



Public Schools of North Carolina

Title I Comparability

October 27, 2020

Melissa Eddy, FPMS Program Administrator

Tina Letchworth, FPMS Assistant Director

Comparability Defined

- Section 1118(c)(1)(A) of the ESEA provides that a PSU 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 PSU serves all of its schools with Title I funds, the PSU must use state and local funds to provide services that, taken as a whole, are substantially comparable in each Title I School. [Section 1118(c)(1)(B)]



Comparability Requirements

- North Carolina requires PSUs to conduct comparability calculations annually to demonstrate comparability – Data from October 2020.
- PSUs must maintain records of comparability documentation.
- PSUs will submit comparability reports annually to the SEA.



Comparability and Reporting

- Comparability is reported through CCIP – Title I related documents
- Assurance forms A-D will be available in a workbook format
- Prior to submission, remove all forms not chosen by PSU for reporting

Due Date – on or before December 1, 2020



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.



Comparability Reminders

- 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, early college schools and charter 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 determined by the PSU.



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.



Comparability Equivalence Exemption Only Tab 6 (Far Right)

- 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="checkbox"/>	
Policy to ensure equivalence among schools in teachers, administrators, and other staff	<input type="checkbox"/>	
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies	<input type="checkbox"/>	

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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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="checkbox"/>	
Policy to ensure equivalence among schools in teachers, administrators, and other staff	<input type="checkbox"/>	
Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies	<input type="checkbox"/>	

Original Report Date	<input style="width: 95%;" type="text"/>	
Revised Report Date	<input style="width: 95%;" type="text"/>	<input style="width: 100%;" type="text"/>
Exempt / Not Exempt	<input style="width: 95%;" type="text"/>	

***Required Actual Signature of PSU Assurance Representative**

(Must be Supervisor of Preparer)

Typed Name

Title

Date

Comparability Forms

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



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Public School Unit Header Sheet**

Fiscal Year

PSU Code

Name of PSU

Prepared by

Title

Telephone

E-mail Address

Original Report Date

Revised Report Date

Exempt / Not Exempt

***Required Actual Signature of PSU Assurance Representative**

(Must be Supervisor of Preparer)

Typed Name

Title

Date

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

PSU	<input type="text"/>	Fiscal Year	<input type="text" value="2020-2021"/>
PSU Code	<input type="text"/>	Staff Category	<input type="text"/>
School Type	<input type="text"/>	School Groupings	<input type="text"/>

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* (Calculation of Column 3/4)
				#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* (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 Comparability

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

PSU

Fiscal Year

PSU Code

Staff Category

School Type

School Groupings

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* (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

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 (Calculation of Column 4/3)
				#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 Base Salaries	Per-Pupil Cost* (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!

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.



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 2020
- Comparability Report is due by December 1, 2020



Comparability Regional Contacts

Region	Contact	Email
Northeast/North Central	Melissa Eddy Federal Program Administrator	melissa.eddy@dpi.nc.gov
Southeast/Sandhills	Tina Hinson Federal Program Administrator	tina.hinson@dpi.nc.gov
Piedmont Triad/Northwest	James Popp Federal Program Administrator	james.popp@dpi.nc.gov
Southwest/Western	Timothy Dryman Federal Program Administrator	timothy.dryman@dpi.nc.gov





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Wrap Up/Questions?

Melissa Eddy

Melissa.Eddy@dpi.nc.gov