



Title I Comparability Report

Why must comparability be determined?

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)]

When must comparability be determined?

Determining comparability is an annual requirement and this report is to be based on current fiscal year data. Reports are to be submitted to DPI no later than November 1, 2011.

How is comparability reported?

The online Comparability Report is available for use for the 2011-2012 school year. Some districts may find that in order to determine comparability with one of the less frequently used options, they may still need to use the paper document found at <http://dpi.wi.gov/forms/doc/f1753.doc>. Such districts must still open the online application, complete the contact information, indicate that they will be submitting paper comparability forms manually, and complete the submission process.

Where is the more in-depth information on comparability requirements?

The US Department of Education's non-regulatory guidance on Title I Fiscal Issues, including comparability, is found at <http://www.ed.gov/programs/titleiparta/fiscalguid.doc>.

What are the steps in completing the online *Title I Comparability Report*?



1. The district must complete and submit the online *ESEA Consolidated Application* (<https://www2.dpi.state.wi.us/esea>) **before** the online *Title I Comparability Report* can be completed. Information from the application is imported into the comparability form.
2. Use the same district ID and password as are used for the *ESEA Consolidated Application* and the *ESEA Consolidated End-of-Year Report*.
3. If the district is exempt from determining comparability a screen message will inform the district of their exemption. This determination is based on information from the current year ESEA Consolidated Application. Districts exempt from comparability requirements should print this exemption page for your files and exit report.
4. If not exempt, enter contact information for at least a primary contact for the *Title I Comparability Report*. You may also enter information on a secondary contact.
5. Grade spans are defined as elementary (K-5), middle (6-8) and high (9-12). Districts with both Title I and non-Title I schools at the same grade span must first complete the screen for non-Title I schools. This establishes the baseline for comparison with Title I schools. A district can demonstrate comparability in any one of the three options for comparison purposes. All schools must be comparable using the option chosen.
 - **Option A:** Number of FTE Instructional Staff, compared by grade span. When entering information in column 3, be sure to include only the instructional staff paid with NON-federal funds. Instructional staff may include teachers and other personnel assigned to schools who provide direct instructional services, such as

music, art, and physical education teachers, guidance counselors, speech therapists, and librarians, as well as other personnel who provide services that support instruction, such as school social workers and psychologists. The district must be consistent with the categories of staff included for its schools.

- **Option B:** Average Instructional Staff/Student Ratio, compared by grade span.
- **Option C:** Average per pupil expenditures for instructional materials and supplies, compared by grade span.

6. When the district has both Title I and non-Title I schools at a specific grade span, the online comparability process determines comparability at each grade span. The non-Title I school page must be completed first, then the Title I page for each grade span. The computer will display a message at the top of the screen when comparability has been met in a specific option.

If any school is not comparable with the others, the district may make necessary adjustments to make all schools comparable within that option, OR the district may find another option that does show comparability.

7. When the district serves ALL schools at a specific grade span with Title I funds, the Title I schools must be compared to each other to ensure comparability. Enter data and click the  button until ALL entry calculations are green (**green indicates COMPARABLE**) under the SAME option. **Once ALL schools are comparable under the SAME Option, you MUST click on the  button before continuing.**

8. **Submit to DPI**

The submit screen will ask for:

- Information regarding district comparability policy
- Date copy of district salary schedule was submitted to DPI
- Name of district administrator and date of review of report
- Assurance that the district maintains documentation that the salary schedule and policies were actually implemented and that they result in equivalence among the schools. Documentation includes a record of any needed adjustments to ensure compliance with the comparability option chosen. (*Section 1120A©(3)(B); Section 443 of GEPA; and 34 CRF 75.730, and 80.42*)
- An indication that the district has submitted a paper ***Title I Comparability Report*** because the online form did not meet their needs. (Do not indicate this if a district is completing the form manually.)