



ARIZONA DEPARTMENT OF EDUCATION

Title I, Part A Comparability

FY25 Requirements

PURPOSE

The purpose of Title I, Part A is to provide all children a significant opportunity to receive a fair, equitable, and high-quality education and help ensure that all children meet challenging academic standards. Title I-A provides financial assistance to LEAs and schools that serve a larger population of children from families experiencing poverty. By providing additional resources, the program is intended to help close the opportunity gaps and thus the achievement gap that some students experience.

Comparability is a school-level calculation that measures the level of State and local funds and resources provided to an LEA's Title I-A and non-Title I-A schools. The goal is to determine whether the distribution of State and local funds and resources to schools are comparable regardless of Title I-A status. If all schools are Title I schools, all schools must be "substantially comparable".

DEFINING COMPARABILITY

Annual Requirement

Comparability is an annual requirement. Using current-year data, it precedes eligibility for the receipt of Title I, Part A fund allocations for that year. An LEA that does not demonstrate compliance may have its Title I, Part A allocation withheld until compliance is demonstrated.

To comply with the comparability requirement, the LEA must show that in comparison to its non-Title I schools, all its Title I, Part A schools receive an equitable share of state and local resources for the current year. If all schools in the LEA receive Title I, Part A funds, the LEA must demonstrate that comparable state and local resources are provided to each Title I, Part A schools for the current year.

Written Policy

All LEAs receiving Title I, Part A funds **must** establish written procedures that include (at minimum):

- An LEA-wide salary schedule
- A written policy to ensure equivalence (without regard of Federal funding) among schools in teachers, administrators, and other staff
- A written policy to ensure equivalence (without regard of Federal funding) among schools in the provision of curriculum materials and instructional supplies

The written procedures **may** also include the following (recommended):

- LEA's timeline for demonstrating comparability, including the identity of the office responsible for making comparability calculations
- Measure and process used to determine whether schools are comparable
- How and when the LEA makes adjustments in schools which are not comparable

Which LEAs Must Demonstrate Comparability?

- LEAs with at least one non-Title I-A funded school and one Title I-A funded school
- LEAs with more than one Title I-A funded school with the same grade span (even without the presence of a non-Title I-A funded school) *all schools must be substantially comparable

Which LEAs Do Not Need to Demonstrate Comparability?

- Only one school per grade span (nothing to compare)
- Less than 100 students

METHODS

Choices to Demonstrate Comparability: Three template worksheets (listed below) have been provided on Academic Achievement Comparability webpage ([Welcome to Academic Achievement | Arizona Department of Education](#)) for LEAs to use to demonstrate comparability. Each worksheet has two tabs. One tab is for LEAs with all Title I-A funded sites and one tab is for LEAs with both Title I-A funded sites and non-Title I-A funded sites.

If an LEA is not comparable using one of the three provided methods, they may work with the SEA to demonstrate an alternative method to demonstrate all sites are comparable.

1. Students to Instructional-Staff (FTE) Ratio:

Comparison of the **average number of students per instructional staff** (Instructional staff are defined as *anyone whose primary function is to provide instruction to students*)

- ✓ **Must** use the AzEDS October 1 Enrollment Report Count
- ✓ **Must** run a staffing report based on October 1
- ✓ **Must** use all staff with a pay code/state function code of 1000, even if the position is unfilled
- ✓ **Must exclude:** Administrators (principals, assistant principals, deans), preschool staff, social workers, custodial staff, front office staff, non-instructional paraprofessionals, cafeteria personnel, school nurses, security personnel, short-term substitute teachers, (typically staff paid with 2000/3000 function codes) etc.
- ✓ **Must exclude:** Federally funded staff **must** be omitted (Title I, IDEA, Title III, Title IV, etc.)
- ✓ **May** include counselor, speech therapist, media specialist/librarian **if** the LEA deems their role as instructionally focused (**must remain consistent across all sites**)
- ✓ **May** include long-term substitute teachers and contract employees who are filling positions that meet above acceptable criteria (such as retired ESI or other applicable staff)

