### Who must document compliance for comparability?This requirement applies to all school districts that accept Title I-A funds with the exception of any district that does not have more than one building per grade span. In addition, if a district has a school with fewer than 100 students enrolled that school does not need to be included in the comparability calculations.

1. How is comparability determined? The Title I-A statute and legislative history does not provide guidance on the meaning of the word “equivalence” as it relates to the local school district policy on equivalence among schools in regards to teachers, administrators, and auxiliary personnel (paid with State and local funds).

In the absence of a statutory definition, ODE has developed a standard comparing student/ instructional staff ratios. Districts must complete an annual comparability status report that compares the average number of students per instructional staff in each Title I-A school with the average number of students per instructional staff in schools not participating in Title I-A. Comparability is determined based on the number of students per staff person with a ten (10) percent allowable variance for non-Title I-A schools.

The comparability status report includes information on Title I-A and non-Title I-A schools. Such information must include student enrollments, number of assigned staff paid with State and local funds, and calculations of the ratio of students per instructional staff in all reported schools. The district must select and use the same date (on or before October 1) for collecting and measuring comparability information.

When a school does not demonstrate comparability using this method ODE staff will work with the district using one of several alternate methods.

### When should a district begin the process of determining comparability? Districts should begin the process at the time school budgets are discussed since decisions are made to allocate local and State resources well before the Comparability Report is due.

### On what date should student enrollment and staff assignments be counted? Student enrollment and staff assignments should be counted on the same day. A district may wish to use the same date on which the official enrollment count for the district is performed – October 1st.

1. What steps should be taken to complete the annual report? Each district receiving Title I-A funding must develop procedures for compliance and maintain records that are updated annually documenting compliance.

### Which schools should be included in the Comparability Report? All district schools must be included. The comparison is made between like grade spans (i.e. elementary-to-elementary, middle-to-middle, high-to-high school). Student/teacher ratios and/or expenditures are calculated between Title I-A schools and non-Title I-A schools. Only public schools must be included in the report.

1. Must a district include district-sponsored charter schools when determining whether Title I and non-Title I schools are comparable? Yes. All schools within an LEA must be included.
2. How does a district calculate comparability when all schools in the grade span receive Title I-A funds? When all Title I-A schools being served fall in one specific grade span or size group, the data averages for all the Title I-A schools may serve as comparison data.

### Which students are included in the Comparability Report? All students enrolled in Title I-A and non-Title I-A schools must be included in the Report.

### What staff information needs to be collected and reflected in the report? When comparing student/instructional staff ratios, the district must consistently include the same staff members in the ratios for both Title I-A schools and the comparison non-Title I-A schools.

Calculate the FTE numbers of certified and non-certified instructional staff paid with State and local funds assigned to each school listed. Staff members whose full salaries are paid with federal dollars should not be included in this report. For staff who are proportionally paid with federal, State and/or local dollars, count only the portion of the staff salary that is state and locally funded. Enter data to the nearest tenth. “Instructional staff’ is defined as anyone who provides direct instruction to children *or who assists or supervises those staff members who provide instruction.* The following individuals would be considered “instructional staff”, however, this is not an all-inclusive list.

* Classroom teachers
* Paraprofessionals
* School-based administrators
* Librarians/Media Specialists
* Music and art teachers
* STEAM/Technology teachers
* Mentor teachers
* Physical Education teachers
* Reading and math specialists
* Speech therapists
* Guidance and psychological personnel
* Parent/Family liaisons
* Resource teachers
* School social workers

1. Are substitutes included in the Comparability Report? Long-term substitute teachers are included in the count for the Comparability Report. Short-term substitutes temporarily replacing a teacher on leave are not counted, but the official teacher should be counted. Full-time substitutes under contract with the LEA and assigned to a specific school should also be included in the count.

### Can any staff be excluded? When determining compliance with comparability, a district, in accordance with Section 1120A (c)(5), may exclude State and local funds expended for bilingual education for emergent bilingual students and excess costs of providing services to children experiencing disabilities as determined by the district.

### What calculation assures that the Title I-A school meets comparability requirements? A Title I-A school is comparable if the school’s average student/teacher ratio does not exceed 110 percent of the average student/teacher ratio of schools not participating in Title I-A. For example, if the average ratio of students to instructional staff is 20 to 1 for an LEA’s non-Title I-A schools, the ratio at each Title I-A school can be no higher than 22 to 1.

### When does a Title I-A school need to meet the comparability requirement? What happens if the school does not meet comparability? All Title I-A funded schools in a district should meet the Title I-A “equivalence” staffing requirement by December 1 of each school year. If a district cannot demonstrate comparability Title I-A funds may be placed on hold until comparability is resolved. In order to meet the annual target date of December 1, a district should collect the comparability report information by October 1 of each school year. This will allow the district sufficient time for allocation, placement, and/or realignment of staffing in Title I-A schools prior to December 1st.

1. What documentation needs to be maintained? Districts should maintain records that document compliance with the comparability requirement for three years after the grant period ends or three years after resolution of audit findings related to the grant. Maintain all supporting data including but not limited to student counts, staffing FTE, and a list of staff by name and position. In cases where initial information indicates a district is out of compliance with comparability requirements, the district should retain documentation to demonstrate the specific actions taken to achieve Title I-A comparability of service in all Title I-A schools.