

Kentucky Department of Education

Title I, Part A Comparability Guide

Office of Continuous Improvement and Support Division of School and Program Improvement 300 Sower Blvd. Frankfort, KY 40601 • (502) 564-3791

Table of Contents

I.	Introduction	2
II.	Requirements of Title I, Part A	3
III.	Saving your Comparability Report	4
IV.	Completing CR Worksheet	4
	SAMPLE 1: Completing CR Worksheet – Comparing Title I and Non-Title I Schools	6
	SAMPLE 2: Completing CR Worksheet – Comparing Title I Schools Only	7
	SAMPLE 3: Completing CR Worksheet – No Comparable Schools	8
v.	Completing the Student/Staff Ratio Worksheet	9
	General Information	9
,	When Comparing Title I & Non-Title I Schools	
	SAMPLE 4: Completing Student/Teacher Ratio Worksheet – Title I & Non-Title I Schools	
,	When Comparing Only Title I Schools	
	SAMPLE 5: Completing Student/Teacher Ratio Worksheet – Title I Schools Only	
VI.	Completing the Salary Ratio Worksheet	14
(General Information	14
:	Salary Ratio Worksheet	
:	SAMPLE 6: Completing Salary Ratio Worksheet	
VII	Dates, Records, and Action in Comparability Reporting	17
VII	II. Appendix: Uploading the Title I Comparability Report to GMAP	

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.



Reminders

- The workbook must be completed and submitted electronically. Complete the applicable comparability worksheets by the KDE-determined deadline (typically on or around November 1 of the current school year) and upload the entire workbook with the file name "20XX-XX District Name CompRep", to GMAP. Consult the <u>Appendix</u> of this guide for instructions.
- 2. 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.
- 3. Demonstrating comparability is a requirement that districts must annually meet to receive Title I, Part A funds.

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 contact your <u>Title I Consultant</u> for assistance.

II. Requirements of Title I, Part A

The Comparability requirement of the Every Student Succeeds Act (ESSA), found in section 1118, is identical to the requirement found in the No Child Left Behind Act (NCLB), Section 1120A. It is a requirement that LEAs (districts) be able to demonstrate that services provided in Title I served schools are comparable to those provided in non-Title I schools prior to the expenditure of Title I funds. Essentially, a school district must show that Title I served schools have equitable access to state and local dollars as non-Title I served schools. This requirement also applies in districts where all schools are served by Title I dollars. In those instances, the district must demonstrate that comparable state and local funds are spent on each school served under Title I. [See ESSA 1118(c)(1)(B)]

Additionally, districts are required to design and implement three written policies and/or features within their district to meet comparability. These include:

- An LEA-wide salary schedule
- A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies
- A policy to ensure equivalence among schools with regard to teachers, administrators, and other staff

[See ESSA 1118(c)(2)(A)]

The first two requirements are policies that should be administered by the district and kept on file at the district office. The third piece to comparability is what this guide directly covers – the comparability report. On an annual basis KDE requires school districts to demonstrate comparability of services by first comparing student/staff ratios between non-Title I served and Title I served schools prior to the expenditure of Title I funds. If comparability cannot be achieved through those means a second measure exists that looks at staff wages and expenditures and compares those between Title I served and non-Title I served schools.

The goal of comparability is to ensure Title I money is being used to supplement the educational experiences of disadvantaged youth. By ensuring that adequate and comparable state and local funds are directed to Title I served schools it allows Title I funds to be used to achieve the state grant goal of improving the academic achievement of disadvantaged youth.

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 according to the following naming convention: "20XX-XX District Name CompRep"

Example: 20XX-XX Bardstown Ind CompRep

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

File name:	
Save as type:	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.

- 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 between the last day of the second school month (a school month is twenty teaching days) and October 31 of the current school year. Often this timeframe will be September 30 through October 31, inclusive, but this may depend on district calendars.
- **Step 2.** Schools with 100 or fewer students may be excluded from the study. List the names of these schools in the yellow box designated for 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. The number of grade spans 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 or alternative education programs, unless alternative education programs are served as a Title I school.

