



Comparability

What is Comparability &

What Needs to be Submitted

Sept. 2022

Today's Agenda



This session will review:

- Exemptions
- Calculations
- Assurances

What is the purpose of Comparability?



Federal Title I Grants are intended to provide supplemental programs to disadvantaged students and to ensure that these awards are used for additional programs, and fiscal law requires that all Title I schools receive a “fair share” of State and Local education funds.

Non-compliance will cause a Local Education Agency (LEA) to become ineligible for receipt of Title I funds. Consequences also include a hold on grant funds as well as a requirement to return funds.

Annual Requirement



- **Writing and annually updating Policy & Procedures**
- **Annually testing comparability (if not exempt)**
- **Annually documenting compliance**
- **Reporting an Assurance of Comparability (every 2 years)**

So, what do LEAs that have to do:

Although LEAs must complete the Comparability calculation each year & have it on file, what is submitted alternates year to year.

For calendar year 2022:

LEAs who are on an EVEN monitoring Cycle
(Cycle 0, 2, 4, or 6) will provide:

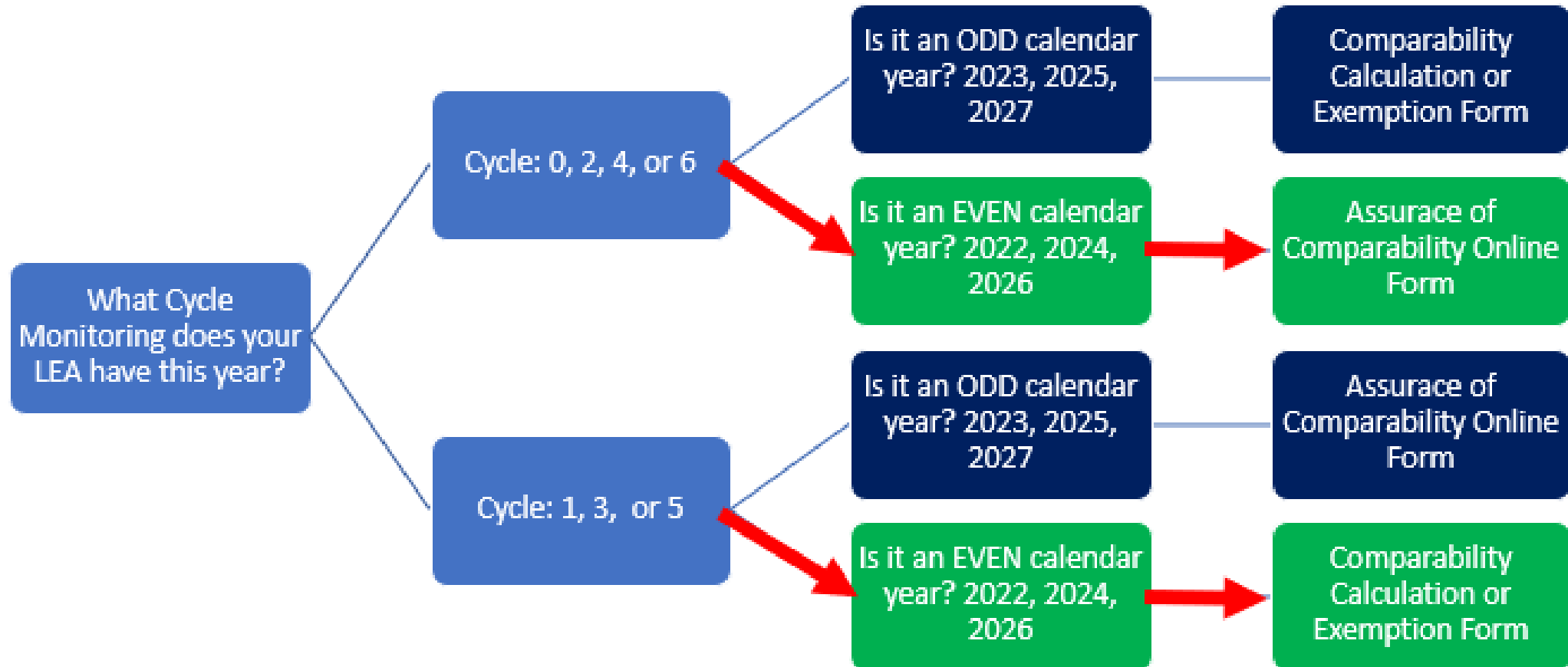
- Assurance of Comparability

LEAs who are on an ODD monitoring Cycle
(Cycle 1, 3, or 5) will either provide:

- Comparability Calculation (the Excel spreadsheet)
-as well as additional supporting documentation
- Exemption Form

UPDATE

What to submit in November 2022:



Criteria Questions

Answering this question correctly will ensure that your LEA completes the correct documentation, either the Exemption Form or completing the Comparability Calculation. Only one answer should be YES.

