KENTUCKY TITLE I COMPARABILITY GUIDE

2014-2015 School Year

502-564-3791

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Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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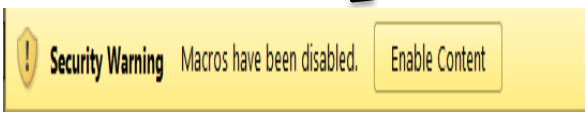
I. INTRODUCTION

This guidebook has been developed to assist the local district in completing its comparability report. It includes

1) a brief description of what the law requires;
2) instructions for completing each required worksheet with examples; and
3) reminders for the district

The worksheets in the Comparability Report are part of an **Excel Macro-Enabled workbook**. In order to use the workbook, you must select **enable content** which appears at the top left of the screen.



If you have questions as you complete the worksheets, or if any Title I school in the district is not comparable after you have completed the applicable worksheets, please call your Title I Consultant for assistance at (502) 564-3791.

REMINDERS

1) **The workbook must be completed and submitted electronically.**
2) **Complete the applicable comparability worksheets by November 14, 2014 and email the entire workbook, with the name of the file ("2014-15 <enter district name> CompRep") in the Subject line, to title1reports@education.ky.gov.**
3) **Keep the worksheets and backup data on file in the district Title I office to be reviewed by Title I, Part A staff during monitoring visits.**
4) **Demonstrating comparability is a requirement that districts must annually meet to receive Title I, Part A funds.**

II. REQUIREMENTS OF TITLE I, PART A

Section 1120A states that a district may receive Title I funds only if it uses general funds (state and local funds) to provide services in Title I schools that are at least comparable to the services provided in non-Title I schools. If the district serves all of its schools (or all of its schools in a grade span or size grouping) with Title I funds, the district must use general funds to provide services that are comparable in each school. Comparability procedures must be demonstrated annually.

Title I requires that each district give written assurances that schools within the district receive comparable services from general funds. These assurances state that the district must meet the comparability requirements by establishing and implementing:

(a) Districtwide salary schedules;
(b) Policies to ensure equivalence among schools in teachers, administrators, and other staff; and
(c) Policies to ensure equivalence among schools in the provision of curriculum materials and instructional supplies

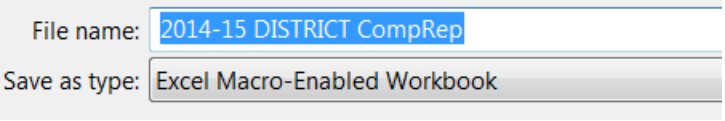
III. SAVING YOUR COMPARABILITY REPORT

Remember, your comparability report is a macro-enabled document. You must save it in the same format. To save your report

1. Click File, then Save As
2. Change the file name by replacing "District" with your district name

***Example**: "2014-15 DISTRICT CompRep" becomes "2014-15 Bardstown Ind CompRep"*

3. Make sure the "Save as type" box still says "Excel Macro-Enabled Workbook"



4. Click **Save**

IV. COMPLETING CR WORKSHEET

CR Worksheet 1 is the starting point for determining comparability. The purpose of this worksheet is to establish whether or not a detailed comparability study must be completed, and, if so, the number of such reports required.

This document is locked. You may only enter data in the yellow cells

Need space to calculate? Click insert sheet symbol at the bottom of worksheet

Step 1. Enter the name of the district and the person responsible for completing the comparability report. Enter the date of the data used for the report. The information for the comparability report must be taken on the last day of the second school month (a school month is twenty teaching days) or another date early in the school year (on or before October 31, 2014).

Step 2. Schools with 100 or fewer students may be excluded from the study. List these in the yellow box designated for the excluded schools and do not include their information in any other worksheets.

Step 3. A district may meet the comparability requirements on a grade span by grade span basis or a school-by-school basis. If grade span grouping is used, group schools according to grade span. Although there is no limitation on the number of grade spans a district may use, the number should match the basic organization of schools in the district. Usually there are three groups: (A) elementary, (B) middle or junior high, and (C) senior high. Every school with an enrollment over 100 must be assigned to one of the groups. Up to EIGHT grade spans are permitted. **Do not include preschool centers**.

