

Comparability



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What is Comparability & What Needs to be Submitted

April 2022



**What does every LEA have to do each year
if they are NOT exempt?**

Comparability Calculation



What is the purpose of Comparability?

Federal Title I Grants are intended to provide supplemental programs to disadvantaged students and to ensure that these awards are used for additional programs, and fiscal law requires that all Title I schools receive a “fair share” of State and Local education funds.

Non-compliance will cause a Local Education Agency (LEA) to become ineligible for receipt of Title I funds. Consequences also include a hold on grant funds as well as a requirement to return funds.

So, what do LEAs that have to do:

For calendar year 2022:

LEAs who are on an EVEN monitoring Cycle (Cycle 0, 2, 4, or 6) will provide:

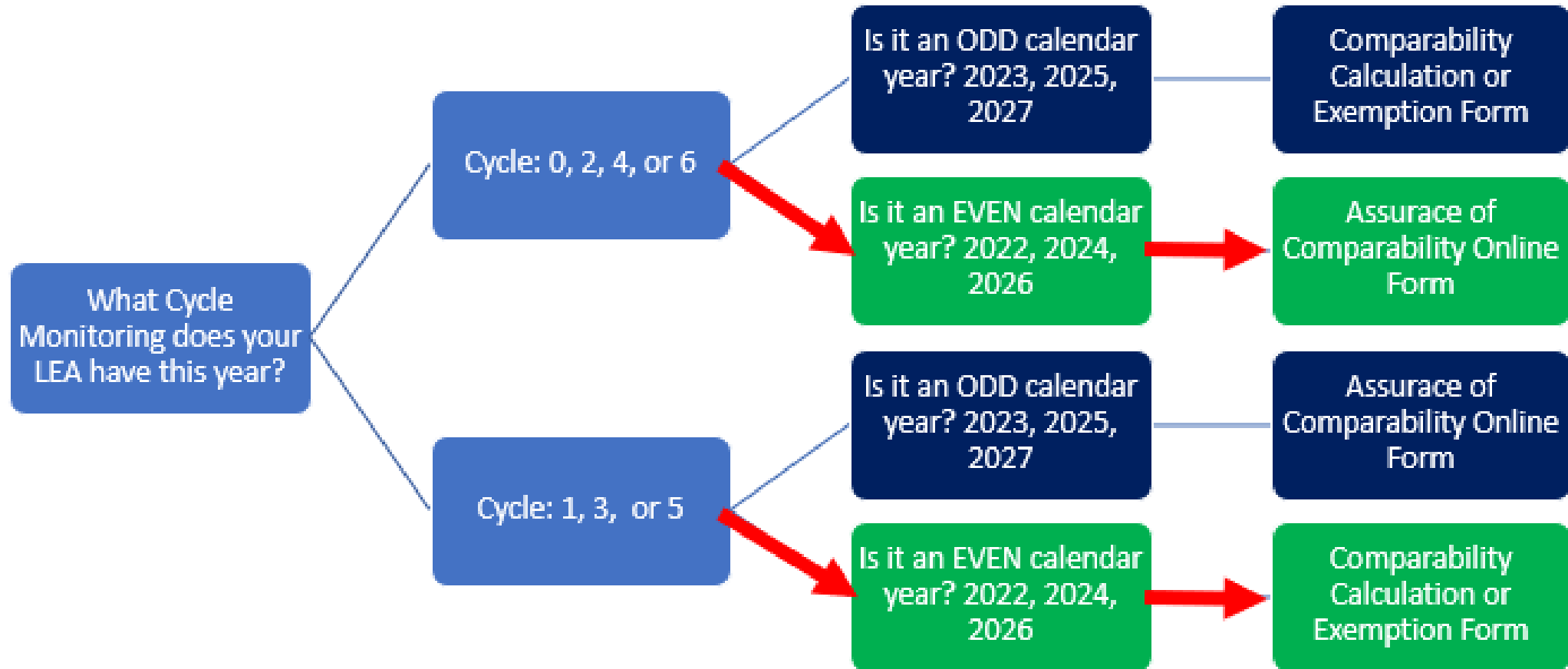
- Assurance of Comparability

LEAs who are on an ODD monitoring Cycle (Cycle 1, 3, or 5) will either provide:

- Comparability Calculation (the Excel spreadsheet)
 - as well as additional supporting documentation
- Exemption Form

UPDATE

What to submit in November 2022:





Criteria Questions

Answering this question correctly will ensure that your LEA completes the correct documentation, either the Exemption Form or completing the Comparability Calculation. Only one answer should be YES.



Who is Exempt?

