

# Title I, Part A Comparability of Services Guidance Handbook

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**Codes** Eh.3720.257(C) de (R) x C

Exampls

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## Comparability Assurance Document

The purpose of the CAD is for the LEA to certify whether it is exempt or non-exempt from comparability testing and provide assurance that it is in compliance with the remaining comparability of services requirements. All LEAs that receive Title I, Part A, funds must complete and submit the CAD, which is an electronic survey submitted online each fall. A link to the CAD is available on the [Title I, Part A – A. Comparability of Services Requirement](#) page of the TEA website.

On the CAD, the LEA certifies that it is either exempt or non-exempt. (Exemption criteria are listed in the next section.)

Table 1. LEA with multiple campuses that serve the same grade span yet have no overlap of grades.

Grades	Grade Span Group	Title I, Part A or Skipped
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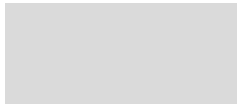


Table 2. No Title I, Part A or skipped campuses in

Tables below illustrate the exclusion of campuses resulting in exemption from comparability testing requirement.

All Campuses

Grades	LEA Grade Span Group	Title I, Part A or Skipped	Enrollment
PK-5	Elementary	Yes	99
PK-5	Elementary	Yes	185
6-8	Middle School	Yes	105
6-8	Middle School	Yes	235
9-12	High School	Yes	100
9-12	High School	No	201
9-12	High School	No	210

Campuses by Grade Span

Grades	LEA Grade Span Group
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## Comparability Computation Form (CCF)

LEAs that meet any of the criteria for exemption from the comparability testing requirement are

## Exclusion of Supplemental State and Local Funds

Certain services are designed for specific students. Expenditures for those services could vary from campus to campus depending on the student populations. When testing for compliance with the comparability of services requirement, an LEA may exclude supplemental state and local funds expended for the following:

- x Language instruction educational programs, such as bilingual education for children with limited English proficiency
- x English as a second language (ESL) services
- x Excess state and local

the Comparability Instructions.

### Test 3: Ratio of Pupils to Non–Federally Funded Instructional Staff FTEs

The following data are required for Test 3:

- x Total campus enrollment.
- x The count of campus non-federal instructional staff full-time equivalents (FTEs). For a definition of FTE, refer to [Appendix 1](#) of this handbook.

### Subdivided Grade Span Group (High and Low Enrollment)

Grade span groups with a significant difference in enrollment—that is, where the largest campus has at least twice the enrollment of the smallest campus—may be subdivided into high and low enrollment grade span groups.

After the subdivision, there must be at least two campuses in both the high-enrollment and low-enrollment groups.

In the following example, the LEA can subdivide the grade span groups into high and low enrollment groups as shown. Note in this example, subdividing the elementary school grade span group into high and low enrollment groups results in the LEA's ability to exclude two elementary campuses from testing, as shown in Table 4.

Table 4. Subdividing grade span groups into high and low enrollment

Grades	LEA Grade Span Group	Title I, Part A Campus	Enrollment
PK-5	Elementary	Yes	175
PK-5	Elementary	Yes	300
PK-5	Elementary	No	400
PK-5	Elementary	No	450

### Enrollment Subdivision

- Low-enrollment elementary campuses are compared to each other.
- High-enrollment group includes no Title I, Part A elementary campuses. The entire high-enrollment elementary grade span group may be excluded from testing.

Grades

LEA Grade

## Skipped Campus

In some cases, an LEA may choose not to serve a Title I, Part A eligible campus with Title I, Part A funds. In other words, an LEA may have a

## Schoolwide Program Flexibility

An LEA may demonstrate compliance with the comparability requirement using any of three tests. (Refer to the section titled [LEA Chooses One Test](#) for details.)

The following tests are used most commonly:

- x Test 2: Comparison of Per Pupil Expenditures for State and Local Base Salaries
- x Test 3: Ratio of Pupils to Non-Federally Funded Instructional Staff FTEs.

Compliance with the comparability requirement is based only on how state and local funds are used. Therefore, Test 2 and Test 3 assume that an LEA can differentiate those instructional staff who are paid from state and local funds from those paid with federal funds.

