

Louisiana Believes

NCLB Title I Comparability

Requirements & Instructions

Fall 2014

COMPARABILITY OF SERVICES
Comparability Requirements
NCLB Section 1120A. Fiscal Requirements, (c) Comparability of Services

The fiscal foundation of Title I is grounded in three central requirements: Maintenance of Effort (LEA-level), Comparability (school-level), and Supplement not Supplant.

Comparability requires that Local Education Agencies (LEAs) be able to document that the services provided with State and local funds in Title I schools are comparable to those provided in non-Title I schools. Additionally, districts must keep records to document that the salary schedule and policies implemented annually, result in equivalence among schools.

Each LEA that receives Title I funds must maintain comparable programs in all schools in its district. Federal guidance states that an LEA is comparable if it ***files a written assurance with the State Education Agency (SEA) that it has developed and implemented one of the following test methods: (Test 1) Student Instructional Staff Ratio or (Test 2) Student Instructional Staff Salary Ratio.*** Additionally, each LEA has the flexibility to develop comparability protocol around existing systems. LEAs must maintain comparability by retaining records to indicate that these policies have been followed throughout the year.

To meet comparability requirements, LEAs must complete the following actions:

1. Submit written Assurance of Comparability form to the LDOE, that one of the following methods has been implemented:
 - Student Instructional Staff Ratios or
 - Student Instructional Staff Salary Ratios
2. Maintain the following Title I Comparability worksheets and policies which are kept on file for review:
 - School Data Worksheet
 - School Enrollment
 - Salary Schedule & Policies for the Equitable Distribution of Staff and Other Resources
 - Comparison Schools' Averages Worksheet for Title I and non-Title I schools
3. Submit the following comparability forms annually to the LDOE:
 - Form 4524-A
 - Form 4524-B, applicable for LEAs with Title I and Non-Title I Schools
 - Form 4524-C, applicable for LEAs with Title I schools only
 - Assurance of Comparability signature page

NOTE: Comparability requirements do not apply to an LEA that has only one school for each grade span. In addition, the LEA may exclude schools that have fewer than 100 students

To document adherence to comparability requirements, LEAs must submit a Comparability Report to Madeline.Swift@la.gov by **Friday, December 12, 2014**. If you need assistance, please contact your district's network point of contact.

COMPARABILITY REPORT CHECKLIST
(For District Use)

1. Forms

- Comparability Report: Form 4524-A (General Information)
- Comparability Report: Form 4524-B (Title I & Non-Title I Schools)
- Comparability Report: Form 4524-C (All Title I schools)
- Assurance of Comparability—signed by local Superintendent

2. Information from General Fund

- List of School Employees by Title, paid with state and local funds
- List of School Employees by Title, paid with federal funds
- Student Enrollment by School (exclude Pre-K students)

3. Other

- List of Staff and Degrees
- District Pay Scale
- District Policy for Equitable Distribution of Instructional Staff

**INSTRUCTIONS TO COMPLETE
GENERAL INFORMATION
FORM 4524-A**

The following information is reported on the general information page:

- Grade Span
- Enrollment size range
- Number of schools

Arrange information by Grade Span.

- The first step in reporting comparability is to rank all schools according to grade levels, starting with the lowest grade spans working to the highest grade spans.

Determine ranking of enrollment size ranges by grade span groupings

- Grade span, which is reported on the detailed report, may be divided into a smaller grade span grouping and into a larger grade span grouping for the purpose of comparison.
- The division into two groups allows for comparison of smaller to smaller and larger to larger.
- The division is allowed only if the largest school is at least twice as large as the smallest.
- This division also allows the grade span to be divided at any logical place separating the grade span into smaller and larger enrollment.

Calculate the set of information (number of schools) tabulated by numbering the Title I schools in the smaller enrollment range

- Each of the grade span groupings—A, B, C, and X—may be divided into smaller and larger enrollment subgroups.
- Then, the numbers of Title I and non-Title I schools are entered.
- The number of Title I schools added to the number of non-Title I schools should equal the total number of public schools in the LEA.
- LAB schools, private schools, and parochial schools are not considered public schools.

**INSTRUCTIONS TO COMPLETE
STUDENT INSTRUCTIONAL [STAFF RATIO](#)
FORM 4524-B**

Note: Form 4524-B should only be used for districts with Title I and Non-Title I Schools.

Directions:

Column 1. Name List by name each Title I school in this grade span (and size subgroup, if applicable). Use additional sheets if necessary.

Column 2. Actual Grade Span Enter the actual span of grades operated in each school.

Column 3. Students Enrolled Record the actual number of pupils enrolled in each school using October 1 count. Prorate if necessary because of exclusions or other reasons. Enter data to nearest tenth.

Column 4. FTE Staff Determine the full-time equivalent number of staff members who are paid with State and local funds and are regularly assigned to each school listed. Prorate salaries as necessary and round the result to the nearest tenth.

