### Comparability

## Regulations and Reporting through CDE's Online Data System

2012-13

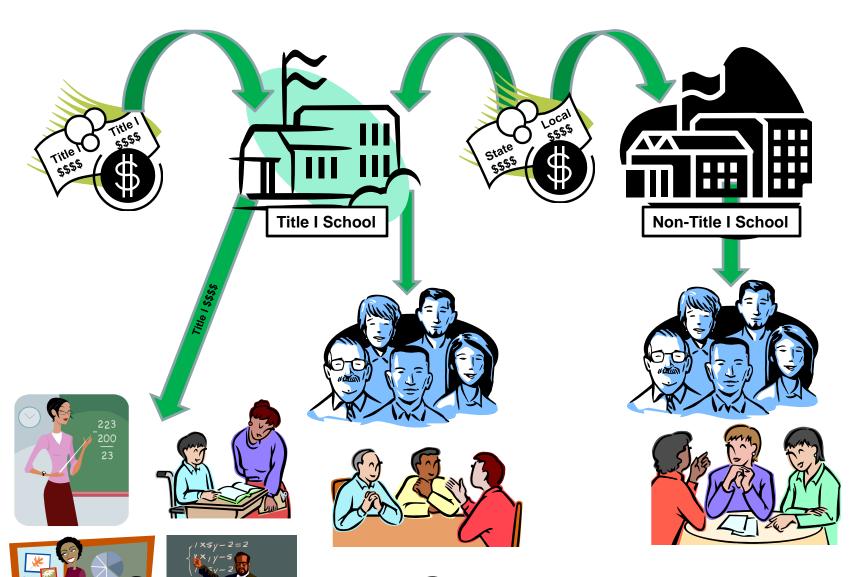


### Section 1120A(c) of No Child Left Behind:

District may receive federal Title I-A funds only if services in Title I schools, taken as a whole, are comparable to services provided by state and local funds to non-Title I schools in the same grade span (e.g., elementary, middle, high).

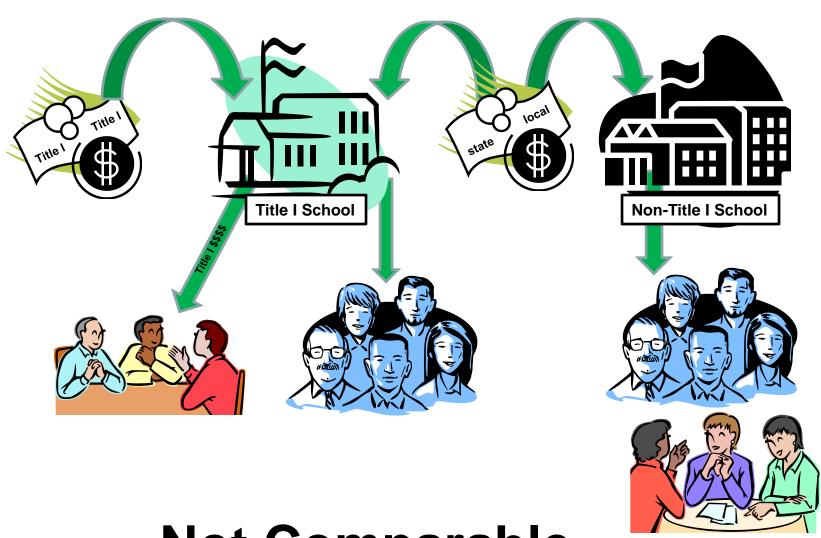
State- and locally-funded services in Title I schools must be "comparable" to non-Title I schools before Title I-A dollars are applied.











### **Not Comparable**



### Remember

Title I funds intended to provide *extra* resources to poorly performing students from low-income neighborhoods—above and beyond that provided through state and local funding.

If Title I funds are spent on the basics, students won't receive the *extra* resources the law intended them to have.



## Districts do not demonstrate Comparability if they:

- 1. Do not receive Title I-A funds; or
- 2. Receive Title I-A funds but:
  - a. have only one school per grade span (E, M, H); or
  - b. have more than 1 school per grade span (E, M, H) but all Title I schools have 100 students or less.