Follow these rules in grouping schools:

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 grouping 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 methods:
 - a. 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.
 - b. 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.

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 schools comparable. Contact your <u>Title I Consultant</u> if you have difficulties or questions.

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.**

Once all applicable worksheets are completed AND all the schools are comparable, upload the entire workbook, with the name of the file (*20XX-XX District Name CompRep*) to GMAP. Consult the <u>Appendix</u> of this guide for instructions.

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

CR Worksheet District Pleasantville Independent									
General Information	Responsible Official John Davis								
Comparabi	Date of Data Used *								
* Use either last day of s	second sch	ool month	or anothe	er date ear	ly in schoo	l year (on	or before	October 3	1, 20XX)
NOTE: Schools with 100 or fewer students may be excluded from comparability determinations. List schools									
PU	BLIC SC	HOOLS	ENROLL	ING MO	RE THAN	100 CH	ILDREN		
Grade Spans	Grade	Span A	Grade	Span B	Grade	Span C	Grade	Span D	
(identify actual grade	P-			-8		12			
Size Grouping	Smaller	Larger	Smaller	Larger	Smaller	Larger	Smaller	Larger	
# of Title Schools	1	5							
# of Non-Title Schools		3	1		1				
Grade Spans	Grade	Span E	Grade	Span F	Grade	Span G	Grade	Span H	
(identify actual grade									
Size Grouping	Smaller	Larger	Smaller	Larger	Smaller	Larger	Smaller	Larger	
# of Title I Schools									
# of Non-Title Schools									
Schools Tally	Total Tit	le I Scho	ols	6	Total No	n-Title I	Schools	5	
There is more that	n one sch	ool in any	grade sp	an or size	grouping		TR	UE	
	Deter	mining l	f Worksl	neet 2 M	ust Be C	omplete	d		
If the answer above is		-						book wit	h this
worksheet completed,	-							-	in child
Comparability Report"									o
GMAP.	, - ,	,,							-
If the answer above is							an or size	grouping	that
contains more than on	e school ii	n Column	C or in Co	lumns C a	and D tog	ether.			
Make sure you use the	correct	orkchact	Thora is	a differen	t workete	at for an	ob grada -	non size	
			mere is	a unieren	it workshe	et for ea	ch grade s	pan-size	
Introduction CR Wor	ksheet	Gradesp	an A - Lai	rger1	Salary Co	mparisor	n CRC	hecklist	+

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. <u>Gradespan A – Larger</u> worksheet will appear and must be completed. See <u>Sample 4</u> for a 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

CR Worksheet District Westeros Independent									
General Information	to Docu	ment	F	Responsible Official Tyrian Lannister					
Comparabil	ity		Date of Data Used *						
* Use either last day of s		nool month				l vear (on	or before	October 3	1. 20XX)
					<i>.</i>	, , ,			,,
NOTE: Schools with 100 or fewer students may be excluded from comparability determinations. List schools									
NOTE: Ochools with 100 of	lewer stu	dento ma	y be exen	uded from	compara	onity dete	mination	5. LISt 501	10013
						400.011			
Grade Spans					RE THAN		1		
(identify actual grade		Span A		Span B		Span C	Grade	Span D	
(nens	P	-	-	-8		12			
Size Grouping	Smaller	Larger	Smaller	Larger	Smaller	Larger	Smaller	Larger	
# of Title I Schools	8		1	1					
# of Non-Title Schools					2				
Grade Spans	Grade	Span E	Grade	Span F	Grade	Span G	Grade	Span H	
(identify actual grade									
Size Grouping	Smaller	Larger	Smaller	Larger	Smaller	Larger	Smaller	Larger	
# of Title I Schools						Ŭ		Ŭ	
# of Non-Title Schools									
Schools Tally	Total Tit	le I Scho	ols	10	Total No	n-Title I	Schools	2	
								-	
There is more the		ool in onv	arada an		arouping		тр	UE	
There is more that	n one sch	oor in any	grade sp	an or size	grouping		IK	UE	
	Detei	mining l	t Worksi	heet 2 M	ust Be C	omplete	d		
If the answer above is	F ALSE , thi	s is the or	nly worksł	neet to be	complete	ed. The er	ntire work	book, wit	h this
worksheet completed,									
Comparability Report") by Novei	mber 1, 20	DXX. Cons	ult help d	ocument	Upload	ing CR Wo	orksheet t	0
GMAP.									
If the answer above is							an or size	grouping	that
contains more than on	e school i	n Column	C or in Co	olumns C	and D tog	ether.			
Make sure you use the			. There is	a differen	t workshe	et for ea	ch grade s	span-size	
Introduction CR Worl			an A - Sn	naller1	Salary C	compariso	on CR	Checklist	(+)