- **Single Site LEA**
- **One School Per Grade Span**

YES

K-3

4-6

7-8

9-12

NO

K-2

K-6

6-8

9-12

- **Fewer than 100 students**
 - School sites with fewer than 100 students are not to be included in your Comparability calculation, if by removing individual schools that have fewer than 100 students results in your LEA in having only a single site that would be included OR one eligible school per grade span, then your LEA is exempt.

What do Exempt LEAs upload to EMAC ?

(Contact Information for main point of contact)

School Letter Head

[DATE]
[LEA Name]
COMPARABILITY EXEMPTION PROCEDURES
Please choose one from the following exemptions:

- Single site LEA
LEA's total enrolment is less than 100 students
 One school per grade span with no overlapping grades

[LEA Name] receives Title I grant funds and does not calculate comparability because [Checked Reason].

[LEA Name] will review its school status annually as part of the annual budget development and approval process. If the [LEA Name] stops receiving Title I funds or is no longer exempt (due to expansion or other reasons), then it will revise these procedures immediately in accordance with State guidance.

STAFF: The [Staff Position(s)] will be responsible for compliance, which includes the annual review and recordkeeping and completing the assurance of comparability.

The [LEA Name] is still required to notify ADE of its exempt status by completing and submitting an Assurance of Comparability every other year by the deadline. To meet the notification requirement, [LEA Name] shall submit the "Assurance of Comparability" available in ALEAT.

DOCUMENTATION OF EXEMPTION: The [LEA Name] will keep a [paper and/or electronic] file containing these procedures, student counts, and a copy of the biannual Assurance of Comparability available for inspection in the [Location Name] located at [Location Address] for not less than three (3) years.

(Contact Information for main point of contact)

School Letter Head

**This generic timeline is for complying with the Title I Comparability Requirements. Please input specific dates, persons reporting, locations, etc. If there are other steps your LEA performs to meet comparability, please list them. If there are steps listed below that are not used, you may remove them.
Please remove these directions before you post to EMAC.**

(Date) – Gather information
<p>Obtain the following reports from district staff:</p> <ul style="list-style-type: none"> • 40th day student count from (person/reporting system) • District staffing positions by school site from (person/reporting system) <ul style="list-style-type: none"> ◦ Report should represent staffing around the 40th day time period • All reports will be retained at (location/computer folder/etc.)
(Date) – Calculate Comparability/File Exemption
<p>Prepare the comparability tables in the comparability workbook</p> <ul style="list-style-type: none"> • (Describe method used if applicable) • (Describe exemption used if applicable)
(Date) – Review Calculation/Exemption with Business Manager/Superintendent
<p>Review outcome of Calculation/Exemption</p> <ul style="list-style-type: none"> • Make recommendations if shown not comparable • Review other methods to ensure comparability can be shown
(Date) – Submit Comparability/Exemption report to the Department of Education
<p>Comparability report can be filed through EMAC</p> <ul style="list-style-type: none"> • Supporting evidence should be filed with the workbook <p>Assurance of Comparability is to be filed through EMAC biennially attesting that our sites are comparable or are exempt.</p>



Comparability Calculation: What do to upload?

1. **Comparability Procedures and Timeline** (Now we have a template)
2. **Comparability Workbook** (Updated)
Choose the workbook that applies to your LEA
 - All Title I Schools
 - Both Title I and Non-Title I Schools
3. **Supporting Documentation for the Workbook Calculations**
 - Student counts of the LEA's number of enrolled K-12 students on October 1st. A report of this data can be located in AzEds. (Updated)

Staff and/or Expense Records Snapshot

- For school districts: SDER
- For charter schools: an official record of staff FTE
- An official record of federally funded positions (both school districts & charters)

AND/OR

- Expense records that show the annual budgeted state & local funds per school site

Comparability Procedures and Timeline

School Letter Head (Contact Information for main point of contact)

[DATE]
[LEA Name]
COMPARABILITY PROCEDURES & TIMELINE

[LEA Name] receives Title I grant funds and calculates comparability by [Comparability Method].

[LEA Name] will review its school status annually as part of the annual budget development approval process. If the [LEA Name] stops receiving Title I funds or becomes exempt, then it will revise these procedures immediately in accordance with State guidance.

The [Staff Position(s)] will be responsible for compliance, which includes the annual review and recordkeeping, completing the assurance of comparability, and submitting all required documentation to EMAC.

The [LEA Name] will include [describe which resource will be compared to the student population to determine Comparability].