## Districts must demonstrate Comparability if they:

Allocate Title I-A funds to at least one school with more than 100 students, in a grade span (E, M, H) that has at least two schools.

Districts may need to demonstrate Comparability in more than one grade span.



## Districts that must demonstrate comparability fall into 2 groups:

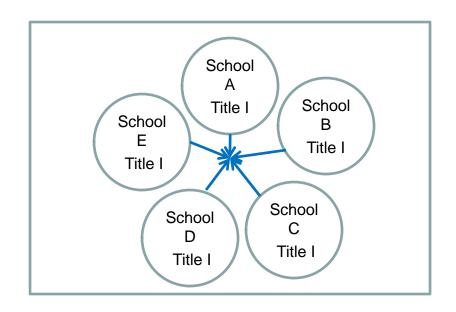
1. All schools in grade span (E, M, H) receive Title I funds.

2. Some schools in grade span get Title I funds and some do not.



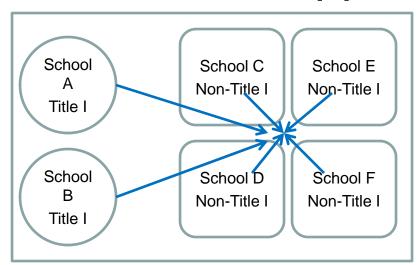
## Section 1120A(c) of NCLB:

If <u>all</u> schools in a grade span receive Title I-A funds, the district must demonstrate that each school is comparable to the average of all the schools, before Title I funds are applied.





If there are both Title I and non-Title I schools in the grade span (EMH), each Title I school must be comparable to the average of the non-Title I schools before Title I funds are applied.





## Online System Uses Teacher FTE Method

- "Recommended" by U.S. Department of Education
- Districts must go through this system before attempting any alternative methods



### What FTE is Included?

- Classroom teacher FTE paid from state and local funds (in full or part):
  - Includes FTE for Reading, Math, Science, as well as PE, Art, etc.
  - Special Education and ELL FTE paid with state and local funds—not federal funds
- Classroom teacher FTE paid with Title I funds



### What FTE is Excluded?

 FTE for staff members that are not classroom teachers—paraprofessionals, administrators, librarians, team coaches, etc.

 Other federally funded FTE not paid with Title I funds.



## If ALL schools in grade span are Title I

The online system calculates:

- 1. The student-teacher ratio for each school in the grade span, based on state and locally funded FTE only.
- 2. The average student-teacher ratio for the whole grade span (weighted so that the ratio for a 200-student school does not "weigh" as heavily as a 1,000-student school).



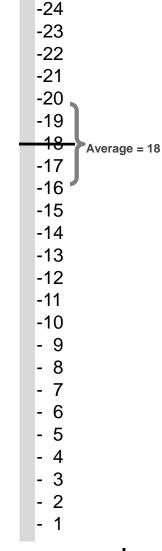
## For each Title I school, the system reports whether the number of students per state/locally-funded teacher is:

more than 10% above the weighted average (Not Comparable) School appears under-served compared to others in grade span

within 10% of the weighted average (Comparable)

more than 10% below the weighted average (Not Comparable) School appears over-served compared to others in grade span

Title I schools with 100 or fewer students are not required to be comparable (NA). However, they are included when calculating the weighted average.



110% x 18=19.8

90% x 18=16.2



## If SOME schools in grade span are Title I and some are not

The online system calculates:

- 1. The student-teacher ratio for each non-Title I school in the grade span, based on state and locally funded FTE only.
- 2. The average student-teacher ratio for non-Title I schools across the grade span (weighted-ratio for a 200-student school does not "weigh" as heavily as a 1,000-student school).



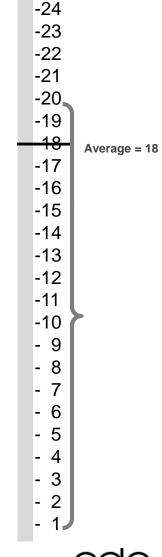
## For each Title I school, the system reports whether the number of students per state/locally funded teacher is:

more than 10% above the weighted average (Not Comparable) School appears to be under-served compared to non-Title I schools

10% or less above the of the weighted average—not 110% x 18=19.8 more than 110% of weighted average (Comparable) Title

I School appears to be equally or better served than non-Title I schools

Non-Title I schools with 100 or fewer students are included when calculating the weighted average.





