Title I Comparability Report Directions

DATA VERIFICATION TOOL:

An EMIS Staff Detail Report is included on the Data Verification Page. It includes names and full-time equivalencies (FTE) of instructional staff paid with state and local funds for each school. The report assists in verifying the instructional staff FTE reported for each school on the Data Verification Page**.**

COMPARABILITY OVERVIEW:

To be eligible to receive Title I funds, a district must use state and local funds to provide services in Title I schools that are at least comparable to services provided in non-Title I schools. If the district serves all schools with Title I funds within a particular grade span, the district must use state and local funds to provide services that are substantially comparable in each school. While the district is only required to document and submit compliance with the comparability requirement biennially (once every two years) to the Ohio Department of Education and Workforce (DEW), it must perform the necessary calculations annually to demonstrate that all Title I schools are, in fact, comparable and make adjustments if any are not.

DEW approves the reports biennially in even numbered fiscal years, FY26, 28, etc. In odd numbered fiscal years, FY25, 27, etc., DEW verifies that districts have completed the comparability report as "District Representative Approved" via the Comparability system, reviews the reports of districts scheduled for either onsite or desk reviews, and conducts a select number of random reviews.

COMPARABILITY SYSTEM:

The Comparability system is a tool to assist districts with reporting Title I Comparability annually. When the system is activated, it queries the databases to determine which districts are required to complete the report and sends the following message to the superintendent and treasurer:
Upon review of OEDS-R and CCIP data, it has been determined that your district is required to complete the annual Title I Comparability Report for the current fiscal year.

In addition, a message is posted on the homepage if the district is required or not required to do the report.

The system determines comparability by using data submitted through the Ohio Educational Directory – Revised (OEDS-R), the Comprehensive Continuous Improvement Plan (CCIP) Title-I Building Eligibility Page Low Income Percentage and Title I School Service and the Education Management Information System (EMIS). The Comparability system is available in OHID or through the CCIP Consolidated Application in the left menu bar under the funding section. OHID Account access roles include Superintendent, Treasurer, Data Entry-CCIP, Data Entry

Funding-CCIP, Coordinator-Federal Programs, Coordinator-Title I Programs. CCIP access roles include Superintendent, Treasurer, Data Entry Funding-CCIP.

The Comparability tool provides two reporting options when clicking on the Data Verification Page:

1) **EMIS Data** is the default option. This option uses the *student instructional staff ratio method to demonstrate comparable services*. The system generates the school name and IRN, student enrollment, instructional staff full time equivalency, low-income percentage, and Title I school service data. An EMIS Staff Detail Report, located on the *Data Verification Page*, includes a breakdown of instructional staff by name and FTE for each school.
2) **Self-Reported Data** generates the school name and IRN, low-income percentage, and Title I school service data. Districts input current school year data based on the selected method. There are three methods available for the Self-Reported Data option. The EMIS Staff Detail Report is also included on the *Data Verification Page* to assist with verification of instructional staff data. Refer to the instructions on the Data Verification Page or the section titled "Methods for Demonstrating Comparable Services using Self-Reported Data option" below.

Both the EMIS Data and the Self-Reported Data options runs algorithms to determine comparability. The district representative clicks on "Check Comparability" to determine the status of the report. An automated message appears at the top of the report that indicates if the district met or did not meet comparability requirements. The system determines the grouping (grade span, district-wide or larger/smaller), as well as which schools are excluded. If any building is one-of-a-kind, no comparison necessary, the Comparability report excludes that school. Comparable services are based on either the 10% tolerance criteria or the within range variance between 90 and 110 percent of the average for all schools served. The report includes an audit list overview of the steps used by the system to determine comparable services.

Technical assistance is available by e-mailing *Comparability@education.ohio.gov*. The Comparability system also contains a history log for communications and messages, similar to the CCIP.

