Presentation topics

★ What is comparability – definition
★ Annual requirement
  ★ Written assurance (policy & procedures)
  ★ Comparability determinations
★ District policy & procedures for comparability
★ Comparability instructions & forms
★ Completion of forms
★ Submission of comparability reports to ESE
★ Questions/Comments
Comparability is a test of fairness

Schools receiving federal Title I funds must receive state and local funds comparable to the state and local funds given to non-Title I schools. In other words, Title I schools must be getting their fair share of state and local funds before they receive Title I funds. Title I funds, by law, are therefore supplemental to state and local funds.

Comparability is required by the No Child Left Behind Act of 2001.
Annual requirement

Written assurance

- Massachusetts Department of Elementary and Secondary Education FY2012 Grant Assurances Document. Original to ESE and signed copy on file in the district.
- District wide salary schedule
- Policy to ensure equivalence among schools in teachers, administrators, and other staff
- Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies

Timing

- Use October student enrollment and October staffing data
- If Title I schools are not comparable ~ staffing changes need to be implemented by November 30th.
District policy & procedures for comparability

All districts must have written policies and procedures for complying with comparability requirements, documenting:

- Office responsible for written assurance
- Office responsible for making comparability calculations and measure and process used to determine whether schools are comparable
- District timeline for demonstrating comparability
- How and when district makes adjustments in schools that are not comparable

Resources: [http://www.doe.mass.edu/apa/titlei/parta/program-design/default.html?section=CP](http://www.doe.mass.edu/apa/titlei/parta/program-design/default.html?section=CP)
Meeting comparability

★ LEAs must conduct calculations every year to demonstrate compliance because Title I, Part A allocations are made annually.

★ LEAs must keep comparability documentation on file for outside review.
Exemptions

- Schools with 100 or fewer students

- An LEA with only one school for each grade span

- A school with no comparison school in the same grade span grouping by enrollment size
What must be excluded

An LEA must exclude any resources paid for with federal or private funds.

(NCLB, Title I, Section 1120A)
We encourage everyone to use the new comparability determination forms on the ESE website.

However, the traditional forms are still available and an acceptable method of determining comparability.
Comparability instructions & forms

New forms are easier to complete and automated. The only instructional staff to be listed / used are:

- EPI MS 1305 Principal
- EPI MS 1310 Assistant/Vice Principal
- EPI MS 2305 Teacher
- EPI MS 2310 Teacher – support content instruction
- EPI MS 2325 Long Term Substitute Teacher
- EPI MS 2330 Instructional Coach
- EPI MS 3329 Guidance Counselor

REMINDER: Include only staff paid from State and local funds. Exclude staff paid from Title I or other federal funds.
1305  Principal/headmaster/headmistress/head of school  Performs the highest level of executive management functions in an individual school, a group of schools or units of a school system. Responsibilities include the administration of instructional programs, extracurricular programs, community relations, operation of the school plant, selection and evaluation of professional and support staff, and the coordination of staff and student activities.

1310  Deputy/associate/vice-/assistance principal  Performs high-level executive management functions in an individual school, group of schools, or units of a school system. Primary duties include but are not limited to: 1) supervising student behavior; 2) handling specific assigned duties related to school management; 3) continuing curriculum and staff development; 4) working cooperatively with professional staff; 5) providing leadership in the instructional program; and 6) coordinating and/or arranging class schedules.

2305  Teacher  Provides instruction, learning experiences, and care to students during a particular time period or in a given discipline.

2310  Teacher – support content instruction  Provides supportive content instruction in the classroom. The students receiving services from these educators also receive direct content instruction in core academic areas from a teacher that needs to meet the Highly Qualified teacher requirements, and therefore these educators are not required to meet the highly qualified standard in the content area.

2325  Long Term Substitute Teacher  An individual temporarily assigned to a specific teaching assignment for a minimum of 30 days.