The [LEA Name] is still required to notify ADE of its status by completing and submitting an Assurance of Comparability every other year by the deadline. To meet the notification requirement, [LEA Name] shall submit the "Assurance of Comparability" available in EMAC.

Should [LEA Name] not be Comparable, [LEA Name] will [describe remedy to make resource adjustments] and complete the required ADE form.

DOCUMENTATION: The [LEA Name] will keep a [paper and/or electronic] file containing these procedures, student counts, and a copy of the biannual Assurance of Comparability available for inspection in the [Location Name] located at [Location Address] for not less than three (3) years.

School Letter Head (Contact Information for main point of contact)

This generic timeline is for complying with the Title I Comparability Requirements. Please input specific dates, persons reporting, locations, etc. If there are other steps your LEA performs to meet comparability, please list them. If there are steps listed below that are not used, you may remove them. Please remove these directions before you post to EMAC.

(Date) – Gather information
Obtain the following reports from district staff:
<ul style="list-style-type: none"> • 40th day student count from [person/reporting system] • District staffing positions by school site from [person/reporting system] <ul style="list-style-type: none"> ◦ Report should represent staffing around the 40th day time period • All reports will be retained at [location/computer folder/etc.]
(Date) – Calculate Comparability
Prepare the comparability tables in the comparability workbook
<ul style="list-style-type: none"> • [Describe method used if applicable] • [Describe exemption used if applicable]
(Date) – Review Calculation with Business Manager/Superintendent
Review outcome of Calculation/Exemption
<ul style="list-style-type: none"> • Make recommendations if shown not comparable • Review other methods to ensure comparability can be shown
(Date) – Submit Comparability report to the Department of Education
Comparability report can be filed through EMAC
<ul style="list-style-type: none"> • Supporting evidence should be filed with the workbook
Assurance of Comparability is to be filed through EMAC biennially attesting that our sites are comparable or are exempt.



Comparability Calculation Methods

For LEAs with Title I & Non-Title I Schools

1. Pupil/Instructional Staff ratio at Title I to Non-Title I schools
- ➔ 2. Pupil/Instructional Staff ratio Large/Small Schools – Title I & Non-Title I Schools

For LEAs with ONLY Title I Schools

1. Pupil/Instructional Staff ratio at Title I schools
2. Pupil/Instructional Staff ratio at Title I schools by grade span
 - a. Grade Spans must match the basic organization of the LEA and have school buildings with at least two overlapping grades
3. Pupil/Instructional Staff ratio at Title I schools by poverty level (high to low)
- ➔ 4. Pupil/Instructional Staff ratio at Title I schools by poverty level (high-poverty compared with each other and low-poverty compared with each other)
5. State and Local per pupil spending at Title I schools (all expenditures)
- ➔ 6. State and Local per pupil spending at Title I schools by grade span (all expenditures)
 - a. Grade Spans must match the basic organization of the LEA and have school buildings with at least two overlapping grade



Comparability Workbook

- LEAs must ensure they choose the right workbook
 - All Title I Schools OR Title I and Non-Title I Schools
- LEA must upload the Excel Spreadsheet, NOT a PDF
- The LEA is only comparable if ALL change to YES
- “Who” they count as staff must be the same across all school sites
- SDER stands for School District Employee Reports
- The LEA does not have to show Comparable across all methods, only one
- The supporting evidence must match the Comparability Workbook







