



Title I, Part A Comparability Handbook

**OVERVIEW
TIMELINES
PROCEDURES
OPTIONS**



**Office of Federal
Programs**

**www.mdek12.org
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COMPARABILITY OVERVIEW

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Title I, Part A allocations are made annually, comparability is an **annual requirement**. The Local Educational Agency (LEA) must perform comparability calculations every year to demonstrate that All Served Title I schools are in fact comparable and make adjustments if any are not. Adjustments must be made as early in the same school year as possible and with minimum disruption to the learning environment.

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, or all schools within a particular grade span, with Title I funds, the LEA must use state and local funds to provide services that are substantially comparable in each school.

An LEA may determine comparability of each of its Title I schools on a district-wide basis or a grade-span basis. [Section 1118(c)(1)(C)] The LEA may exclude schools that have fewer than 100 students. An LEA need not demonstrate comparability if it has only one school at each grade span.

Under the Every Student Succeeds Act (ESSA), the Mississippi Department of Education may establish the method LEAs use to determine comparability. The department has flexibility in establishing reasonable variances for LEAs to use in determining whether their schools are comparable.

The comparability method the Office of Federal Programs provides includes:

1. **Grade Span using Instructional Personnel FTEs.** Comparison of student/staff ratios for state and locally- funded Instructional Personnel, Full Time Equivalent (FTE) in each Title I school with the average student/staff ratios for state and locally funded Instructional Personnel in non-Title I schools or Title I comparison schools by **grade span**. A Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of non-Title schools or Title I comparison schools.

Or

2. **Grade Span using Instructional Personnel Salary.** Comparison of student/staff ratios for state and locally- funded Instructional Personnel salary in each Title I school with the average staff/student salary ratios for state and locally funded Instructional Personnel salary in non-Title I schools or Title I comparison schools by **grade span**. A Title I school is deemed comparable if its staff/student salary ratio does exceed 90 percent of the average staff/student salary ratio of non-Title schools or Title I comparison schools.

Or

3. **All Served Title I Schools using Instructional Personnel FTEs.** Comparison of student/staff ratios for state and locally- funded Instructional Personnel Full Time Equivalent (FTE) where **all schools are Title I schools** with the average student/staff ratios for state and locally funded Instructional Personnel. A Title I school is deemed comparable if its student/staff FTE ratio lies between 90 percent and 110 percent of the average student/staff FTE ratio for all schools.

Or

4. **All Served Title I Schools using Instructional Personnel Salary.** Comparison of student/staff ratios for state and locally- funded Instructional Personnel salary where **all schools are Title I schools** with the average student/staff salary ratios for state and locally funded Instructional Personnel. A Title I school is deemed comparable if its staff/student salary ratio lies between 90 percent and 110 percent of the average staff/student salary ratio for all schools.

COMPARABILITY DEADLINES

No later than October 30th, the LEA shall annually demonstrate if comparability requirements have been met via the comparability report along with all required forms must be uploaded to the MCAPS LEA Document Library current year's Comparability folder regardless of method used to demonstrate comparability.

If the LEA is unable to demonstrate comparability by October 30th, **the LEA must complete the comparability report, upload all required forms by the October 30th and a letter stating that the LEA was not able to demonstrate comparability and understands it must make necessary adjustments within the same school year.** If the LEA's first submission, after review by the department, shows comparability has not been met due to an error in data, calculation or procedure, and adjustments are required, the LEA will be notified.

If adjustments are required to demonstrate comparability, the LEA must revise the comparability report, upload the new comparability report and a letter stating what adjustments were made. The revised comparability report and letter must be uploaded to the MCAPS LEA Document Library current year's Comparability folder no later than December 1st of the same school year.

DEVELOPING LEA PROCEDURES FOR COMPLIANCE

An LEA must develop procedures for complying with comparability requirements as outlined in the ESEA Sec. 1118(c).

These procedures must be in writing and should, **at a minimum**, include the LEA's:

- **identification** of the office responsible for making comparability calculations,
- **timeline** for demonstrating comparability,
- **method and process** for collecting data required to demonstrate comparability,
- **selected basis** for demonstrating comparability, and
- **timeline** for how and when the LEA makes required **revisions** to demonstrate comparability.

I. IDENTIFICATION OF THE RESPONSIBLE OFFICE FOR COMPARABILITY CALCULATIONS

The LEA must ensure that the LEA remains in compliance with the Title I comparability requirements. The designated office will oversee the process to ensure all procedures are followed and all deadlines are met. The LEA must identify the office and job title of the responsible person.

II. TIMELINE FOR DEMONSTRATING COMPARABILITY AND REVISION

The LEA must have a written timeline that is followed, to ensure all LEA-level comparability procedures are conducted and comparability is demonstrated for All Served Title I schools. This timeline should be detailed using either daily, weekly, monthly, quarterly, or yearly format. Within the timeline format the LEA should outline what will occur. A sample yearly timeline is provided in Appendix C.

Deadlines: The LEA must have a deadline that ensures that no later than October 30th, the LEA shall annually complete the comparability report and upload the report in the MCAPS LEA Document Library current year's Comparability folder.

Reallocation: The LEA must include procedures and deadlines if the initial calculations indicate that a school is not comparable. These procedures must include the responsible person's title and office. All corrected comparability forms must be uploaded to the MCAPS LEA Document Library current year's Comparability folder. All Served Title I schools must demonstrate comparability **by December 1st** of the same school year.

Complaints: The LEA must identify the office and job title of the person responsible for overseeing all complaints from parents, community members, or LEA and school staff members concerning the provision of comparable services.

III. METHODS AND PROCESS FOR COLLECTION OF DATA TO DEMONSTRATE COMPARABILITY

NOTE: A **comparison school** can be a Non-Title I school or a Title I school as defined in your procedures. The LEA must define what will be considered a Title I school and what will be considered a comparison school. For example, "... to determine comparability, a Title I school will be any school with a poverty factor of 75% or higher and a comparison school will be any school with a poverty factor of 74% or lower."

Basis for Demonstrating Comparability: The LEA must identify the specific method that will be used to calculate comparability:

1. **Grade Span Using FTE.** The LEA will compare Title I and Non-Title I or Title I Comparison Schools by the identified **grade-range** in the LEA's procedures. Title I schools are compared to non-Title I schools/Title I comparison schools using student enrollments and Instructional Personnel FTEs.
2. **Grade Span Using Salary.** The LEA will compare Title I and Non-Title I or Title I Comparison Schools by the identified **grade-range** in the LEA's procedures. Title I schools are compared to non-Title I schools/Title I comparison school using Instructional Personnel salary and student enrollments.
3. **All Served Title I Schools Using FTE.** The LEA will compare All Served Title I Schools to the average of All Served Title I schools using student enrollments and Instructional Personnel FTEs. **ALL schools in the LEA must be served through Title I, Part A** to use this method.
4. **All Served Title I Schools Using Salary.** The LEA will compare All Served Title I Schools to the average of All Served Title I schools overusing Instructional Personnel salary and student enrollments. **ALL schools in the LEA must be served through Title I, Part A** to use this method.