In this example, size grouping was <u>not</u> used since the P-5 schools are similar in enrollment. The number of P-5 schools was placed in <u>Gradespan A – Smaller</u>. A study must be made to compare the Title I schools in the P-5 grade span to each other. <u>Gradespan A – Smaller</u> worksheet will appear and must be completed. See <u>Sample 4</u> to compare low and high poverty Title I schools. See <u>Sample 5</u> for a 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

CR Worksh	leet		District Calaveras County						
General Information	Responsible Official John Tort								
Comparabi	ity			Date of Data Used *					
* Use either last day of	second scl	hool month	or anothe	er date ear	ly in schoo	l year (on	or before	October 3	1, 20XX)
NOTE: Schools with 100 or fewer students may be excluded from comparability determinations. List schools									
Huck Finn Elementary			, 						
PU	BLIC SC	HOOLS	ENROLL	ING MO	RE THAN	100 CH	ILDREN		
Grade Spans	Grade	Span A	Grade	Span B	Grade	Span C	Grade	Span D	
(identify actual grade	P	-5	6	-8	9-	12			
Size Grouping	Smaller	Larger	Smaller	Larger	Smaller	Larger	Smaller	Larger	
# of Title Schools	1		1	1					
# of Non-Title Schools		1			1	1			
Grade Spans (identify actual grade	Grade	Span E	Grade	Span F	Grade	Span G	Grade	Span H	
(Identity actual grade									
Size Grouping	Smaller	Larger	Smaller	Larger	Smaller	Larger	Smaller	Larger	
# of Title I Schools									
# of Non-Title Schools									
Schools Tally	Total Tit	le I Scho	ols	3	Total No	n-Title I	Schools	3	
T I 1 1		1.5							I
There is more tha	n one sch	ool in any	grade sp	an or size	grouping		FA	LSE	
	-								
		rmining l				•			
If the answer above is	-								h this
worksheet completed,									
Comparability Report" GMAP.	by Nove	mber 1, 20	UXX. Cons	ult help d	ocument	Upload	ing CR Wo	orksheet t	0
GIMAP.									
If the answer above is	TRUE. Wo	orksheet 2	must be	complete	d for each	grade so	an or size	grouning	that
contains more than on								0 shuig	
Make sure you use the			. There is	a differen	t workshe	et for ea	ch grade s	span-size	
Introduction CR Wor			ompariso	n CR	Checklist	+)		

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. *Administrative assistants, 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 learners (ELs);
- 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 ESSA 1114 or targeted assistance school requirements of ESSA 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 ESSA 1114 if it:

- Is implemented in a school that meets or exceeds the Title I schoolwide program poverty threshold (40% low-income);
- Is designed to upgrade the entire educational programs 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 ESSA 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;
- Reviews the effectiveness of the program through the state's system of assessment

When Comparing Title I & Non-Title I Schools

See <u>Sample 4</u> on the following page

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

- **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 or locally funded instructional staff as a Full-time Equivalency (F.T.E.) for each school (column D).