2. Per Student Instructional-Staff \$ Salary Expenditure Ratio:

Comparison of the **average salary expenditure per student**

- ✓ LEAs should use the base (starting) salary for each type of FTE, versus the overall cost (for example, omit differentials, extra-consideration pay, stipend pay, extra-duty pay)
- ✓ **Must** use the AzEDS October 1 Enrollment Report Count
- ✓ **Must** run a staffing report based on October 1
- ✓ **Must** use all staff with a pay code/state function code of 1000, even if the position is unfilled
- ✓ **Must exclude:** Administrators (principals, assistant principals, deans), preschool staff, social workers, custodial staff, front office staff, non-instructional paraprofessionals, cafeteria personnel, school nurses, security personnel, short-term substitute teachers, (typically staff paid with 2000/3000 function codes) etc.
- ✓ **Must exclude:** Federally funded staff **must** be omitted (Title I, IDEA, Title III, Title IV, etc.)
- ✓ **May** include counselor, speech therapist, media specialist/librarian **if** the LEA deems their role as instructionally focused (**must remain consistent across all sites**)
- ✓ **May** include long-term substitute teachers and contract employees who are filling positions that meet above acceptable criteria (such as retired ESI or other applicable staff)

3. Per Pupil Expenditure:

Comparison of the **average purchase of instructional materials per student**

- ✓ Instructional materials are materials that would have a function code of 1000
- ✓ **May** include textbooks, library/media center materials, etc. if the LEA deems their use as instructionally focused (must remain consistent across all sites)
- ✓ State/local funds that can be excluded from calculation:
 - Language instruction for emergent bilingual students
 - Excess costs of providing services to students experiencing disability
 - Staff salary differentials for years of employment
 - Any State or local funds used for supplemental purposes meeting the same intent and purpose as Title I-A (such as MOWR, State Tutoring program, State grants, tax credit, etc.)

4. Resource Allocation Plan (after conferring with the SEA)

Allocations to schools based on student characteristics (i.e., weighted student formula)

- ✓ The LEA allocates State and local funds to schools based on a standard formula in which dollar amounts are allocated based on objective student characteristics (i.e., students experiencing disability, emergent bilingual students). This is sometimes referred to as a “weighted student formula”.
- ✓ A LEA is comparable if it can provide evidence of its schedule of allocations and demonstrate that funds have been allocated according to the LEA schedule.

5. Other Methods (after conferring with the SEA)

There are many methods an LEA may use to demonstrate comparability. If an LEA has established and implemented other measures for demonstrating their schools are comparable, the LEA may upload their evidence in EMAC. **The LEA must maintain source documentation to support the calculations and provide a detailed explanation of their methodology along with a spreadsheet or comparable proof of comparability that aligns with Section 1118(c) of the ESSA.**

Adjusting if Not Comparable

- The LEA must reallocate funds, instructional staff, or instructional resources and demonstrate comparability.
- Non-compliance will result in the LEA being placed on programmatic hold and may result in loss of Title I-A funding.

STEPS TO COMPLETE ANNUAL COMPARABILITY

Step 1

Access the comparability worksheets and FAQs from the ADE's Academic Achievement Website under Resources Comparability Webpage ([Welcome to Academic Achievement | Arizona Department of Education](#))

Step 2

Determine if the LEA is Exempt

- LEAs with no overlapping grade spans
- LEAs with fewer than 100 students

Step 3

- ✓ Determine the method most appropriate for demonstrating comparability for the LEA.
- ✓ Download the **worksheet (excel spreadsheet) for the chosen comparability method**
- ✓ **On the selected method worksheet, use the tab that represents the LEAs situation correctly:**
 - All Title I-A Schools
 - Title I-A and non-Title I-A Schools

Step 4

Gather necessary reports and complete the comparability method workbook tab manually. Each method is described below in more detail.