Grade Span Range: The LEAs are required to define the grade span grouping used to determine comparability. The LEA must also indicate what is defined as a Title I school and Non-Title I or Comparison school (please see above.) Remember that the grade spans must be based on the LEA's configuration.

Data Collection: The LEA must identify who will be responsible for the collection of all data from the appropriate LEA office(s) that are required to demonstrate comparability. The LEA must identify the office and job title of the responsible person. The designated office will ensure all required data is submitted to appropriate staff within the defined timeline.

Data Verification: The LEA will identify who will verify the accuracy of the data used to demonstrate comparability and to ensure the calculations are performed correctly using the method established. The LEA must identify the office and job

title of the person responsible.

Records: The LEA must identify who will ensure that all comparability reports, records, and source documentation of the LEAs comparability analysis and calculations are retained for at least five years for audit purposes.

An **LEA organizational chart** must also be included as part of the records. The LEA must identify the office and job title of the person responsible.

The LEA must agree to the following assurances:

- LEA- wide salary schedule [ESEA Sec. 1118(c)(2)(A)(i)]
- Policies ensuring equivalence among schools in teachers, administrators, and other staff; [ESEA Sec. 1118(c)(2)(A)(ii)]
- Policies ensuring equivalence among schools in the provision of curriculum materials and instructional supplies; [ESEA Sec. 1118(c)(2)(A)(iii)]
- Written LEA comparability procedures

IV. Basis for Demonstrating Comparability

LEAs, using the **month 1 MSIS report**, will apply the standard comparability method to determine comparability based on the average number of students per state and locally funded Instructional Personnel 's full-time equivalence (FTE) or state and locally funded instructional salary. There are four ways that a school can be deemed comparable. However, the LEA must apply the same method to all schools within the LEA.

1. Grade Span Using Instructional Personnel FTE
2. Grade Span Using Instructional Personnel Salary
3. All Served Title I Schools Using Instructional Personnel FTE
4. All Served Title I Schools Using Instructional Personnel Salary

V. Determining Comparability

There are four ways that a school can be deemed comparable. However, the LEA must apply the same method to all schools within the LEA.

How do you Determine Comparability?

- Grade Span Using Instructional Personnel Full Time Equivalent (FTE)
- Grade Span Using Instructional Personnel Salary
- All Served Title I Schools Using Instructional Personnel FTE
- All Served Title I Schools Using Instructional Personnel Salary

INSTRUCTIONAL PERSONNEL

When considering which Instructional Personnel will be used, the LEA must contemplate the following:

- All teachers must hold a MS teaching license.
- What licensed instructional personnel assigned by schedule to the school, whether full or part-time at that school.
 - Use payroll, time records and/or other documented sources.
- Instructional personnel can include all licensed classroom teachers and other licensed personnel assigned to the school who provide services that support instruction:
 - principals,
 - assistant principals,
 - instructional coaches,
 - librarians,
 - music, art, and physical education teachers,
 - guidance counselors,
 - speech therapists,
 - licensed social workers and
 - psychological personnel
- Other personnel directly supporting instruction assigned to the school may include:
 - paraprofessionals and other non-licensed personnel such as social workers.
- Personnel not involved in providing instructional support **MAY NOT** be included.
- Other personnel that **MAY NOT** be included are clerical, custodial, food service, transportation, and any other personnel not providing instructional support. **Do not include any PreK personnel or 100% federally funded personnel.**
- Please remember that federally funded personnel would include staff paid from Title I, Title II, Title III, Title IV, Title V, Homeless, CTE, SPED, ESSER, etc.

Grade Span Using Instructional Personnel Full-Time Equivalent (FTE)

Comparison of student/Instructional Personnel ratios for state and locally- funded Instructional Personnel, Full Time Equivalent (FTE) in each Title I school with the average student/Instructional Personnel ratios for state and locally funded Instructional Personnel in non-Title I schools or Title I comparison schools by grade span. A Title I school is deemed comparable if its student/Instructional Personnel ratio does not exceed 110 percent of the average student/Instructional Personnel FTE ratio of non-Title schools or Title I comparison schools.

1. The LEA will calculate the student enrollment to Instructional Personnel FTE ratio for each **Title I** and **Non-Title I or Comparison** school.
2. The LEA will calculate the average student enrollment to Instructional Personnel FTE ratio for **ALL Non-Title I or Comparison school(s)**.
3. The LEA will calculate 110% of the average for the **Non-Title I or Comparison school(s)**.
4. The LEA will compare 110% of the average **Non-Title I or Comparison school(s)** to each **Title I school(s)** student enrollment to Instructional Personnel FTE ratio.
5. A **Title I school** is deemed comparable if its student enrollment to Instructional Personnel FTE ratio **does not exceed 110%** of the average student enrollment to Instructional Personnel FTE ratio of **Non-Title I or Comparison school(s)**.

Comparability Report Grade Span using Instructional FTE

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL Served Title I Schools serving the same grade span range as ALL Non-Served Title I or Title I Comparison Schools

110% of the Average for Non-Title I or Title I Comparison Schools

11.344

LEA Name: Test LEA		Grade Range: K-5th			School Year:		
1	2	3	4	5	6	7	8
Served Title I School's Name	Grade Span (Populates)	Total Student Enrollment (Populates)	Total Low Income Students (Populates)	Students Poverty Percentage (Calculated)	Total Instructional Staff FTEs State and Local Funded (Populates)	Student Enrollment to Instructional Staff FTEs (Calculated)	Comparable (Yes or No)
School A	K-5th	200	175	88%	32.00	6.250	YES
School B	3rd-5th	300	250	83%	32.00	9.375	YES
School C	K-2nd	400	375	94%	32.00	12.500	NO
School D	K-5th	500	400	80%	32.00	15.625	NO
School E	K-5th	250	200	80%	32.00	7.813	YES
School F	K-5th	200	175	88%	32.00	6.250	YES
School G	3rd-5th	300	250	83%	32.00	9.375	YES

If the student/Instructional Staff FTE ratio is less than **11.34**, the last column turns **green**. The school is comparable.

Comparability Report Grade Span using Instructional FTE

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL Non-Served Title I or Title I Comparison Schools serving the same grade span range as ALL Served Title I Schools

LEA Name: <u>Test LEA</u>		Grade Range: <u>K-5th</u>			School Year: <u> </u>	
1	2	3	4	5	6	7
Non-Served Title I or Title I Comparison School's Name	Grade Span (Populates)	Total Student Enrollment (Populates)	Total Low Income Students (Populates)	Students Poverty Percentage (Calculated)	Total Instructional Staff FTEs State and Local Funded (Populates)	Student Enrollment to Instructional Staff FTEs (Calculated)
School AA	K-5th	200	75	38%	32.00	6.250
School BB	3rd-5th	300	125	42%	32.00	9.375
School UU	K-5th	500	175	35%	32.00	15.625
School VV	K-5th	250	100	40%	32.00	7.813
Total		6600	Total		640.00	110% of Average
						11.344

Grade Span Using Instructional Personnel Salary

Comparison of Instructional Personnel /student ratios for state and locally- funded Instructional Personnel salary in each Title I school with the average Instructional Personnel /student ratios for state and locally funded Instructional Personnel salary in non-Title I schools or Title I comparison schools by grade span. A Title I school is deemed comparable if its Instructional Personnel /student salary ratio exceed 90 percent of the average Instructional Personnel salary/student ratio of non-Title schools or Title I comparison schools.

