**MEMORANDUM**

**SUBJECT: Title I Comparability Methodology**

**DATE: December 31, 2012**

***Title I – Comparability Methodology:***

As noted in the Non-Regulatory Guidance booklet titled “Title I Fiscal Issues” section B-1, LEAs are required to demonstrate comparability every year. It further states “Demonstrating comparability is a prerequisite for receiving Title I funds. Because Title I allocations are made annually, comparability is an annual requirement. [Section 1120A(c) (1) (A)]”

**Resources required to conduct the Comparability test:**

1. School enrollment numbers by school: the enrollment number used to establish the fiscal year budget will be used to determine comparability.
2. Schedule A for all schools: the position funding report will be created from the PeopleSoft system at the beginning of the fiscal year. The positions used in this test must be the instructional staff only. Following is a list of instructional staff positions:

* Principal - Assistant Principal
* Dean of Students - Instructional Facilitator
* SPED Coordinator - ISS Coordinator
* Academic Coordinator - General Ed Teacher
* Pre-K Teacher - SPED Teacher
* ELL Teacher - Head Start Teacher
* Art Teacher - Music Teacher
* PE Teacher - Teacher (EG-09)
* Counselor - Social Worker
* Psychologist - Computer Lab Coor
* Behavior Technician - Instructional Developer
* Campus Leader - Transition Specialist
* AP Invention Coach - IB Coordinator
* Intervention Coach - Instructional Developer
* Parent/Tech Coordinator - Librarian
* Bilingual Counselor

1. Schoolwide budget for each school: the Schoolwide Title I allocations will be collected from the Title I application.
2. Comparability excel spreadsheet: we received an excel file from OSSE to be used in the comparability test.

**Test Period:**

The initial test will be conducted during the September to October time frame. This will allow the program staff time to complete equalization and adjust for school enrollment.

A second test will be conducted if the initial test fails. This means there would have been some adjustment required by the program staff to correct the problems found in the initial test. The test will be conducted as many times as it takes to correct any problems identified in prior testing.

The final test results are to be sent to OSSE no later than December 31st of each year. However if the initial comparability test passed the test, then the report will be submitted and sent to OSSE at that time.

**Testing for Comparability:**

Setting up and using the electronic excel file setup to test for comparability:

Tab 1. Group Schools on the Comparability tabs:

* 1. Using the Schoolwide information from the Title I application setup the schools by category:
     1. Title I Elementary Schools
     2. Title I Middle Schools
     3. Title I Senior High Schools
     4. Non-Title I Schools
  2. Record the Org Code and Org Code Title.

Tab 2. Schedule A

* 1. Download the Position Funding Report in the PeopleSoft System.
  2. Using the position list in the resource section above, delete all positions from the schedule “A” that do not use those titles. Also delete all org codes that do not represent schools.
  3. Copy this information into the Schedule A tab.

Tab 3. Enrollment

* 1. The enrollment information, by school, will be used from the BFA used to create current budget, and will be recorded at this tab.

Determining the student/instructional staff ratio for the Non-Title I schools:

The Comparability tab is linked to each of the tabs identified above. The Schedule “A” tab is used to determine the number of instructional staff for each title and non title school, and is reports out on the Comparability tab. The Enrollment tab also reports out on the comparability tab and is used to calculate the student/instructional staff ratio for each school.

The Comparability tab will use the Non-Title I schools sectional and calculate the average student/instructional staff ratio and then it will apply an addition 10 percent to generate the mark that Title I schools will use for the staffing ratio target.

The Comparability tab will automatically run a comparison on each Title I school comparing them to the Non-Title one schools staff ratio average to determine the staffing ratio for each school. Title I schools with a student/instructional staff ratio that exceeds that of the Non-Title I schools is deemed out of compliance.

If the Comparability test reveals that the LEA is out of compliance, actions must be taken in order to become compliant:

1. Move resources from eligible schools into not compliant schools in order to bring their student/instructional staff ratio below the Non-Title I schools mark.
2. Return the amount of funds by which the LEA is out of compliance to OSSE.

In summary, the excel file is formatted to complete all necessary calculations to determine compliance, assuming the correct data is loaded into the correct tabs. All non compliant schools will report compliance problem in the Non Compliance School column in red.

Once all schools are reporting compliance the file will be forward to OSSE for their review and approval.