Comparability Calculation: Criteria Questions

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1. Comparability Calculation

An LEA may receive Title I, Part A funds only if it uses State and local funds to provide comparable services in Title I schools and Non-Title I schools.

Please answer the two criteria questions, only one question can be yes.

1. Are you a single site LEA AND/OR more than one school site, but only one school per grade span with no overlapping grades?

Yes

2. Does your LEA have two or more school sites AND do any of them serve the same grade span of at least two or more grade level? (Ex: K-6, K-8 or 7-12, 9-12)

No



Who is Exempt?

- **Single Site LEA**
- **One School Per Grade Span**

<u>YES</u>	<u>NO</u>
K-3	K-2
4-6	K-6
7-8	6-8
9-12	9-12

- **Fewer than 100 students**
 - School sites with fewer than 100 students are not to be included in your Comparability calculation, if by removing individual schools that have fewer than 100 students results in your LEA in having only a single site that would be included OR one eligible school per grade span, then your LEA is exempt.

What do Exempt LEAs upload to EMAC ?

(Contact Information for main point of contact)

School Letter Head

[DATE]
[LEA Name]
COMPARABILITY EXEMPTION PROCEDURES
Please choose one from the following exemptions:

- Single site LEA
- LEA's total enrolment is less than 100 students
- One school per grade span with no overlapping grades

[LEA Name] receives Title I grant funds and does not calculate comparability because [Checked Reason].

[LEA Name] will review its school status annually as part of the annual budget development and approval process. If the [LEA Name] stops receiving Title I funds or is no longer exempt (due to expansion or other reasons), then it will revise these procedures immediately in accordance with State guidance.

STAFF: The [Staff Position(s)] will be responsible for compliance, which includes the annual review and recordkeeping and completing the assurance of comparability.

The [LEA Name] is still required to notify ADE of its exempt status by completing and submitting an Assurance of Comparability every other year by the deadline. To meet the notification requirement, [LEA Name] shall submit the "Assurance of Comparability" available in ALEAT.

DOCUMENTATION OF EXEMPTION: The [LEA Name] will keep a [paper and/or electronic] file containing these procedures, student counts, and a copy of the biannual Assurance of Comparability available for inspection in the [Location Name] located at [Location Address] for not less than three (3) years.

(Contact Information for main point of contact)

School Letter Head

**This generic timeline is for complying with the Title I Comparability Requirements. Please input specific dates, persons reporting, locations, etc. If there are other steps your LEA performs to meet comparability, please list them. If there are steps listed below that are not used, you may remove them.
Please remove these directions before you post to EMAC.**

(Date) – Gather information
Obtain the following reports from district staff: <ul style="list-style-type: none"> 40th day student count from (person/reporting system) District staffing positions by school site from (person/reporting system) <ul style="list-style-type: none"> Report should represent staffing around the 40th day time period All reports will be retained at (location/computer folder/etc.)
(Date) – Calculate Comparability/File Exemption
Prepare the comparability tables in the comparability workbook <ul style="list-style-type: none"> (Describe method used if applicable) (Describe exemption used if applicable)
(Date) – Review Calculation/Exemption with Business Manager/Superintendent
Review outcome of Calculation/Exemption <ul style="list-style-type: none"> Make recommendations if shown not comparable Review other methods to ensure comparability can be shown
(Date) – Submit Comparability/Exemption report to the Department of Education
Comparability report can be filed through EMAC <ul style="list-style-type: none"> Supporting evidence should be filed with the workbook
Assurance of Comparability is to be filed through EMAC biennially attesting that our sites are comparable or are exempt.



**What does every LEA have to do each year
if they are NOT exempt?**

Comparability Calculation

Comparability Calculation: What do to upload?