1. The LEA will calculate the Instructional Personnel Salary to student enrollment ratio for each **Title I** and **Non-Title I or Comparison** school.
2. The LEA will calculate the average Instructional Personnel Salary to student enrollment ratio for **ALL Non-Title I or Comparison school(s)**.
3. The LEA will calculate 90% of the average for the **Non-Title I or Comparison school(s)**.
4. The LEA will compare 90% of the average **Non-Title I or Comparison school(s)** to each **Title I school(s)** Instructional Personnel Salary to student enrollment ratio.
5. A **Title I school** is deemed comparable if its Instructional Personnel Salary to student enrollment ratio **exceed 90%** of the average Instructional Staff Salary to student enrollment ratio of **Non-Title I or Comparison school(s)**.

Comparability Report Grade Span Using Instructional Staff Salary

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL Served Title I Schools serving the same grade span range as ALL Non-Served Title I or Title I Comparison Schools

90% of the Average for Non-Title I /
Title I Comparison Schools **\$5,105.45**

1	2	3	4	5	6	7	8
Served Title I School's Name	Grade Span (Populates)	Total Student Enrollment (Populates)	Total Low Income Students (Populates)	Students Poverty Percentage (Calculated)	Total Instructional Staff Salary State and Local Funded (Populates)	Instructional Staff Salary to Students Ratio (Calculated)	Comparable (Yes or No)
School A	K-5th	200	175	88%	\$1,872,000.00	\$ 9,360.00	YES
School B	3rd-5th	300	250	83%	\$1,872,000.00	\$ 6,240.00	YES
School C	K-2nd	400	375	94%	\$1,872,000.00	\$ 4,680.00	NO
School D	K-5th	500	400	80%	\$1,872,000.00	\$ 3,744.00	NO
School E	K-5th	250	200	80%	\$1,872,000.00	\$ 7,488.00	YES

Comparability Report Grade Span Using Instructional Staff Salary

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL Non-Served Title I or Title I Comparison Schools serving the same grade span range as ALL Served Title I Schools

1	2	3	4	5	6	7	8
Non-Served Title I or Title I Comparison School's Name	Grade Span (Populates)	Total Student Enrollment (Populates)	Total Low Income Students (Populates)	Students Poverty Percentage (Calculated)	Total Instructional Staff Salary State and Local Funded (Populates)	Instructional Staff Salary to Students Ratio (Calculated)	Comparable (Yes or No)
School AA	K-5th	200	75	38%	\$1,872,000.00	\$ 9,360.00	
School TT	K-2nd	400	150	38%	\$1,872,000.00	\$ 4,680.00	
School UU	K-5th	500	175	35%	\$1,872,000.00	\$ 3,744.00	
School VV	K-5th	250	100	40%	\$1,872,000.00	\$ 7,488.00	
Total		6600		Total	\$27,440,000.00	90% of Average	\$ 5,105.45

Grade Span Using Instructional Staff Salary

If the student/Instructional Staff ratio is more than **\$5,105.45**, the last column turns **green**. The school is comparable.

All Served Title I Schools Using Instructional Personnel FTE

Comparison of student/Instructional Personnel ratios for state and locally- funded Instructional Personnel Full Time Equivalent (FTE) where all schools are Title I schools with the average student/staff ratios for state and locally funded Instructional Personnel. A Title I school is deemed comparable if its student/Instructional Personnel FTE ratio lies between 90 percent and 110 percent of the average student/Instructional Personnel FTE ratio for all schools.

1. The LEA will calculate the student enrollment to Instructional Personnel FTE ratio for **all schools**.
2. The LEA will calculate the average student enrollment to Instructional Personnel FTE ratio for **all schools**.
3. The LEA will calculate 90% of the average student enrollment to Instructional Personnel FTE ratio for **all schools**.
4. The LEA will calculate 110% of the average student enrollment to Instructional Personnel FTE ratio for **all schools**.
5. The LEA will compare 90% of the average and 110% of the average to each school's student enrollment to Instructional Personnel FTE ratio.
6. A **Title I school** is deemed comparable if its student enrollment to Instructional Personnel FTE ratio is **between 90% and 110%** of the average student enrollment to Instructional Personnel FTE ratio for **all schools**.

Comparability Report for All Served Title I Schools Using Instructional FTEs

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL Served Title I Schools

LEA Name: Test LEA

90% of the Average for Student/Instructional Staff FTE ratio	18.5625
110% of the Average for Student/Instructional Staff FTE ratio	22.6875

School Year

1 Served Title I School's Name	2 Grade Span (Populates)	3 Total Student Enrollment (Populates)	4 Total Low Income Students (Populates)	5 Students Poverty Percentage (Calculated)	6 Total Instructional Staff FTE State (MAY Populate)	7 Student to Instructional Staff FTE Ratio (Calculated)	8 Comparable (Yes or No)
School A	K-5th	200	175	88%	16.00	12.500	No
School B	3rd-5th	300	250	83%	16.00	18.750	Yes
School C	K-2nd	400	375	94%	16.00	25.000	No
School D	K-5th	500	400	80%	16.00	31.250	No
School E	K-5th	250	200	80%	16.00	15.625	No
School F	K-5th	200	175	88%	16.00	12.500	No
School G	3rd-5th	300	250	83%	16.00	18.750	Yes
School H	K-2nd	400	375	94%	16.00	25.000	No
School J	K-5th	500	400	80%	16.00	31.250	No
School K	K-5th	250	200	80%	16.00	15.625	No
School L	K-5th	200	175	88%	16.00	12.500	No
School M	3rd-5th	300	250	83%	16.00	18.750	Yes
School N	K-2nd	400	375	94%	16.00	25.000	No
School P	K-5th	500	400	80%	16.00	31.250	No
School Q	K-5th	250	200	80%	16.00	15.625	No
School R	K-5th	200	175	88%	16.00	12.500	No
School S	3rd-5th	300	250	83%	16.00	18.750	Yes
School T	K-2nd	400	375	94%	16.00	25.000	No
School U	K-5th	500	400	80%	16.00	31.250	No
School V	K-5th	250	200	80%	16.00	15.625	No

All Served Title I Schools Using Instructional FTE

If the
student/Instructional
Personnel FTE ratio
lies between **18.56**
and **22.69**, the last
column turns **green**.
The school is
comparable.

