

October 29, 2012

To: Superintendents

cc: Title I Directors, HR Directors, Comparability Respondents

It is time for the Comparability data collection. NCLB requires districts that receive Title IA funds to demonstrate, without considering any Title I resources, that their Title I schools are comparable to non-Title I schools in the same grade span. Demonstrating comparability assures CDE and the United States Department of Education (USDE) that federal dollars are not paying for educational resources in Title I schools that state and local dollars fund in non-Title I schools. Districts must demonstrate that Title I funds are used to supplement, not supplant, state and local funds. This ensures that Title I money provides additional resources to economically disadvantaged students, as the law intended.

Districts that must demonstrate comparability have at least one Title I school with enrollment more than 100 students in a grade span (elementary, middle, high) that has two or more schools. Thus, districts that have only one school per grade span do not have to demonstrate comparability even if that school receives Title I funds. A list of districts that must demonstrate comparability in 2012-2013 along with the applicable grade span(s) follows. If you have questions about why your grade span/district is included or omitted from the list, contact Donna Morganstern at morganstern_d@cde.state.co.us or 303-866-6209.

In accordance with current USDE guidance, CDE's online system uses the FTE method, which analyzes the number of students per state- or locally-funded teacher. CDE also complies with federal guidance that, when all schools in the grade span accept Title I funds, each school must have student- teacher ratios within 10% of the average (not counting Title I teachers) to be considered comparable. If a school's student-teacher (state/locally funded) ratio is less than 90% or more than 110% of the average, that school is considered "non-comparable." Less than 90% (lower than average student-teacher ratio) may indicate that a school receives disproportionately more state/local funds; more than 110% (higher than average student-teacher ratio) indicates it receives disproportionately less.

For districts with both Title I and non-Title I schools in the same grade span, the online system calculates the average student/teacher ratio for all non-Title I schools. It then compares each Title I school's student-teacher (state and locally funded) to the non-Title I school average. The district demonstrates comparability when no Title I school has a student-teacher (state and locally funded) ratio more than 10% above the non-Title I school average.

The USDE allows districts unable to demonstrate Comparability with the FTE method to use any of three alternative methods, which the online system is not programmed to calculate. However, Excel calculators are available to assist districts that cannot demonstrate Comparability using the online FTE system. Two methods allow Comparability calculations to be done within two separate bands based on school enrollment (small schools separate from large schools) and poverty rate (low poverty

schools separate from high poverty schools). A third method allows calculations based on per pupil expenditures for educational resources. However, these alternative methods are to be applied *only* in the event that the district is not able to demonstrate Comparability based on the traditional FTE method discussed above. All districts must first submit their data through the online system using the traditional method.

For this process to begin, each superintendent must authorize a Comparability Respondent. If your district does not have a respondent or you need to authorize a different one, complete the authorization form that is attached. This form also can be downloaded from:

http://www.cde.state.co.us/FedPrograms/dl/ti_a_comp_respondinfo.pdf.

When the online Comparability system opens, it will be pre-populated with 2011-2012 data. Authorized Respondents will update the system with 2012-2013 data. CDE has scheduled the following in-depth training webinars geared to Comparability Respondents and other district personnel whose help will be needed to compile the data and update the online system. We will add more webinar sessions if the need arises. Please pass along this information to everyone in your district who might be involved in comparability data collection and reporting and encourage them to attend one of these one-hour sessions.

All three meetings will use the same phone number (1-800-832-0736) and conference room number (7133264):

Comparability, Nov 2 Session
11/02/2012, 10:00 AM - 11:00 AM
<http://connect.enetcolorado.org/comp110212/>

Comparability, Nov 5 Session
11/05/2012, 12:00 PM - 1:00 PM
<http://connect.enetcolorado.org/comp110512/>

Comparability, Nov 6 Session
11/06/2012, 1:00 PM - 2:00 PM
<http://connect.enetcolorado.org/comp110612/>

Your district's authorized Respondent should begin to gather the data and update the system as soon it opens, at which time the district already will have the official October Count. Similarly, the HR department will know by this time who is teaching in which schools for how much of the day/week and out of which funds they are being paid. We will email a notice to district respondents when the system opens and provide the link.

Ideally, once the district's Respondent updates the student enrollment and teacher FTE data, all Title I schools will come out as "comparable." If this is not the case and your district has a very wide range of school enrollments or poverty rates, one of the

first two alternate methods might work. However, if neither of those two methods, or the method based on per pupil expenditure, enables the district to demonstrate that a school is comparable, the district will have to take action to get into compliance very quickly. Such action might involve moving staff from one building to another for some days or fraction of days. Another solution might involve redistributing teacher funding sources.

All non-comparable situations must be remediated, so that districts and the state meet all obligations and requirements for the receipt of Title I funding, by the time classes begin for the second semester, right after winter break. CDE is more than willing to help any non-comparable districts achieve comparability in a way that results in as little disruption to students and staff as possible. Understand, however, there is no guarantee that non-comparability remediation can be accomplished without disruption to students, even though that is everyone's goal, and that any district that fails to meet this deadline will be considered out of compliance with Title I regulations.

We appreciate your time and attention to the Comparability data collection. Should you have any questions or need further assistance, please contact Donna Morganstern at 303-866-6209 or morganstern_d@cde.state.co.us.