1. **Comparability Procedures and Timeline** (Now we have a template)
2. **Comparability Workbook** (Updated)
Choose the workbook that applies to your LEA
 - All Title I Schools
 - Both Title I and Non-Title I Schools
3. **Supporting Documentation for the Workbook Calculations**
 - Student counts of the LEA's number of enrolled K-12 students on October 1st. A report of this data can be located in AzEds. (Updated)**Staff and/or Expense Records Snapshot**
 - For school districts: SDER
 - For charter schools: an official record of staff FTE
 - An official record of federally funded positions (both school districts & charters)**AND/OR**
 - Expense records that show the annual budgeted state & local funds per school site



Comparability Procedures and Timeline

School Letter Head (Contact Information for main point of contact)

[DATE]
[LEA Name]
COMPARABILITY PROCEDURES & TIMELINE

[LEA Name] receives Title I grant funds and calculates comparability by [Comparability Method].

[LEA Name] will review its school status annually as part of the annual budget development approval process. If the [LEA Name] stops receiving Title I funds or becomes exempt, then it will revise these procedures immediately in accordance with State guidance.

The [Staff Position(s)] will be responsible for compliance, which includes the annual review and recordkeeping, completing the assurance of comparability, and submitting all required documentation to EMAC.

The [LEA Name] will include [describe which resource will be compared to the student population to determine Comparability].

The [LEA Name] is still required to notify ADE of its status by completing and submitting an Assurance of Comparability every other year by the deadline. To meet the notification requirement, [LEA Name] shall submit the "Assurance of Comparability" available in EMAC.

Should [LEA Name] not be Comparable, [LEA Name] will [describe remedy to make resource adjustments] and complete the required ADE form.

DOCUMENTATION: The [LEA Name] will keep a [paper and/or electronic] file containing these procedures, student counts, and a copy of the biannual Assurance of Comparability available for inspection in the [Location Name] located at [Location Address] for not less than three (3) years.

School Letter Head (Contact Information for main point of contact)

This generic timeline is for complying with the Title I Comparability Requirements. Please input specific dates, persons reporting, locations, etc. If there are other steps your LEA performs to meet comparability, please list them. If there are steps listed below that are not used, you may remove them. Please remove these directions before you post to EMAC.

(Date) – Gather information
Obtain the following reports from district staff:
<ul style="list-style-type: none"> 40th day student count from [person/reporting system] District staffing positions by school site from [person/reporting system] <ul style="list-style-type: none"> Report should represent staffing around the 40th day time period All reports will be retained at [location/computer folder/etc.]
(Date) – Calculate Comparability
Prepare the comparability tables in the comparability workbook
<ul style="list-style-type: none"> [Describe method used if applicable] [Describe exemption used if applicable]
(Date) – Review Calculation with Business Manager/Superintendent
Review outcome of Calculation/Exemption
<ul style="list-style-type: none"> Make recommendations if shown not comparable Review other methods to ensure comparability can be shown
(Date) – Submit Comparability report to the Department of Education
Comparability report can be filed through EMAC
<ul style="list-style-type: none"> Supporting evidence should be filed with the workbook
Assurance of Comparability is to be filed through EMAC biennially attesting that our sites are comparable or are exempt.



Comparability Calculation Methods

For LEAs with Title I & Non-Title I Schools

1. Pupil/Instructional Staff ratio at Title I to Non-Title I schools
- ➔ 2. Pupil/Instructional Staff ratio Large/Small Schools – Title I & Non-Title I Schools

For LEAs with ONLY Title I Schools

1. Pupil/Instructional Staff ratio at Title I schools
2. Pupil/Instructional Staff ratio at Title I schools by grade span
 - a. Grade Spans must match the basic organization of the LEA and have school buildings with at least two overlapping grades
3. Pupil/Instructional Staff ratio at Title I schools by poverty level (high to low)
- ➔ 4. Pupil/Instructional Staff ratio at Title I schools by poverty level (high-poverty compared with each other and low-poverty compared with each other)
5. State and Local per pupil spending at Title I schools (all expenditures)
- ➔ 6. State and Local per pupil spending at Title I schools by grade span (all expenditures)
 - a. Grade Spans must match the basic organization of the LEA and have school buildings with at least two overlapping grade



Comparability Workbook

- LEAs must ensure they choose the right workbook
 - All Title I Schools OR Title I and Non-Title I Schools
- LEA must upload the Excel Spreadsheet, NOT a PDF
- The LEA is only comparable if ALL change to YES
- “Who” they count as staff must be the same across all school sites
- SDER stands for School District Employee Reports
- The LEA does not have to show Comparable across all methods, only one
- The supporting evidence must match the Comparability Workbook



Assurance of Comparability

The Assurance of Comparability assures that the LEA has completed the Comparability Calculation and has it, along with all supporting documentation on file.

