

2018-19 Title I Comparability Report - Annually - 2018

Introduction - Introduction

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Background Information

As outlined in Section 1118(c) of the Every Student Succeeds Act (ESSA), local education agencies (LEAs) must use State and local funds to provide services in Title I schools that are comparable to the services provided in non-Title I schools. If all schools within an LEA receive Title I funds, the LEA must use State and local funds to provide services that are substantially comparable in each Title I school.

Criteria for Meeting Comparability

An LEA can meet the Comparability requirement by filing written assurances that it has established and implemented:

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

All LEAs that submitted a 2018-2019 LEA Application for ESSA-Funded Programs were required to provide these assurances, therefore meeting the Comparability requirements.

Monitoring Comparability

NYSED will use the 2018-2019 Comparability Report to monitor each LEA's implementation of those assurances. NYSED requires that LEAs use a standardized method to demonstrate implementation of Comparability assurances by comparing the ratio of:

- The number of students enrolled in each Title I and non-Title I school; with
- The number of instructional staff in each building who are funded by State/local resources.

For all LEAs, actual 2018-2019 student and staff numbers must be used in the calculations. When determining student and staff counts, an LEA may exclude those English Language Learners (ELL) and Special Education programs approved by NYSED and State/locally funded compensatory education programs that meet the intent and purposes of Title I, Part A.

Additional Ways to Demonstrate Implementation

If an LEA established and implemented other measures for demonstrating Comparability, the LEA may seek a variance to the standard statewide method by submitting a ESSA Title I Comparability Variance Request Form. The LEA must maintain source documentation to support the calculations and demonstrate that any needed adjustments to staff assignments were made. NYSED will consider variances for LEAs that can:

1. Provide a detailed rationale for why the current statewide methodology is not appropriate for demonstrating Comparability in their LEA and
2. Provide an alternate methodology that sufficiently demonstrates compliance with the Comparability requirements outlined in Section 1118(c) of the ESSA.

Consistent with guidance issued by the United States Department of Education, LEAs may utilize a variety of rationales for why the standardized statewide methodology is not appropriate for their LEA such as:

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- Signification enrollment size differences within a grade span grouping;
- School function/specialty issues;
- High Poverty/Low Poverty buildings; or
- Extraordinary circumstances resulting in short-term/one-time anomalies to the Comparability calculations.

Similarly, LEAs may propose a variety of alternate methodologies for demonstrating Comparability, including, but not limited to:

- Student/instructional staff salary ratios;
- Expenditures per pupil; or
- A resource allocation plan based on student characteristics such as poverty, limited English proficiency, or disability, etc.

Corrective Actions When Comparability Is Not Demonstrated

Any LEA that fails to demonstrate Comparability must address the issues that led to such failure early enough in the school year so that students do not spend an unreasonable portion of the school year in non-comparable schools. Therefore, any LEA which does not demonstrate Comparability must address deficiencies identified by NYSED staff by January 31, 2019 or 30 days after submission of the Comparability Report, whichever is sooner. Technical assistance will be provided by Title I School and Community Services staff members as needed.

Questions

Questions concerning Comparability requirements should be directed to the Title I School and Community Services Office at (518) 473-0295 or via email at CONAPPTA@NYSED.GOV.

Section 1: Contact Information

1. Please provide the name of the point of contact person for the LEA.
2. Please provide the e-mail address of the point of contact person for the LEA.

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Comparability Reporting - Section 2: Exemptions

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There are a limited number of circumstances in which an LEA may be exempted from demonstrating Comparability. An LEA is eligible for an exemption if:

- The LEA does not receive/accept Title I Part A funds;
- The LEA has fewer than 1000 students LEA-wide;
- The LEA has a single building serving grades K-12;
- The LEA has one building per grade span (non-overlapping);
- The LEA is a Charter School; or
- The LEA is a Special Act District.

If applicable, the LEA should indicate if it is eligible for any of the above exemptions and then select applicable exemption from the list below. Once one or more exemptions are selected, the LEA will be directed to the "Submit/Certify" portion of report. Please note that only the Superintendent/CEO will have the authority to submit the report.

1. Please indicate if the LEA is eligible for an exemption.

- No, the LEA is not eligible for an exemption.
- Yes, the LEA is eligible for an exemption.

1a. As applicable, select the exemption(s) for which the LEA qualifies.