### To access Online System go to:

https://edx.cde.state.co.us/comp/faces/CompLogin.jspx

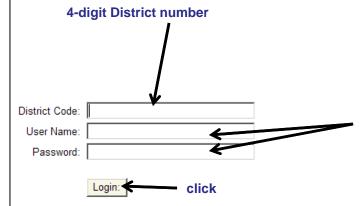


### Login Page



#### **Colorado Department of Education**

#### Comparability



Section 1120A(c) of No Child Left Behind states that a LEA may receive Title I, Part A funds only if it uses State and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. If the LEA serves all of its schools with Title I funds, the LEA must use State and local funds to provide services that, taken as a whole, are substantially comparable in each Title I school.

Accordingly, LEAs that receive Title I funds and have more than one school per grade are required to demonstrate comparability for those Title I schools with student enrollment of over 100.

User Name and Password assigned to Respondent authorized by Superintendent

	The district does not need to conduct comparability calculations because:  district does not have Title I funds district does not have at least one school per grade span with the requisite student enrollment
Address Line 1: Address Line 2: Phone Number: Fax Number: Email Address: Title 1 Authorized Representative: Date:	Please enter name before submitting  Mar 30, 2010
click Submit Logout	The authorized representative's name constitutes an electronic signature.  Please click here to acknowledge that BUENA VISTA R-31 is not required to demonstrate comparability for

### This district takes Title I money at only one grade span

Your district must conduct comparability calculations because:					
<ul> <li>☑ district has at least one Title I school</li> <li>☑ district has at least one school in a grade span with the requisite student enrollment</li> </ul>					
Must conduct com	Must conduct comparability at the following grade span(s):				
☐ Elementary					
✓ Middle	Edit Middle School Data	Finalize Middle School Comparability Data			
☐ High	□ High				
*When all eligible grade level data has been finalized, press the Submit Final Comparability Report button below					
Submit Final Comparability Report Logout					



### This district takes Title I money at two grade spans

Your district must conduct comparability calculations because:						
<ul> <li>✓ district has at least one Title I school</li> <li>✓ district has at least one school in a grade span with the requisite student enrollment</li> </ul>						
Must conduct com	Must conduct comparability at the following grade span(s):					
✓ Elementary	Edit Elementary School Data Finalize Elementary Comparability Data					
☑ Middle	Edit Middle School Data	Finalize Middle School Comparability Data				
☐ High	□ High					
*When all eligible grade level data has been finalized, press the Submit Final Comparability Report button below						
Submit Final Comparability Report Logout						



Your district must conduct comparability calculations because:

| district has at least one Title I school |
| district has at least one school in a grade span with the requisite student enrollment

| Must conduct comparability at the following grade span(s):
| Elementary | Edit Elementary School Data | Finalize Elementary Comparability Data |
| Middle | Edit Middle School Data | Finalize Middle School Comparability Data |
| High |
| \*When all eligible grade level data has been finalized, press the Submit Final Comparability Report button below |
| Submit Final Comparability Report | Logout |
| Log

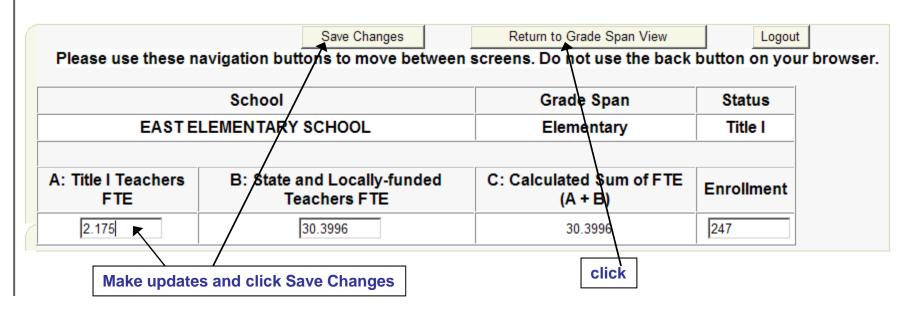
#### Classroom Teacher and Student Data by School