In a Title I, Part A schoolwide program school, however, the school is not required to track the expenditure of federal funds to particular activities. Preferably, the school may consolidate its federal funds with its state and local funds and spend the consolidated funds for any activities included in its Title I, Part A schoolwide campus improvement program plan. Thus, an LEA might not be able to determine which instructional staff to include in its comparability determinations.

There are several ways an LEA may show comparability in a schoolwide program school:

- x If the LEA does not consolidate other federal and state funds or continues to track expenditures of those funds to particular activities, the LEA may calculate comparability for its schoolwide program schools the same as it would for its Title I, Part A targeted assistance schools (as described in previous sections).
- x The LEA may determine the ratio of federal funds to the total funds available in a schoolwide program school. The LEA may assume the same percentage of instructional staff in the school paid with federal funds and delete those staff from its comparability determinations.
- x The LEA may use a different measure for determining comparability in schoolwide program schools which is not dependent on identifying instructional staff paid with state and local funds. In each case, the non–Title I schools compared would be the same, but the method used for comparison purposes would be different.



- x The CAD is submitted with the “digital signature” of the superintendent or other designated signature authority (for example, the person who submits the CAD must either be the superintendent or a person who has been given signature authority on the CAD by the superintendent).
- x All the LEA’s applicable campuses are included on the CCF for comparability testing and any excluded campus(es) is listed on the excluded campuses tab.
- x All the LEA’s applicable campuses are identified correctly on the CCF as either Title I, Part A/Skipped or non–Title I, Part A campuses.
- x On the grade span group test form of CCF, the LEA has at least two campuses listed.
- x If the LEA has dedicated EE and/or PK campuses receiving state and local funding, those campuses are included in comparability testing if the LEA also has an elementary campus serving the same grades as are served on the dedicated campuses.
- x The LEA has selected one comparability test (Test 1, 2, or 3) which shows compliant results for all Title I, Part A campuses, regardless of whether the results are in the “A” section, “B” section, or both.
- x The CCF for the current school year is completed and submitted.
- x The CCF is submitted in Excel format and not in PDF.

## Comparability Timeline

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x An LEA has the

Appendix 2: Exclusion of

## Questions and Answers Regarding the Exclusion of Supplemental State or Local Funds

Question 1: When may nonfederal supplemental funds be excluded for determining compliance with the comparability of services requirement on a targeted-assistance campus?

Answer 1: Nonfederal supplemental funds may be excluded when all the following conditions apply:

x ~~the~~ funds



Question 7: May the LEA use Title I, Part A funds to pay for 50 percent of the Title I, Part A extended-year program costs for the eight students identified as eligible for Title I, Part A and use local funds to pay for 50 percent of the Title I, Part A extended-year program costs for the Non-

## Appendix 3: Frequently Asked Questions

Question 1. Our LEA does not receive any Title I, Part A funds. Do we have to submit a CAD claiming we are exempt? Do we need to submit a CCF?





Determine the LEA contact person designated to approve your request for the GFFC Reports and Data Collections application. If you have confirmation that the request has been approved and you have not obtained access to GFFC Reports and Data Collections, contact [compliance@tea.texas.gov](mailto:compliance@tea.texas.gov) for assistance.

Question 13. Would an LEA need to resubmit a CCF if there is a change in payroll during the school year?

Answer 13. No. Per statute, an LEA need not include unpredictable changes in student enrollment or personnel assignments occurring after the beginning of the school year in determining comparability of services (Refer to [ESSA Section 1118\(c\)](#).)

Question 14. Does the "Total Base Salaries for non-federally funded instructional staff for each campus" include instructional aides?

Answer 14. "Instructional staff" refers to numerous categories of personnel and does not include only teachers. Refer to the instructions for completing the CAD and CCF for a list of role



(A) language instruction educational programs; and

(B) the excess costs of providing services to children with disabilities as determined by the local educational agency.

(d) EXCLUSION OF FUNDS.—For the purpose of complying with subsections (b) and (c), a State educational agency or local educational agency may exclude supplemental State or local funds expended in (or) Tj0 Tc 0 Tw 1.781 0 Td( )Tj0.001 Tc -0.001 Tw 0.273 0 Tdy(or)Tj0 Tc 0 4 -17956 0 Td( )Tj

