	320	16.00	20.00	Yes
Non Title 1 Schools					
Crest Hill	K-5	320	16.00	20.00	
Ft. Caspar	K-5	444	22.00	20.18	
Manor Heights	K-5	320	16.00	20.00	
Oregon Trail	K-5	344	17.00	20.24	
Paradise Valley	K-5	462	23.00	20.09	
Park	K-5	368	18.00	20.44	
Poison Spider	K-5	320	16.00	20.00	
Sagewood	K-5	320	16.00	20.00	
Southridge	K-5	320	16.00	20.00	
Summit	K-5	444	22.00	20.18	
Verda James	K-5	444	22.00	20.18	
Woods	K-5	120	6.00	20.00	
Total	K-5	4004	201.00	19.92	

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Schools

110% of average for non Title 1 schools: $19.92(1.1) = 21.91$

	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Title 1 Schools					
Midwest	6-8	52	6.00	8.67	Yes
Midwest	9-12	51	5.76	8.85	Yes
Non Title 1 Schools					
CCA	6-8	419.5	25.00	16.78	
Centennial	6-8	791	47.00	16.83	
CY	6-8	772.5	45.50	16.98	
Dean Morgan	6-8	891.5	53.00	16.82	
Poison Spider	6-8	73	4.50	16.22	
Woods	6-8	64	4.00	16.00	
Total	6-8	3011.5	179.00	16.82	
KWHS	9-12	1775.5	98.50	18.03	
NCHS	9-12	1659	92.00	18.03	
Total	9-12	3434.5	190.50	18.03	

Title 1 Schools	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Afton Elementary	K-3	449	32.11	13.98	Yes
Cokeville Elementary	K-6	131	10.05	13.03	Yes
Thayne Elementary	K-3	369	28.00	13.18	Yes
Etna Elementary	4-6	278	20.43	13.61	Yes
Osmond Elementary	4-6	345	23.47	14.70	Yes
		1,572	114.06	13.78	
				90% of Student/Instructional Staff Ratio	12.40
				110% of Student/Instructional Staff Ratio	15.16

Comparability is reached here!!

POVERTY > 50%

High Poverty Title 1 Schools	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	F/R Lunch Count	F/R %	Comparable
Trail Elementary	3-5	274	15	18.27	162	59.12%	Yes
Lincoln Elementary	K-2	259	16	16.19	141	54.44%	Yes
		533	31	17.23			
90% of student/instructional staff ratio				15.51			
110% of student/instructional staff ratio				18.95			
POVERTY < 50%							
Low Poverty Title 1 Schools							
Lingle/Ft. Laramie	K-5	136	9	15.11	56	41.18%	Yes
Southeast Elementary	K-6	118	7	16.86	37	31.36%	Yes
		254	16	15.99			
90% of student/instructional staff ratio				14.39			
110% of student/instructional staff ratio				17.59			

Per-Pupil Allocation

INCLUDE:

- All educational and instructional resources purchased with State and local funds
 - Salaries/benefits for classroom teachers, librarians, instructional coaches, paraprofessionals and aides, principal, etc.
 - Curriculum materials, educational software, field trip costs

Per-Pupil Allocation

EXCLUDE:

- Transportation and cafeteria costs
- Resources and materials purchased with funds other than State and local
- Office staff indirectly involved in educational activities: secretaries, administrative assistants, counselors, nurses
- After-school or extracurricular activities: sports, clubs, newspaper
- Operating costs: HVAC, utilities, building lease

QUIZ!!

Every fall, a local educational agency must make a comparability report to check whether its Title I schools and its non-Title I schools are receiving comparable services through state and local funding. A local educational agency has a Title I K-5 elementary school on targeted assistance, a 6-8 middle school on the Title I schoolwide program, and a non-Title I high school. Is the LEA required to do a comparability report?

Know The Rules

- **A: Yes.** Comparability is a must for compliance.
- **B: Yes.** But only compare the middle school to the high school because neither are elementary schools.
- **C: No.** Comparisons are based on grade spans or a school-by-school basis.

- **Is the LEA required to do a comparability report?**
- **The correct answer is: C.** No, because comparisons are based on grade spans or a school-by-school basis.
- In other words, compare apples to apples, but not to oranges.
- This LEA would not be able to compare similar schools or grade spans. **The law exempts LEAs with only one building or school for each grade span.** Elementary and Secondary Education Act Section 1118(c)(2)(B)(4).
- An LEA with three elementary schools, one middle school, and one high school would be required to compare its three elementary schools but not its middle or high school.
- **A is incorrect.** Exemptions are allowed when comparisons cannot be made within grade spans.
- **B is incorrect.** Middle and high schools are not in the same grade spans and cannot be compared.

Wrap-Up

- Prerequisite
- Annual requirement
- Funding streams
- 100
- Choose your measure  **Be consistent!**
- Will review 2018-2019 Comparability documents via GMS and coordinate with you
- Audio available upon request
- Slides on website?

Contact

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