

Title I Comparability Requirement



WISCONSIN DEPARTMENT OF
PUBLIC INSTRUCTION

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Title I Comparability Definition



A Local Educational Agency (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 non-Title I schools.



If all schools in a grade span within the LEA are Title I schools, all schools must be “substantially comparable.”



Title I Comparability Timing

LEAs must determine comparability annually.

- The Department of Public Instruction (DPI) is only required to collect comparability data at least once every two years.
- Comparability is typically completed in the fall because LEAs need to review current-year resources and make adjustments for the current year as necessary.



Required LEAs

Comparability is determined on a grade span by grade span basis.

- If an LEA has at least one non-Title I school and at least one Title I school within a grade span, the LEA must demonstrate comparability for that grade span.
- If an LEA has more than one Title I school at the same grade span (even without the presence of a non-Title I school), the LEA must demonstrate comparability for that grade span.



Grade Spans

- Elementary School
- Middle School
- High School
- Combined Elementary/Secondary School



Exemptions

LEAs are exempt if there is only one school per grade span, because there is nothing to compare.

Example: Phelps School District has two schools, one for grades 4K–8 and one for grades 9–12. Phelps School District is exempt from completing the comparability report.

Schools that have fewer than 100 students are exempt.



Required LEAs Scenarios

Example #1:

A district consists of the following:

- One elementary school, grades K-5 (Title I schoolwide)
- One middle school, grades 6-8 (Title I targeted assistance)
- One high school, grades 9-12 (non-Title I)



Is this district required to complete the Comparability Report?



Required LEAs Scenarios

No. This district is exempt because there is only one school per grade span.



Required LEAs Scenarios

Example #2:

A district consists of the following:

- One elementary school, grades K-5 (Title I schoolwide)
- One middle school, grades 6-8 (Title I schoolwide)
- One high school, grades 9-12 (Title I schoolwide)



Is this district required to complete the Comparability Report?



Required LEAs Scenarios

No. This district is exempt because there is only one school per grade span.



Required LEAs Scenarios

Example #3:

A district consists of the following:

- Three elementary schools, grades K-5 (all Title I schoolwide)
- One middle school, grades 6-8 (Title I targeted assistance)
- One high school, grades 9-12 (non-Title I)

Is this district required to complete the Comparability Report?



Required LEAs Scenarios

Yes. The district is required to complete the Comparability Report to demonstrate comparability among the *elementary schools only*.

The district is not required to complete the Comparability Report for the middle school because there is no other school in that grade span to which it can be compared.



Required LEAs Scenarios

Example #4:

A district consists of the following:

- Two elementary schools, grades PK-2 and 3-5
- One middle school, grades 6-8
- One high school, grades 9-12

The two elementary schools receive Title I funds.



Is this district required to complete the Comparability Report?



Required LEAs Scenarios

No. The report is not required because the grade spans do not overlap.

However, if the district had two PK–2 schools and two 3-5 schools that received Title I funds, the district would be required to demonstrate comparability for each grade span.



Required LEAs Scenarios

Example #5:

A district consists of the following:

- One elementary school, grades PK–5 (Title I schoolwide)
- One middle school, grades 6–8 (Title I schoolwide)
- One high school, grades 9–12 (Title I targeted assistance)
- One alternative high school, grades 9–12 (non-Title I)



Is this district required to complete the Comparability Report for the high school?



Required LEAs Scenarios

Yes, but only if the alternative high school has an enrollment greater than 100 students.

This district is exempt from the Comparability Report if the alternative high school has fewer than 100 students.



Determining Comparability

LEAs should use current-year data.

LEAs should not include federal resources in the calculations.

LEAs *may* exclude state/local funds expended for the following:

- Language instruction for Limited English Proficiency (LEP) students
- Excess costs of providing services to students with disabilities
- Staff salary differentials for years of employment
- Supplemental programs that meet the intent and purpose of Title I



Definition of Instructional Staff

- **Teachers and other personnel assigned to schools who provide direct instructional services**
Examples: music, art, and physical education teachers; guidance counselors, speech therapists, and librarians
- **Other personnel who provide services that support instruction**
Examples: school social workers and psychologists

The LEA must be consistent with the categories of staff included for its schools.



Instructional Staff Scenarios

Should LEAs include teachers' aides in the calculations for instructional staff salaries or instructional staff?



Instructional Staff Scenarios

No. Aides are not considered instructional staff.

- Aides provide support services, such as lunch/recess duty, taking attendance, making copies, and decorating bulletin boards. Aides may not be used in the calculations for comparability.
- **Paraprofessionals must be included in the calculation.** Paraprofessionals provide direct instructional support to students.



Instructional Staff Scenarios

How should LEAs count an instructional staff person that is shared between two or more schools, but not across all schools within the LEA?



Instructional Staff Scenarios

LEAs should determine the Full Time Equivalent (FTE)/salary for the staff person and include each school's share in the comparability calculation.



Instructional Staff Scenarios

How should LEAs count an instructional staff person that supports all the schools equally across the entire district (for example, one art teacher who serves the entire district)?



Instructional Staff Scenarios

The LEA may do either of the following:

- Divide the staff person's time/salary and include an equal portion in each school's comparability calculation, or
- Exclude that staff person from the comparability calculations for all of the schools

Either way the LEA must be consistent across all schools.



Definition of Instructional Materials

Instructional materials and supplies include the following:

- General supplies for instruction
- Instructional media
- Textbooks and workbooks
- Computers, software, and other technology
- Library books and media center learning materials



Determining Comparability Scenarios

A district is required to demonstrate comparability among its three elementary schools (all of which receive Title I funding).

The district tried all three comparability options in the application, but it did not meet comparability requirements.

What should the district do?



Determining Comparability Scenarios

A district may recalculate its figures with the exclusion of state/local funds expended for the following:

- Language instruction for LEP students
- Excess costs of providing services to students with disabilities
- Staff salary differentials for years of employment
- Supplemental programs that meet the intent and purpose of Title I



If the district is still not comparable, the district will need to reallocate resources and adjust its general ledger to become comparable.



Title I Comparability Requirements

Questions?

When in doubt, contact your Title I Consultant for assistance.

<http://dpi.wi.gov/title-i/consultant-directory>



Documentation

LEAs are required to:

- Develop procedures to be in compliance with the comparability requirements, and
- Maintain the supporting documentation used for determining comparability.



ESEA Section 1118(c)(3)



Audits

At the end of the fiscal year, independent auditors make sure that actual expenditures are comparable.

If an LEA's expenditures are not comparable, the LEA *may* be required to return funds to DPI/United States Department of Education (USDE).



Contacts

Title I Education Consultant Directory

dpi.wi.gov/title-i/consultant-directory

Title I Network Coordinators

dpi.wi.gov/title-i/network/contacts



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