<u>Follow these rules in grouping schools:</u>

a. A school serving grades in two or three of the grade span groupings should be included in that group with which it has the greatest number of grades in common.

b. A school that serves an equal number of grades in two or more grade span groupings should be included in the lower grade span grouping.

c. If there is a significant difference in the enrollments of schools within a grade span – for example, the largest school in the grade span has an enrollment that is two times the enrollment of the smallest school in the grade span – the district may divide grade spans into a smaller size grouping and a larger size grouping. Any school whose enrollment falls between the two can be placed in the size group deemed most appropriate.

d. Enter the actual grade spans under the appropriate grade span).

e. Enter the number of Title I Schools (using size grouping as necessary), and the number of non-Title I schools (using size grouping as necessary).

Step 4. If CR Worksheet 1 indicates that a study must be completed, the appropriate worksheet will be shown. The district has the option of documenting comparability compliance by utilizing one of the following two ways:

i. Using the **Student/Staff Ratio Worksheet** that matches the groups to be compared to compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools. If all schools in a grade span or size grouping are served by Title I, higher poverty Title I schools are compared to lower poverty Title I schools.

OR

ii. Using the **Salary Ratio Worksheet** to compare the average instructional staff salary expenditure per student in each Title I school with the average instructional staff salary expenditure per student in non-Title I schools. If all schools in a grade span or size grouping are served by Title I, higher poverty Title I schools are compared to lower poverty Title I schools.

The following pages of this guide explain the procedures to complete the required Student/Staff Ratio Worksheet(s) as determined by completion of the **CR Worksheet 1**. Use the worksheet(s) that correspond to the grade span groups that must be compared. **Only required worksheets will be visible**.

Helpful Hint

Since **Student/Staff Ratio** is the easier of the two worksheets to complete, it is suggested that the Salary Ratio Worksheet be completed ***ONLY*** if comparability cannot be shown using Student/Staff Ratio. **Salary Ratio** allows the district to demonstrate that schools are comparable without having to move or add staff to make the schools comparable. Call your Title I consultant if you have difficulties or questions.

Click for CR Worksheet Samples

Sample 1 *Title I and Non-Title I Schools*
(page 5)

Sample 2 *Title I Schools Only*
(page 6)

Sample 3 *No Comparable Schools*
(page 7)

Once all applicable worksheets are completed AND all the schools are comparable, email the entire workbook, with the name of the file ("2014-15 <enter district name> CompRep") in the Subject line to title1reports@education.ky.gov

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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SAMPLE 1: Completing CR Worksheet – Comparing Title I and Non-Title I Schools

TITLE I COMPARABILITY REPORT *for* 2014-2015

CR Worksheet		
General Information to Document Comparability	**District**	Pleasantville Ind
	Responsible Official	John Davis
	Date of Data Used *	10/15/2014

** Use either last day of second school month or another date early in school year (on or before October 31, 2014)*

NOTE: Schools with 100 or fewer students may be excluded from comparability determinations. List schools

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Grade Spans	Grade Span **A**		Grade Span **B**		Grade Span **C**		Grade Span **D**	
(identify actual grade span)	P-5		6-8		9-12			
Size Grouping	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**
# of Title I Schools	1	5						
# of Non-Title I Schools		3	1		1			

Grade Spans	Grade Span **E**		Grade Span **F**		Grade Span **G**		Grade Span **H**	
(identify actual grade span)								
Size Grouping	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**
# of Title I Schools								
# of Non-Title I Schools								

Schools Tally	**Total Title I Schools**	6	**Total Non-Title I Schools**	5

CR Worksheet 1 | Gradespan A - Larger1 | Salary Comparison

In this example, the smallest school in the P-5 grade span was placed in the smaller size grouping because it was approximately half the size of the other schools in the grade span. No study is necessary since there is no school to be compared.