Edit This School's FTE or Enrollme	nt Data		Return to Ma	ain Menu	Logout
School Select Code School Name	Grade Span	School Status	All Teachers	State and Loc funded Teach	
<b>%</b>	E	Non-Title I	15.9986	15.9986	240
Choose a school	E	Title I	30.8689	30.8689	478
and click	E	Title I	30.3996	30.3996	247
0	E	Title I	39.5673	39.5673	441
О	E	Non-Title I	23.9006	23.9006	404
0	E	Non-Title I	22.8988	22.8988	343
0	E	Non-Title I	19.0001	19.0001	278
0	E	Non-Title I	16.1080	16.1080	309
0	E	Non-Title I	24.6125	24.6125	361
О	E	Non-Title I	30.5432	30.5432	618
С	E	Non-Title I	21.3462	21.3462	301
С	E	Non-Title I	22.0016	22.0016	338
О	E	Non-Title I	22.3996	22.3996	387
0	E	Non-Title I	23.9987	23.9987	461
0	E	Non-Title I	20.8991	20.8991	350
О	E	Non-Title I	18.4993	18.4993	261
0	E	Non-Title I	31.1180	31.1180	619

#### **Edit School Data** Save Changes Return to Grade Span View Logout Please use these navigation buttens to move between screens. Do not use the back button on your browser. School **Grade Span** Status **EAST ELEMENTARY SCHOOL** Elementary Title I B: State and Locally-funded C: Calculated Sum of FTE A: Title I Teachers Enrollment FTE Teachers FTE (A + B)30.3996 247 .0000 30.3996 Update Title I FTE, State and Locally-funded FTE and Student Enrollment fields and "Save Changes"



#### **Edit School Data**



	Edit Th	is School's FTE or Enroll	lment Data		Return to Ma	ain Menu Logo	ut
Select	School Code	School Name	Grade Span	School Status	All Teachers	State and Locally- funded Teachers	Enrollme
•			LE	Non-Title I	15.9986	15.9986	240
0			E	Title I	33.8689	30.8689	478
0	Once al	l school FTE and e	nrollment /	Title I	32.5746	30.3996	247
0	number	s have been update	ed, click	Title I	39.5673	39.5673	441
0			E	Non-Title I	23.9006	23.9006	404
0			E	Non-Title I	22.8988	22.8988	343
0			E	Non-Title I	19.0001	19.0001	278
0			E	Non-Title I	16.1080	16.1080	309
0			E	Non-Title I	24.6125	24.6125	361
0			E	Non-Title I	30.5432	30.5432	618
0			E	Non-Title I	21.3462	21.3462	301
0			E	Non-Title I	22.0016	22.0016	338
0			E	Non-Title I	22.3996	22.3996	387
0			E	Non-Title I	23.9987	23.9987	461
0			E	Non-Title I	20.8991	20.8991	350
0			E	Non-Title I	18.4993	18.4993	261
0			E	Non-Title I	31.1180	31.1180	619

Your district must conduct comparability calculations because:					
☑ district has at least one Title I school ☑ district has at least one school in a grade span with the requisite student enrollment					
Must conduct com	Must conduct comparability at the following grade span(s):				
☑ Elementary	Edit Elementary School Data	Finalize Elementary Comparability Data			
☑ Middle	Edit Middle School Data	Finalize Middle School Comparability Data			
□ High	□ High				
*When all eligible grade level data has been finalized, press the Submit Final Comparability Report button below  Submit Final Comparability Report Logout Click					

