

Determining Comparability

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SCHOOL IMPROVEMENT & DISTRICT EFFECTIVENESS



Purpose



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This session will provide an overview of the requirements for comparability under the Elementary and Secondary Education Act of 1965 (ESEA) and the Title I, Part A data requirements for the comparability application.

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Comparability Overview

What is Comparability?



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Comparability is one indication that an LEA is using Title I funds to supplement and not supplant other funding sources. Meeting comparability means that the LEA provides services in the Title I schools that are at least comparable to services the LEA provides in the non-Title schools.

Why Must an LEA Demonstrate Comparability?



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Comparability is a requirement under section 1120A(c) of the ESEA. Section 1120A(c) provides that an LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. If the LEA serves all of its schools with Title I funds, the LEA must use state and local funds to provide services that, taken as a whole, are substantially comparable in each Title I school.
[Section 1120A(c)]

How Often Must an LEA Demonstrate Comparability?



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Demonstrating comparability is a prerequisite for receiving Title I, Part A funds.

Because Part A allocations are made annually, comparability is an **annual** requirement.

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What are the Consequences for Failure to Meet Comparability?



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- When an LEA fails to demonstrate comparability the consequences are situation specific. However, it is important to understand what the wide range of consequences might be:
 1. The LEA might have to move teachers and/or paraprofessionals from one school to another school to achieve comparability.

What are the Consequences for Failure to Meet Comparability?



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2. The LEA might have to hire teachers and/or paraprofessionals to achieve comparability.
3. The LEA might have to repay funds to Georgia Department of Education. The repayment of funds must be made with a non-federal fund source.



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Important Note

Because demonstrating comparability is a prerequisite for receiving Title I, Part A funds, there is **no waiver** for the comparability requirement.

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Data Elements Used by the On-line Comparability Application

Required Data Elements for Comparability



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- Certified/Classified Personnel Information (CPI) codes for staff at each school in the LEA
 - Staff at each school (including charter schools and residential treatment facilities that are designated as schools) in the LEA must be coded with the correct job code and fund code.
 - Correct data entry around these codes is vital to comparability since both the job code and the fund code determine how staff are counted for comparability purposes.

Required Data Elements for Comparability



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- Full-Time Equivalent (FTE) data for each student at each school in the LEA
 - Data related to each student at each school (including charter schools and residential treatment facilities that are designated as schools) in the LEA must be coded correctly. Data elements include but are not limited to:
 - Grade level
 - FTE instructional segments

Garbage In – Garbage Out



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Having an on-line comparability application will not eliminate errors in comparability caused by inaccurate data sources.



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Data Accuracy

- It is critical that a method for verifying the accuracy of the data entered be established to ensure that the LEA meets compliance for comparability.
- Remember, if inaccurate data is entered into any of the applications from which the on-line comparability application pulls data, the resulting comparability report will also be inaccurate.



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Data Accuracy

- Comparability reporting presents an opportunity for the Title I Director and CPI Coordinator to work together in assuring the accuracy of staff coding.
- The most advantageous time to answer any questions about where staff members should be funded is before the CPI report is submitted.
- Ensure that all staff members are included on the CPI.
- Some instances occurred where paraprofessionals were not counted.



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Data Accuracy

- Ensure that staff serving more than one school are counted appropriately at each school.
- Check the funding codes of federally paid staff to ensure the correct codes are used.
- Review the previous year's comparability report for problem areas or near-problem areas.
- Consider a "trial run" early in the school year using the old Excel spreadsheets to identify possible problem areas.

Staff Members to be Included in Comparability Calculations



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- Core Subject Teachers
- Music Teachers
- Art Teachers
- Physical Education Teachers
- Instructional Paraprofessionals

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Staff Members to be Included in Comparability Calculations



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- Guidance Counselors (Optional)
- Speech Therapists (Optional)
- Media Specialists (Optional)
- Optional in terms that the district may or may not deem these positions as instructionally focused; thus the district, once it determines status, must apply the status consistently across all schools. In other words, if these positions are counted at one school in the district, then the position must be counted at all schools in the district.

Staff Members to be Excluded in Comparability Calculations



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- Staff paid with federal funds
- Principals
- Assistant Principals
- Custodians
- Cafeteria personnel
- School nurses
- Security personnel

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Staff Members to be **Excluded** in Comparability Calculations

- **Prekindergarten teachers**
- **Prekindergarten paraprofessionals**
- **Secretaries**
- **Non-instructional paraprofessionals**
- **School Social Workers**
- **Psychologists**

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CPI Codes Included



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- 085
- 100 – 115
- 118
- 120 – 121
- 123 – 124
- 130 – 133
- 135
- 142
- 144
- 146 – 150
- 156 – 171
- 300 – 301
- 397
- 400 – 402
- 405 – 408
- 413 – 414
- 435 -437
- 439 – 441
- 445
- 480 - 481

Staff Adjustments to Meet Comparability



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- Any adjustments made after the comparability report is run will require that evidence showing that changes have been made be provided to an Title I Education Program Specialist. Upon acceptance of the evidence, the Title I Education Program Specialist will revise the data on the Comparability Reporting site.
- This is referred to on the reporting site as Self-Reported Data.