- **Student to Instructional-Staff Ratio**
 - ✓ Access the AzEDs October 1 Enrollment Report
 - ✓ Run a staffing report based on October 1 for each site that includes funding code, position type, and FTE
 - ✓ Have each site's grade span accessible
 - ✓ Determine which staff will be included using the criteria in the instructions
 - ✓ Exclude all staff listed in the instructions that must be excluded
 - ✓ Demonstrate comparability using a template on the comparability website
 - ✓ If comparable, go to EMAC (see Step 6)
- **Per Student Instructional-Staff Salary Expenditure Ratio**
 - ✓ Access the AzEDs October 1 Enrollment Report
 - ✓ Run a staffing report based on October 1 for each site that includes the funding code and position type

- ✓ Add the base salary for each position
 - ✓ Have each site's grade span accessible
 - ✓ Determine which staff will be included using the criteria in the instructions
 - ✓ Exclude all staff listed in the instructions that must be excluded
 - ✓ Demonstrate comparability using a template on the comparability website
 - ✓ If comparable, go to EMAC (see Step 6)
- **Per Pupil Expenditure**
 - ✓ Access the AzEDs October 1 Enrollment Report
 - ✓ Run site-based budget report that includes funding codes
 - ✓ Have each site's grade span accessible
 - ✓ Determine which materials will be included from the *May* criteria in the instructions
 - ✓ Exclude all materials listed in the instructions that must be excluded
 - ✓ Demonstrate comparability using a template on the comparability website
 - ✓ If comparable, go to EMAC
- **Resource Allocation Plan (no worksheet provided)**
 - ✓ Reach out to the assigned specialist to verify approval before proceeding
 - ✓ Access the AzEDs October 1 Enrollment Report
 - ✓ Run site-based budget report that includes funding codes
 - ✓ Have each site's grade span accessible
 - ✓ LEA created spreadsheet that compares Title I-A funded sites to non-Title I-A funded sites or all Title I-A funded sites
 - ✓ If comparable, go to EMAC (see Step 6)
 - ✓ All evidence and LEA comparability workbooks must be uploaded as evidence
- **Other Methods (no worksheet provided)**
 - ✓ Reach out to the assigned specialist to verify approval before proceeding
 - ✓ Access the AzEDs October 1 Enrollment Report
 - ✓ Applicable report aligned to the method chosen
 - ✓ LEA created spreadsheet that compares Title I-A funded sites to non-Title I-A funded sites or all Title I-A funded sites
 - ✓ If comparable, go to EMAC (see Step 6)
 - ✓ All evidence and LEA comparability workbook must be uploaded as evidence

Step 5

Adjusting if Not Comparable

- ✓ The LEA must reallocate funds, instructional staff, or instructional resources and demonstrate comparability
- ✓ Non-compliance will result in the LEA being placed on programmatic hold and may result in loss of Title I-A funding

- ✓ Reallocation must be complete no later than February 2, 2025

Step 6

All LEAs accepting Title I-A funds must annually attest to the following items as established and implemented (including Exempt):

- LEA-wide salary schedule
- Policy to ensure equivalence among schools in teachers, administrators, and other staff
- Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies
[Section 1120A(c)(2)(A)]

- ✓ Assign the LEA Entity Authorized Signer to Title I, Part A Comparability in EMAC
- ✓ The LEA Entity Authorized Signer must complete the first Data Collection Task called Comparability Assurance
- ✓ Within the Comparability Assurance Data Collection Form, choose the appropriate method aligned to the LEA's choice for determining comparability
- ✓ LEAs that must demonstrate comparability will select if they have only Title I-A funded schools or both Title I-A schools and non Title I-A schools
- ✓ Submit the Comparability Assurance task when completed
- ✓ Optional: Add an additional user to the monitoring program who will complete the Comparability Calculation Data Collection task
- ✓ Once the Comparability Assurance task is submitted, the LEA will be assigned the Comparability Calculation Data Collection Task aligned to the LEA's selected method. It may take up to 2 minutes to appear. If that does not work, exit the browser and log back into EMAC.
- ✓ Copy the LEA's data from the downloaded version of the comparability method workbook and enter it into *the Comparability Calculation Data Collection Task using the appropriate tab/page on the EMAC form.*
**Note data calculated should have already been tested for comparability based on the downloaded version of the comparability method workbook available on the Academic Achievement Website under Resources Comparability webpage ([Welcome to Academic Achievement | Arizona Department of Education](#)).*
- ✓ **If** the LEA used an alternative method, please upload the workbook and all contributory evidence.
- ✓ Submit the Comparability Calculation Data Collection task.
**Please note, if the LEA incorrectly chooses the wrong method, please reach out the assigned specialist so they may reject the task, and the LEA may begin again with the correct method.*