#### Title I and State and Locally-funded Schools - Elementary

		Return to Main N	/lenu	Logou	t				
School Code School Name		School Status	All Teacher FTE		and lly-funded her FTE	Student Enrollment	All Student per Teacher Ratio		Comparabl
		Title I	33.8689	30.86	89	478	14.1132	15.4848	YES
		Title I	32.5746	30.39	96	247	7.5826	8.1251	YES
		Title I	45.3173	39.56	73	441		11.1456	YES
otals for Title I Schools			111	1.7608	100.83	58 1	166 10.4330	11.563	4
			All Teacher		lly-funded		All Student per		
School Code School Name		School Status	FTE	Teac	her FTE	Enrollment	Teacher Ratio	Teacher Ratio	Comparable
		Non-Title I	15.9986			240	15.0013		N/A
		Non-Title I	23.9006		8	404	16.9033		N/A
		Non-Title I	22.8988		Pared	343	14.9790		N/A
		Non-Title I	19.0001		8/	278	14.6315		N/A
		Non-Title I	16.1080			309	19.1830		N/A
		Non-Title I	24.6125			361	14.6673		N/A
		Non-Title I	30.5432			618	20.2336		N/A
		Non-Title I	21.3462			301	14.1009		N/A
		Non-Title I	22.0016			338	15.3625		N/A
		Non-Title I	22.3896			387	17.2771		N/A
		Non-Title I	23.9987			461	19.2094		N/A
		Non-Title I	20.8991			350	16.7471		N/A
		Non-Title I	18.4993			261	14.1086		N/A
		Non-Title I	31.1180			619	19.8920		N/A
otals for State and Locally-funded Schools			313	3.3243		5	270 16.8196	5	
Elementary School Base for Comparability Check (	1.1 * 16.8196) = 18.5016					_	ate and loca	-	

10% above average State- and locally-funded student/teacher ratio for non-Title I schools

funded student/teacher ratio for non-Title I schools in grade span

**Colorado Department of Education** 

Your district must conduct comparability calculations because:

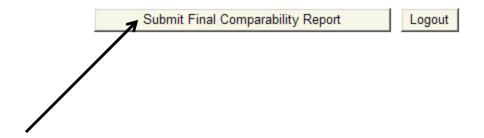
- district has at least one Title I school
- ☑ district has at least one school in a grade span with the requisite student enrollment

Must conduct comparability at the following grade span(s):

✓ Elementary	Edit Elementary School Data	Finalize Elementary Comparability Data
☑ Middle	Edit Middle School Data	Finalize Middle School Comparability Data

☐ High

\*When all eligible grade level data has been finalized, press the Submit Final Comparability Report button below



#### Title I Comparability Status and Final Submission

**Title I Elementary Schools** 

Title I Liei	nemary schools			Comparable via	
School Code	School Name	Enrollment		Alternate Calculation	Notes
1382	V	478	YES		
2382		247	YES		
2926		441	YES		

	Submission Form
School District:	
Contact Person for this Submission:	
Telephone Number:	
Email Address:	
Address:	
City:	
State:	
Zip:	
	To be in compliance with NCLB, LEA's receiving Title I Part A funds must develop procedures to ensure that the services provided with provided in non-Title 1 schools. State and local funds must be used in participating schools to provide services that, taken as a whole, a the Title 1 program. Moreover, if an LEA serves all of the schools in its district with Title 1 funds, the LEA must use state and local funds in each participating schools.
	An LEA shall be considered to have met the requirements if they have filed with the Colorado Department of Education a written assura
	District-wide salary schedule; Policy/documentation to ensure equivalence among schools in teachers, administrators and other staff;

To be in compliance with NCLB, LEA's receiving Title I Part A funds must develop procedures to ensure that provided in non-Title 1 schools. State and local funds must be used in participating schools to provide servic the Title 1 program. Moreover, if an LEA serves all of the schools in its district with Title 1 funds, the LEA must in each participating schools.

An LEA shall be considered to have met the requirements if they have filed with the Colorado Department of

District-wide salary schedule;

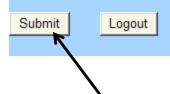
Policy/documentation to ensure equivalence among schools in teachers, administrators and other staff; and

Policy/documentation to ensure equivalence among schools in the provision of curriculum materials and The district has established the above mentionned requirements and the above completed data tables at any time, any documentation and data that support these assurances.

\* Authorized Representative: Please enter name before submitting

\* Date: Mar 30, 2010

The authorized representative's name constitutes an electronic signature.