2330  Instructional Coach Teacher  that provides support to other teachers such as a mentor teacher.

3329  Guidance Counselor  Guides individuals by assisting them in problem solving, decision making, discovering meaning, and articulating goals related to personal, education, and career development.
# Automated form: detailed school data

## Massachusetts Department of Elementary and Secondary Education

### 2010-11 Title I Comparability Documentation (Pilot Forms)

#### Detailed School Data

**District Name:**
- Click yellow cell at right, then downward arrow

- **White cells:** Information may be changed/added
- **Yellow cells:** Information must be entered
- **Green cells:** Auto-calculated, cannot be changed

**Please do not cut and paste**

<table>
<thead>
<tr>
<th>School Information</th>
<th>Selecting Comparison Schools</th>
<th>Calculating Ratios</th>
<th>Comparability</th>
<th>Special Grouping</th>
</tr>
</thead>
<tbody>
<tr>
<td>School Code</td>
<td>School Name</td>
<td>Grades Served</td>
<td>Grades Span</td>
<td>Title I Status</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>CL = Closed</td>
<td>TA = Targeted Assistance</td>
<td>TAP = School-wide planning</td>
<td>NT = Non-Title I SW = Schoolwide</td>
<td>(See instructions)</td>
</tr>
</tbody>
</table>

If Grade Span split option is applied, select school size (Smaller or Larger)
Massachusetts Department of Elementary and Secondary Education

2010-11 Title I Comparability Documentation (Pilot Forms)

Summary of Comparison Schools by Gradespan
(Used as the comparison group(s) for Title I schools in 'Detailed School Data' worksheet.)

District Name:

<table>
<thead>
<tr>
<th>Gradespan</th>
<th>School Size (Smaller or Larger)</th>
<th>COMPARISON SCHOOLS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(Comparison schools may include Title I schools if there are no Non-Title I schools in the same gradespan)</td>
</tr>
<tr>
<td>Total # of Schools</td>
<td>Total Enrollment</td>
<td>Total State and Locally Funded FTE Count</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| | | | |
Automated Form: summary sheet

Massachusetts Department of Elementary and Secondary Education

2010-11 Title I Comparability Documentation (Pilot Forms)

Summary Sheet

District:

Compiled by:

Name: ___________ Phone: ___________
Title: ___________ Email: ___________
Signature: ___________ Date: ___________

Summary of All Schools in District by Gradespan (Auto-calculated)

<table>
<thead>
<tr>
<th>Gradespan</th>
<th>School Size</th>
<th>Total Schools</th>
<th>Total Enrollment</th>
<th>Total State and Local FTE Count</th>
<th>Non-Title I Schools</th>
<th>Total Schools</th>
<th>Total Enrollment</th>
<th>Total State and Local FTE Count</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Automated form: staff data

2010-11 Title I Comparability Documentation (Pilot Forms)
Staff Data By Individual School

District Name: [ ]
School Name: [ ] School Code: [ ]
Title I Status: [ ]

Select from the drop down lists by clicking in the yellow cells below.

This sheet is for grade span:
Grade Span Split Option Applied (Yes/No):
If Grade Span Split option applied, select school size:

<table>
<thead>
<tr>
<th>1 State and Locally Funded School Staff</th>
<th>2 Grade Level or Function</th>
<th>3 Full Time Equivalent (FTE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ] Total = 0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ESE-generated report

- ESE is using a newly created database to **monitor** district compliance with comparability.
- ESE will run reports annually in August (prior year SIMS and EPI MS data) and will notify all districts that may be at risk of non-compliance.
Sample ESE automated report

<table>
<thead>
<tr>
<th>GRADE SPAN</th>
<th>SIZE RANGE</th>
<th>TITLE I SCHOOLS</th>
<th>NON-TITLE I SCHOOLS</th>
<th>SCHOOLS NOT COMPARABLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ELEMENTARY GRADE SPAN</td>
<td>212 - 506</td>
<td>5</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>MIDDLE SCHOOL GRADE SPAN</td>
<td>511 - 557</td>
<td>0</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>SECONDARY GRADE SPAN</td>
<td>1359 - 1359</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