GENERAL INFORMATION:

Users must have a OHID account and one of the following roles in OEDS-R:

- Superintendent;
- Treasurer;
- Data Entry Funding – CCIP

REPORTING REQUIREMENT:

- Comparability is determined based on the use of state and local funds. Remember to **exclude** instructional staff, instructional supplies and curriculum materials paid with any **federal funds,** including Title I, II-A, Title III, Title IV-A, Title V-A, IDEA-B, etc.

School Building Information: The system extracts school data from OEDS-R so names of schools and grade spans must be up to date in that system. The building IRN is the official audit source for school identity.

- Districts must provide an explanation in the Comparability history log if a building is missing grade span data.
- Comparability reporting excludes preschool (grade level P) students and staff.
- Data is entered for all schools required to be included in the comparability report unless there is a valid reason to exclude the school approved by the Office of Federal Programs as an administrative override.

CONTRACTED SERVICES:

- A contracted service through the ESC is reported at the district level.
- When contracting through a non-EMIS reporting entity, the district reports their FTE time using Self-Reported Data.

The EMIS manual defines pupil enrollment. Enrollment is entered as a whole (head count) using EMIS Data. Districts using the Self-Reported Data option may enter the current year pupil enrollment as either a whole or full-time equivalency. Within each grade span report, the method used must be consistent.

- Special Notes:
  - Both the EMIS and Self-Reported Data options exclude Autism and/or John Peterson Scholarship students from the pupil count.
  - Districts must exclude vocational students from the home school if they are attending a joint vocational school or career center outside of the district 100% of the time.

Instructional staff is reported based on full time equivalency (FTE) using EMIS or Self-Reported Data.

EMIS DATA OPTION:

The Comparability EMIS Data Report option is system generated.

- The EMIS Data option uses the *student/instructional staff ratio method* for determining comparability
- The system generates the school name/IRN, student enrollment, instructional staff, low-income percentage, and Title I school service data. This information comes from OEDS-R, EMIS, and the CCIP Title I Building Eligibility Page.

- Pupil enrollment and instructional staff data reflects the EMIS Comparability Reporting Period (**October 1**).
- Pupil enrollment is entered as a whole (head count) using EMIS Data.
- Instructional staff is reported based on full time equivalency (FTE) using EMIS or Self-Reported Data.

NOTE: If contracting teacher positions/assignment areas (*identified below) through a non-EMIS reporting entity, the district reports their FTE time. In this instance, the district uses the Self-Reported Data option.

The district verifies the data on the Comparability Data Verification Page. To verify instructional staff full-time equivalency for each district building, click on the EMIS Staff Detail Report. When the report is displayed, you can view the report in Excel, PDF or Word using the following steps:

- Hover over the diskette icon at the top of the report and click on it to select Excel, PDF or Word.
- From the application, you can save or print the report.

Next, the district representative clicks on **"**Check Comparability." The system runs algorithms for comparability and automatically determines if the district is "Comparable" or "Not Comparable." The district can verify the data as often as they wish since the system updates daily until the Comparability closing date (see homepage timeframes and announcements). The "SAVE" button remains inactive until the Comparability closing date. At that time the "SAVE" button becomes active and the Comparability Report can be submitted providing the data is reported accurately and the district is comparable.

The district clicks **"**SAVE" and changes the status on the Sections Page to "Draft Completed." The superintendent or treasurer changes the status to "District Representative Approved" to complete the report. In the event there are comparability issues to resolve or additional technical assistance is necessary, all reports need to be completed on or before the requested date.