#### Title I Comparability Status and Final Submission

Title I Eler	nentary Schools				
School Code	School Name	Enrollment	Compara	Comparable via Alternate Calculation	Notes
1382	V	478	YES		
2382		247	YES		
2926		441	YES		

	Submission Form
School District:	
Contact Person for this Submission:	
Telephone Number:	
Email Address:	
Address:	
City:	
State:	
Zip:	
	To be in compliance with NCLB, LEA's receiving Title I Part A funds must develop procedures to ensure that the services provided with provided in non-Title 1 schools. State and local funds must be used in participating schools to provide services that, taken as a whole, a the Title 1 program. Moreover, if an LEA serves all of the schools in its district with Title 1 funds, the LEA must use state and local funds in each participating schools.
	An LEA shall be considered to have met the requirements if they have filed with the Colorado Department of Education a written assura
	District-wide salary schedule; Policy/documentation to ensure equivalence among schools in teachers, administrators and other staff;

USDE offers 3 alternative methods to determine Comparability—after FTE method attempted but does not "work."

Use alternative calculators found on CDE website at:

http://www.cde.state.co.us/FedPrograms/ti/a\_comp.asp



# Alternative 1: Schools compared separately based on large or small enrollment numbers

In addition to comparing FTE ratios within a grade span, the district further categorizes schools as large or small (for example, 450+ students vs. less than 450 students) and conducts comparability analyses on the two groups separately.



# Alternative 2: Schools compared separately based on high or low poverty level

In addition to comparing FTE ratios within a grade span, the district further categorizes schools as high or low poverty (for example, 60% and higher vs. less than 60%) and conducts comparability analyses on the two groups separately.



#### Federal Programs Home

- NCLB Final Regulations
- NCLB Guidance
- Other NCLB Programs
- Federal Complaint Procedure
- Perkins Loan
- Contacts

#### Awards

Buzz

AYP

Parents & NCLB

**Support Systems** 

Consolidated Application

Reports

Monitoring

**Grants Fiscal** 

NCLB Calendar

#### Title I Comparability

Districts demonstrate comparability, a key requirement for accepting Title IA funds, by validating that Title IA schools are funded at the same level as non-Title IA schools – prior to any Title IA allocations [Section 1120A(c)]. This process ensures that Title IA funding through NCLB is "supplemental," in accordance with Federal law.

Only districts that have more than one school with 100 or more students, in a grade span (elementary, middle, high) that receives Title IA funds, need to conduct comparability. If a district accepts Title IA funds but does not meet these criteria, the district does not need to demonstrate comparability. List of districts that need to demonstrate comparability - pdf

For the 2009-2010 school year, all districts will use a new on-line comparability system to demonstrate and report comparability. The reporting window for the on-line comparability system will be October 2009 - December 2010.

To access the on-line system, each participating district will need to complete and submit a respondent form to CDE. Please note that even districts that do not need to demonstrate comparability will have to log-in to the on-line comparability system and confirm their status.