Pontiac Elementary State & Locally Funded Instructional Staff	F.T.E. (Full Time Equivalency)
1 Principal	1.00
16 Regular Classroom Teachers	16.00
1 Music Teacher (itinerant)	0.33
1 Art Teacher (itinerant)	0.33
1 P.E. Teacher (itinerant)	0.33
1 Media Specialist (part federal)	0.11
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).

Calculating Kindergarteners

- Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes.
 - Example: 0.5 x 50 = 25
- Review the <u>General Information</u> 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.

If any of the Title I schools are not comparable using student/staff ratio, contact your Title I Consultant.

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

Gradespan A - Larger District Pleasantville Independent									
Gradespan A - Larger Detailed School Data	Bespor	sible Official		e independer	n –				
Using Student/Staff Ratio		of Data Used							
This worksheet is for				DMI V					
- This indiksneeds for	, Grauespan	#-Laiger 0	<i>lecrooping</i> e		_				
Comparable: The <u>Student/Staff Ratio</u> for <u>each</u>	Title I (or high p	overty Title I) sch	ool does not exc	eed the Compar	ability Ratio.				
Not Comparable: The <u>Student/Staff Ratio</u> for any Title I (or high poverty Title I) school exceeds the <u>Comparability Ratio</u> .									
If any Title I (or high poverty Title I) school is r	not comparable,	call the Title I con	sultant assigned	to your district a	at (502) 564-				
3791 for further guidance.									
TITLE I SO	CHOOLS (or H	ligh Poverty Title	e I Schools)						
	Grade	Student		aff					
Title I Schools	Span	Enrollment	FTE	Ratio	Comparable?				
Pontiac Elementary	P-5	409	21.10	19.38	YES				
Cadillac Elementary	P-6	409	18.10	22.60	YES				
Thunderbird Elementary	P-6	424	20.80	20.38	YES				
Ford Elementary	P-5	412	18.70	22.03	YES				
Mustang Elementary	P-7	684	29.52	23.17	YES				
COMPARISON SCH		Title I or Low P	overty Title I S	chools)					
Comparison Schools	Grade Span	Enrollment	FTE	uses as Stud	ent/Staff Rati				
Comparison Schools Camero Elementary	P-5	420	19.47						
Pinto Elementary	P-5	462	21.04	22	2.21				
Corvette Elementary	P-6	462	20.00	multipi	lied by				
				hederally rec					
				Compara	bility Ratio				
				24.43					
				If any Title I (or high poverty Title I) school is not comparable,					
				call your Title					
					guidance.				
	Totals	1344	60.51	[502] 5	64-3791				

This example determines if the schools in *Gradespan 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.

See <u>Sample 5</u> on the following page.

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.

- **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 <u>each</u> listed Title I school (column D).

EXAMPLE: Identifying schools with the lowest percentage 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 currently available data, 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 (Yellow, Blue, and Pink Elementary) will be used as Comparison Schools.

If any of the Title I schools are not comparable using student/staff ratio, contact your Title I Consultant.

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

Gradespan A - Smaller District Vesteros Independent										
Gradespan A - Smaller Detailed School Data	Bespor	nsible Official								
Using Student/Staff Ratio			10/5/20XX							
				ONIX						
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 SC	TITLE I SCHOOLS (or High Poverty Title I Schools)									
	Grade	Student		aff						
Title I Schools	Span	Enrollment	FTE	Ratio	Comparable?					
Kingswood Elementary	P-5	409	21.10	19.38	YES					
Blackwater Elementary	P-6	409	18.10	22.60	YES					
Eddard Stark Elementary	P-6	424	20.80	20.38	YES					
Volantis Elementary	P-5	412	18.70	22.03	YES					
Lannisport Elementary	P-7	682	29.52	23.10	YES					
		I								
COMPARISON SCH	OOL(S) (Non-	Title I or Low P	overtv Title I S	chools)						
	1			í I						
Comparison Schools	Grade Span	Enrollment	FTE	uerade Stud	lent/Staff Rati					
Pennytree Elementary	P-5	420	19.47							
Rook's Rest Elementary	P-5	462	21.04	22	2.21					
Night's Watch Elementary	P-6	462	20.00	multip	lied by					
				· · ·	quired 110%					
				Comparability Ratio						
				24.43						
				If any Title I (or high						
				If any Title I (or high poverty Title I) school is						
				not com	parable,					
					e i consultant r guidance.					
					64-3791					
	Totals	1344	60.51							

This example determines if the schools in *Gradespan 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.