A study must be made to compare the Title I schools to the non-Title I schools in the P-5 grade span. *Gradespan A - Larger* worksheet will appear and must be completed.

Click here *to see* ***Sample 4*** *(page 10) worksheet comparing Title I and Non-Title I Schools*

No study is needed for Grade Span B or Grade Span C since there is no school to compare to in either grade span.

SAMPLE 2: Completing CR Worksheet – Comparing Title I Schools Only

TITLE I COMPARABILITY REPORT *for* 2014-2015

CR Worksheet		
General Information to Document Comparability	**District**	Westeros Ind
	Responsible Official	Tyrian Lannister
	Date of Data Used *	10/22/2014

** Use either last day of second school month or another date early in school year (on or before October 31, 2014)*

NOTE: Schools with 100 or fewer students may be excluded from comparability determinations. List schools

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Grade Spans *(identify actual grade span)*	Grade Span **A**		Grade Span **B**		Grade Span **C**		Grade Span **D**	
Size Grouping	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**
# of Title I Schools	8		1	1				
# of Non-Title I Schools					2			

Grade Spans *(identify actual grade span)*	Grade Span **E**		Grade Span **F**		Grade Span **G**		Grade Span **H**	
Size Grouping	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**
# of Title I Schools								
# of Non-Title I Schools								

Schools Tally	**Total Title I Schools**	10	**Total Non-Title I Schools**	2

CR Worksheet 1 | Gradespan A - Smaller1 | Salary Comparison

In this example, size grouping was not used since the P-5 schools are similar in enrollment. The number of P-5 schools was placed in *Gradespan A - Smaller*. A study must be made to compare the Title I schools in the P-5 grade span to each other. *Gradespan A - Smaller* worksheet will appear and must be completed.

Click here *for example of* ***chart*** *(page 11) to compare low and high poverty Title I schools*

Click here *to see* ***Sample 5*** *(page 12) worksheet comparing Title I Schools Only*

No studies are necessary for Grade Span B-Smaller Grouping and for Grade Span B-Larger Grouping because there are no schools to be compared.

No study is necessary for Grade Span C-Smaller Grouping because the high schools are not Title I.

SAMPLE 3: Completing CR Worksheet – No Comparable Schools

TITLE I COMPARABILITY REPORT *for* 2014-2015

CR Worksheet		
General Information to Document Comparability	**District**	Calaveras Co
	Responsible Official	John Tortuga
	Date of Data Used *	10/15/2014

** Use either last day of second school month or another date early in school year (on or before October 31, 2014)*

NOTE: Schools with 100 or fewer students may be excluded from comparability determinations. List schools

Huck Finn Elementary		

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Grade Spans *(identify actual grade span)*	Grade Span **A**		Grade Span **B**		Grade Span **C**		Grade Span **D**	
Size Grouping	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**
# of Title I Schools	1		1	1				
# of Non-Title I Schools		1			1	1		

Grade Spans *(identify actual grade span)*	Grade Span **E**		Grade Span **F**		Grade Span **G**		Grade Span **H**	
Size Grouping	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**	**Smaller**	**Larger**
# of Title I Schools								
# of Non-Title I Schools								

Schools Tally	**Total Title I Schools**	3	**Total Non-Title I Schools**	3

CR Worksheet 1 | Salary Comparison

In this example, no study is necessary for any grade span or size grouping. Note that a school with an enrollment of 100 or less has been excluded from the study. No additional worksheets will appear. There are no schools to be compared in grade spans or size groupings.

V. COMPLETING the STUDENT/STAFF RATIO WORKSHEET

General Information

The general provisions contained in this section apply to the Student/Staff Ratio Worksheet in all circumstances.

F.T.E. (Full-Time Equivalency) Staff

When calculating instructional staff, be consistent from school to school and for Title I and non-Title I schools alike. Itinerant staff must be prorated as necessary (e.g., if the music teacher serves more than one school, the music teacher's F.T.E. is less than full-time in each school).