Respondent Information Form - pdf

#### **System Access**

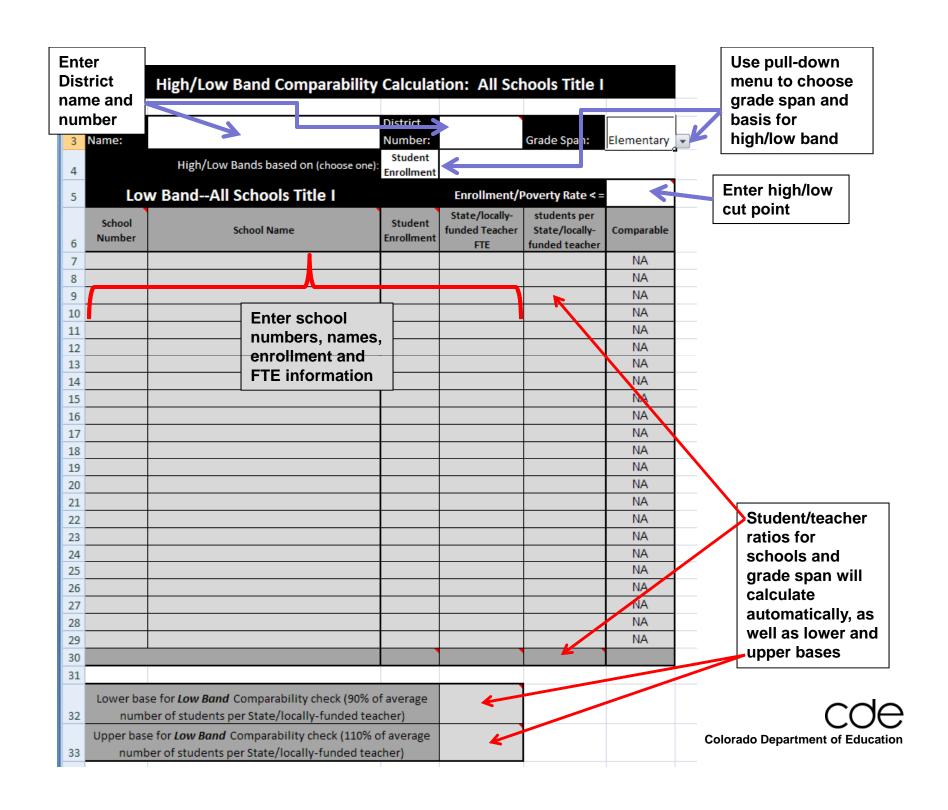
https://cdeapps.cde.state.co.us/Comp/faces/CompLogin.jspx

#### Resources:

2010-2011 Alternative Comparability Calculator - excel Comparability Letter to Superintendents - pdf
Comparability Training Power Point - pdf

Go to <a href="http://www.cde.state.co.us/FedPrograms/ti/a\_comp.asp">http://www.cde.state.co.us/FedPrograms/ti/a\_comp.asp</a>





36	High E	BandAll Schools Title I		Enrollment	Poverty Rate >	
7	School Number	School Name	Student Enrollment	State/locally- funded Teacher FTE	students per State/locally- funded teacher	Comparable
ı						NA
Ì						NA
I						NA
						NA
						NA
						NA
						NA
ľ						NA
Ī						NA
Ī						NA
Ī						NA
Ī						NA
Ī						NA
Ī						NA
						NA
Ī						NA
Ī						NA
Ī						NA
Ī						NA
						NA
						NA
						NA
						NA
ĺ						
		r <i>High Band</i> Comparability check (90% of students per State/locally-funded tea				
1	Upper base for	High Band Comparability check (110% f students per State/locally-funded tea	of average			

1	н	igh/Low Band Comparability Calcu	ılation:	Not All S	chools Title	e I
3	District Name:		District Number:		Grade Span	
4		High/Low Bands based on (choose one):	poverty rate			
5	Low BandTitle I Schools		Enrollment/Poverty Rate <=			
6	School Number	School Name	Student Enrollment	State/locally- funded Teacher FTE	students per State/locally- funded teacher	Comparable
7						NA
8						NA
9						NA
10						NA
11						NA
12						NA
13						NA
14						NA
15						NA NA
16						NA NA
17 18						NA NA
19						NA NA
20						NA NA
21						NA.
22						
24	Base for L	ow Band Comparability check (110% of average students per State/locally-funded teacher)	number of			
25		ow BandNon-Title I Schools				
26	School Number	School Name	Student Enrollment	State/locally- funded Teacher FTE	State/locally-	
28						
29						
30						
31						

# Alternative 3: Based on state and local funds per-pupil for educational materials and resources

If all schools Title I, worksheet calculates weighted average for grade span and determines whether per-pupil amount for each school falls within 10% of average (i.e. 90% - 110%).

If not all schools Title I, worksheet calculates weighted average for non-Title I schools and determines whether per-pupil amount for each Title I school falls at or above 90% of non-Title I average.



## What is included in Per-Pupil Allocation?

## All educational and instructional resources purchased with state and local funds:

- Salaries and benefits for teachers, librarian, instructional coaches, paraprofessionals and aides, principal, etc.
- Curriculum materials, educational software, manuals—some hardware in certain circumstances.
- Field trip costs.