Assurance of Comparability

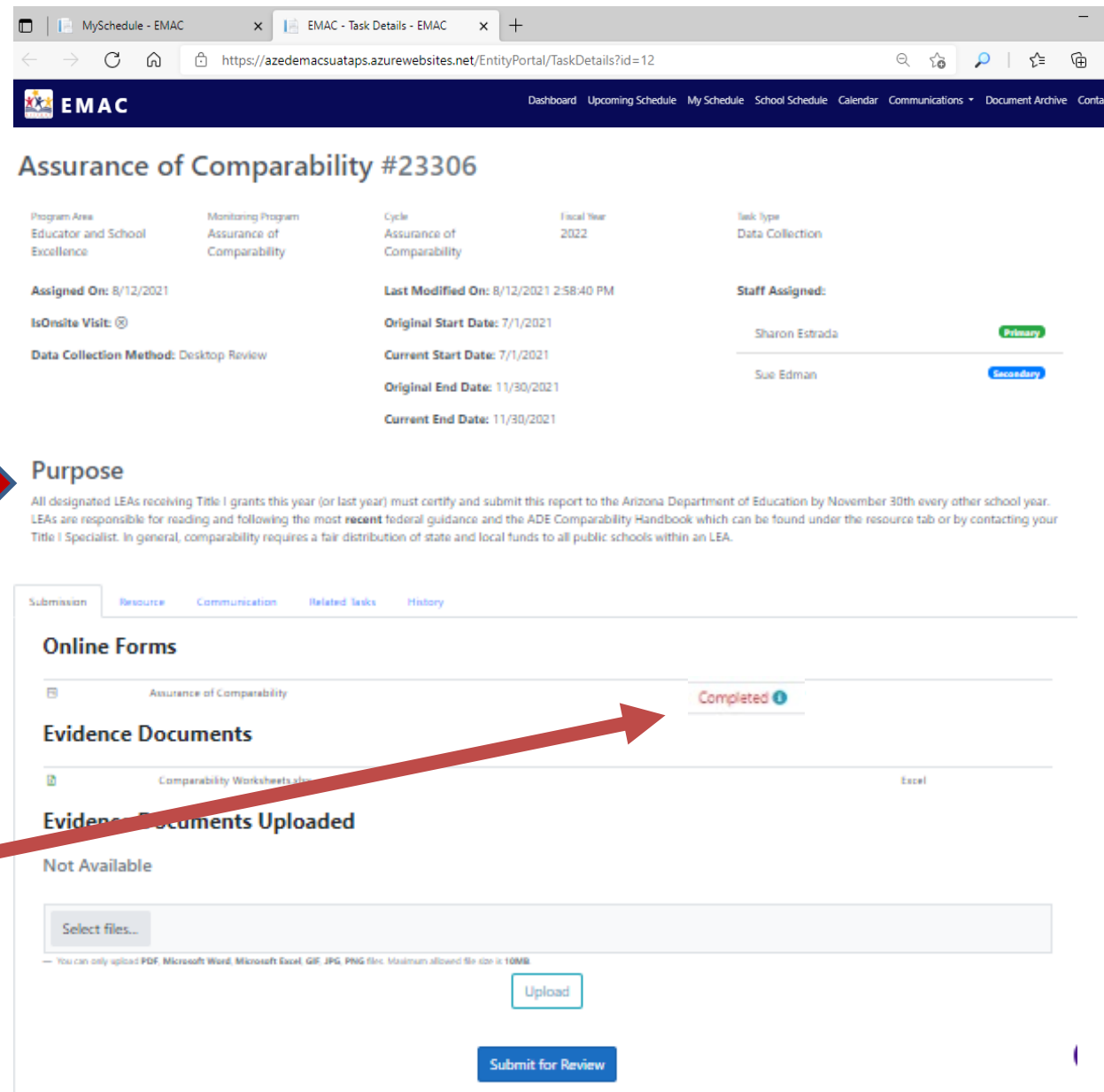
The Assurance of Comparability assures that the LEA has completed the Comparability Calculation and has it, along with all supporting documentation on file.



Data Collection

Assurance of Comparability

- 3 main parts to every Task
- Big Picture 
- Purpose 
 - Purpose
 - Task Collection Tabs
- Data Collection Section
 - Online Forms
 - Required Evidence
 - Submission



MySchedule - EMAC | EMAC - Task Details - EMAC | +

https://azedemacsuataps.azurewebsites.net/EntityPortal/TaskDetails?id=12

EMAC | Dashboard | Upcoming Schedule | My Schedule | School Schedule | Calendar | Communications | Document Archive | Contact

Assurance of Comparability #23306

Program Area	Monitoring Program	Cycle	Fiscal Year	Task Type
Educator and School Excellence	Assurance of Comparability	Assurance of Comparability	2022	Data Collection

Assigned On: 8/12/2021 | Last Modified On: 8/12/2021 2:58:40 PM | Staff Assigned: Sharon Estrada (Primary), Sue Edman (Secondary)

IsOnsite Visit: ☒ | Original Start Date: 7/1/2021 | Current Start Date: 7/1/2021 | Original End Date: 11/30/2021 | Current End Date: 11/30/2021

Data Collection Method: Desktop Review

Purpose

All designated LEAs receiving Title I grants this year (or last year) must certify and submit this report to the Arizona Department of Education by November 30th every other school year. LEAs are responsible for reading and following the most recent federal guidance and the ADE Comparability Handbook which can be found under the resource tab or by contacting your Title I Specialist. In general, comparability requires a fair distribution of state and local funds to all public schools within an LEA.

Submission | Resource | Communication | Related tasks | History

Online Forms

Assurance of Comparability	Completed
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Evidence Documents

Comparability Worksheets.xlsx	Excel
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Evidence Documents Uploaded

Not Available

Select files... | Upload | Submit for Review

You can only upload PDF, Microsoft Word, Microsoft Excel, GIF, JPG, PNG files. Maximum allowed file size is 10MB.



