

# Title I, Part A – Comparability of Services

---

EVERY STUDENT SUCCEEDS ACT  
(ESSA)

Texas Education Agency  
Federal Fiscal Compliance  
and Reporting Division



FEDERAL FISCAL  
COMPLIANCE & REPORTING  
DIVISION

# Topics

---

- What is comparability?
- Comparability of services requirement
- Exempt local educational agencies (LEAs)
- Exemption criteria
- Exemptions illustrated
- Comparability Assurance Document (CAD) for exempt LEA
- CAD for non-exempt LEA



# Topics (continued)

---

- Non-exempt LEAs
- Comparability testing steps
- Grade span grouping considerations
- Completing the Comparability Computation Form (CCF)
- Reviewing CCF test results
- GFFC Reports and Data Collections



# What Is Comparability?

---

- Annual fiscal compliance requirement for receiving Title I, Part A federal grant funds
- Every Student Succeed Act (ESSA) made no changes to the comparability of services requirement
- Title I, Part A campuses and skipped campuses must receive the same level of services through state and local funds as campuses that are not receiving Title I, Part A funding



# Comparability of Services Requirement

---

- Per Public Law 115-64, Section 1118. Fiscal Requirements(c) COMPARABILITY OF SERVICES, LEAs are required to:
  - Annually demonstrate comparable services at all campuses
  - Annually provide assurance of equivalence
  - Develop procedures for compliance
  - Update and maintain the records biannually



# Comparability of Services Requirement

---

- Requirement: Annually demonstrate comparable services at all campuses
  - Services provided with state and local funds in Title I, Part A schools must be comparable to the services in schools that do not participate in the Title I, Part A program.
  - If an LEA serves all schools with Title I, Part A funds, services provided with state and local funds must be “substantially comparable” in each Title I, Part A school.



# Comparability of Services Requirement

---

- Requirement: Annually demonstrate comparable services at all campuses
  - Demonstrate compliance with this requirement by completing and submitting the Comparability Computation Form (CCF).
  - The requirements for completing and submitting the CCF can be found in the [Comparability Instructions](#) and the [Title I, Part A Comparability of Services Guidance Handbook](#) which are posted on TEA's [Title I, Part A – Comparability of Services Requirement webpage](#).



# Comparability of Services Requirement

---

- Requirement: Annually provide assurance of equivalence
- All LEAs receiving Title I, Part A funds must establish:
  - an LEA-wide salary schedule,
  - a policy to ensure equivalence among schools with regard to teachers, administrators, and other staff, and
  - a policy to ensure equivalence among schools in provision of curriculum materials and instructional supplies.





# Comparability of Services Requirement

---

- Requirement: Annually provide assurance of equivalence
  - Submit a Comparability Assurance Document (CAD) survey to assure that it has established these items.
  - The requirements for completing and submitting the CAD can be found in the [Comparability Instructions](#) which are posted on TEA's [Title I, Part A – Comparability of Services Requirement webpage](#).



# Comparability of Services Requirement

---

- Requirement: Develop procedures for compliance
  - Develop written procedures for complying with the comparability requirements:
    - Identify timeline
    - Identify who is responsible for calculations
    - Describe process used to determine if Title I, Part A schools are comparable, and how and when LEA makes adjustments in Title I, Part A schools that are not comparable.



# Comparability of Services Requirement

---

- Requirement: Update and maintain the records biannually
  - LEA-wide salary schedule
  - Policy to ensure equivalence among schools with regard to teachers, administrators, and other staff
  - Policy to ensure equivalence among schools in provision of curriculum materials and instructional supplies
  - Procedures for complying with the comparability requirements



# Exempt LEAs

---

- LEA meets at least one exemption criteria
- Requirement:
  - Submit Comparability Assurance Document (CAD) to claim exemption and to assure that the LEA has established and implemented districtwide salary schedule and policies related to equal resources among schools.