Data collected showing the number of students enrolled in the Non-Title I and Title I schools in that particular grade span group will be added together and divided by the number of schools.

- This average will be placed in the block of space provided for averages for non-project schools (FORM 4524-B).

Comparison calculations, in Box 6, that allow a 110% tolerance level are computed according to the instructions on the form. Once completed, comparisons are made and any area of non-comparability is noted in Column 8.

In the first set of calculations, which is based on all schools in the grade span grouping, if one or more schools is not comparable, narrow the comparison by school enrollment size (smaller and larger) then compare small schools with each other and large schools with each other to determine comparability.

**INSTRUCTIONS TO COMPLETE
STUDENT INSTRUCTIONAL STAFF RATIO
FORM 4524-C**

Note: Form 4524-C should only be used for districts with ONLY Title I Schools.

Directions:

Column 1. Name List by name each Title I school in this grade span (and size subgroup, if applicable). Use additional sheets if necessary.

Column 2. Actual Grade Span Enter the actual span of grades operated in each school.

Column 3. Students Enrolled Record the actual number of pupils enrolled in each school using October 1 count. Prorate if necessary because of exclusions or other reasons. Enter data to nearest tenth.

Column 4. FTE Staff Determine the full-time equivalent number of staff members who are paid with State and local funds and are regularly assigned to each school listed. Prorate salaries as necessary and round the result to the nearest tenth

Data collected showing the number of students enrolled in the Title I schools in a particular grade span group will be added together and divided by the number of schools.

- This average will be placed in the block of space provided for averages for Title I schools (FORM 4524-C).

Local educational agencies that provide Title I services to all schools, or all schools within a grade span, are not excluded from demonstrating comparability. The same sets of information must be collected and reported on the Detailed School Data report (Form 4524-C) with the exception that some of the Title I Schools become comparability schools.

- Data from these comparison schools is computed to create averages. The averages are then compared to other Title I schools.

Comparing Title I schools to Title I schools requires the collection of one or two more sets of information.

- Determine the percent or number of children from low-income families.
- Rank schools from the highest to lowest.
- Rank only within the grade span group.

The schools with the lowest percent or number of low income will be selected as comparison schools.

- One-half or fewer of the schools with the lowest percent or number of low-income children in the grade span group become the comparison schools.
- The average of these comparison schools with the lowest percent of poverty provide the calculations to which the student/staff ratios and per pupil expenditures of the individual schools (in the half having the highest poverty) are compared.

Comparison calculations, in Box 6, that allow a 110% threshold are computed according to the instructions on the form. Once completed, comparisons are made and any area of non-comparability is noted in Column 8.

If one or more schools are not comparable, narrow the comparison by school enrollment size (smaller and larger) then compare smaller schools with each other and larger schools with each other to determine comparability. Remember to attend to the poverty grouping procedures described above to determine the comparison schools.

**INSTRUCTIONS TO COMPLETE
STUDENT INSTRUCTIONAL STAFF SALARY RATIO
FORM 4524-B**

Note: Form 4524-B should only be used for districts with Title I and Non-Title I Schools.

A separate 4524-B form must be submitted for each grouping of schools by grade span and size in which, as shown on 4524-A, there are both Title I and non-Title I schools. The following instructions apply to Form 4524-B:

District Name Type school system's name.

Grade Span and Size Following the words *grade span*, enter *A*, *B*, *C*, or the optional group *X*, in accordance with the groupings shown on Form 4524-A. Indicate the enrollment size group of the schools being reported.

TITLE I SCHOOLS

Column 1. Name List by name each Title I school in this grade span (and size subgroup, if applicable). Use additional sheets if necessary.

Column 2. Actual Grade Span Enter the actual span of grades operated in each school.

Column 3. Students Enrolled Record the actual number of pupils enrolled in each school using October 1 count. Prorate if necessary because of exclusions or other reasons. Enter data to nearest tenth.

Column 4. FTE Staff Determine the full-time equivalent number of staff members who are paid with State and local funds and are regularly assigned to each school listed. Prorate salaries as necessary and round the result to the nearest tenth.

Column 5. Salaries Excluding Longevity Enter the total amount of State and local funds spent on salaries for the staff members listed in Column 4, less the amount of such salaries based on length of service (longevity). Round the result to the nearest dollar.

Column 6. Column 3 Divided by Column 4 Enter the result of dividing the figure in Column 3 by the figure in Column 4. Round the result to the nearest tenth, as in 12.7 pupils per staff member.

Column 7. Column 5 Divided by Column 3 Enter the result of dividing the figure in Column 5 by the figure in Column 3. Round the result to the nearest cent, as in \$243.18 expended per pupil.