*The EMIS Reporting Pupil Counts are based on data as of October 1. The EMIS Data will define and automatically input pupil counts for each building. Students included in the EMIS generated headcount are as follows:

- Students enrolled in district as of October 1.
- Students receiving instruction, in whole or in part, from the reporting district.
- i.e. half-day kindergarten students would be counted as 1 pupil

EXCLUDED STUDENTS:

- Students in grade level preschool or infant/toddler
- Students receiving all instruction at one of the following:
  - CT = Contract Career Technical Education participant
  - PI = Proprietary institution program participant
  - JV = Joint Vocational School District program participant

- ES = Education Service Center preschool program participant
- MR = MRDD program participant
- OS = State school (OSB or OSD) program participant
- PS = Post-Secondary Enrollment Options program participant

*The EMIS Reporting Teacher Code used by the system is **Position Code 230- Teacher**, along with the following:

Assignment Areas:

- 999370 General Education, including High school teachers teaching art, music, and physical education
- 999050 Art Education K-8
- 999570 Music Education K-8
- 999418 Physical Education K-8
- 999414 Special Education
- 999365 LEP Instructional Program
- 999380 Gifted and Talented
- 999800 Career-Technical Programs/Career Pathways

Fund Source-Valid Options:

- A – State Auxiliary Funds
- B – Other State Funds
- I – State Poverty-Based Assistance Funds (formerly DPIA)
- L – Local Funds and/or State Foundation Funds, T- Private/Tuition
- U – State Unit Funding (use funds source *Z* for preschool special education unit staff).

Position Status-Valid Options:

C – Current position in the district; **A -** Contracted Personnel – Agency; **I -** Contracted Personnel – Individual; **P -** Individual is on leave of absence.

Position Separation Date - Valid Options included are**:**

- Staff members employed as of October 1
- These staff members could still be employed in the district or at least had to have a Separation date occurring after the EMIS Comparability October Count Date.

SELF-REPORTED DATA OPTION:

It is recommended to check the EMIS Data option first. If the EMIS Data cannot be corrected or the district is not comparable using this data, then move to the Self-Reported Data option.

The district must verify the accuracy of the data pre-populated by the Comparability system. This includes the name of school, building IRN, grade levels, low-income percentages and school service data. The EMIS Staff Detail Report is also included on the Data Verification Page for reference and data verification purposes.

Once data is verified, districts will select one of the following three methods to demonstrate comparable services. Whichever method is used, it must be uniformly applied within each grade span report.

METHODS FOR DEMONSTRATING COMPARABLE SERVICES USING SELF-REPORTED DATA OPTION:

1) **Student/Instructional Staff Ratio Method**: Use the EMIS position code/assignment areas and funding sources outlined above or the district's official written **definition of instructional staff (see sample below). The definition is to be included in your written procedures. Enter the instructional staff full-time equivalency (FTE) and enrollment (total number of pupils, either reported as a whole or FTE).

*It is recommended that all figures used (enrollment and instructional staff FTE) reflect the EMIS Comparability reporting period (**October 1**); otherwise, figures must be consistent with regard to what day of the year the data collected reflect.*

***Sample definition of instructional staff**:* If the district chooses to measure compliance by comparing student/staff ratios or student/staff salary ratios, the district should consistently include the same categories of staff members in the ratios for both Title I and non-Title I schools. *Instructional staff may include teachers and other personnel assigned to schools who provide direct instructional services, such as music, art, and physical education teachers, guidance counselors, speech therapists, and librarians, as well as other personnel who provide services who support instruction, such as school social workers and psychologists.*

Whether paraprofessionals are included in comparability determinations depends on procedures developed by the Ohio Department of Education and Workforce or district, as appropriate. Consistent with the requirement in Title I that a paraprofessional supported with Title I funds may only provide instructional support under the direct supervision of a teacher, however, the U.S. Department of Education urge state departments of education and districts to consider carefully whether a paraprofessional supported with State and local funds should be considered equivalent to a teacher or other instructional staff member in comparability determinations. In addition, a district should take care not to include aides not involved in providing instructional support in its comparability determinations (Non-Regulatory Guidance, Title I Fiscal Issues, U.S. Department of Education, Revised February 2008).

2) **Expenditures Per Pupil Method:** Amounts entered should only be state and local funds allocated for the current school year. These expenditures include state and local funds allocated for the current school year for instructional staff base salaries plus curriculum materials and instructional supplies (accounts located between functions 1000 through 1900 in the Uniform School Accounting System (USAS) document) in the column headed "Instr. Staff Base Salaries, Supplies & Curriculum Materials."

