

# Title I Comparability

Handout #9



**TOM TORLAKSON**  
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

CALIFORNIA  
DEPARTMENT OF  
EDUCATION

September 15, 2011

Dear Select State and Federal Categorical Program Directors:

### **2011–12 ELECTRONIC SUBMISSION OF TITLE I COMPARABILITY REPORT**

This letter is being sent to inform all local educational agencies (LEAs) of the requirement to demonstrate Title I comparability and to conduct comparability calculations annually. In accordance with the Elementary and Secondary Education Act (ESEA), LEAs are required to perform the calculations every year to demonstrate that each of their Title I schools is equivalent among schools in teachers, administrators, and other staff, and equivalent among schools in provision of curriculum materials and instructional supplies. LEAs are to document compliance with the comparability requirement to the California Department of Education (CDE) once every two years.

LEAs receiving this letter that are located in county codes 31–58 (Plumas through Yuba) are required to submit an electronic comparability report to CDE for 2011–12 by October 14, 2011. LEAs located in county codes 1–30 are to complete the comparability calculation requirement and retain the documentation on site.

*Forms due  
October 14*

The Regional Coordination and Support Office (RCSO) has prepared instructions and calculation forms for your use to calculate comparability. The forms are designed to provide each LEA with immediate feedback about whether or not a Title I school meets the comparability requirement. The procedures, guidelines, calculation forms, and instructions are posted on the CDE 2011–12 Comparability Documents Web page at <http://www.cde.ca.gov/sp/sw/t1/compar.asp>. Also available at this site is a narrated PowerPoint presentation that discusses the requirements, timelines, and procedures to demonstrate and document comparability.

All LEAs required to submit a comparability report must complete and transmit by e-mail the following:

- Local Educational Agency Profile (Form A)
- School Data (Form B)
- A listing of the school names used to populate these forms (2011–12 Consolidated Application Part 1, page 8)

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- Specific forms used for calculating comparability, (Forms D–G, as appropriate; please see Enclosure, Comparability Form Selection Chart, for more details)

If a school is not comparable, LEAs must make immediate fiscal and/or staffing adjustments and then re-enter the data that demonstrates compliance before submitting the report to the CDE. LEAs may use other calculation methods, but they will need to design their own form to demonstrate compliance.

### **Verification Review**

Each year the CDE will conduct random verification reviews of 2.5 percent of the LEAs to verify and validate submitted comparability data. The verification reviews will include an analysis of the following documentation:

- Written LEA policy and procedures, including the timeline for how the LEA will meet comparability requirements
- Verification of data used in the calculation for staff and students
- Data supporting allowable exclusions of funds and/or staff from the calculation
- Evidence that schools skipped for Title I funding and locally-funded charter schools have been included in the calculation
- Evidence that data for staff and students were collected on the same date

A notification of findings for items not meeting requirements will be shared with each LEA visited. The LEA must make immediate adjustments to rectify the situation and submit revised reports with the proper supporting documentation.

### **Deadlines**

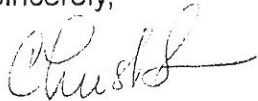
LEAs that are located in county codes 31–58 (Placer through Yuba) must submit comparability calculations to the CDE by e-mail to [compar@cde.ca.gov](mailto:compar@cde.ca.gov) no later than October 14, 2011. CDE will only accept those LEA reports that demonstrate all schools have met comparability requirements. CDE will withhold the first apportionment of Title I, Part A funds for LEAs that fail to submit a report by this due date.

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CDE will withhold the second apportionment of Title I, Part A funds for LEAs that still have not submitted an initial or a revised comparability report demonstrating that all schools have met requirements by December 16, 2011.

If you have any questions regarding this subject, please contact Sandi Ridge, Education Programs Consultant, RCSO, by phone at 916-319-0243 or by e-mail at [compar@cde.ca.gov](mailto:compar@cde.ca.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Swenson".

Christine Swenson, Director  
District and School Improvement Division

CS:rs  
Enclosure

cc: Select District Superintendent of Schools

### Comparability Form Selection Chart

This chart is provided to local educational agencies (LEA) to help in the selection of pertinent comparability forms.

All LEAs must complete and submit **Forms A** and **B**.

**Form C** is for LEA internal use only.

LEAs with **BOTH** Title I schools in the same grade span have two form options:

- **Form D**—Calculation Option 1—Student to Instructional Staff Ratio
- **Form E**—Calculation Option 2—Student to Instructional Staff Salary Ratio

LEAs with **ONLY** Title I schools in the same grade span also have two form options:

- **Form F**—Calculation Option 1—Student to Instructional Staff Ratio
- **Form G**—Calculation Option 2—Student to Instructional Staff Salary Ratio

Calculation Options	Title I/Non-Title I Status	Form A LEA Profile	Form B School Data	Form C Staff Data	Form D Option 1 Student/ Staff Ratio	Form E All Title I Schools- Option 1	Form F All Title I Schools- Option 1	Form G All Title I Schools- Option 2
1	Title I & non-Title I schools	X	X	X	X			
2	Title I & non-Title I schools	X	X	X		X		
1	Title I schools only	X	X	X			X	
2	Title I schools only	X	X	X				X

# CDE Update