All Served Title I Schools Using Instructional Personnel Salary

Comparison of Instructional Personnel /student ratios for state and locally- funded Instructional Personnel salary where all schools are Title I schools with the average Instructional Personnel /student ratios for state and locally funded Instructional Personnel. A Title I school is deemed comparable if its Instructional Personnel /student salary ratio lies between 90 percent and 110 percent of the average Instructional Personnel salary/student ratio for all schools.

1. The LEA will calculate the Instructional Personnel Salary to student enrollment ratio for **all schools**.
2. The LEA will calculate the average Instructional Personnel Salary to student enrollment ratio for **all schools**.
3. The LEA will calculate 90% of the average Instructional Personnel Salary to student enrollment ratio for **all schools**.
4. The LEA will calculate 110% of the average Instructional Personnel Salary to student enrollment ratio for **all schools**.
5. The LEA will compare 90% of the average and 110% of the average to each school's Instructional Personnel Salary to student enrollment ratio.
6. A **Title I school** is deemed comparable if its Instructional Personnel Salary to student enrollment ratio is **between 90% and 110%** of the average Instructional Personnel Salary to student enrollment ratio for **all schools**.

Comparability Report for All Served Title I Schools Using Instructional Salary

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL Served Title I Schools

LEA Name: Test LEA

School Year: 2022-2023

1	2	3	4	5	6	7	8
Served Title I School's Name	Grade Span (Populates)	Total Student Enrollment (Populates)	Total Low Income Students (Populates)	Students Poverty Percentage (Calculated)	Total Instructional Staff Salary for State	Student to Instructional Staff Salary Ratio (Calculated)	Comparable (Yes or No)
School A	K-5th	200	175	88%	\$ 1,914,000.00	\$ 9,570.00	No
School B	3rd-5th	300	250	83%	\$ 1,914,000.00	\$ 6,380.00	Yes
School C	K-2nd	400	375	94%	\$ 1,914,000.00	\$ 4,785.00	No
School D	K-5th	500	400	80%	\$ 1,914,000.00	\$ 3,828.00	No
School E	K-5th	250	200	80%	\$ 1,914,000.00	\$ 7,656.00	No
School F	K-5th	200	175	88%	\$ 1,914,000.00	\$ 9,570.00	No
School G	3rd-5th	300	250	83%	\$ 1,914,000.00	\$ 6,380.00	Yes
School LL	K-5th	200	75	38%	\$1,914,000.00	\$ 9,570.00	No
School MM	3rd-5th	300	125	42%	\$1,914,000.00	\$ 6,380.00	Yes
School NN	K-2nd	400	150	38%	\$1,914,000.00	\$ 4,785.00	No
School PP	K-5th	500	175	35%	\$1,914,000.00	\$ 3,828.00	No
School QQ	K-5th	250	100	40%	\$1,914,000.00	\$ 7,656.00	No
School RR	K-5th	200	75	38%	\$1,914,000.00	\$ 9,570.00	No
School SS	3rd-5th	300	125	42%	\$1,914,000.00	\$ 6,380.00	Yes
School SS	K-2nd	400	150	38%	\$1,914,000.00	\$ 4,785.00	Yes
School TT	K-5th	500	175	35%	\$1,914,000.00	\$ 3,828.00	No
0	K-5th	250	100	40%	\$1,914,000.00	\$ 7,656.00	No
Total Student Enrollment		13200	Total Instructional Staff Salary		\$ 76,560,000.00		

All Served Title I Schools Using Instructional Salary

If the Student/Instructional Personnel Salary ratio lies between **\$5,220.00** and **\$6,380.00**, the last column turns **green**. The school is comparable.

GRADE SPAN RANGE

The basic premise of comparability is to ensure the LEA can demonstrate that state and local funds used to provide services at Title I schools are at least comparable to the services at Non-Title I or Comparison schools. LEAs are required to define the grade span grouping used to determine comparability. Examples of the grade span range grouping within the written procedure may include:

1. The LEA will use the following grade span ranges: K-5th, 6th-8th, and 9th-12th. Any school that has overlapping grade levels will be included with the grade span range that they have the most in common with.

Or

2. The LEA will use the following grade span ranges: K-2nd, 3rd-5th, 6th-8th and 9th – 12th. For any schools with overlapping grade levels, that school will be broken down into K-2nd, 3rd-5th, 6th-8th and 9th – 12th and be compared with the appropriate grade span.

Or

3. The LEA will use the following grade span range K-8th and 9th-12th. Any school that has overlapping grade levels will be included with the grade span range that they have the most in common with.

Or

4. The LEA serves all schools with Title I, Part A funds and will compare each school against the average of all schools.

In each example above the LEA specifically identified how the schools will be grouped. **Remember, the LEA has the discretion on how they will group the schools.** The statements above are only examples.

One School Per Grade Span
















If the LEA has only **one school per grade span** and **none** of the grade spans are in common, the LEA is **exempt** from demonstrating comparability, however, the LEA still must submit the **Comparability School Informational List** and the **Comparability Summary & Assurances form**. The LEA is also still required to have written procedures in place and maintain documentation for five years.

School Eligibility

CLINTON PUBLIC SCHOOL DIST (2521) Public District - [REDACTED] 24 - Consolidated - Rev 0 -

Go To 

The underlined items in the column headings on this page can be clicked for sorting. For example,

<u>School Name</u> (7 Buildings)	<u>School Number</u>	<u>Grade Span</u>	<u>Service</u>	<u>K-12</u>
A	B	C	D	
CLINTON PARK ELEM SCHOOL	2521012	K-1	SW 	
EASTSIDE ELEM	2521014	4-5	SW 	
NORTHSIDE ELEM	2521016	2-3	SW 	
CLINTON JR HI SCHOOL	2521008	7-8	None 	
LOVETT ELEM SCHOOL	2521015	6	None 	
CLINTON HIGH SCHOOL	2521004	10-12	None 	
SUMNER HILL JR HI SCHOOL	2521018	9	None 	
Totals:				

If the LEA has multiple schools serving grades that cross more than one grade span range, **and at least one of those schools is a Title I school**, using the current year's School Eligibility Page from MCAPS, determine which schools are being served and which schools are not served. Those schools should be included in the comparability demonstration.

Schools With Grade Levels in Common
EXAMPLE #1

School Eligibility

ALCORN SCHOOL DIST (0200) Public District - FY Consolidated - Rev 2 - Title I-A

Go To

The underlined items in the column headings on this page can be clicked for sorting. For example, to

Table with 4 columns: School Name (8 Buildings), School Number, Grade Span, Service. Rows include Biggersville Elementary, Alcorn Central Elementary School, Kossuth Elementary School, Alcorn Central Middle School, Biggersville High School, Kossuth Middle School, Alcorn Central High School, and Kossuth High School.

Determine the grade spans that are being served.

In example #1, the following grade spans are being served:

K-6
PK-4
K-4

The LEA will sort schools by grade spans to see if there are any additional schools that have grade spans in common.

The LEA has grades 5-8 in common with K-6.

