

# Determining Comparability

Georgia Compensatory Educational Leaders  
Conference

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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.

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# Why Must an LEA Demonstrate Comparability?

- 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)]





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# How Often Must an LEA Demonstrate Comparability?

- 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?

- 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.

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# What are the Consequences for Failure to Meet Comparability?

2. The LEA might have to hire teachers and/or paraprofessionals to achieve comparability.
3. The LEA might have repay funds to the Department's Title I, Part A program. The repayment of funds must be made with a non-federal fund source.

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# Important Note



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- 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

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# 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





# Data Accuracy



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- 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



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- 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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# Staff Members to be Included in Comparability Calculations

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

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# Staff Members to be Included in Comparability Calculations

- Guidance Counselors
- Speech Therapists
- Media Specialists
- School Social Workers
- Psychologists

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

- Staff Paid With Private or 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

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# CPI Codes Included

- 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





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# How the On-line Comparability Application Works

- Beginning in FY14 (school year 2013-2014) LEAs did not have to **hand** calculate comparability formulas.
- In FY14, an on-line comparability reporting system was developed by the Georgia Department of Education for LEA use.
- The on-line comparability application calculates in a matter of seconds all allowable formulas for determining if an LEA is comparable.

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# How the On-line Comparability Application Works

Georgia's on-line comparability application calculates a district's comparability by using the following methods:

- an LEA's student/instructional staff ratios are calculated to determine whether Title I and non-Title I schools are comparable
- an LEA compares each Title I school with the average of its non-Title I schools in the district **(to be comparable, each Title I school's student/instructional staff ratio must not exceed 110 percent of the ratio for all non-Title I schools)**





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# How the On-line Comparability Application Works

- an LEA, in which all schools are Title I schools, bases the comparisons on grade span groupings, however, all schools in the district must be Title I **(to be comparable, each Title I school's student/instructional staff ratio must fall within 90 percent and 110 percent of the average for all Title I schools)**

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# How the On-line Comparability Application Works



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- an LEA, in which all schools are Title I schools, the LEA divides its schools between high- and low-poverty schools and compares schools within each poverty band to each other (**to be comparable, each high-poverty Title I school's student/instructional staff ratio must fall within 90 percent and 110 percent of the average for all high-poverty Title I schools and each low-poverty Title I school's student/instructional staff ratio must fall within 90 percent and 110 percent of the average for all low-poverty Title I schools**)



# How the On-line Comparability Application Works



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- Should a district not show as comparable in the on-line comparability application, the application will provide a district with the method that is most favorable to the district to make corrections.
- In most cases, it is the student-staff ratio calculation that is provided as the method that an LEA should use to either make corrections by hiring or move staff or repay the amount that the LEA is not comparable by multiplying the number of staff the LEA is out of comparability by salary of the lowest paid instructional paraprofessional.







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# How the On-line Comparability Application Works

- An LEA could serve all its schools with Title I funds, and chooses to compare its schools by grade span, based on the amount of State and local funds allocated per child for each grade span as a whole. To determine comparability, the LEA compares the per-pupil amount allocated to each school within the grade span to a range that falls within 90 and 110 percent of the per-pupil average for the grade span as a whole. This method would require running the On-line Comparability Application again. This does not guarantee comparability.

# How the On-line Comparability Application Works



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- In both of the previous examples, the LEA must submit source documentation to the Department Title Programs Division to review. Source documentation would include any dollar amounts that clearly show the amount of state and local funds used in the calculation and how these funds were distributed to each school for personnel, supplies, textbooks, etc. because the above two examples are demonstrating comparability based on the per-pupil amount of state and local funds that a school uses to purchase instructional staff and materials.



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# How the On-line Comparability Application Works

- An additional method for determining comparability is a Resource Allocation Plan that an LEA would have in place regardless if the LEA has a Title I program or not.
- If a Resource Allocation Plan is to be utilized by an LEA, the Plan must be approved by the Department's Title Programs Division at least six months prior to the fiscal year the Plan is to be utilized by the LEA for comparability purposes.
- Once an LEA has been approved for use of a districtwide Resource Allocation Plan then that approved Plan will be utilized in future fiscal years.



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# How the On-line Comparability Application Works

- The LEA would still run an On-line Comparability Report as a comparison to the Department approved LEA districtwide Resource Allocation Plan.
- Department Title Program Monitors would review expenditures and LEA source documentation at the end of each fiscal year to determine if the LEA's Resource Allocation Plan was implemented for each fiscal year.

# Questions

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# Title I, Part A Program Specialists' Contact Information



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