Instructional Staff to Be Included

State and locally funded instructional staff members **assigned to the school** who provide direct instructional services to children or who assist or supervise those staff members who provide instruction **MUST be included** for comparability purposes. This includes **state and locally funded** teachers, principals, librarians, guidance personnel and paraprofessionals who are employed to assist other instructional staff members providing instructional service. ***Secretaries, clerical personnel and cafeteria workers are NOT included.***

Instructional Staff to Be Excluded

The following instructional staff must be excluded for comparability purposes:

- Instructional staff paid from **any federal funds**, such as Title I funded teachers and paraeducators/ instructional assistants, Title II funded teachers to reduce class size, Title III funded staff; staff funded through IDEA; etc.;

The following instructional staff may be excluded (maintain consistency between schools)

- Instructional staff paid from general funds for language instruction educational programs for English language learners;
- Instructional staff paid from general funds for excess costs of providing services to children with disabilities as determined by the district; and
- Instructional staff paid from supplemental general funds for a program in a non-Title I school that meets the schoolwide program requirements of section 1114 or targeted assistance school requirements of section 1115. These programs must comply with the requirements of a schoolwide program or a targeted assistance school.

A program funded from *supplemental* state or local funds meets the schoolwide program requirements of section 1114 if it

- Is implemented in a school that meets the Title I schoolwide program poverty threshold (40% low-income);
- Is designed to upgrade the entire educational program in the school to enable all children to meet the state's challenging student performance standards;
- Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Reviews the effectiveness of the program through the state's system of assessment

A program funded from *supplemental* state or local funds meets the targeted assistance school requirements of section 1115 if it

- Serves only children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Provides supplemental services designed to meet the special educational needs of children who are participating in the program to enable those children to meet the state's student performance standards;
- U Reviews the effectiveness of the program through the state's system of assessment

When Comparing Title I & Non-Title I schools

See ***Sample 4*** *(page 10)*

This document is locked. You may only enter data in the yellow cells

Need space to calculate? Click insert sheet symbol at the bottom of worksheet Salary Comparison

Step 1. Under **Title I Schools**, list all Title I schools *(column A)*

Step 2. Enter the actual grade span for each listed Title I school *(column B)*

Step 3. Enter the enrollment of each Title I school at the date the study is taken *(column C)*.
Do not include preschool students

Step 4. Enter the number of state and locally funded instructional staff as a Full-time Equivalency (F.T.E.) for each school (column D).

In this example, the total state and locally funded instructional staff (F.T.E.) for Pontiac Elementary School is 21.10. Note that the itinerant teachers and teachers partially paid from federal funds have been prorated.

CALCULATING KINDERGARTENERS

- ***Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes.***

Example: .5 X 50 = 25

- **Review the *General Information*** (link) **to ensure only required instructional staff is included in the count.**
- **Each school's staff information must be on file in the district Title I office.**

Pontiac Elementary	
State and Locally Funded Instructional Staff	**F.T.E.** (Full-Time Equivalency)
1 Principal	1.00
16 Regular Classroom Teachers	16.00
1 Music Teacher (itinerant)	.33
1 Art Teacher (itinerant)	.33
1 P.E. Teacher (itinerant)	.33
1 School Nurse (part federal)	.11
1 Counselor	1.00
2 Full-time Paraeducators (Instructional Assistants)	2.00
BUILDING F.T.E. TOTAL	**21.10**

Step 5. Under the Comparison Schools section, list the non-Title I schools (column A)

Step 6. Enter the actual grade span for each listed non-Title I school *(column B)*

Step 7. Enter the enrollment of each non-Title I school at the date the study is taken (column C)

Step 8. Enter the number of state and locally funded instructional staff as a Full-time Equivalency (F.T.E.) for each listed non-Title I school (column D).