The LEA may have one or two grade span ranges:

K-4

- Includes Alcorn Central Elementary School and Kossuth Elementary School

K-6

- Includes Biggersville Elementary, Alcorn Central Middle School, and Kossuth Middle School

Two grade spans

School Eligibility

ALCORN SCHOOL DIST (0200) Public District - FY Consolidated - Rev 2 - Title I-A

Go To

The underlined items in the column headings on this page can be clicked for sorting. For example, to

Table with 4 columns: School Name (8 Buildings), School Number, Grade Span, Service. Rows include Alcorn Central Middle School, Kossuth Middle School, Biggersville High School, Alcorn Central High School, Kossuth High School, Kossuth Elementary School, Biggersville Elementary, and Alcorn Central Elementary School.

OR

K-8

- Includes Alcorn Central Elementary, Kossuth Elementary School, Biggersville Elementary School, Alcorn Central Middle School and Kossuth Middle School

One grade span

Schools With Grade Levels in Common

EXAMPLE #2

School Eligibility

GULFPORT SCHOOL DIST (2421) Public District - FY 2020 Consolidated - Rev 3 - Title I-A

Go To ▶

The underlined items in the column headings on this page can be clicked for sorting. For example, to

School Name (10 Buildings)	School Number	Grade Span	Service
A	B	C	D
TWENTY EIGHTH ST ELEM	2421072	K-5	SW
GULFPORT CENTRAL MIDDLE SCHOOL	2421016	6-8	SW
WEST ELEMENTARY SCHOOL	2421064	K-5	SW
PASS ROAD ELEMENTARY SCHOOL	2421060	K-5	SW
CENTRAL ELEM	2421014	K-5	SW
ANNISTON AVENUE ELEMENTARY SCHOOL	2421004	K-5	SW
BAYOU VIEW MIDDLE SCHOOL	2421012	6-8	SW
BAYOU VIEW ELEMENTARY SCHOOL	2421008	K-5	None
GULFPORT HIGH SCHOOL	2421040	9-12	None
GASTON POINT ELEMENTARY SCHOOL	2421032		None
Totals:			

Determine the grade spans that are being served.

In example #2, the following grade spans are being served:

K-5
6-8

The LEA will sort schools by grade spans to determine if there are any additional schools that have grade spans in common with the served schools.

The LEA may have one or two grade span ranges:

K-5

- Includes Twenty Eighth St Elementary School, West Elementary School, Central Elementary School, Pass Road Elementary, Anniston Avenue Elementary School, and Bayou View Elementary School

6-8

- Includes Gulfport Central Middle School and Bayou View Middle School

School Eligibility

GULFPORT SCHOOL DIST (2421) Public District - FY 2020 Consolidated - Rev 3 - Title I-A

Go To ▶

The underlined items in the column headings on this page can be clicked for sorting. For example, to

School Name (10 Buildings)	School Number	Grade Span	Service
A	B	C	D
TWENTY EIGHTH ST ELEM	2421072	K-5	SW
WEST ELEMENTARY SCHOOL	2421064	K-5	SW
PASS ROAD ELEMENTARY SCHOOL	2421060	K-5	SW
CENTRAL ELEM	2421014	K-5	SW
ANNISTON AVENUE ELEMENTARY SCHOOL	2421004	K-5	SW
BAYOU VIEW ELEMENTARY SCHOOL	2421008	K-5	None
GULFPORT HIGH SCHOOL	2421040	9-12	None
GULFPORT CENTRAL MIDDLE SCHOOL	2421016	6-8	SW
BAYOU VIEW MIDDLE SCHOOL	2421012	6-8	SW
GASTON POINT ELEMENTARY SCHOOL	2421032		None

OR

K-8

- Includes Twenty Eighth St Elementary School, West Elementary School, Central Elementary School, Pass Road Elementary, Anniston Avenue Elementary School, Bayou View Elementary School, Gulfport Central Middle School and Bayou View Middle School

Schools With Grade Levels in Common

EXAMPLE #3

School Eligibility

RANKIN CO SCHOOL DIST (6100) Public District - FY [REDACTED] - Consolidated - Rev 1 - Title I-A

Go To ▶

The underlined items in the column headings on this page can be clicked for sorting. For example,

<u>School Name</u> (28 Buildings)	<u>School Number</u>	<u>Grade Span</u>	<u>Service</u>
A	B	C	D
RICHLAND UPPER ELEMENTARY	6100057	3-6	SW ▼
RICHLAND ELEMENTARY SCHOOL	6100058	K-2	SW ▼
MCLAURIN ELEMENTARY SCHOOL	6100025	PK-6	SW ▼
RICHLAND HIGH SCHOOL	6100056	7-12	SW ▼
MCLAURIN ATTENDANCE CENTER	6100028	7-12	SW ▼
PELAHATCHIE ELEMENTARY SCHOOL	6100046	PK-6	SW ▼
PELAHATCHIE ATTENDANCE CENTER	6100044	7-12	SW ▼
PUCKETT ELEMENTARY SCHOOL	6100054	K-6	SW ▼
FLOWOOD ELEMENTARY SCHOOL	6100023	K-5	None ▼
PUCKETT ATTENDANCE CENTER	6100052	7-12	None ▼
STEEN'S CREEK ELEMENTARY	6100017	PK-2	None ▼
FLORENCE ELEMENTARY SCHOOL	6100018	3-5	None ▼
PISGAH ELEMENTARY SCHOOL	6100048	K-6	None ▼
FLORENCE MIDDLE SCHOOL	6100020	6-8	None ▼
PISGAH HIGH SCHOOL	6100050	7-12	None ▼
STONEBRIDGE ELEMENTARY	6100012	2-3	None ▼
ROUSE ELEMENTARY	6100010	PK-1	None ▼
BRANDON MIDDLE SCHOOL	6100016	6-8	None ▼
FLORENCE HIGH SCHOOL	6100022	9-12	None ▼
BRANDON ELEMENTARY SCHOOL	6100006	4-5	None ▼
HIGHLAND BLUFF ELEMENTARY	6100040	K-5	None ▼
NORTHWEST RANKIN MIDDLE SCHOOL	6100026	6-8	None ▼
NORTHWEST ELEMENTARY SCHOOL	6100034	K-5	None ▼
OAKDALE ELEMENTARY	6100038	K-5	None ▼
BRANDON HIGH SCHOOL	6100008	9-12	None ▼
NORTHWEST RANKIN HIGH SCHOOL	6100032	9-12	None ▼
NORTHSHORE ELEMENTARY	6100036	K-5	None ▼

Totals:

Determine the grade spans that are being served.