Program A...	Monitoring...	Cycle	Task Name	Start Date	End Date	Task Type	Task Status	Staff Assig...	Actions
Educator and School Excellence	Assurance of Comparability	Assurance of Comparability	Assurance of Comparability	07/01/2022	11/30/2022	Data Collection	Not Started	Vanessa Velez	



Data Collection Assurance of Comparability

- 3 main parts to every Task

- Big Picture



- Purpose

- Purpose



- Task Collection Tabs

- Data Collection Section

- Online Forms



- Required Evidence

- Submission

EMAC Program Area Calendar Communications Schedule Manager Schedule Views Document Archive Reports

Assurance of Comparability #53321

Program Area: Educator and School Excellence | Monitoring Program: Assurance of Comparability | Cycle: Assurance of Comparability | Fiscal Year: 2023 | Task Type: Data Collection

Assigned On: 8/24/2022 | Last Modified On: 8/24/2022 3:09:36 PM

IsOnsite Visit: ☺ | Original Start Date: 7/1/2022

Data Collection Method: Desktop Review | Current Start Date: 7/1/2022

Original End Date: 11/30/2022

Current End Date: 11/30/2022

Staff Assigned:

- Vanesa Velez (Primary)
- Lilian Le (Secondary)
- Lilian Le (Secondary)

Purpose

All designated LEAs receiving Title I grants this year (or last year) must certify and submit this report to the Arizona Department of Education by November 30th every other school year. LEAs are responsible for reading and following the most recent federal guidance and the ADE Comparability Handbook which can be found under the resource tab or by contacting your Title I Specialist. In general, comparability requires a fair distribution of state and local funds to all public schools within an LEA.

LEAs are not required to upload their Comparability Calculation but must keep (1) official written procedures, which include a timeline, (2) completed LEA Schools Profile and Worksheets, (3) the data used to arrive at the entries for the Worksheets, and (4) any other supporting data on file.

Submission Resource Communication Related Tasks History

Online Forms

Assurance of Comparability Not Started

Evidence Documents

Not Available

Evidence Documents Uploaded

Not Available

Select files...

You can only upload PDF, Microsoft Word, Microsoft Excel, PPT, GIF, JPG, PNG files. Maximum allowed file size is 10MB.

Upload

Submit for Review



Assurance of Comparability due November 30th

Calculating Comparability is an annual requirement. Every calendar year, the LEA will calculate comparability and every year the LEA will either report the calculations or the Assurance.

All designated LEAs receiving Title I grants this year (or last year) must certify and submit this report to the Arizona Department of Education by November 30th every other school year. LEAs are responsible for reading and following the most recent federal guidance and the ADE Comparability Handbook which can be found under the "Resource" tab in EMAC, on the Title I website and by contacting your Title I Specialist. In general, comparability requires a fair distribution of state and local funds to all public schools within an LEA and the comparability calculation is one method of testing if an LEA is supplanting.

PREPARE - Gather your 40th day enrollment and your 40th day comparison data. Enter required information into the calculation worksheet. The ADE Worksheets will automatically calculate whether your schools are comparable or not. You only need to choose one method to do the calculation. If any of schools receive a NO, then choose another method. If all methods are exhausted and you still have schools showing not comparable, contact Stephanie Washington as soon as possible.

SHOW - LEAs must keep (1) official written procedures, which include a timeline, (2) completed LEA Schools Profile and Worksheets, (3) the data used to arrive at the entries for the Worksheets, and (4) any other supporting data.

REVIEW AND CORRECT YOUR WORK - ADE's materials set out some options if one or more schools in your LEA are not comparable. Ultimately, a failing LEA must fix the misallocation of state and local funds by December 31st. Worksheets and supporting documents showing the imbalance was corrected are required. The LEA must report noncompliance on this assurance by emailing Sharon.Estrada@azed.gov immediately.

Does your LEA have one school per grade span or is your LEA a single site LEA? – If you can answer yes to either of these questions, you are only exempt from doing the calculation. You must still do this assurance and you must have an exemption form that includes official written procedures for comparability also including a timeline.