If any of the Title I schools are not comparable using student/staff ratio, call your Title I Consultant at (502) 564-3791 for further guidance.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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SAMPLE 4: Completing Student/Teacher Ratio Worksheet – Title I & Non-Title I schools

TITLE I COMPARABILITY REPORT *for* **2014-2015**

Gradespan A - Larger	**District**	**Pleasantville Ind**
Detailed School Data Using Student/Staff Ratio	**Responsible Official**	**John Davis**
	Date of Data Used	**10/15/2014**

This worksheet is for ***Gradespan A - Larger*** *Size Grouping* ***ONLY***

Comparable: The *Student/Staff Ratio* for each Title I (or high poverty Title I) school does not exceed the *Comparability Ratio*.

Not Comparable: The *Student/Staff Ratio* for any Title I (or high poverty Title I) school exceeds the *Comparability Ratio*.

If any Title I (or high poverty Title I) school is not comparable, call the Title I consultant assigned to your district at (502) 564-3791 for further guidance.

TITLE I SCHOOLS *(or High Poverty Title I Schools)*

Title I Schools	Actual Grade Span	Student Enrollment	FTE	Student/Staff Ratio	Comparable?
Pontiac Ele	P-5	409	21.10	19.38	YES
Cadillac Ele	P-6	409	18.10	22.60	YES
Thunderbird Ele	P-6	424	20.80	20.38	YES
Ford Ele	P-5	412	18.70	22.03	YES
Mustang Ele	P-7	682	29.52	23.10	YES

COMPARISON SCHOOL(S) *(Non-Title I or Low Poverty Title I Schools)*

Comparison Schools	Actual Grade Span	Enrollment	FTE	Average Student/Staff Ratio
Camaro Ele	P-5	420	19.47	**22.21**
Pinto Ele	P-5	462	21.04	
Corvette Ele	P-6	462	20.00	*multiplied by federally required 110%*
				Comparability Ratio
				24.43
	Totals	*1344*	*60.51*	

This example determines if the schools in Grade Span A-Larger size grouping from *Sample 1* are comparable. The schools used as comparison schools in this example are non-Title I schools. All schools in this example are comparable because the student/staff ratio for each Title I school does not exceed the Comparability Ratio.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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When Comparing Only Title I Schools

See ***Sample 5*** *(page 12)*

If all schools in a grade span or size grouping are Title I schools, then the district is obligated to demonstrate that state and local services, taken as a whole, are comparable in each school. In order to do this, the district must compare high poverty Title I schools to low poverty Title I schools.

This document is locked. You may only enter data in the yellow cells

Need space to calculate? Click insert sheet symbol at the bottom of worksheet Salary Comparison

Step 1. Use the sample to the right to identify schools with the lowest percent of low-income children.

Step 2. Under **Title I Schools,** list the **HIGHEST POVERTY** Title I schools (column A)

Step 3. Enter the actual grade span for each listed Title I school *(column B)*

Step 4. Enter the enrollment of each Title I school at the date the study is taken *(column C)*.
Do not include preschool students

Step 5. Enter the number of state and locally funded instructional staff as a Full-time Equivalency (F.T.E.) for each Title I school (column D).

Step 6. Under the Comparison Schools section, list the **LOWEST POVERTY** Title I schools (column A)

Step 7. Enter the actual grade span for each listed Title I school *(column B)*

Step 8. Enter the enrollment of each Title I school at the date the study is taken (column C)

Step 9. Enter the number of state and locally funded instructional staff as a Full-time Equivalency (F.T.E.) for each listed Title I school (column D).

EXAMPLE: **Identifying schools with the lowest percent of low-income children**

Grade span: P-5

(a) Since the district will not split the grade span by size grouping, schools will be listed as smaller group size.

(b) There are eight elementary schools, all served by Title I.

(c) The percent of children from low-income families must be used to determine which schools will act as the comparison schools. Using the data available on the Title I Ranking Report for 2013-2014, identify those schools from the group with the lowest percent of low-income children.