# Exemption Criteria

---

1. No Title I, Part A funding
2. One campus per grade span group
3. Multiple campuses in the grade span group, yet no overlap of grades levels
4. Overlap of grade levels but no Title I, Part A or skipped campuses in the grade span group
5. Excluding a campus or campuses results in no basis for comparison



# Exemptions Illustrated

---

- One campus per grade span group  
(one elementary, one middle school, one high school)

Grades at Campus	Grade Span Group	Title I, Part A or Skipped
PK-5	Elementary	Yes
6-8	Middle School	Yes
9-12	High School	Yes



# Exemptions Illustrated

---

- Multiple campuses in the grade span group, yet no overlap of grade levels

Grades at Campus	Grade Span Group	Title I, Part A or Skipped
PK-1	Elementary	Yes
2-3	Elementary	Yes
4-5	Elementary	Yes
6-8	Middle school	Yes
9-12	High school	Yes



# Exemptions Illustrated

---

- Overlap of grade levels but no Title I, Part A or skipped campus in the grade span group

Grades at Campus	Grade Span Group	Title I, Part A or Skipped
K-2	Elementary	Yes
3-5	Elementary	Yes
6-8	Middle school	No
6-8	Middle school	No
9-12	High school	No





# Exemptions Illustrated

---

- Excluding a campus or campuses results in no basis for comparison

Grades at Campus	Grade Span Group	Enrollment
EE-05	Elementary	100
<del>06-08</del>	<del>Middle School</del>	<del>95</del>
06-08	Middle School	340
09-12	High School	570



# Comparability Assurance Document

---

## EXEMPT LEAS

Submit a completed CAD through the online survey system

From the Type of Certification pull-down list, select “Exempt”

## NON-EXEMPT LEAS

Submit a completed CAD through the online survey system

From the Type of Certification pull-down list, select “non-exempt”

# Non-exempt LEAs

---

- LEA does not meet any exemption criteria
- Requirement to submit:
  1. Comparability Assurance Document (**CAD**) survey that assures LEA has established and implemented districtwide salary schedule and policies related to equal resources among schools, **and**
  2. Comparability Computation Form (**CCF**) to demonstrate Title I, Part A and skipped campuses are receiving fair share of state and local resources.



# Comparability Testing Steps

---

## 1. Choose *one* test to demonstrate compliance:

- Test 1 – Comparison of state and local expenditures per pupil
- Test 2 – Comparison of per pupil expenditures for state and local base salaries
- Test 3 – Ratio of pupils to non-federally funded instructional staff



# Comparability Testing Steps

---

## 2. Determine grade span groupings\* to be tested:

- Elementary campuses
- Middle school campuses
- High school campuses

\*LEA may be eligible to subdivide a grade span group into high-enrollment and low-enrollment grade span groupings.



# Comparability Testing Steps

---

## 3. Gather data for chosen test:

- Test 1: Campus enrollment **and** campus state and local expenditures
- Test 2: Campus enrollment **and** campus *base* salaries for non-federal instructional staff
- Test 3: Campus enrollment **and** campus non-federal instructional staff full-time equivalents (FTEs)



# Comparability Testing Steps

---

## 4. Determine exclusions from testing data:

- Campus or campuses that meet specific criteria
- Supplemental state and local funds
- Staff salary differential for years of employment



