

# Comparability and Equity Technical Assistance Webinars

*Office of Federal Programs*

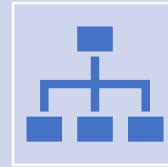
*Tuesday, September 27, 2022  
Thursday, September 29, 2022*

# Comparability Reporting

# Comparability & Reporting



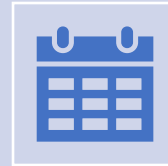
Comparability is reported through CCIP – Title I related documents



Assurance forms A-D will be available in a workbook format – one form per grouping



Prior to submission, remove all forms not chosen by PSU for reporting



\*Due Date – on or before December 1, 2022

# Comparability Exemptions

The comparability requirement does not apply to:

A school with 100 or fewer students

A PSU with only one school for each grade span

A school with no comparison school in the same grade span grouping by enrollment size.

# Comparability Exclusions

A PSU must exclude any resources paid with federal funds and private funds.

A PSU may exclude state and local funds expended for bilingual education for English Learners, excess costs for providing services to students with disabilities, or supplemental state or local funds used to meet the intent and purpose of Title I.

# Key Considerations

- Exempt and Non-Exempt PSUs must complete and submit the Comparability Assurance in CCIP
- PSUs are not required to include unpredictable changes in student enrollment or personnel assignments after selected point in time.
- PSU funded alternative schools and virtual schools must be included in respective grade span
- A school that falls into more than one grade span will be compared to the grade span it is most like.

# Instructional Staff

- Each PSU determines the definition of instructional staff.
- Definitions can include:
  - Certified classroom teachers including art, music, physical education, and others providing direct instruction to students.
  - Guidance counselors, speech therapists, media specialists, social workers, psychologists, and others providing support services that impact instruction.

# Key Points

- The selection of instructional staff must be consistent between Title I and non-Title I schools
- Staff salary differentials for years of employment are not included in comparability determinations.
- Note: Consider carefully whether a paraprofessional supported with state and local funds should be considered equivalent to a teacher or other instructional staff.

# Pathway A

- Must have the following policies [1118(c)(2)]:
  - A public school unit-wide salary schedule (1118(c)(2)(A)(i))
  - A policy to ensure equivalence among schools in teachers, administrators, and other staff (1118(c)(2)(A)(ii))
  - A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies (1118(c)(2)(A)(iii))

# **Title I Comparability Public School Unit Header Sheet**

Fiscal Year

PSU Code

Name of PSU

Prepared by

Title

Telephone

E-mail Address

| Comparability Equivalence Exemption ESSA Section 1118 (c)(2)(A-C)  |                      | If you answer "yes" to each of the documents in the Equivalence Exemption, then comparability has been established. <u>Documents must be uploaded, along with this coversheet, into CCIP as documentation.</u> |
|--|----------------------|--|
| Public school unit-wide salary schedule  | <input type="text"/> |  |
| Policy to ensure equivalence among schools in teachers, administrators, and other                              | <input type="text"/> |  |
| Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies | <input type="text"/> |  |

|                      |                      |
|----------------------|----------------------|
| Original Report Date | <input type="text"/> |
| Revised Report Date  | <input type="text"/> |
| Exempt / Not Exempt  | <input type="text"/> |