3) **Student/Instructional Staff Salary Ratio Method:** Enter the pupil enrollment for the current school year, either as a whole or full-time equivalency and the state and local funds allocated for the current school year for instructional staff base salaries. For instructional staff salaries, use the base salary, not salary differential, for each position, e.g., teachers, tutors, instructional paraprofessionals, etc.

- All data entered by the district (enrollment, instructional staff, instructional staff salaries, or expenditures) must be for the current school year.
- Exclude federal funds, preschool students, and preschool staff.
- The system will run all the algorithms once the district enters the data required for self-reporting and clicks "Check Comparability."

SPECIAL NOTES:

- The district has the option of using separate methods for determining comparability within different grade span reports based on how they complete the Data Verification Page (email comparability@education.ohio.gov if technical assistance is needed).
- Both the EMIS and Self-Reported Data options exclude Autism and/or John Peterson Scholarship students from the pupil count.
- Districts must exclude vocational students from the home school if they are attending a joint vocational school or career center outside of the district 100% of the time.

SUBMISSION OF COMPARABILITY REPORT:

- Users log into their OHID account. On the Account Maintenance page click on "Comparability."
- In the left menu on the Comparability homepage, click on "Comparability Report" to go to the District Report Section. The default report year is the current school year.
- Change the status to "Draft Started."
- Click on the Comparability Data Verification link and select the data type (EMIS or Self-Reported Data).
- Verify the pre-populated data, including the EMIS Staff Detail Report and any data entered by the district and click "SAVE."
- Once the data is completed and verified, the user is ready to test comparability by clicking on "Check Comparability." The system will run all the algorithms using the selected data and produce an output report. The report will show whether the district is comparable or not comparable.
- If the report indicates the district is "*Not Comparable,*" the system will display a Comparability Report that shows an audit trail of the steps and methods used by the Comparability system to try to determine comparability.

- The user will then need to return to the data verification section to re-verify the data entered or select a different data element to determine Comparability and re-run the "Check Comparability" function.
- Once the output report is saved, the system will create a PDF report, which can be accessed on the Sections Page. The Comparability Data link is the input report. The Comparability Report link is the output report.
- Once the output report shows the district is "*Comparable,*" users will return to the Sections Page and change the status to "Draft Completed."
- The system will send a notification to the superintendent and treasurer regarding the status change, with instructions to log into their OHID account and access the Comparability system. Either the superintendent or treasurer can submit the report by changing the status to "District Representative Approved." At the time the status is changed to "District Representative Approved," the superintendent or treasurer will also be asked to accept the comparability written assurances (see below).

DETERMINING COMPLIANCE:

When determining compliance for comparability, a district may exclude state and local funds expended for:

- Language instruction educational programs;
- Excess state and local costs of providing services to children with disabilities as determined by the district; and
- State or local supplemental programs in any school attendance area or school that meets the intent and purposes of Title I, Part A. See the discussion of the USDOE Title I Non-Regulatory Guidance, Revised, February 2008 (page 39) for determining whether such a program meets the intent and purposes of Title I. [ESEA, *Section 1118(c)(5) and (d); 34 CFR 200.79]*

WRITTEN PROCEDURES:

The district must develop and implement written procedures for compliance with the comparability requirement annually. These procedures must be in writing. At a minimum, procedures should include the following:

- A timeline for demonstrating comparability.
- The office responsible for making comparability calculations.
- The measure and process used to determine whether schools are comparable.
- How and when the district makes adjustments in schools that are not comparable (refer to the USDOE Revised February 2008 Title I Fiscal Guidance on Comparability).

Sample Title I comparability procedures are available in the CCIP Document Library and in the help link of the Comparability application.

DISTRICT WRITTEN ASSURANCES:

The district has established and implemented the following:

- District-wide salary schedule;
- Policy to ensure equivalence among schools in teachers, administrators, and other staff; and
- Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

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