Next



LEA PROFILE: LIST ALL SCHOOLS AND 40TH DAY ENROLLMENT

Program Area ▾ Calendar Communications ▾ Schedule Manager ▾ Schedule Views ▾ Document Archive ▾

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Assurance of Comparability

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2. LEA PROFILE: LIST ALL SCHOOLS AND 40TH DAY ENROLLMENT

LEA Information *

Name of LEA	<input type="text"/>
Entity ID & CTDS Number	<input type="text"/>
Contact Name, Title	<input type="text"/>
Contact Phone Number	<input type="text"/>
Contact Email Address	<input type="text"/>
Mailing Address	<input type="text"/>



LEA PROFILE: LIST ALL SCHOOLS AND 40TH DAY ENROLLMENT

1 Title I School with less than 100 students *

School Name	Grade Span	Elementary Student Count	Mid. School or Jr. High Student Count	High School Student Count	Total

[Remove](#)
[Remove](#)
[Add Row](#)

2 Title I School with more than 100 students *

School Name	Grade Span	Elementary Student Count	Mid. School or Jr. High Student Count	High School Student Count	Total

[Remove](#)
[Remove](#)
[Add Row](#)

3 Non-Title I School with less than 100 students *

School Name	Grade Span	Elementary Student Count	Mid. School or Jr. High Student Count	High School Student Count	Total
NA					

[Remove](#)
[Remove](#)
[Add Row](#)

4 Non-Title I School with more than 100 students *

School Name	Grade Span	Elementary Student Count	Mid. School or Jr. High Student Count	High School Student Count	Total

[Remove](#)
[Remove](#)
[Add Row](#)

- 1) Title I School with less than 100 students.
- 2) Title I School with more than 100 students.
- 3) Non-Title I School with less than 100 students
- 4) Non-Title I School with more than 100 students.



Assurance of Comparability Attestation

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3. PLEASE ANSWER THE FOLLOWING QUESTIONS:

Choose the correct statement based on your LEA Profile entries. *

- Single Site LEA
- One School Per Grade Span
- None of the Above

If you chose none of the above, then you are required to perform the comparability calculation, please mark which method of calculation you chose.

- Pupil/Instructional Staff ratio at Title I Schools
- Pupil/Instructional Staff ratio at Non-Title I Schools
- Pupil/Instructional Staff ratio at Title I schools by grade span
- Pupil/Instructional Staff ratio Large/Small Schools – Title I & Non-Title I Schools
- Pupil/Instructional Staff ratio at Title I schools by poverty level (high to low)
- Pupil/Instructional Staff ratio at Title I Schools by poverty level (high-poverty compared with each other and low-poverty compared with each other)
- State and Local per pupil spending at Title I schools (all expenditures)
- State and Local per pupil spending at Title I schools by grade span (all expenditures)

Attestation:

As Chief Administrator of the LEA, I confirm the LEA uses State and Local funds to provide comparable services to all of our schools, including Title I schools. The LEA has adopted and implemented formal written Comparability Procedures in accordance with ESEA Section 1120.

I certify that I am authorized to make this Assurance of Comparability on behalf of the LEA.

I am also providing an alternate preferred contact (including an email address) in the event a notice of non-compliance is issued.

Print Name: *

Signature: *

Sign here

x

Date *

Alternative Contact Information:

Print Name	Email Address	Phone Number
<input type="text"/>	<input type="text"/>	<input type="text"/>

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Complete

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Updates for Fall 2022

- **Required submission is based on current Monitoring Cycle and not the first letter of the LEA's name**
- **Three additional methods to show Comparability**
- **Template for LEA Procedures and Timeline**
- **Evidences of student counts will only be of the LEA's number of enrolled K-12 students on October 1st. A report of this data can be located in AzEds.**
- **All of this information and documentation can be found on our website**



Important Dates

- **October 1st Count** (this can be found in AzEds)
- **November 30th submission** due in EMAC
- **December 31st reallocation** of resources if needed
- **February 1st Programmatic Holds** placed on LEAs whose **Comparability** has not been submitted and accepted



Common Reasons Comparability is Returned

- **Ensure the correct workbook is used (All Title I schools vs Non Title I and Title I schools)**
- **Supporting documentation**
 - **Is not provided**
 - **Information in supporting documentation does not align with Calculation workbook**
 - **Student enrollment data with whole student data**
 - **Staff reports that include all staff FTE and clearly identify federally funded staff**
 - **Policy and Procedures are not updated**
 - **All highlighted information must be updated with LEA information**
 - **Remove red directions once you have read**



Questions

If you have further questions, please contact your Title I Specialist.

If you are unsure who that is, please email us at

EducatorAndSchoolExcellence@azed.gov





Thank You

Sharon Estrada
Vanesa Velez