- The LEA is requesting an exemption because it does not receive/accept Title I Part A funds.
- The LEA is requesting an exemption because it has fewer than 1000 students LEA-wide.
- The LEA is requesting an exemption because it has a single building serving grades K-12.
- The LEA is requesting an exemption because it has one building per grade span (non-overlapping).
- The LEA is requesting an exemption because it is a Charter School.
- The LEA is requesting an exemption because it is a Special Act District.

Section 3: Exclusions

An LEA may exclude those English Language Learners (ELL) and Special Education programs approved by the New York State Education Department and State/locally funded compensatory education programs that meet the intent and purposes of Title I, Part A. Please note that an LEA may exclude approved programs only if it does so in all project and non-project schools in which the program operates.

1. If applicable, please check which state and/or locally-funded programs the LEA is excluding from its Comparability demonstration.

- English Language Learners
- Students with Disabilities
- Compensatory Education Services
- None

- 1a. Please provide a description of the English Language Learner program(s) to be excluded, including the number of pupils enrolled, the FTE assignment of staff, and how the program will be supplemental. The LEA must also provide assurances that children served are educationally disadvantaged, and that their progress will be evaluated against the same performance objectives as the Title I funded programs.**
- 1b. Please provide a description of the Students with Disabilities program(s) to be excluded, including the number of pupils enrolled, the FTE assignment of staff, and how the program will be supplemental. The LEA must also provide assurances that children served are educationally disadvantaged, and that their progress will be evaluated against the same performance objectives as the Title I funded programs.**
- 1c. Please provide a description of the Compensatory Education Services program(s) to be excluded, including the number of pupils enrolled, the FTE assignment of staff, and how the program will be supplemental. The LEA must also provide assurances that children served are educationally disadvantaged, and that their progress will be evaluated against the same performance objectives as the Title I funded programs.**

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Comparability Reporting - Comparability Groupings

Section 4: Comparability Groupings

Four typical grade span groupings are listed for comparability reporting: primary, elementary, junior high/middle school, and high school. Each school building should be listed with the grade span group where it has the most grades in common and matches the basic organization of schools in the LEA. If there are an equal number of grades in each grouping, report the buildings in the higher grouping (e.g., for buildings with Grades 3 and 4, use "elementary", rather than "primary"). Use "Other" only if your LEA's grade spans do not fit the four categories listed. Select "LEA-wide" if you are reporting all your buildings on one report. For example:

- An LEA with a K-3, Pre-K-2, and K-2 buildings would probably choose to group them in the primary grade span group.
- An LEA with K-6, 3-5, and 4-6 buildings would most likely include them in the elementary grade span group.

If an LEA has two or more elementary buildings, but only one middle school and high school, only the elementary schools would be reported for comparability purposes. Likewise, if there are two or more middle/junior high or high schools, these groups must also be reported.

LEAs seeking a variance to the current statewide method for demonstrating Comparability must submit the *ESSA Title I Comparability Variance Request Form* annually to the Title I School and Community Services Office.

- 1. Select all applicable groupings for which the LEA will demonstrate Comparability. Report only groupings with more than one building. The LEA-wide comparison (all buildings in a single Comparability Report) may be used if an LEA chooses to include all buildings in the Title I/non-Title I comparison.**

- LEA-Wide Comparisons
- Grade Span Group Comparisons - PRIMARY
- Grade Span Group Comparisons - ELEMENTARY
- Grade Span Group Comparisons - MIDDLE/JR. HIGH
- Grade Span Group Comparisons - HIGH SCHOOL
- The LEA will use a variant methodology.

- 1a. Please complete and upload the 2018-2019 Comparability Workbook - LEA-WIDE.**
 - 1b. Please complete and upload the 2018-2019 Comparability Workbook - PRIMARY GRADES.**
 - 1c. Please complete and upload the 2018-2019 Comparability Workbook - ELEMENTARY GRADES.**
 - 1d. Please complete and upload the 2018-2019 Comparability Workbook - MIDDLE-JR HIGH GRADES.**
 - 1e. Please complete and upload the 2018-2019 Comparability Workbook - HIGH SCHOOL GRADES.**
 - 1f. Please upload a completed ESSA Title I Comparability Variance Request Form.**
- 2. As applicable, provide a brief narrative explaining any extenuating circumstances that impact the data provided within the completed Comparability Workbook(s).**