Appendix

SEC. 1118. [20 U.S.C. 6321] FISCAL REQUIREMENTS

(a) MAINTENANCE OF EFFORT. — A local educational agency may receive funds under this part for any fiscal year only if the State educational agency involved finds that the local educational agency has maintained the agency's fiscal effort in accordance with section 8521.

(b) FEDERAL FUNDS TO SUPPLEMENT, NOT SUPPLANT, NON-FEDERAL FUNDS. —

(1) IN GENERAL. — A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.

(2) COMPLIANCE. — To demonstrate compliance with paragraph

(1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.

(3) SPECIAL RULE. — No local educational agency shall be required to —

(A) identify that an individual cost or service supported under this part is supplemental; or

(B) provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency's compliance with paragraph (1).

(4) PROHIBITION. — Nothing in this section shall be construed to authorize or permit the Secretary to prescribe the specific methodology a local educational agency uses to allocate State and local funds to each school receiving assistance under this part.

(5) TIMELINE. — A local educational agency —

(A) shall meet the compliance requirement under paragraph (2) not later than 2 years after the date of enactment of the Every Student Succeeds Act; and (B) may demonstrate compliance with the requirement under paragraph (1) before the end of such 2-year period using the method such local educational agency used on the day before the date of enactment of the Every Student Succeeds Act.

(c) COMPARABILITY OF SERVICES. —

(1) IN GENERAL. —

(A) COMPARABLE SERVICES. — Except as provided in paragraphs (4) and (5), a local educational agency may receive funds under this part only if State and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part.

(B) SUBSTANTIALLY COMPARABLE SERVICES. — If the local educational agency is serving all of such agency's schools under this part, such agency may receive funds under this part only if such agency will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.

(C) BASIS. — A local educational agency may meet the requirements of subparagraphs (A) and (B) on a grade-span by grade-span basis or a school-by-school basis.

(2) WRITTEN ASSURANCE. —

(A) EQUIVALENCE. — A local educational agency shall be considered to have met the requirements of paragraph (1) if such agency has filed with the State educational agency a written assurance that such agency has established and implemented —

(i) a local educational agency-wide salary schedule;

(ii) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and

(iii) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

(B) DETERMINATIONS. — For the purpose of this subsection, in the determination of expenditures per pupil from State and local funds, or instructional salaries per pupil from State and local funds, staff salary differentials for years of employment shall not be included in such determinations.

(C) EXCLUSIONS. — A local educational agency need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services under this subsection.

(3) PROCEDURES AND RECORDS. — Each local educational agency assisted under this part shall—

(A) develop procedures for compliance with this subsection; and

(B) maintain records that are updated biennially documenting such agency's compliance with this subsection.

(4) INAPPLICABILITY. — This subsection shall not apply to a local educational agency that does not have more than one building for each grade span.

(5) COMPLIANCE. — For the purpose of determining compliance with paragraph (1), a local educational agency may exclude State and local funds expended for —

(A) language instruction educational programs; and

(B) the excess costs of providing services to children with disabilities as determined by the local educational agency.

(d) EXCLUSION OF FUNDS. — For the purpose of complying with subsections (b) and (c), a State educational agency or local educational agency may exclude supplemental State or local funds expended in any school attendance area or school for programs that meet the intent and purposes of this part.