Patrick Chapman, Executive Director
Office of Federal Programs Administration
Colorado Department of Education

Districts that must demonstrate Comparability for 2012-13

| District Number | District Name | Elementary | Middle | High |
|------------------------|----------------------------|-------------------|---------------|-------------|
| 0010 | MAPLETON 1 | X | X | |
| 0020 | ADAMS 12 FIVE STAR SCHOOLS | X | X | |
| 0030 | ADAMS COUNTY 14 | X | X | |
| 0040 | BRIGHTON 27J | X | | |
| 0050 | BENNETT 29J | X | | |
| 0070 | WESTMINSTER 50 | X | X | |
| 0120 | ENGLEWOOD 1 | X | | |
| 0123 | SHERIDAN 2 | X | | |
| 0130 | CHERRY CREEK 5 | X | | |
| 0140 | LITTLETON 6 | X | | |
| 0180 | ADAMS-ARAPAHOE 28J | X | X | X |
| 0190 | BYERS 32J | X | | |
| 0220 | ARCHULETA COUNTY 50 JT | X | | |
| 0260 | VILAS RE-5 | X | X | X |

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|------|-------------------------|---|---|---|
| 0470 | ST VRAIN VALLEY RE 1J | X | | |
| 0480 | BOULDER VALLEY RE 2 | X | X | X |
| 0490 | BUENA VISTA R-31 | X | | |
| 0500 | SALIDA R-32 | X | X | X |
| 0540 | CLEAR CREEK RE-1 | X | | |
| 0550 | NORTH CONEJOS RE-1J | X | X | X |
| 0870 | DELTA COUNTY 50(J) | X | | |
| 0880 | DENVER COUNTY 1 | X | X | X |
| 0890 | DOLORES COUNTY RE NO.2 | X | | |
| 0900 | DOUGLAS COUNTY RE 1 | X | | |
| 0910 | EAGLE COUNTY RE 50 | X | | |
| 0920 | ELIZABETH C-1 | X | | |
| 0980 | HARRISON 2 | X | X | |
| 0990 | WIDEFIELD 3 | X | | |
| 1000 | FOUNTAIN 8 | X | | |
| 1010 | COLORADO SPRINGS 11 | X | X | |
| 1020 | CHEYENNE MOUNTAIN 12 | X | | |
| 1030 | MANITOU SPRINGS 14 | X | | |
| 1040 | ACADEMY 20 | X | | |
| 1070 | HANOVER 28 | X | | |
| 1080 | LEWIS-PALMER 38 | X | | |
| 1110 | FALCON 49 | X | X | |
| 1120 | EDISON 54 JT | | X | X |
| 1140 | CANON CITY RE-1 | X | | |
| 1150 | FREMONT RE-2 | X | X | X |
| 1180 | ROARING FORK RE-1 | X | | |
| 1195 | GARFIELD RE-2 | X | | |
| 1220 | GARFIELD 16 | X | | |
| 1350 | EAST GRAND 2 | X | | |
| 1360 | GUNNISON WATERSHED RE1J | X | | |
| 1390 | HUERFANO RE-1 | X | X | |
| 1420 | JEFFERSON COUNTY R-1 | X | X | X |
| 1500 | BURLINGTON RE-6J | X | | |
| 1510 | LAKE COUNTY R-1 | X | | |
| 1520 | DURANGO 9-R | X | | |
| 1540 | IGNACIO 11 JT | X | | |
| 1550 | POUDRE R-1 | X | | |
| 1550 | POUDRE R-1 | X | | |
| 1560 | THOMPSON R2-J | X | | |
| 1570 | PARK (ESTES PARK) R-3 | X | | |

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|------|--------------------------|---|---|---|
| 1580 | TRINIDAD 1 | X | | |
| 1790 | LIMON RE-4J | X | | |
| 1810 | KARVAL RE-23 | X | X | X |
| 1828 | VALLEY RE-1 | X | | |
| 1990 | PLATEAU VALLEY 50 | X | | |
| 2000 | MESA COUNTY VALLEY 51 | X | | |
| 2020 | MOFFAT COUNTY RE:NO 1 | X | | |
| 2035 | MONTEZUMA-CORTEZ RE-1 | X | | |
| 2180 | MONTROSE COUNTY RE-1J | X | | X |
| 2190 | WEST END RE-2 | X | X | |
| 2395 | BRUSH RE-2(J) | X | | |
| 2405 | FORT MORGAN RE-3 | X | | |
| 2520 | EAST OTERO R-1 | X | | |
| 2530 | ROCKY FORD R-2 | X | | |
| 2610 | PARK COUNTY RE-2 | X | X | |
| 2640 | ASPEN 1 | X | | |
| 2660 | LAMAR RE-2 | X | | |
| 2690 | PUEBLO CITY 60 | X | X | |
| 2700 | PUEBLO COUNTY 70 | X | | |
| 2730 | DEL NORTE C-7 | X | | |
| 2740 | MONTE VISTA C-8 | X | | |
| 2770 | STEAMBOAT SPRINGS RE-2 | X | | |
| 2800 | MOFFAT 2 | X | X | |
| 3000 | SUMMIT RE-1 | X | | |
| 3020 | WOODLAND PARK RE-2 | X | | |
| 3080 | WELD COUNTY RE-1 | X | | |
| 3085 | EATON RE-2 | X | | |
| 3090 | KEENESBURG RE-3(J) | X | | |
| 3100 | WINDSOR RE-4 | X | | |
| 3110 | JOHNSTOWN-MILLIKEN RE-5J | X | | |
| 3120 | GREELEY 6 | X | | |
| 3140 | WELD COUNTY S/D RE-8 | X | | |
| 3200 | YUMA 1 | X | | |
| 3210 | WRAY RD-2 | X | | |
| 8001 | CHARTER SCHOOL INSTITUTE | X | X | X |