**\*Required Actual Signature of PSU Assurance Representative**  
(Must be Supervisor of Preparer)

Typed Name

Title

Date





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# Pathway B

|  | Form A<br><u>Title I and Non-Title I Schools</u> Compared<br>Student Enrollment to Instructional Staff | Form B<br><u>Title I Schools</u> Compared Student<br>Enrollment to Instructional Staff     | Form C<br><u>Title I and Non-Title I Schools</u> Compared<br>Student Enrollment to Instructional Staff<br><u>Salary</u> | Form D<br><u>Title I Schools</u> Compared Student<br>Enrollment to Instructional Staff<br><u>Salary</u> |
|--|--|--|---|---|
| Option 1<br>Grade Span Compared:<br><ul style="list-style-type: none"> <li>Elementary</li> <li>Middle</li> <li>High</li> </ul> | <u>Title I and Non-Title I Schools</u> Elementary to<br>Elementary<br>Middle to Middle<br>High to High | <u>All Title I Schools</u><br>Elementary to Elementary<br>Middle to Middle<br>High to High | <u>Title I and non-Title I Schools</u><br>Elementary to Elementary<br>Middle to Middle<br>High to High                  | <u>All Title I Schools</u><br>Elementary to Elementary<br>Middle to Middle<br>High to High              |
| Option 2<br><ul style="list-style-type: none"> <li>Large Schools Compared</li> <li>Small Schools Compared</li> </ul>           | <u>Title I and non-Title I Schools</u><br><br>Large to Large<br>Small to Small                         | <u>All Title I Schools</u><br><br>Large to Large<br>Small to Small                         | <u>Title I and non-Title I Schools</u><br><br>Large to Large<br>Small to Small  | <u>All Title I Schools</u><br><br>Large to Large<br>Small to Small                                      |

## Title I Comparability

### Form A - Title I to Non-Title I - Student-to-Instructional Staff Ratio

PSU

Fiscal Year

2022-2023

PSU Code

Staff Category

School Type

School Groupings

#### Non-Title I Schools

| Column 1            | Column 2   | Column 3   | Column 4                      | Column 5  |
|---------------------|------------|------------|-------------------------------|---|
| Non-Title I Schools | Grade Span | Enrollment | Total Instructional Staff FTE | Student-to-Instructional Staff Ratio<br>(Calculation of Column 3/4) |
|                     |            |            |                               | #DIV/0!   |
|                     |            |            |                               | #DIV/0!   |
|                     |            |            |                               | #DIV/0!   |
|                     |            |            |                               | #DIV/0!   |
|                     |            |            |                               | #DIV/0!   |
| Total and Average   |            | 0          | 0                             | #DIV/0!   |
| Average x 1.1       |            |            |                               | #DIV/0!   |

#### Title I Schools

| Column 1        | Column 2   | Column 3   | Column 4                      | Column 5   | Column 6                  |
|-----------------|------------|------------|-------------------------------|--|---------------------------|
| Title I Schools | Grade Span | Enrollment | Total Instructional Staff FTE | Student-to-Instructional Staff Ratio*<br>(Calculation of Column 3/4) | Is the School Comparable? |
|                 |            |            |                               | #DIV/0!  | #DIV/0!                   |
|                 |            |            |                               | #DIV/0!  | #DIV/0!                   |
|                 |            |            |                               | #DIV/0!  | #DIV/0!                   |
|                 |            |            |                               | #DIV/0!  | #DIV/0!                   |
|                 |            |            |                               | #DIV/0!  | #DIV/0!                   |
|                 |            |            |                               | #DIV/0!  | #DIV/0!                   |

Title I and non-Title I schools are compared using student to instructional staff ratio by all schools, grade span, or size. Student to instructional staff ratio in Column 5 must be equal to or less than 110 percent of the average ratio of the non-Title I schools to be comparable.

## Title I Comparability

### Form B - All Title I Schools - Student-to-Instructional Staff Ratio

|                    |  |                         |           |
|--------------------|--|-------------------------|-----------|
| <b>PSU</b>         |  | <b>Fiscal Year</b>      | 2022-2023 |
| <b>PSU Code</b>    |  | <b>Staff Category</b>   |           |
| <b>School Type</b> |  | <b>School Groupings</b> |           |

### All Title I Schools

| Column 1            | Column 2   | Column 3   | Column 4  | Column 5   | Column 6                  |
|---------------------|------------|------------|-----------|--|---------------------------|
| Title I Schools     | Grade Span | Enrollment | Total FTE | Student-to-Staff Ratio*<br>(Calculation of Column 3/4) | Is the School Comparable? |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
|                     |            |            |           |  |                           |
| Total and Average   |            | 0          | 0         | #DIV/0!  |                           |
| Average Ratio x 1.1 |            |            |           | #DIV/0!  |                           |

Only Title I schools are compared by student to instructional staff ratio using all schools, grade span, or size. The student to staff ratio in Column 5 must be equal to or less than 110 percent of the average ratio of all the Title I schools in the grade span.