# Grade Span Groupings Considerations

---

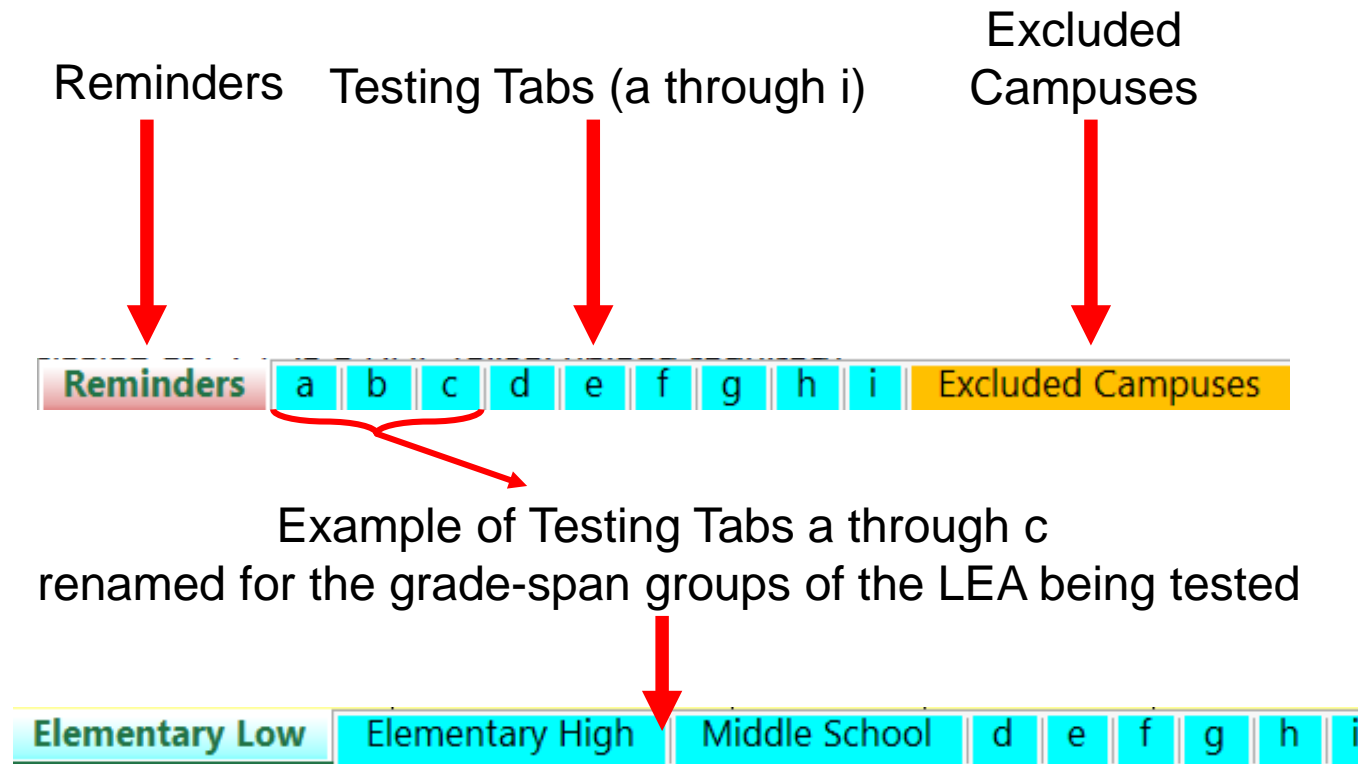
- Subdivided Grade Span Group (High and Low Enrollment)
- If an LEA has a grade span grouping with a substantial difference in enrollment between the largest and smallest campus, then the LEA may subdivide the grade span grouping into a high enrollment group and a low enrollment group.
- Campus Overlaps Grade Span Groups
- If a campus overlaps more than one grade span grouping, the LEA should place the campus in the grouping that most accurately represents the makeup of the campus.





# Completing the CCF

- The CCF is an auto-calculating Excel form
- The CCF includes tabs for:



# Completing the CCF Testing Tab

Form must contain at least two campuses.  
Enter current school year budget data.  
For further information, review the instructions

Enter 3-digit campus number for campuses of the grade span group

Enter name of the campus

Enter "Y" or leave blank

Enter enrollment

Report grade span group

Enter Test 1, 2, or 3 Input data

				Grade Span Group [Elementary, Middle, or High]			Title I, Part A
				Middle Grade Span Group			NonTitle I, Part A
				All tests	Test 1 Input	Test 2 Input	Title I, Part A, Comparable
							Title I, Part A, Not Comparable
#	required Campus #	required Campus Name	required Title I, Part A or Skipped Campus? (enter Y for Yes leave blank for No)	required Campus Enrollment	Campus State/Local Expenditures	Campus Base Salaries for Non-Federal Instructional	Test 3 Input Campus Non Federal Instructional Staff FTE's
			<b>Grade Span Totals</b>	<b>2,413</b>	<b>\$10,820,302</b>	<b>\$7,216,159</b>	<b>177</b>
1	043	Happy Middle	Y	767	\$3,564,834	\$2,522,218	61.34
2	044	Joy Middle	Y	790	\$3,639,694	\$2,377,529	60.17
3	045	Excel Middle		856	\$3,615,774	\$2,316,412	55.60