Example: A School Serving as a Special Education Center



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- Springhill Elementary School houses a special education center for children with autism.
- No other school in the district provides services for autistic children, they all come to Springhill.
- There are four Special Education teachers providing services to these children.
- For comparability purposes, the number of children receiving services for autism would be returned in number only to their "home" school's eligible attendance areas (schools where the students are zoned).
- The four teachers providing services for these special needs children would be prorated to the "home" school of the students they teach.
- Documentation is attached to the site and approved by the Title I Education Program Specialist using the Self-Reported section of the application.

The LEA Comparability Reporting On-Line Application



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Admin Configuration

Title I Education Program Specialists:

- Assign each districts schools to the proper grade span.
- Load all schools to districts where all schools are Title I.



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Admin Configuration

High/Low Poverty:

- High poverty equals 60-percent and above.
- Low Poverty equals 59.9-percent and below.

Enrollment Size:

- The enrollment of the largest school in a district's grade span must be at least twice as large as the enrollment of the smallest school in that grade span.

Comparability Reporting Tab



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Steps for the LEA to run comparability:

- Login to the GaDOE Portal.
- Select the Title I Comparability fly-out from the Site Navigation menu.
- Select LEA Comparability Reporting.
- On the Contact Info tab, complete all required fields indicated by an *.

Note: after entering information on any page, make sure you click the Save button.

Comparability Reporting Tab



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Steps for the LEA to run comparability:

- On the Enrollment Size tab, if your district has large and small schools in a grade span according to the large/small definition, check the box.

Note: after entering information on any page, make sure you click the Save button.

Comparability Reporting Tab



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Steps for the LEA to run comparability:

- On the Comparability Reporting tab, click the Run Comparability button.
- Click the Submit button.
- The Superintendent will receive an email that the comparability report is ready for review.
- The Superintendent should login in to the portal, go to the comparability application and click Submit.

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Comparability Reporting Tab



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Comparability Methods for All Title I or Title I
compared to Non-Title I:

- District as a Whole
- Grade Span
- Enrollment Size
- High Poverty/Low Poverty
- Limited Low Poverty

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Comparability Reporting Tab



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- When an LEA is exempt for meeting the comparability requirement, an exemption must be completed after completing the contact information.
- The submitter/coordinator must complete the form by checking the Coordinator box and then checking the box beside the reason the district is exempt (Hint: the reason will be "The LEA has only one school per grade span").
- The Superintendent must click the box beside Superintendent and click Submit on this form.

Districts Not Meeting Comparability



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- When a district does not meet the comparability requirement for all schools in the district, corrections to staffing must be made immediately.
- The district should consult with their Title I Education Program Specialist to agree on proper staffing adjustments.
- There may be instances where certain may be excluded if approved by the Title I Education Program Specialist.

Districts Not Meeting Comparability



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- Once the adjustments have been implemented, documentation supporting the changes must be uploaded to the Comparability Reporting Web site.
- After it is determined that the changes are acceptable, and documentation has been uploaded, the Title I Education Program Specialist makes manual changes using the Self-Reported Data option.

Caution: Do not make changes to staff without keeping the Title I Education Program Specialist informed each step of the way.

Reminder



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- Adjustments of a school's staff should be made:
 - Before the start of the school year.
 - Before CPI data is finalized and submitted.
 - Before the on-line comparability report is run.
- Districts should ensure that all schools are comparable July 1 of each school year.
- Never wait until the December reporting date to review the staffing status of schools.
- It is preferable to move/add staff in July, not December.

Meeting Comparability through the Resource Allocation Process



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- A district may choose to use the district approved resource allocation process to meet the comparability requirement.
- This process involves the review of your resource allocation plan by the GaDOE's Title I Education Program Specialist, Program Managers and Director.
- This process may also involve the review of the district's resource allocation plan by the U.S. Department of Education (US ED).
- This process must be begun one year prior to the district wishing to use a district approved resource allocation plan to meet comparability.
- The district must still run the GaDOE On-line Comparability Report as a comparison.
- The district has an obligation to provide supporting documentation that all of the resources available to the district are provided in an equitable manner to all of the schools in the district.

Meeting Comparability through the Resource Allocation Process



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- A districtwide resource allocation plan is based on student characteristics such as poverty, limited English proficiency, or disability, etc. as is allowed through the section 1120A(c) of the Elementary and Secondary Education Act of 1965 (ESEA) which provides that an LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds.

Meeting Comparability through the Resource Allocation Process



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- Due to the requirement that an LEA must develop procedures for complying with the comparability requirements [Section 1120A(c)(3)], a district must ensure that these procedures are in writing and, should, at a minimum:
 - Include a timeline for demonstrating comparability.
 - Include the identification of the office responsible for making comparability calculations.
 - Include the measure and process used to determine whether schools are comparable.
 - Include how and when the district makes adjustments in schools that are not comparable.

Questions

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