Column 8. If Not Comparable After the averages have been calculated for the non-project schools (for which instructions follow), Boxes 6B and 7B will contain the numbers to be used for comparison with schools. Compare the entries in Columns 6 and 7 for each project school to the figures in Boxes 6B and 7B respectively. If an entry in Column 6 is more than the entry in Box 6B, or if an entry in Column 7 is less than the entry in Box 7B, mark an X on the same line in Column 8.

NON-TITLE I SCHOOLS AVERAGES

Column 1. Name List by name each Title I school in this grade span (and size subgroup, if applicable). Use additional sheets if necessary.

Column 2. Actual Grade Span Enter the actual span of grades operated in each school.

Column 3. Average Enrollment Total the number of pupils enrolled in non-project schools and divide by the number of such schools. Enter the result to the nearest child in Column 3.

Column 4. Average FTE Staff Calculate the full-time equivalent number of instructional staff members at each non-project school. Total these amounts and divide by the number of such schools. Enter the result to the nearest tenth in Column 4.

Column 5. Average Salaries Excluding Longevity Determine the total amounts of the salaries of the instructional staff members in non-project schools. Divide by the number of schools and enter the result in Column 5. Round the result to the nearest dollar.

Columns 6 and 7. Calculate as for the Project Schools to the nearest tenth for Column 6 and to the nearest cent for Column 7.

Box 6B. Multiply the non-project school figure in Box 6A by 110 percent and enter the result in Box 6B to the nearest tenth.

Box 7B. Multiply the non-project school figure in Box 7A by 90 percent and enter the result in Box 7B to the nearest cent.

**INSTRUCTIONS TO COMPLETE
STUDENT INSTRUCTIONAL STAFF SALARY RATIO
FORM 4524-C**

Note: Form 4524-C should only be used for districts with ONLY Title I Schools.

A separate Form 4524-C is to be submitted for those LEAs that must report Title I schools compared to Title I schools within a particular grade span.

District Name Type name of the LEA.

Grade Span and Size Following the words grade span, enter *A*, *B*, *C*, or the optional group *X*, in accordance with the grouping shown on Form 4524-A. Indicate the enrollment size group of the schools being reported.

TITLE I SCHOOLS

(Half or more of Title I schools in grade span group, or enrollment size subgroup, with the highest percentages of children from low-income families, according to e-Grant Targeting Step 4.)

Column 1. Name List by name each Title I project school in this grade span (or size subgroup, if applicable). Use additional sheets if necessary.

Column 2. Actual Grade Span Enter the actual span of grades operated in each school.

Column 3. Students Enrolled Record the actual number of pupils enrolled in each school using October 1 count. Prorate if necessary because of exclusions or other reasons. Enter data to nearest tenth.

Column 4. FTE Staff Determine the full-time equivalent number of staff members who are paid with State and local funds and who are regularly assigned to each school listed. Prorate salaries as necessary and round the result to the nearest tenth.

Column 5. Salaries Excluding Longevity Enter the total amount of State and local funds spent on salaries for the staff members listed in Column 4, less the amount of such salaries based on length of service (longevity). Round the result to the nearest dollar.

Column 6. Column 3 Divided by Column 4 Enter the result of dividing the figure in Column 3 by the figure in Column 4. Express the result to the nearest tenth, as in 12.7 pupils per staff member.

Column 7. Column 5 Divided by Column 3 Enter the result of dividing the figure in Column 5 by the figure in Column 3. Round the result to the nearest cent, as in \$243.18 expended per pupil.

Column 8. If Not Comparable, Mark 'X' After the figures have been calculated for the Title I comparison schools (for which instructions are provided below), Boxes 6B and 7B will contain the numbers to be used for comparison. Compare the entries in Columns 6 and 7 for each school to the figures in Boxes 6B and B respectively. If an entry in Column 6 is more than the entry in Box B, or if an entry in Column 7 is less than the entry in Box 7B, mark a *T* on the same line in Column 8.

TITLE I COMPARISON SCHOOLS' AVERAGES

(Averages of not more than half of Title I schools in grade span group, or enrollment size subgroup, with the lowest percentages of children from low-income families, according to e-Grant Targeting Step 4.)

Column 3. Average Enrollment Total the number of pupils enrolled in each school and divide by the number of such schools. Enter the result to the nearest child in Column 3.

Column 4. Average FTE Staff Calculate the full-time equivalent number of instructional staff members at each school. Total these amounts and divide by the number of such schools. Enter the result to the nearest tenth in Column 4.

Column 5. Average Salaries Excluding Longevity Determine the total amounts of the salaries of the instructional staff members in these schools. Divide by the number of schools and enter the result in Column 5. Express the result to the nearest dollar.

Columns 6 and 7. Calculate to the nearest tenth for Column 6 and the nearest cent for Column 7.

Box 6B. Multiply the figure in Box 6A by 110 percent and enter the result in **Box 6B to the nearest tenth.**

Box 7B. Multiply the figure in Box 7A by 90 percent and enter the result in **Box 7B to the nearest cent.**