# Title I Comparability

## Form C - Title I to Non-Title I - Student-to-Instructional Staff Salary Ratio

PSU

Fiscal Year

2022-2023

PSU Code

Staff Category

School Type

School Groupings

### Non-Title I Schools

| Column 1            | Column 2   | Column 3   | Column 4                      | Column 5                                      |
|---------------------|------------|------------|-------------------------------|---|
| Non-Title I Schools | Grade Span | Enrollment | Amount of Staff Base Salaries | Per-Pupil Cost<br>(Calculation of Column 4/3) |
|                     |            |            |                               | #DIV/0!                                       |
|                     |            |            |                               | #DIV/0!                                       |
|                     |            |            |                               | #DIV/0!                                       |
|                     |            |            |                               | #DIV/0!                                       |
|                     |            |            |                               | #DIV/0!                                       |
| Total and Average   |            |            | \$0                           | #VALUE!                                       |
| Average x 0.9       |            |            |                               | #VALUE!                                       |

### Title I Schools

| Column 1        | Column 2   | Column 3   | Column 4                         | Column 5                                       | Column 6                     |
|-----------------|------------|------------|----------------------------------|--|------------------------------|
| Title I Schools | Grade Span | Enrollment | Amount of Staff<br>Base Salaries | Per-Pupil Cost*<br>(Calculation of Column 4/3) | Is the School<br>Comparable? |
|                 |            |            |                                  | #DIV/0!  | #DIV/0!                      |
|                 |            |            |                                  | #DIV/0!  | #DIV/0!                      |
|                 |            |            |                                  | #DIV/0!  | #DIV/0!                      |
|                 |            |            |                                  | #DIV/0!  | #DIV/0!                      |
|                 |            |            |                                  | #DIV/0!  | #DIV/0!                      |
|                 |            |            |                                  | #DIV/0!  | #DIV/0!                      |

Title I and non-Title I schools are compared using student to instructional staff salary ratio by all schools, grade span, or size. The per pupil cost ratio in Column 5 must be equal to or greater than 90 percent of the average ratio of the non-Title I schools to be comparable.

### Title I Comparability

## Form D - All Title I Schools - Students-to-Instructional Staff Salary Ratio

\_\_\_\_\_

2022-2023

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

## All Title I Schools

| Column 1                   | Column 2   | Column 3   | Column 4                      | Column 5  | Column 6                  |
|----------------------------|------------|------------|-------------------------------|---|---------------------------|
| Title I Schools            | Grade Span | Enrollment | Amount of Staff Base Salaries | Student-to-Staff Salary Ratio*<br>(Calculation of Column 4/3) | Is the School Comparable? |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
|                            |            |            |                               | #DIV/0!   |                           |
| Total and Average          |            | 0          | \$0                           | #DIV/0!   |                           |
| Average Salary Ratio x 0.9 |            |            |                               | #DIV/0!   |                           |

The LEA has all Title I schools. Title I schools can be compared by all schools, grade span, or size. The student to staff salary ratio in Column 5 must be equal to or more than 90 percent of the average ratio of all the Title I schools for the schools to be comparable.

|  |
|--|
| <b>Title I Comparability</b><br><b>Public School Unit Header Sheet</b> |
|--|

|             |  |                |                      |
|-------------|--|----------------|----------------------|
| Fiscal Year | <input type="text" value="2022-2023"/> |                |                      |
| PSU Code    | <input type="text"/>                   |                |                      |
| Name of PSU | <input type="text"/>                   |                |                      |
| Prepared by | <input type="text"/>                   | Title          | <input type="text"/> |
| Telephone   | <input type="text"/>                   | E-mail Address | <input type="text"/> |

|                      |                      |
|----------------------|----------------------|
| Original Report Date | <input type="text"/> |
| Revised Report Date  | <input type="text"/> |
| Exempt / Not Exempt  | <input type="text"/> |

