

Comparability 2022-2023 Frequently Asked Questions (FAQs)

1. Which schools are included in comparability calculations?

All schools (Title I and non-Title I) within the grade spans(s) served with Title I funds are to be included in comparability calculations, unless the following exceptions are true. There are three exceptions: 1) the school has less than 100 students; 2) the school served is the only school within the grade span; 3) The Public School Unit (PSU) only has one school per grade span. Grade Spans are defined as K-5, 6-8 and 9-12 in North Carolina. All schools within a grade span, regardless of their grade configuration, must fit in one of the 3 identified grade spans.

2. How is the definition of Instructional Staff developed?

The PSU determines the definition of Instructional Staff. It is required that all personnel funded through federal funds be removed from the definition. Any state or local funded position that impacts student achievement may be included in the Instructional Staff definition.

3. Are charters required to demonstrate comparability?

PSUs that only have one school per grade span are exempt from comparability reporting. This would include virtually all charters. Feel free to email your Regional Program Administrator if you have questions about if your school is exempt from comparability. If your charter is exempt, you are still required to upload the Comparability Assurance Header sheet indicating “exempt” in the Title I Related Documents of CCIP.

4. Are Alternative Schools included in comparability calculations?

Yes – alternative schools are included in comparability reporting within their respective grade span, unless they meet a comparability exemption.

5. Who is required to submit the comparability header?

All PSUs are required to submit the Comparability Assurance Header sheet. If your PSU is exempt, this must be indicated on the header. All comparability documentation is uploaded into CCIP.

6. If my PSU is exempt, what are my responsibilities?

If your PSU is exempt, you are still required to upload the Comparability Assurance Header sheet. You will indicate on this form that your PSU is “exempt” from comparability requirements. You will not have to complete any other comparability form. The Comparability Assurance Header must be uploaded into CCIP Title I Related Documents.

7. Who should sign the comparability report?

Comparability Reporting is a federal requirement. Due to the importance of this calculation, there will need to be more than one person checking this report. This will be demonstrated to the SEA by asking for the preparers name and position and also requiring an actual signature

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from a second PSU assurance representative. The PSU representative must be the supervisor of the person completing the report. For example, if a Title I director completes the report, then the Federal Program Director should sign the report; or if a Federal Program Director completes the report, then an Assistant Superintendent should sign the report. It is always acceptable for the Superintendent to sign the comparability report. **Again, the Assurance Representative signature must be an actual signature and the supervisor of the preparer.**

8. What is Comparability Equivalence Exemption? (Formerly known as Pathway A)

Every Student Succeeds Act (ESSA) allows for two ways to demonstrate comparability. Comparability Equivalence Exemption allows comparability to be demonstrated through providing the following **three** school board approved policy documents:

1. PSU-wide salary schedule (1118(c)(2)(A)(i))
2. A policy to ensure equivalence among schools in teachers, administrators, and other staff (1118(c)(2)(A)(ii))
3. A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies (1118(c)(2)(A)(iii))

It is understood that PSUs use the state salary schedule, so the documentation required to demonstrate bullet one is a detailed description of the PSU supplement and bonus guidelines.

The policies listed must be board approved. An important note to remember is that the policy has to move beyond just “ensuring” to specific details as to how equitable distribution will occur and how it will be measured.

It is encouraged that if you choose to pursue Comparability Equivalence Exemption, an email be sent to your Regional Program Administrator including the policies listed above. Feedback will be given on the policies as to let you know if they meet the comparability requirements. If the policies do not meet the specificity required to demonstrate comparability, time needs to be allowed to complete the comparability worksheet.

9. Should only one form be used to demonstrate comparability?

One comparability form (A-D) should be used for each school grouping within the PSU. PSUs are allowed to group all schools into one grouping or to group based on grade span or school size or both grade span and school size. All forms not used should be deleted prior to uploading report into CCIP.

10. How is a school that bridges multiple grade spans reported?

A school that bridges multiple grade spans should be compared with the grade span most like the bridge school. For example, a school that serves grades 4-8 overlaps both the elementary and middle grade spans. The PSU would make the determination of the most appropriate group to place the school (elementary or middle).

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11. Will the PowerPoint be shared?

The PowerPoint and this FAQ will be posted on the “resource” page of the Federal Program Monitoring and Support webpage.