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 0.5 F.T.E. in one elementary and 0.5 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 a 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. *Administrative assistants, clerical personnel, and cafeteria workers are NOT included*.

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 learners (ELs);
- 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 ESSA 1114 or targeted assistance school requirements of ESSA 1115. These programs must comply with the requirements of a schoolwide program or a targeted assistance school. (See pages 9-10 for schoolwide program requirements and targeted assistance requirements)

Salary Ratio Worksheet

See <u>Sample 6</u> on the following page

Step 1. Determine which grade span and grade 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 the drop-down button next to "Add Sheet?" and choose "Yes".

Add Sheet?	choose 💌
Per Pupil	choose
	Yes
	No

- 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.

Calculating Kindergarteners

- Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes.
 - Example: 0.5 x 50 = 25
- Review the <u>General Information</u> 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.
- **Step 5.** Enter the total salaries, excluding longevity, at each school. The district should compile the total salary expenditure by building. In the following example, the salaries are prorated based on the F.T.E. of each position.

Kingswood Elementary Staff	F.T.E.	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	0.33	\$20,000	\$6,660
Art Teacher	0.33	\$20,000	\$6,660
P.E. Teacher	0.33	\$18,000	\$5,994
Media Specialist	0.11	\$15,000	\$1,650
Counselor	1	\$8,000	\$8,000
Full-time Paraeducators (Instructional Assistants)	2	\$7,167	\$14,334
тот	ALS 21.1		\$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 added or moved in order to make the school comparable. Contact your <u>Title I Consultant</u> for assistance.

SAMPLE 6: Completing Salary Ratio Worksheet

Select Gradespan Being Compared		District	Westeros Indep	endent						
Detailed School Data	Besnon		Tyrian Lanniste							
Using Salary		of Data Used		•						
Do not use this form unless at				noista Grada	50.30					
Use a separate Salary Comparison Worksheet (Before using this worksheet					Vorksheet 1)					
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 Student Salaries Grade Enrollmen (Excl. Title I Schools Span t Longevity)									
Kingswood Elementary	P-5	409	\$376,298.00	e \$920.04	Comparable? YES					
Blackwater Elementary	P-6	409	\$343,400.00	\$839.61	YES					
Eddard Stark Elementary	P-6	424	\$396,738.00	\$935.70						
Volantis Elementary	P-5	412	\$360,269.00	\$874.44						
Lannisport Elementary	P-7	682	\$566,961.00	\$831.32	YES					
COMPARISON SCHOOL(S) (Nor	Title Lor Low	Poverty Title I	Schoole)							
Comparison schools are either the non-i		-		this areada soor						
comparison schools are enner the non-	Grade	Enrollmen	(Ercl.	Average I						
Comparison Schools	Span	t	Longevity)	Expen						
Pennytree Elementary	P-5	420	\$396,298.00							
Rook's Rest Elementary	P-5	462	\$380,269.00	\$85	1.81					
Night's Watch Elementary	P-6	462	\$368,266.00	multipli	iadhu					
		402	\$000,200.00	federally reg	/					
				Compara	bility Ratio					
					-					
				A70	0.00					
				\$76	6.63					
	Totals	1344	\$1,144,833.00							

This example determines if the schools in the smaller size grouping from Sample 2 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.

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.