**\*Required Actual Signature of PSU Assurance Representative**  
*(Must be Supervisor of Preparer)*

**Typed Name**

**Title**

**Date**

|                      |
|----------------------|
| <input type="text"/> |
| <input type="text"/> |
| <input type="text"/> |
| <input type="text"/> |

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# Comparability Completion

- All is defined as grade spans receiving Title I funds or receiving comparable services
- Large school is 450 students or more
- Comparability is a prerequisite for receiving Title IA funds (section 1118(c)(1)(A))
- Data for report should be pulled from October 2022
- Comparability Report is due on or before December 1, 2022

# Steps for Uploading in CCIP

Templates can be found in the Title I Related Documents section of the Consolidated Application

Change Status to Chief Administrator Approved after uploaded the Comparability **AND** Equity Reports. Please do not submit one at a time.

|  |                                       |
|--|---------------------------------------|
|  | Title IA PRC 050                      |
|  | <u>Budget</u>                         |
|  | <u>Grant Details</u>                  |
|  | <u>Building Eligibility</u>           |
|  | <u>Set Asides</u>                     |
|  | <u>School Allocations - PPA List</u>  |
|  | <u>Related Documents</u>              |
|  | <u>Grant Award Notification (GAN)</u> |

# Comparability Report Approval Process



Comparability Reports are due by December 1.

Approval and/or feedback will be provided within 30 business days of submission via the History Log in CCIP.



# Final Reminders

**Data for report should be  
pulled from October 2022**

**Comparability Report is  
due on or before  
December 1, 2022**

Comparability is a  
prerequisite for receiving  
Title IA funds  
(section 1118(c)(1)(A))

# Comparability Report Checklist

- Internal Reviewer rubric
- PSUs can use this as a checklist to ensure a quality submission
- PSUs should not retain a copy of the document for monitoring

## COMPARABILITY REPORT REVIEW CHECKLIST FOR 2022-2023

PSU

Regional PA

Date Completed

### CR Header Sheet – General Information to Document Comparability

|   | Yes | No | NA |   |
|---|-----|----|----|---|
| 1 |     |    |    | At the top of the CR Header sheet, is all PSU information listed?   |
| 2 |     |    |    | At the top of the CR Header sheet, are the name, title, telephone number, and email address of report preparer listed?  |
| 3 |     |    |    | In the middle of the CR Header sheet, are the original report date, revised report date (if applicable) and exempt/not exempt indicated?  |
| 4 |     |    |    | At the bottom of the CR Header sheet, is the name of the Assurance Representative listed with signature, title, and date? <b>Must be the supervisor of the preparer.</b>  |
| 5 |     |    |    | Is there only one school per grade span? <i>(In that case, comparability does not apply. The preparer should only complete the CR Header Sheet and mark exempt).</i>  |
| 6 |     |    |    | Are the grade spans listed and are schools included in the correct grade span? <i>(Usually the grade spans - elementary, middle and high. All schools with enrollments of more than 100 MUST be included in the chart on the CR Worksheet). Preschools and alternative education are not included because they are programs, not schools.</i> |

# Federal Program Monitoring

**Check out the Office of Federal Programs  
Webpage for more information about  
Comparability and Equity.**

# Contact Us!

## Comparability Report

Dr. Masa Kinsey-Shipp – Comparability  
Reviewer (West)

[Masa.Kinsey-Shipp@dpi.nc.gov](mailto:Masa.Kinsey-Shipp@dpi.nc.gov)

Shawna Andrews – Comparability  
Reviewer (East)

[Shawna.Andrews@dpi.nc.gov](mailto:Shawna.Andrews@dpi.nc.gov)

## Equity Plan

Dr. Pauletta Thompson – Equity Planning  
Reviewer (Narrative Component)

[Pauletta.Thompson@dpi.nc.gov](mailto:Pauletta.Thompson@dpi.nc.gov)

Dr. Damesha Smith – Equity  
Planning Reviewer (Data Component)

[Damesha.Smith@dpi.nc.gov](mailto:Damesha.Smith@dpi.nc.gov)

Alex Charles – Section Chief – West

[Alex.Charles@dpi.nc.gov](mailto:Alex.Charles@dpi.nc.gov)