# Reviewing CCF Test Results

		<b>"A" Section Test Results</b>		
required Campus Name	required Title I, Part A or Skipped Campus? (enter Y for Yes leave blank for No)	TEST 1 Exp / Enroll	TEST 2 Base Sal / Enroll	TEST 3 Enroll / FTE's
	<b>Grade Span Totals</b>	3,801.63	2,435.48	16.94
Happy Middle	Y	yes	yes	yes
Joy Middle	Y	yes	yes	yes
Excel Middle				

Review "A" section if  
Grade span group  
contains  
Title I, Part A/Skipped  
and Non-Title campuses  
(Y and blank)



# Reviewing CCF Test Results

Review "B" section if grade span group contains **all** Title I, Part A/Skipped campuses (**all Y**)

required  Campus Name	required Title I, Part A or Skipped Campus? (enter Y for Yes leave blank for No)	90%	Grade Span (GS) Base	110%	90%	Grade Span (GS) Base	110%	90%	Grade Span (GS) Base	110%
		"B" Section Test Results								
		TEST 1			TEST 2			TEST 3		
		Comp or NC	Campus State & Local Expenditures per Pupil	Campus to GS Base	Comp or NC	Campus Base Salary per Pupil	Campus to GS Base	Comp or NC	Campus Pupil per FTEs	Campus to GS Base
	<b>Grade Span Totals</b>		5,016.94			3,375.17		10.04		
Marvel Elementary	Y	yes	5,022.23	100.567%	yes	3,284.01	97.780%	yes	10.80	99.930%
Honey Elementary	Y	yes	5,229.86	104.724%	yes	3,569.79	106.289%	yes	10.21	94.411%
First Elementary	Y	yes	5,174.22	103.610%	NC	3,713.65	110.573%	yes	9.74	90.087%
Absolute Elementary	Y	yes	4,641.43	92.942%	NC	2,933.25	87.337%	NC	12.59	116.472%



# Grants and Federal Fiscal Compliance (GFFC) Reports and Data Collections

---

1. Log on to TEAL or TEASE.
2. Select GFFC Reports and Data Collections.
3. Select Upload Response Templates.
4. Select the document title (Comparability Computation Form) from the dropdown menu.
5. Select the current school year.
6. Select Response Document from the dropdown menu.
7. Browse for the completed CCF.
8. Select Upload Document.



# Questions

---

Federal Fiscal Compliance and Reporting Division

[compliance@tea.texas.gov](mailto:compliance@tea.texas.gov)

(512) 463-9127



FEDERAL FISCAL  
COMPLIANCE & REPORTING  
DIVISION

# Copyright © Notice

---

The materials are copyrighted © and trademarked ™ as the property of the Texas Education Agency (TEA) and may not be reproduced without the express written permission of TEA, except under the following conditions:

1. Texas public school districts, charter schools, and Education Service Centers may reproduce and use copies of the Materials and Related Materials for the districts' and schools' educational use without obtaining permission from TEA.
2. Residents of the state of Texas may reproduce and use copies of the Materials and Related Materials for individual personal use only without obtaining written permission of TEA.
3. Any portion reproduced must be reproduced in its entirety and remain unedited, unaltered and unchanged in any way.
4. No monetary charge can be made for the reproduced materials or any document containing them; however, a reasonable charge to cover only the cost of reproduction and distribution may be charged.

Private entities or persons located in Texas that are not Texas public school districts, Texas Education Service Centers, or Texas charter schools or any entity, whether public or private, educational or non-educational, located outside the state of Texas MUST obtain written approval from TEA and will be required to enter into a license agreement that may involve the payment of a licensing fee or a royalty.

For information contact: Texas Education Agency, 1701 N. Congress Ave., Austin, TX 78701-1494; email: [copyrights@tea.state.tx.us](mailto:copyrights@tea.state.tx.us).