District Comparability

- The effective date of the comparability report should be between the last day of the second school month (a school month is twenty teaching days) and October 31 of the current school year. Often this timeframe will be September 30 through October 31, inclusive, but this may depend on district calendars. 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.

Information and Records on File in Local District

- 1. All districts MUST complete CR Worksheet 1
 - a. If additional worksheets are required, they will appear. The district must complete those worksheets.
 - b. Only use Salary Comparison Worksheet if schools are not comparable using Student Ratio Worksheet. Contact your <u>Title I Consultant</u> before using the Salary Ratio Worksheet.
- 2. The entire workbook with the completed worksheets MUST be uploaded to GMAP by the KDEdetermined date (typically on or close to November 1).
- 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 used when completing the Comparability Report on file for each school. This includes each school's Enrollment Summary Report (located in Infinite Campus via Student Information | Reports) as well as documentation of the staff included and excluded for the report or the salary information for the report. The data on this documentation should match the data used in the Comparability Report.
- 5. Comparability records must be maintained in the district for three years plus the current year or until any impending audit is settled.

Actions in Cases of Non-Comparability

- 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. Contact your <u>Title I Consultant</u> if 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 Kentucky 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 local funds to be paid back to the school is determined by the percentage by which the school was not comparable.

VIII. Appendix: Uploading the Title I Comparability Report to GMAP

Note: The years shown in some of the following screenshots may not reflect the current fiscal year because document revisions occurred before the document was uploaded to GMAP.

Instructions	Screenshot
 Select District Document Library in the GMAP Main Menu. 	GMAP Home Administer Search Inbox Planning Funding Grant Summary District Document Library Address Book KDE Resources Help for Current Page Contact KDE GMAP Sign Out
2. Select the current fiscal year from the Root Folders menu and click <i>Show Folders</i> . Note: For future years, always click on the current year's folder. The folder name will always be the END of the upcoming fiscal year.	Root Folders: General 2020 2019 RootFolders 2018 2017 - Show Folders
 Open the folder and locate the Title I Comparability Report subfolder. Expand the folder (+) and click on <i>Edit Documents.</i> 	District Document Library [Expand All] [Collapse All] ■ 2019 Folders ● CDIP/CSIP documents ● Grant Funding Application Documents ● Title I Comparability Report Documents ● 2018-19 Title I Comparability Report [Edit Documents] ● Title III Monitoring Documents ● Title III Monitoring Documents ● IDEA Documentation ● Equitable Services

	Instructions	Screenshot
 Click the Comparability Report link provided under Document Template. This allows you to download the template to your computer. 		Document Information
	Document Name 2018-19 Title I Comparability Report	
	Folder Hierarchy 2019 Title I Comparability Report	
	Upload Begin Date 9/15/2018	
		Upload End Date
		Minimum Required Count 1
		Maximum Allowed Count
		Document Template 2018-19 Comparability Report
5.	Click on the downloaded document to open it (located in the lower left corner of the screen).	2018-19Comparaxlsm ^
	Open the document and click <i>Enable</i> <i>Editing</i> . Complete the report per the instructions in this guide.	
7.	Name the document according to the	File name: 20XX-XX Sample District CompRep
	naming convention in this guide and save it to your computer. Close Microsoft Excel.	Save as type: Excel Macro-Enabled Workbook
	Return to the <i>Comparability Report</i> subfolder in the GMAP District Document Library using steps 1-3. Click the <i>Upload</i> <i>Document</i> link.	Docume Document Name Folder Hierarchy Upload Begin Date Upload End Date Minimum Required Count Maximum Allowed Count Document Template Upload Document Documents/Links
9.	Click <i>Choose File</i> and locate the completed Comparability Report you saved to your computer. Enter a <i>Document Name</i> and click save.	Upload Document Document Name: 20XX-XX Sample District CompRep Document: Select Document Description:
10	. To verify a successful upload, return to the District Document Library and click on <i>Document History</i> within the Title I Comparability Report subfolder. There should be a link to your document there.	Document History Document Name <u>© comparability report 2018</u>