Title I Schools	% Low-Income
Red Elementary	40
White Elementary	38
Black Elementary	35
Green Elementary	34
Orange Elementary	30
Yellow Elementary	29
Blue Elementary	27
Pink Elementary	25

(d) Up to one-half of the lowest poverty schools may be used as Comparison Schools. In this example, only three schools (highlighted) will be used as Comparison Schools.

If any of the Title I schools are not comparable using student/staff ratio, call your Title I Consultant at (502) 564-3791 for further guidance.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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SAMPLE 5: Completing Student/Teacher Ratio Worksheet – Title I Schools Only

TITLE I COMPARABILITY REPORT *for* **2014-2015**

Gradespan A - Smaller	**District**	**Westeros Ind**
Detailed School Data Using Student/Staff Ratio	**Responsible Official**	**Tyrian Lannister**
	Date of Data Used	**10/22/2014**

This worksheet is for ***Gradespan A - Smaller*** *Size Grouping* ***ONLY***

Comparable: The *Student/Staff Ratio* for each Title I (or high poverty Title I) school does not exceed the *Comparability Ratio*.

Not Comparable: The *Student/Staff Ratio* for any Title I (or high poverty Title I) school exceeds the *Comparability Ratio*.

If any Title I (or high poverty Title I) school is not comparable, call your Title I consultant at (502) 564-3791 for further guidance.

TITLE I SCHOOLS *(or High Poverty Title I Schools)*

Title I Schools	Actual Grade Span	Student Enrollment	FTE	Student/Staff Ratio	Comparable?
Kingswood Elementary	P-5	409	21.1	19.38	YES
Blackwater Elementary	P-6	409	18.1	22.60	YES
Eddard Stark elementary	P-6	424	20.8	20.38	YES
Volantis Elementary	P-5	412	18.7	22.03	YES
Lannisport Elementary	P-7	682	29.52	23.10	YES

COMPARISON SCHOOL(S) *(Non-Title I or Low Poverty Title I Schools)*

Comparison Schools	Actual Grade Span	Enrollment	FTE	Average Student/Staff Ratio
Pennytree Elementary	P-5	420	19.47	**22.21**
Rook's Rest Elementary	P-5	462	21.04	
Night's Watch Elementary	P-6	462	20.00	*multiplied by federally required 110%*
				Comparability Ratio
				24.43
	Totals	*1344*	*60.51*	**If any Title I (or high poverty Title I) school is not comparable, call your Title I consultant for further guidance. (502) 564-3791**

This example determines if the schools in Grade Span A-Smaller size grouping from *Sample 2* are comparable. The schools used as comparison schools in this example are the lowest poverty Title I schools. All schools in this example are comparable because the student/staff ratio for each Title I school does not exceed the Comparability Ratio.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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VI. COMPLETING the SALARY RATIO WORKSHEET

General Information

This section explains the procedures for comparing the instructional staff salary expenditure per student in each Title I school (or the highest poverty Title I schools) with the instructional staff salary expenditure per student in schools not participating in Title I (or the lowest poverty Title I schools).

Do not use this comparison worksheet unless schools were not comparable using the Student/Staff Ratio worksheet.

Contact your Title I Consultant before you begin.

Salaries *(Excluding Longevity)*

When calculating instructional staff salaries, be consistent from building to building and Title I and non-Title I schools alike. Be sure to prorate salaries as necessary (e.g., if a music teacher is .5 F.T.E. in one elementary and .5 F.T.E. in another elementary, the salary identified for each building should only reflect that portion of the teacher's time assigned in a particular school). Salaries used for comparability purposes are to exclude longevity (i.e., length of service). Therefore, the base salary for job classification should be used - NOT the current salary. The district should distinguish various levels of base salaries (e.g., teachers with a bachelor's degree would have one base salary; teachers with master's degree would have a higher base salary).

Staff to Be Included

The salaries of state and locally funded instructional staff members assigned to the school who provide direct instructional services to children or who assist or supervise those staff members who provide instruction must be included for comparability purposes. This includes state and locally funded teachers, principals, librarians, guidance personnel and paraprofessionals who are employed to assist other instructional staff members providing instructional service. (Secretaries, clerical personnel and cafeteria workers are NOT included.)