**Woburn - Detailed Report**

**ELEMENTARY GRADE SPAN**

<table>
<thead>
<tr>
<th>TITLE I SCHOOLS</th>
<th>GRADE SERVED</th>
<th>T1 STATUS</th>
<th>LOW INCOME %</th>
<th>SPED %</th>
<th>LEP %</th>
<th>STUDENT ENROLLED</th>
<th>FTE</th>
<th>RATIO</th>
<th>If not comparable Mark 'X'</th>
</tr>
</thead>
<tbody>
<tr>
<td>03470005</td>
<td>K - 05</td>
<td>TA</td>
<td>10.0</td>
<td>11.8</td>
<td>8.6</td>
<td>370</td>
<td>23.3</td>
<td>15.9</td>
<td></td>
</tr>
<tr>
<td>03470025</td>
<td>K - 05</td>
<td>TA</td>
<td>26.0</td>
<td>13</td>
<td>8.3</td>
<td>223</td>
<td>15.9</td>
<td>14.0</td>
<td></td>
</tr>
<tr>
<td>03470043</td>
<td>PK - 05</td>
<td>TA</td>
<td>35.0</td>
<td>22.8</td>
<td>4.1</td>
<td>373</td>
<td>26.5</td>
<td>14.1</td>
<td></td>
</tr>
<tr>
<td>03470055</td>
<td>K - 05</td>
<td>TA</td>
<td>37.0</td>
<td>18.4</td>
<td>7.3</td>
<td>265</td>
<td>17.0</td>
<td>15.6</td>
<td></td>
</tr>
<tr>
<td>03470065</td>
<td>K - 05</td>
<td>TA</td>
<td>30.0</td>
<td>19.2</td>
<td>11.7</td>
<td>215</td>
<td>18.8</td>
<td>11.3</td>
<td></td>
</tr>
</tbody>
</table>

Total Students Enrolled: 1444
Total FTE: 101.5

**NON-TITLE I SCHOOLS**

<table>
<thead>
<tr>
<th>NON-TITLE I SCHOOLS</th>
<th>GRADE SERVED</th>
<th>LOW INCOME %</th>
<th>SPED %</th>
<th>LEP %</th>
<th>STUDENT ENROLLED</th>
<th>FTE</th>
<th>RATIO</th>
</tr>
</thead>
<tbody>
<tr>
<td>03470030</td>
<td>X - 05</td>
<td>18.0</td>
<td>8.4</td>
<td>0.9</td>
<td>212</td>
<td>15.6</td>
<td>13.6</td>
</tr>
<tr>
<td>03470040</td>
<td>PK - 05</td>
<td>20.0</td>
<td>12.3</td>
<td>5.5</td>
<td>506</td>
<td>20.3</td>
<td>17.9</td>
</tr>
<tr>
<td>03470060</td>
<td>K - 05</td>
<td>18.0</td>
<td>10.8</td>
<td>3.6</td>
<td>220</td>
<td>15.7</td>
<td>14.0</td>
</tr>
</tbody>
</table>

Total Students Enrolled: 938
Total FTE: 59.5

Divide Student Enrollment/Instructional Staff = Ratio average for Non-Title I Schools
Multiply by 110% = Box Ratio: Title I School Ratio must be less than Box Ratio to be Comparable.

If not comparable, place 'X' in column next to Title I School.

Box Ratio: 15.8

Grade Span with two or more Title I schools but no non-Title I schools. The ratio of the lowest incident of poverty is selected as the comparison group.

The final ratio: Exclude students and FTEs with less than 100 students or only contains grades PK or K from calculation.
What if a school is not comparable?

LEAs must take immediate action to adjust school resources. Adjustments may involve:

- Moving Title I funds out of a school
- Replacing them with State or local funds
- Making staffing changes in a school
ESE-generated report

- ESE will run reports again in February (using current year SIMS and EPIMS data).

- Districts in question will be asked to review their staffing data and explain discrepancies or submit hard evidence of student to staff ratios.
Contact information

Website:  http://www.doe.mass.edu/apa/titlei
Email:    titlei@doe.mass.edu
Phone:    781-338-6230