## Not included in Per-Pupil Allocation

- Transportation and cafeteria costs.
- Resources/materials purchased with funds from sources other than state and local.
- Office staff not directly involved in educational activities, such as secretaries, counselors, nurses, etc.
- After-school or extracurricular activities such as sports, clubs, newspaper, etc.
- Operating costs such as HVAC, electricity, building lease, etc.



1		Per-Pupil Allocation Compa	rability (	Calculation: All	Schools Title		
2	District		District				
3	Name:		Number:		Grade Span		
1		All Title I Schools					
5	School Number	School Name	Student Enrollment	State/locally-funded Instructional Resources Allocation	State/locally- funded Per-Pupil Allocation	Comparable	
5						NA	
,						NA	
						NA	
						NA	
)						NA	
L						NA	
2						NA	
3						NA	
1						NA	
5						NA	
6						NA	
7						NA	
8						NA	
9						NA	
0						NA	
1						NA	
2						NA	
3						NA	
4						NA	
5						NA	
5						NA	
7						NA	
8						NA	
9						NA	
0							
L					1		
)	Lower base for Comparability check (90% of average State/locally-funded per-pupil allocation)						
_		base for Comparability check (110% of			1		
3							



1		Per-Pupil Allocation Compara	bility Ca	lculation: Not	All Schools Tit	e I
2						
3	District Name:		District Number:		Grade Span	
4	IVOITIE.		Mannber.		drade span	
5		Title I Schools				
_				State/locally-funded	State/locally-	
6	School Number	School Name	Student Enrollment	Instructional Resources Allocation	funded Per-Pupil Allocation	Comparable
7				The source of th	711100001011	NA
8						NA
9						NA
10						NA
11						NA
12						NA
13						NA
14						NA
15						NA
16						NA
17						NA
18						NA
19						NA
20						NA
21						NA
22						NA
23						NA
24						NA
25						NA
26						NA
27						NA
28						NA
29						NA
30						
31						
	Ва	se for Comparability check (90% of ave	erage			
33		state/locally-funded per-pupil allocati				
34						
35		Non-Title I Schools				
	School Number	School Name	Student Enrollment	State/locally-funded Instructional	State/locally- funded Per-Pupil	
36			Linoiment	Resources Allocation	Allocation	
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						I



If you are a new Respondent and have not submitted the form to get a User Name and Password:

- ✓ Print and complete the Respondent Form: <a href="http://www.cde.state.co.us/FedPrograms/ti/a\_c">http://www.cde.state.co.us/FedPrograms/ti/a\_c</a> <a href="mailto:omp.asp">omp.asp</a>
- ✓ Get Superintendent's signature
- ✓ Fax, email or send to Donna Morganstern (303-866-6637)



#### Data needed from HR

FTE numbers for Teacher Job Class Codes:

- 201 (Regular Education)
- 202 (Special Education)
- 206 (Title I)

## **Grant Funding Codes:**

- 4010 (Title I)
- NOT 4027,5027,6027,8027 (IDEA, Part B)

Title I Teachers are identified by Job Class Code 206 or Grant Funding Code 4010



## Frequently Asked Questions

When does the online system open and close?

We will be opening very soon—a couple of technological glitches being worked out. The system will close December 16th.



## Frequently Asked Questions

Which students count for enrollment? All students in kindergarten and higher—but no pre-K or younger.

What if kindergarten students are only half-time? Do they count as ½ student? Enrollment is a head count. Half-time K students count as full students.



#### How do we decide which method to use?

Districts must use FTE online system first. If any school is not comparable via this method, the district may use approved alternative method. Per-pupil allocation method considered last option and requires the most additional work.

What if a school *comparable* via the FTE method comes out *not comparable* with an alternative method?

A school deemed "comparable" via the FTE method will not lose this status if the district must use an alternative method.



## Must the district submit documentation that the data entered are correct?

Updated FTE and enrollment numbers will be compared to October Count and HR data submitted to CDE through other data collections. Districts using per-pupil allocation method required to submit copies of budgets and expenditures.



#### Remember!

Federal law prohibits using Title I-A funds to supplant state and locally funded school programs and resources

Questions?

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