In example #3, the following grade spans are being served:

K-2nd
K-6th
3rd-6th
7th-12th

School Eligibility

RANKIN CO SCHOOL DIST (6100) Public District - FY Consolidated - Rev 1 - Title I-A

Go To 

The underlined items in the column headings on this page can be clicked for sorting. For example

<u>School Name</u> (28 Buildings)	<u>School Number</u>	<u>Grade Span</u>	<u>Service</u>
A	B	C	D
STONEBRIDGE ELEMENTARY	6100012	2-3	None ▼
FLORENCE ELEMENTARY SCHOOL	6100018	3-5	None ▼
RICHLAND UPPER ELEMENTARY	6100057	3-6	SW ▼
BRANDON ELEMENTARY SCHOOL	6100006	4-5	None ▼
NORTHWEST RANKIN MIDDLE SCHOOL	6100026	6-8	None ▼
BRANDON MIDDLE SCHOOL	6100016	6-8	None ▼
FLORENCE MIDDLE SCHOOL	6100020	6-8	None ▼
RICHLAND HIGH SCHOOL	6100056	7-12	SW ▼
PUCKETT ATTENDANCE CENTER	6100052	7-12	None ▼
PELAHATCHIE ATTENDANCE CENTER	6100044	7-12	SW ▼
MCLAURIN ATTENDANCE CENTER	6100028	7-12	SW ▼
PISGAH HIGH SCHOOL	6100050	7-12	None ▼
NORTHWEST RANKIN HIGH SCHOOL	6100032	9-12	None ▼
BRANDON HIGH SCHOOL	6100008	9-12	None ▼
FLORENCE HIGH SCHOOL	6100022	9-12	None ▼
RICHLAND ELEMENTARY SCHOOL	6100058	K-2	SW ▼
HIGHLAND BLUFF ELEMENTARY	6100040	K-5	None ▼
NORTHWEST ELEMENTARY SCHOOL	6100034	K-5	None ▼
OAKDALE ELEMENTARY	6100038	K-5	None ▼
FLOWOOD ELEMENTARY SCHOOL	6100023	K-5	None ▼
NORTHSHORE ELEMENTARY	6100036	K-5	None ▼
PISGAH ELEMENTARY SCHOOL	6100048	K-6	None ▼
PUCKETT ELEMENTARY SCHOOL	6100054	K-6	SW ▼
ROUSE ELEMENTARY	6100010	PK-1	None ▼
STEEN'S CREEK ELEMENTARY	6100017	PK-2	None ▼
PELAHATCHIE ELEMENTARY SCHOOL	6100046	PK-6	SW ▼
MCLAURIN ELEMENTARY SCHOOL	6100025	PK-6	SW ▼

Totals:

The LEA will sort schools by grade spans to see if there are any additional schools that have grade spans in common.

The LEA may have multiple arrangement of grade span ranges. An **example of one option** is:

K-5

- Includes Brandon Elementary School, Florence Elementary School, Flowood Elementary School, Highland Bluff Elementary, Northshore Elementary, Northwest Elementary School, Oakdale Elementary School, Pelahatchie Elementary School, Puckett Elementary School, Richland Elementary School, Richland Upper Elementary School, Rouse Elementary School, Steen's Creek Elementary School, and Stonebridge Elementary School.

6-12

- Includes Brandon High School, Brandon Middle School, Florence High School, Florence Middle School, McLaurin Attendance Center, Northwest Rankin High School, North Rankin Middle School, Pelahatchie Attendance Center, Pisgah High School, Puckett Attendance Center, and Richland High School.

Comparability Report School Information List

(Required- Upload a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL schools in the LEA.

LEA Name:

School Year:

[illegible]

Comparability Report School Information List

(Required- Uploaded a printed copy to the LEA Document Library's Comparability folder in MCAPS)

List ALL schools in the LEA.

LEA Name:

School Year:

[illegible]

Schools Exempted from Demonstrating Comparability

Complete tab labeled “**School Informational Listing**” for the schools within the LEA. If the LEA selects to use grade span range method for comparability, please be mindful that page 1 is for **Title Schools** and page 2 is for **Non-Title I/Title I Comparison Schools**. If the LEA chooses the All Served Title I Schools method for comparability, there is one chart where all schools should be placed upon.

1. **LEA Name** – Record LEA name.
2. **School Year**- Place the current school term, for example 2024-2025.
3. Column 1 – **School Name**. List all schools in the LEA. Record the complete name of each school. Please make sure you are recording the appropriate schools in the appropriate sections.
4. Column 2 – **Grade Span**. The grade span must be based on the grade span reported in Month 1 in MSIS. Also, please do not forget to remove any PreK students from the school’s total enrollment.
5. Column 3 – **Student Counts – Enrollment**. Enter the current school year student enrollment count from month 1 MSIS report. Remove any PreK students.
6. Column 4 – **Student Counts – Poverty**. Enter the current school year low-income student count from the current fiscal year’s MCAPS Consolidated Funding Application Title I, Part A School Eligibility Section-Low Income Student Public Count (Column I).
7. Column 5 – **Enrollment Counts by Grade**. For each applicable grade, enter the student enrollment count that correlates with the enrollment count on the MSIS Month 1 report. (The grade columns should add up to equal the value entered in column 4.) Please ensure that all special coded students are counted with appropriate grade levels.
8. Column 6 – **Total**. The total of student entered per school will automatically generate. The column will turn **green** when the enrollment count by grade equals the amount listed in column 3 for the total enrollment.

Instructional Personnel (FTE or Salary)

Do Not Upload into MCAPS

Complete tab(s) labeled “**Instructional Personnel FTE or Salary**”. In calculating comparability, an LEA may include only personnel paid with State and local funds. [Section 1120A(c)(1)]

LEAs have the option of collecting their instructional personnel FTE data using the sheets within the workbook. The LEA must complete a separate tab for each school in the LEA within the workbook. If the LEA selects to use grade span method for comparability, please be mindful that the **blue tabs** are for **Title I Schools** and the **green tabs** are for **Non-Title I/Title I Comparison Schools**. If the LEA chooses the All Served Title I Schools method for comparability, there are 40 available School tabs that can be completed. When using the sheets within the workbook, all information will prepopulate in the comparability report and complete all further calculations. There are slots for up to 400 Instructional Personnel per school. If additional lines are need, please notify us.

LEA Name – The LEA name will prepopulate.

School – The school’s name will prepopulate.

Grade Span – The grade span will prepopulate.

School Year – The grade span will prepopulate.

1. **Column 1 – Last Name and First Name of Employee.** All teachers must hold a MS teaching license. List the names of all licensed instructional personnel assigned by schedule to the school, whether full or part-time at that school. (Use payroll, time records and/or other documented sources.) Instructional personnel include all licensed classroom teachers and other licensed personnel assigned to the school who provide services that support instruction: principals, assistant principals, instructional coaches, librarians, music, art, and physical education teachers, guidance counselors, speech therapists and licensed social workers and psychological personnel. Other personnel directly supporting instruction assigned to the school may include paraprofessionals and other non-licensed personnel such as social workers. Personnel not involved in providing instructional support **MAY NOT** be included. Other personnel that **MAY NOT** be included are clerical, custodial, food service, transportation, and any other personnel not providing instructional support. **Do not include any PreK personnel or 100% federally funded personnel.** Please remember that federally funded would include Title I, II, III, IV, V, Homeless, CTE, SPED, ESSER, etc.
2. **Column 2 – Position.** For each person named in column 1, state the position in the school. LEA’s can be as specific as they would like, for example: 2nd grade teacher, Interventionist, Asst. Teacher (1st), etc.
3. **Column 3 – Federal FTE or Salary.** For each person named in column 1, list his/her full time equivalent (FTE or Salary) from federal funding, if any. If the person is paid partially from state/local funds and partially from federal funds, make the appropriate entry in each column (3 and 4). The MDE has set the maximum FTE that any non-licensed Instructional Personnel is 0.50.