Staff to Be Excluded

The salaries of the following staff must be excluded for comparability purposes:

- Instructional staff paid from any federal funds such as Title I funded teachers and paraeducators/instructional assistants, Title II funded teachers to reduce class size, staff funded through IDEA, etc.;

The following instructional staff may be excluded (be consistent from school to school):

- Instructional staff paid from general funds for language instruction educational programs for English language learners;
- Instructional staff paid from general funds for excess costs of providing services to children with disabilities as determined by the district; and
- Instructional staff paid from supplemental general funds for a program in a non-Title I school that meets the schoolwide program requirements of section 1114 or targeted assistance school requirements of section 1115. (See page 9 for schoolwide program requirements and targeted assistance requirements.)

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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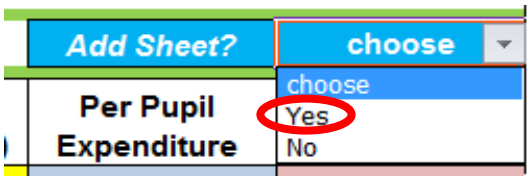
Salary Ratio Worksheet

See ***Sample 6*** *(page 15)*

Step 1. Determine which grade span and size grouping is to be compared on the worksheet. If you must complete a Salary Ratio Worksheet for more than one grade span/size grouping, click next to "Add Sheet?" and choose "Yes"



Step 2. List all the schools that are Title I schools (or high poverty Title I schools) (column A)

Step 3. Enter the actual grade span for each listed Title I school *(column B)*

Step 4. Enter the enrollment of each Title I school at the date the study is taken *(column C)*. **Do not include preschool students**

Step 5. Enter the total salaries, excluding longevity, at each school. The district should compile the total salary expenditure by building. In the example below, the salaries are prorated based on the FTE of each position.

CALCULATING KINDERGARTENERS

- ***Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes.***

  Example: .5 X 50 = 25

- **Review the *General Information* (link) to ensure only required instructional staff is included in the count.**
- **Each school's staff information must be on file in the district Title I office.**

Kingswood Elementary			
Staff	**FTE**	**Base Salary**	**Total Salary**
Principal	1	$25,000	$25,000
Regular Classroom Teachers (Master's)	10	$20,000	$200,000
Regular Classroom Teachers (Bachelor's)	6	$18,000	$108,000
Music Teacher	.33	$20,000	$6,660
Art Teacher	.33	$20,000	$6,660
P.E. Teacher	.33	$18,000	$5,994
School Nurse	.11	$15,000	$1,650
Counselor	1	$8,000	$8,000
Full-time Paraeducators (Instructional Assistants)	2	$7,167	$14,334
BUILDING F.T.E. TOTAL			**$376,298**

Step 6. Under Comparison Schools, list the comparison schools (column A)

Step 7. Enter the actual grade span for each listed comparison school *(column B)*

Step 8. Enter the enrollment of each comparison school at the date the study is taken (column C)

Step 9. Enter the total salaries, excluding longevity, at each comparison school (column D).

IMPORTANT!!

If any school is not comparable, staff will have to be added or moved in order to make the school comparable.

Contact your Title I Coordinator at (502) 564-3791 for assistance.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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SAMPLE 6: Completing Salary Ratio Worksheet

TITLE I COMPARABILITY REPORT *for* **2014-2015**

Gradespan Being Compared	District	Westeros Ind
Detailed School Data Using Salary	Responsible Official	Tyrian Lannister
	Date of Data Used	10/22/2014

Do not use this form unless any school was not comparable using appropriate Gradespan

Use a separate Salary Comparison Worksheet for each grade span or size grouping containing more than one school *(from Worksheet 1)*

Before using this worksheet, call the Title I consultant assigned to your district at (502) 564-3791

Comparable: The *Per Pupil Expenditure* for each Title I (or high poverty Title I) school exceeds the *Comparability Ratio*.

