

Title I Comparability Compliance Procedures NCLB, Section 1120A(c) Winton Woods City School District

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Part A allocations are made annually, comparability is an **annual** requirement. The local educational agency (LEA) must **develop written procedures** for complying with the comparability of services requirement and implement those procedures annually. The comparability report is submitted **biennially** to the Ohio Department of Education (ODE), Office of Federal Programs. The comparability requirement does not apply if the LEA has only one building in each grade span. If grade spans overlap, however, the comparability requirement may apply (see further details in ODE Web-based Comparability Directions, found in the CCIP Consolidated Application Doc Library, Financial Information, Comparability Directions and Forms). The LEA may also exclude schools with one hundred or fewer students from its comparability determinations.

1. **Comparability Compliance:** It is the responsibility of the Office of Accountability to ensure that WWCS remains in compliance with the comparability requirement set forth in NCLB Section 1120A(c). To be eligible to receive Title I funds, the LEA must use state and local funds to provide services in Title I schools that are **at least** comparable to services provided in non-Title I schools. If the LEA serves all of its schools with Title I funds within a particular grade span, the LEA must use state and local funds to provide services that are **substantially** comparable in each school.
2. **Deadlines:** The Office of Accountability shall perform the comparability calculations **annually** using the ODE Comparability Web-based Application. It is essential that the calculations be made as close to the beginning of the school year as possible, but in no event later than February 28th to allow for any necessary reallocation of resources with minimum disruption to students should any school be found not to be receiving comparable services. When submitting the comparability report to ODE, which is required biennially, the LEA will follow ODE deadline for reporting.
3. **Determining schools to be included:** The Office of Accountability will determine which public schools, including community schools that are a part of the LEA, are to be included in making comparability calculations. Refer to ODE Comparability Directions for further details.
4. **Actual data:** The Office of Accountability must use current school year data from schools to make the calculation. *It is recommended that all figures be collected within a relative period of time (enrollment and instructional staff FTE) using the EMIS October reporting period (October Count Week) in determining comparability based on the student/instructional staff ratio method; otherwise, the figures should be consistent with regard to what day of the year the data collected reflect.* Determine **instructional staff, excluding federally funded staff**, to be calculated on a FTE basis (Refer to ODE Web-based Comparability Directions for sample definition of instructional staff and criteria used with the EMIS Report option). **Include local definition of instructional staff with the written procedures** (does not have to be board approved). **Exclude preschool students and staff. Include an explanation of how the LEA treats State Fiscal Stabilization Funds-paid staff and Ed Jobs Fund personnel** (Refer to C-9 of revised ARRA Title I Guidance, Ed Jobs Guidance or Web-based Comparability Directions). Determine if **students** will be counted as either full time equivalency or as a whole within each comparability report. List documents needed may include but are not limited to EMIS data, CCIP Building Eligibility Page, OEDS-R information, staff directories, staff schedules, instructional staff FTE documentation/spreadsheets, building resource schedules, enrollment data, payroll records, EMAD records and/or free and reduced lunch data.
5. **Method:** Comparability will be established using ODE's Web-based Comparability Application located in the SAFE Account, using the EMIS or Self Report Option (circle the one that applies) and the Method (circle the one that applies): student/instructional staff ratio, expenditures per pupil, or student/instructional staff salary ratio). Although the LEA has flexibility in selecting which method will be used with the Self Report option, it must be uniformly applied to each district-wide or grade span report. For help, refer to ODE's Web-based Comparability Directions.
6. **Reallocation:** If the calculation indicates that a school is not receiving comparable services, notify the Office of Accountability immediately. The LEA will then take immediate steps to reallocate resources as early in the school year as possible and with minimum disruption to the learning environment. Appropriate steps may include, but need not be limited to, reallocation of materials or supplies, or reassignment of personnel. The LEA may also wish to contact their ODE Federal Programs consultant at (614-466-4161) for further assistance.
7. **Records:** The Office of Accountability must ensure that all comparability reports, records and source documentation demonstrating the methods and results of the LEA's comparability analysis are retained for three years for audit purposes. A LEA **organizational chart** must also be included as part of the records. In addition, the LEA will maintain up-to-date records of having established and implemented an agency-wide salary schedule, a policy to ensure equivalence among schools in teachers, administrators, and other staff, and a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.
8. **Designate an office to take complaints:** The Office of Accountability will be responsible for handling complaints that a school is not receiving comparable services.

Timeline for Comparability Procedures

Winton Woods City School District

January-April

- Engage in WWCS-level budget (state and local funds) discussions concerning staff assignments, and distribution of equipment and materials for the purpose of ensuring compliance with Title I comparability requirements for the upcoming school year.
- Identify WWCS Title I schools and non-Title I schools.

May-July

- Conduct meetings with appropriate WWCS representatives to discuss the requirements for completing the annual comparability calculations.
- Establish participants' roles and responsibilities.
- Establish specific timeline for completion of the calculations.

August-September

- Obtain preliminary information from appropriate WWCS staff.
- Decide which calculation methodology to use. Refer to Ohio Department of Education's (ODE) Comparability Web-based Directions, found in the CCIP Consolidated Application Doc Library, Financial Information, Comparability Directions and Forms.
- Identify date and collection methodologies for gathering data needed to complete calculations. Refer to ODE Comparability directions, procedures, forms, and guidance.
- Ensure the CCIP Consolidated Application Title I Building Eligibility page is up-to-date in terms of names of schools and grade spans.

September-October

- Collect data.
- Meet with appropriate staff and calculate comparability.
- Make corrections to Title I schools shown not to be comparable.

November-February

- Reconvene appropriate WWCS staff to address any outstanding issues.
- File an official copy of the completed comparability report(s) with the designated district office (usually the treasurer's office) for audit purposes and submit documented compliance report every two years to ODE by the established deadline using the Comparability Web-based Application located in the SAFE Account.
- Maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I schools are comparable. Any report used for documentation should be signed and dated by the person issuing the report.

Note: WWCS will keep the comparability requirement in mind as it plans for the allocation of instructional staff and resources to schools for the coming school year. This would enable the WWCS to minimize the potential for disruption in the middle of a school year, should adjustments need to be made to ensure that Title I schools are comparable to non-Title I schools.

References:

- NCLB Act of 2001, Section 1120A(c)
- USDOE Title I Fiscal Issues Non-Regulatory Guidance (Revised February 2008)
- ARRA Title I Guidance, Ed Jobs Guidance
- Ohio Department of Education CCIP Consolidated Application Doc Library Web-based Comparability Directions, Forms, and Templates

REV. 10-15-07; 3-27-09; 11-17-09, 12-22-10