- When using these tabs, the total State/Local FTE will calculate and transfer to the Comparability Report tab. Please print and keep the document as a part of the Comparability Records.

23

Comparability Report

The LEA's name, School Year, the School's name(s), Grade spans. Enrollment, and Low-Income Students information for each school **will prepopulate from the information the LEA placed on the School Information List.**

The LEA **must enter the grade span range** used to determine comparability.

Each coordinating school's total **State/Local FTE or Salary will prepopulate** from their Instructional Personnel form within the workbook on the comparability report form column 5 (ALL Served Title I Schools forms) or column 6 (Grade Spans forms).

The Students Poverty Percentage, Student/Instructional Personnel FTE or Instructional Personnel Salary/Student, and Comparability determination will calculate for the LEA.

Examples of the Comparability Reports can be found on pages 9-12.

Comparability Summary and Assurances

TITLE I COMPARABILITY SUMMARY REPORT and ASSURANCES

School Year 2024-2025

Mississippi Department of Education (MDE)

Office of Federal Programs

(REQUIRED) Uploaded Signed Copy to the LEA Document Library's Comparability Folder in MCAPS)

All highlighted sections in green must be completed.

Local Educational Agency (LEA) Information		
LEA Name	Name of Person Completing Form	
Superintendent's Name	Person Responsible for Completion of Form Official Title	
LEA's Mailing Address	Telephone Number	Email

Submission Type and Comparability Basis
Submission Type – Check one appropriate response: <input type="checkbox"/> This report is an original submission uploaded to MCAPS no later than October 30th. <input type="checkbox"/> This is a revised submission. It details the reallocation of resources to meet comparability and is submitted not later than December 1st.
Comparability Basis – Check one appropriate response: <input type="checkbox"/> Comparability was calculated on a district basis. (Complete School Listing Form, Comparability Report and Comparability Summary and Assurances Form and upload to MCAPS LEA Document Library) <input type="checkbox"/> Comparability was calculated on a grade-span basis. (Complete School Listing Form, Comparability Report and Comparability Summary and Assurances and upload to MCAPS LEA Document Library) <input type="checkbox"/> LEA has only one building for each grade span. (Complete School Listing Form and Comparability Summary and Assurances and upload to MCAPS LEA Document Library)

Data Collection Date
Required for the CURRENT school year (date must be between the first day of school and October 15th). Applies to all data: school list, student enrollment, number low income students, personnel FTE by funding source, etc.

Schools with 100 or Fewer Students <u>excluded</u> from comparability	
School Name	# Enrolled

Only schools with enrollments of less than 100 students should be listed here.

Total Number of Title I Schools		Total Number of Non-Title I Schools	
---------------------------------	--	-------------------------------------	--

Assurances of Title I Comparability
The LEA has established and <u>implemented</u> the following: 1) a local educational agency-wide salary schedule; 2) a policy to ensure equivalence among schools in teachers, administrators and other staff; and 3) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. 4) a policy ensuring the LEA's hiring practices meet state and federal license requirements (i.e. teachers must be licensed to teach in a MS public school) and paraprofessionals must meet State requirements; and 5) written procedures for complying with the comparability requirements as detailed in the Comparability Handbook provide by the MDE.
I understand that the LEA must document implementation of the above policies, procedures and salary schedules. I understand that demonstrating comparability is a prerequisite for receiving Title I, Part A funds. I attest to the accuracy of the information provided.
<input type="checkbox"/> All Title I Schools are Comparable <input type="checkbox"/> All Title I Schools are <u>NOT</u> Comparable and a Letter of Explanation is Attached
<div> <div> <div>Signature</div> <div> </div> </div> <div> <div>Superintendent's Signature</div> <div> </div> </div> <div> <div>Signature</div> <div> </div> </div> <div> <div>Federal Program Director's Signature</div> <div> </div> </div> </div> <div> <div>Date (Must be no later than October 30th)</div> <div> </div> </div> <div> <div>Date (Must be no later than October 30th)</div> <div> </div> </div>

REQUIRED UPLOADS INTO MCAPS

Each LEA is required to upload at a minimum:

1. School Informational Listing –

If all schools are being served use the School Informational Listing for either FTE or Salary from the ALL Served Title I Schools workbooks.

If Comparability is being demonstrated using a grade span range use the School Informational Listing for either FTE or Salary from the Grade Span workbooks.

If the LEA is exempt from demonstrating Comparability because it only has one school per grade span with no overlapping grade levels use the School Informational Listing for Exempted School's workbooks.

2. Comparability Summary & Assurance Form (PDF)

If the LEA must demonstrate comparability, the comparability report must be uploaded for that grade span range.

All forms must be uploaded as one document into the LEA's document library in MCAPS in the current year's Comparability Folder.

Appendix A

ESEA Title I, Part A. SEC. 1118 Fiscal Requirements

- a) MAINTENANCE OF EFFORT – A local educational agency may receive funds under this part for any fiscal year only if the state educational agency involved finds that the local educational agency has maintained the agency’s fiscal effort in accordance with section 8521.
- b) FEDERAL FUNDS TO SUPPLEMENT, NOT SUPPLANT, NON-FEDERAL FUNDS –
 - 1) IN GENERAL – A state educational agency or local educational agency shall use federal funds received under this part only to supplement the funds that would, in the absence of such federal funds, be made available from non-federal sources for the education of pupils participating in programs assisted under this part, and not supplant such funds.
 - 2) COMPLIANCE.—To demonstrate compliance with paragraph (1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.
 - 3) SPECIAL RULE. —No local educational agency shall be required to—
 - A) identify that an individual cost or service supported under this part is supplemental; or
 - B) provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency’s compliance with paragraph (1)
 - 4) PROHIBITION. —Nothing in this section shall be construed to authorize or permit the Secretary to prescribe the specific methodology a local educational agency uses to allocate State and local funds to each school receiving assistance under this part.
 - 5) TIMELINE. —A local educational agency—
 - A) shall meet the compliance requirement under paragraph (2) not later than 2 years after the date of enactment of the Every Student Succeeds Act; and
 - B) may demonstrate compliance with the requirement under paragraph (1) before the end of such 2-year period using the method such local educational agency used on the day before the date of enactment of the Every Student Succeeds Act.
- c) **COMPARABILITY OF SERVICES –**
 - 1) **IN GENERAL –**
 - A) **COMPARABLE SERVICES – Except as provided in paragraphs (4) and (5), a local educational agency may receive funds under this part only if state and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part.**
 - B) **SUBSTANTIALLY COMPARABLE SERVICES – If the local educational agency is serving all of such agency’s schools under this part, such agency may receive funds under this part only if such agency will use state and local funds to provide services**

that, taken as a whole, are substantially comparable in each school.