Not Comparable: The *Per Pupil Expenditure* for any Title I (or high poverty Title I) school does not exceed the *Comparability Ratio*.

If still not comparable, call your Title I consultant for further guidance since staff will need to be moved or added.

TITLE I SCHOOLS *(or High Poverty Title I Schools)* — *Add Sheet?* choose

Title I Schools	Actual Grade Span	Student Enrollment	Salaries (Excl. Longevity)	Per Pupil Expenditure	Comparable?
Kingswood Elementary	P-5	409	$376,298.00	$920.04	YES
Blackwater Elementary	P-6	409	$343,400.00	$839.61	YES
Eddard Stark Elementary	P-6	424	$396,738.00	$935.70	YES
Volantis Elementary	P-5	412	$360,269.00	$874.44	YES
Lannisport Elementary	P-7	682	$566,961.00	$831.32	YES

COMPARISON SCHOOL(S) *(Non-Title I or Low Poverty Title I Schools)*

Comparison schools are either the non-Title I or the lowest poverty Title I schools in this grade span-size grouping

Comparison Schools	Actual Grade Span	Enrollment	Salaries (Excl. Longevity)	Average Per Pupil Expenditure
Pennytree Elementary	P-5	420	$396,298.00	**$851.81**
Rook's Rest Elementary	P-5	462	$380,269.00	
Might's Watch Elementary	P-6	462	$368,266.00	*multiplied by federally required 90%*
				Comparability Ratio
				$766.63
	Totals	*1344*	*$1,144,833.00*	

This example determines if the schools in the smaller size grouping from the example on page 7 are comparable using staff salaries instead of staff/student ratio. The Title I schools with the lowest percentage of free and reduced lunch count must be used as the comparison schools when all of the schools in the grade span or size grouping are served by Title I. All schools in this example are comparable because the average per pupil expenditure for each school (in Column E-1) exceeds the amount in Column E-3.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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VII. DATES, RECORDS, AND ACTION IN COMPARABILITY REPORTING

It is the district's responsibility to maintain appropriate records in order to verify that the comparability requirement is met. Keep a copy of the completed worksheets and any data that was used to complete them on file in the district Title I office.

A. District Comparability

1. The effective date of the comparability report should be the last day of the second school month or another date early in the school year (on or before October 31, 2014). Data are to reflect the current year program at the date selected.
2. A district must be in compliance with comparability following the comparability study.

B. Information and Records on File in Local District

1. *All districts **MUST** complete CR Worksheet 1*
   i) If additional worksheets are required, they will appear. The district must complete those worksheets.
   ii) Only use Salary Comparison Worksheet if schools are not comparable using Student Ratio Worksheet. Call your Title I Consultant at (502) 564-3791 before using the Salary Ratio Worksheet.
2. The entire workbook with the completed worksheets must be emailed by November 14, 2014 to title1reports@education.ky.gov.
3. The worksheets must be available in the district Title I office for monitoring along with the districtwide salary schedule; policy to ensure equivalence among schools in teachers, administrators, and other staff; and policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.
4. The district must have the working papers on file for each school. This includes the staff included and excluded for the report or the salary information for the report.
5. Comparability records must be maintained in the district for three years plus the current year or until any impending audit is settled.

C. Actions in Cases of Non-Comparability

1. Demonstrating comparability is a requirement for receiving Title I, Part A funds. If a district determines that any Title I school is not comparable, records must be made available to show how the district has brought the schools into comparability. Call your Title I Consultant at (502) 564-3791if the study shows that any Title I school is not comparable. Staff will need to be moved or added immediately in order to make the particular school(s) comparable.
2. A new Comparability Report and documentation showing that staff has been added/moved must then be submitted to the KY Department of Education. Title I funds will be held until the documentation is submitted.
3. If a district is found not to be in compliance with the comparability requirements, the district must pay back the Title I school that was not comparable. The amount of general (state and federal) funds to be paid back to the school is determined by the percentage by which the school was not comparable.

Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

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