Assurance of Comparability due November 30th

Calculating Comparability is an annual requirement. Every calendar year, the LEA will calculate comparability and every year the LEA will either report the calculations or the Assurance.

All designated LEAs receiving Title I grants this year (or last year) must certify and submit this report to the Arizona Department of Education by November 30th every other school year. LEAs are responsible for reading and following the most recent federal guidance and the ADE Comparability Handbook which can be found under the "Resource" tab in EMAC, on the Title I website and by contacting your Title I Specialist. In general, comparability requires a fair distribution of state and local funds to all public schools within an LEA and the comparability calculation is one method of testing if an LEA is supplanting.

PREPARE - Gather your 40th day enrollment and your 40th day comparison data. Enter required information into the calculation worksheet. The ADE Worksheets will automatically calculate whether your schools are comparable or not. You only need to choose one method to do the calculation. If any of schools receive a NO, then choose another method. If all methods are exhausted and you still have schools showing not comparable, contact Stephanie Washington as soon as possible.

SHOW - LEAs must keep (1) official written procedures, which include a timeline, (2) completed LEA Schools Profile and Worksheets, (3) the data used to arrive at the entries for the Worksheets, and (4) any other supporting data.

REVIEW AND CORRECT YOUR WORK - ADE's materials set out some options if one or more schools in your LEA are not comparable. Ultimately, a failing LEA must fix the misallocation of state and local funds by December 31st. Worksheets and supporting documents showing the imbalance was corrected are required. The LEA must report noncompliance on this assurance by emailing Sharon.Estrada@azed.gov immediately.

Does your LEA have one school per grade span or is your LEA a single site LEA? – If you can answer yes to either of these questions, you are only exempt from doing the calculation. You must still do this assurance and you must have an exemption form that includes official written procedures for comparability also including a timeline.



Next



LEA PROFILE: LIST ALL SCHOOLS AND 40TH DAY ENROLLMENT

Assurance of Comparability

Save Draft

LEA PROFILE: LIST ALL SCHOOLS AND 40TH DAY ENROLLMENT

LEA Information *

Name of LEA

Entity ID & CTDS Number

Contact Name, Title

Contact Phone Number

Contact Email Address

Mailing Address

Title I School with less than 100 students *

School Name *	Grade Span *	Elementary Student Count *	Mid. School or Jr. High Student Count *	High School Student Count *	Total *	
Prickly Pear Elementary	K-4	30			30	Remove
Prickly Pear Intermediate	5-8	10	30		40	Remove

Add row

- 1) Title I School with less than 100 students.
- 2) Title I School with more than 100 students.
- 3) Non-Title I School with less than 100 students
- 4) Title I School with more than 100 students.



Complete and Submit

When you are ready to “Submit for Review”, double check:

- ✓ Online Form is “Completed”
- ✓ Evidence is Uploaded

To officially “Submit the Task for Review”, press the Submit button at the bottom of the task.

Task is submitted when:

- A green box will flash in the upper-righthand corner of your screen that says “Success” and
- The sticker/label at the top of the Task changes to

The screenshot shows the EMAC Task Details page for Assurance of Comparability #23306. The page includes a navigation bar with the EMAC logo and various menu items. The main content area displays task details such as Program Area (Educator and School Excellence), Monitoring Program (Assurance of Comparability), Cycle (Assurance of Comparability), Fiscal Year (2022), and Task Type (Data Collection). It also shows assigned staff (Sharon Estrada as Primary and Sue Edman as Secondary) and dates for the task. A 'Purpose' section explains that all designated LEAs must certify and submit this report to the Arizona Department of Education by November 30th every other school year. The 'Submission' section shows the task status as 'Completed' with a green checkmark and a 'Submit for Review' button. A red arrow points from the 'Completed' status label to the 'Submit for Review' button.



Updates for Fall 2022

- **Required submission is based on current Monitoring Cycle and not the first letter of the LEA's name**
- **Three additional methods to show Comparability**
- **Template for LEA Procedures and Timeline**
- **Evidences of student counts will only be of the LEA's number of enrolled K-12 students on October 1st. A report of this data can be located in AzEds.**



Important Dates

- **October 1st Count**
- **November 30th submission due in EMAC**
- **December 31st reallocation of resources if needed**
- **February 1st Programmatic Holds placed on LEAs whose Comparability has not been submitted and accepted**



Questions

If you have further questions, please contact your Title I Specialist.

If you are unsure who that is, please email us at

EducatorAndSchoolExcellence@azed.gov

