



# COMPARABILITY REPORTING PROTOCOL

Ensuring that Federal Funds are Supplemental

North Carolina Department of Public Instruction  
Federal Program Monitoring and Support  
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## I. Introduction

A Public School Unit (PSU) may receive Title I Part A funds only if it uses State and local funds to provide services in Title I schools that are “comparable” to services provided in non-Title I schools. Comparability is one indication that the PSU is using Title I funds to supplement and not supplant other funding sources. In North Carolina (NC), the PSU must determine comparability annually in order to receive Title I Part A funds [Section 1118(c)].

## II. Comparability Reporting – When

In NC, PSUs are required to submit a comparability report using the Consolidated Continuous Improvement Plan (CCIP) system. PSUs gain access to the report in CCIP on November 1<sup>st</sup>. The report must be submitted through the CCIP application to the North Carolina Department of Public Instruction (NCDPI) Federal Program Monitoring and Support Division on or before December 1<sup>st</sup> of the same year.

## III. Comparability Reporting – How

The PSU submit the comparability report under Title I - Related Documents in the CCIP system.

- Template is available in the CCIP system by November 1<sup>st</sup>.
- A webinar/training providing information and instructions on how to complete the comparability report will be held. The presentation and frequently asked questions are provided after the webinar and are to be located on the NCDPI Federal Program Monitoring and Support Division website.
- Reports must be uploaded as a PDF.
- The report must have an actual signature on the cover page (the signature must be a supervisor to the person completing the report). The report requires two different people to complete the report and they are the writer and the signer.
- All PSUs must submit a comparability report. In the event the PSU only has one site, the PSU must include a cover sheet indicating the PSU is exempt from comparability reporting and why.

## IV. Completing the Comparability Report?

### A. Header Sheet

The Header Sheet is the first sheet in the report and has two sections.

- Section one of the Header Sheet includes the PSU name, code, and the name of the person completing the report.
- Section two of the Header Sheet includes an original date and determination of exempt or not exempt. Also, an area for a revision date, if needed.

- Section three of the Header Sheet will include the supervisor’s actual signature and date (this must be a separate person from the report writer). The Comparability Report will need to be a PDF for submission in CCIP.

## B. Methods of Determining Comparability

- Method One: Tabs 1-5 are the traditional way to demonstrate comparability. There are two measures of comparability:
  - Student to Instructional Staff Ratio (Form A-B Tabs 2-3)
  - Student to Instructional Staff Salary Ratio (Form C-D Tabs 4-5)

In calculating these ratios, only non-federally funded staff are included. The definition of instructional staff lies with the PSU; however, the staff included must be instructional and must remain consistent for the PSU for all calculations. There are four forms that may be used to demonstrate comparability using Pathway B:

- Form A – Title I and non-Title I schools – Student to Instructional Staff Ratio (Tab 2)
- Form B – Title I only – Student to Instructional Staff Ratio (Tab 3)
- Form C – Title I and non-Title I schools – Student to Instructional Staff Salary Ratio (Tab 4)
- Form D – Title I only – Student to Instructional Staff Salary Ratio (Tab 5)
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A district may use one or more forms to show comparability. **The form(s) used for Comparability Determination and the Header Sheet must be printed, signed, scanned, and uploaded into the CCIP Title I Related Documents as a PDF.**

- Method Two: Exempt – If a PSU meets the following criteria, then they are exempt from comparability reporting requirements:
  - 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 (Established Grade Spans are: K-5, 6-8 and 9-12) All schools must be listed within the identified established grade spans. Example: A K-2, 3-4, or 4-5 school would be placed with the K-5 schools.

If the PSU determines that they are exempt, it must be indicated on the Header Sheet in section three. **The Header Sheet must be printed, scanned, signed and uploaded into the CCIP Title I Related Documents as a PDF.**

- Method Three: Equivalence Exemption is indicated on Tab 6 by answering “yes” to each of the three questions in section two. This indicates that the PSU has **3 established board approved policies** that outline:
  - Policy 1-PSU established salary schedules
  - Policy 2-Equivalence among schools in teachers, administrators, and other staff
  - Policy 3-Equivalence among schools in the provision of curriculum materials and instructional supplies

If the PSU has these three board policy documents in place with board approval, then the PSU has met comparability. These documents must be uploaded into CCIP along with the header sheet. The PSU must maintain local documentation ensuring compliance to the board policies provided. This documentation is requested during the consolidated monitoring event. **The Equivalence Exemption Sheet (Tab 6) must be printed, signed, scanned and uploaded into the CCIP Title I Related Documents as a PDF with the 3 board policies.**

#### C. Allowable Groupings

This report will describe the broad categories in which schools may be divided into groups based upon:

- Large vs. Small: A large school is considered to be any school with **450** or more students enrolled.
- Grade Spans

In creating groups based upon schools served with Title I funds, or schools skipped within rank order, multiple Comparability forms are used. A separate form will be used for each grouping. If clarification is needed, PSUs should contact the Federal Program Administrator responsible for Comparability.

#### D. Determining the Appropriate Form

Once PSU has established your school comparison groups, PSU decides which form is appropriate for each group. If the group includes Title I and non-Title I schools (i.e. not all elementary schools in the district receive Title I funds), depending on which ratio is appropriate or if all of the schools are served with Title I funds, then either forms A and/or B will be used for instructional staff or C and/or D for instructional staff salary. A different form may be used for each

group. **The Comparability form(s) for each group and the Header Sheet must be printed, signed, scanned, and uploaded into the CCIP Title I Related Documents Section as a PDF.**

## V. Noncomparable

Comparability is required by federal statute to be determined every two years. North Carolina requires comparability reporting annually. As a result, a PSU determined to be noncomparable will be placed on a probationary status. Should the PSU be noncomparable for two consecutive years, the federal funds for the PSU will be frozen until comparability is demonstrated. The federal requirement for comparability is to ensure the federal funds are used to supplement and not supplant state and local funds.

## VI. Conclusion

Comparability is the main supplement, not supplant test. All federal funds must be used to supplement state and local funds. The baseline for a PSU is determined by the methodology submitted in the Title I funding application within the CCIP system. The methodology outlines how state and local funds are distributed equitably to all schools, both Title I served and non-Title I. Comparability is required by federal statute to be determined every two years. North Carolina requires comparability reporting annually.