- C) **BASIS** – A local educational agency may meet the requirements of subparagraphs (A) and (B) on a grade-span by grade-span basis or [an LEA] school-by-school basis.

2) WRITTEN ASSURANCE –

- A) **EQUIVALENCE** – A local educational agency shall be considered to have met the requirements of paragraph (A) if such agency has filed with the state educational agency a written assurance that such agency has established and implemented –

- i. a local educational agency-wide salary schedule;
 - ii. a policy to ensure equivalence among schools in teachers, administrators, and other staff; and
 - iii. a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

- B) **DETERMINATIONS** – For the purpose of this subsection, in the determination of expenditures per pupil from state and local funds, or instructional salaries per pupil from state and local funds, staff salary differentials for years of employment shall not be included in such determinations.

- C) **EXCLUSIONS** – A local educational agency need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services under this subsection.

3) PROCEDURES AND RECORDS – Each local educational agency assisted under this part shall-

- A) develop procedures for compliance with this subsection; and
- B) maintain records that are updated biennially documenting such agency's compliance with this subsection.

4) INAPPLICABILITY – This subsection shall not apply to a local educational agency that does not have more than one building for each grade span.

5) COMPLIANCE – For the purpose of determining compliance with paragraphs (1), a local educational agency may exclude state and local funds expended for –

- A) language instruction educational programs; and
- B) the excess costs of providing services to children with disabilities as determined by the local educational agency.

d) EXCLUSION OF FUNDS – For the purpose of complying with subsections (b) and (c), a State educational agency or local educational agency may exclude supplemental State or local funds expended in any school attendance area or school for programs that meet the intent and purposes of this part.

Appendix B

SAMPLE – LEA Procedures for Demonstrating Title I Comparability Compliance

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 LEA must perform comparability calculations every year to demonstrate that all of its Title I schools are in fact comparable and make adjustments if any are not. An LEA must develop procedures for complying with comparability requirements. [Section 1118A(c)(3)]

- 1) **Responsible Office:** It is the responsibility of (insert office name and job title of designated staff) to ensure that the LEA remains in compliance with the Title I comparability requirements. The designated office will oversee the process to ensure all procedures are followed and all deadlines are met.
- 2) **Deadlines:** No later than (insert date), the LEA shall annually submit the comparability report and upload to MCAPS the required forms to the Mississippi Department of Education (Office of Federal Programs) demonstrating comparability. To ensure the October 30th deadline is met, the attached comparability timeline will be followed.
- 3) **Basis for Demonstrating Comparability:** The LEA may calculate comparability on an LEA (All served schools) or grade- span basis. The LEA will use the following grade spans ranges: K-5th, 6th- 8th, and 9th –12th and each school that has overlapping grades will be grouped with the grade span that they have the most in common with. The LEA will use the Instructional Personnel of each school with an FTE of 1 for certified Instructional Personnel position or 0.5 FTE for non-certified Instructional Personnel position. If the position is partially paid with federal funds, the LEA will only use the portion that is paid with State/Local funds. OR The LEA will use the Instructional Personnel salary for position within each school. If the position is partially paid with federal funds, the LEA will only use the portion that is paid with State/Local funds.
- 4) **Data Collection:** It is the responsibility of (insert office name and job title of designated staff) to collect all data from the appropriate LEA office(s), that are required by the department to demonstrate comparability. The designated office will ensure all required data is submitted to appropriate staff within the defined timeline. The following data sources will be used: Month 1 MSIS report current year, MSIS Personnel Report for month 1 for the current year, The salary distribution report for September 30th of the current year for employees, etc.
- 5) **Data Verification:** It is the responsibility of (insert office name and job title of designated staff) to verify the accuracy of the data used to demonstrate comparability and to ensure the calculations are performed correctly using the method established by the department.
- 6) **Reallocation:** If the initial calculations indicate that a school is not receiving comparable services, (insert office name and job title of designated staff) will be immediately notified. The LEA will then take immediate steps, as early in the

school year as possible and with minimum disruption to the learning environment, that are necessary to demonstrate comparability for All Served Title I Schools. Appropriate steps may include, but need not be limited to, reallocation of funding sources and/or reassignment of personnel. Reallocations must be determined no later than Dec. 1st of the same school year and all corrected comparability forms uploaded to MCAPS.

- 7) **Records:** It is the responsibility of (insert office name and job title of designated staff) to ensure that all comparability reports, records, and source documentation of the LEAs comparability analysis and calculations are retained for at least five years for audit purposes. An 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; policies ensuring equivalence among schools in teachers, administrators, and other staff; equivalence among schools in the provision of curriculum materials and instructional supplies; ensuring the LEA's hiring practices meet state and federal licensure requirements; teachers and paraprofessionals met State requirements; and written LEA comparability procedures.
- 8) **Complaints:** It is the responsibility of (insert office name and job title of designated staff) to oversee all complaints from parents, community members or LEA and school staff members, that a school is not receiving comparable services.

Appendix C

SAMPLE – LEA Comparability Timeline

The timeline below is a sample the LEA may follow to ensure all LEA-level comparability procedures are conducted and comparability is demonstrated for All Served Title I Schools.

January – April

Engage in LEA-level budget (state and local funds) discussions concerning allocation of Instructional Personnel (i.e., hiring additional teachers) and resources to schools for the upcoming school year for the purpose of ensuring compliance with Title I comparability requirements.

May – June

Conduct meetings with appropriate LEA representatives to discuss the requirements for completing the annual comparability calculations.

Establish participant roles and responsibilities.

Select the basis for demonstrating comparability that will be used for calculations. (LEA or grade- span range basis)

Continue to engage in district-level discussions concerning allocation of Instructional Personnel (i.e., hiring additional teachers) and resources to schools for the upcoming school year for the purpose of ensuring compliance with Title I comparability requirements.

July – September

Obtain preliminary information from appropriate LEA staff.

Identify LEA Title I and non-Title I schools.

Identify date and collection methodologies for gathering data needed to complete calculations.

October

Collect data.

Meet with appropriate LEA staff and calculate comparability.

Make necessary reallocation of resources to ensure comparability of Title I schools shown not to be comparable.

Maintain all required documentation supporting the comparability calculations and any corrections made to ensure that All Served Title I Schools are comparable.

No later than November 6th of the same school year, upload corrected comparability forms to MCAPS.

November

Reconvene appropriate LEA staff to address any outstanding issues that have arisen, such as, notification from the Mississippi Department of Education Office of Federal Programs department of non-compliance of any Title I schools.

Make necessary reallocation of resources to ensure comparability of Title I schools shown not to be comparable.

December

No later than Dec. 1 of the same school year, upload corrected comparability forms to MCAPS if the LEA failed to demonstrate comparability at the first Friday in November submission.