Title I Comparability
Maintenance of Effort
Supplement, Not Supplant

Center for School Improvement
Office of Federal Programs

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Ohio Department of Education

Maintenance of Effort

- 1120A(a) and 9521 of Elementary and Secondary Education Act (ESEA)
- 34 *CFR* 299.5

Maintenance of Effort

LEA may receive funds under covered program for any fiscal year if SEA finds that either combined fiscal effort per student or aggregate expenditures from state and local funds for preceding fiscal year was not less than 90 percent of combined fiscal effort or aggregate expenditures for second preceding fiscal year

– Section 9521

Maintenance of Effort

In addition to Title I, Part A, MOE requirements of section 9521 apply to:

- Title I, Part B, Subpart 3, Even Start
- Title I, Part D, Neglected, Delinquent
- Title I, Part F, Comprehensive School Reform
- Title II, Part A, Improving Teacher Quality State Grants
- Title II, Part D, Educational Technology State Grants
- Title III, Part A, English Acquisition State Grants
- Title IV, Part A, Safe and Drug-Free Schools/Communities
- Title IV, Part B, 21st Century Learning Centers
- Title VI, Part B, Subpart 2, Rural Education

Failure to Meet Requirement

SEA must reduce amount of allocation of funds under covered program in any fiscal year in exact proportion by which LEA fails to maintain effort by falling below 90 percent of combined fiscal effort per student and aggregate expenditures (using measure most favorable to LEA)

Failure to Meet Requirement

For year in which effort was not maintained, lesser amount shall not be used for computing maintenance of effort in subsequent years

Waiver

Secretary may waive maintenance of effort requirements if waiver is determined to be equitable due to:

- Exceptional or uncontrollable circumstances such as natural disaster
- Precipitous decline in financial resources of the LEA

Expenditures

In determining whether LEA has maintained fiscal effort, SEA must consider LEA's expenditures from state and local funds

Expenditures

Include:

- Administration
- Instruction
- Attendance and health services
- Pupil transportation services
- Operation and maintenance of plant
- Fixed charges
- Net expenditures to cover deficits for food services and student body activities

Expenditures

Exclude:

- Community services, capital outlay, debt service
- Expenditures from federal funds for which LEA is required to account to federal government directly or through SEA
- Supplemental expenses made as result of Presidentially declared disaster

Data Sources

Average Daily Membership (ADM)

- EMIS period N reporting

General Fund (GF)

- EMIS period H reporting
- EFM (expenditure flow model)
- USAS fund codes: 001, 016 and 494

Example of Calculation

DIST_NAME	ADM(2010)	GF(2010)	ADM (2011)	GF(2011)	PPE 10	PPE 11	GF MOE	PPE MOE
LEA 1	1,514.78	12,276,085	1499.89	10,747,253	$ 8,104.20	$ 7,165.36	-2.73%	-1.76%

Compare FY11 GF (**$10,747,253**) to 90% of FY10 GF (**$11,048,477**).

Compare FY11 PPE (**$7,165.36**) to 90% of FY10 PPE (**$7,293.78**).

Calculation is performed in FY12. LEA may apply for a waiver.

The percentage by which FY13 ESEA covered programs allocations must be reduced if the LEA does not ask for waiver or does not receive approval of the waiver is: **1.76%**

Question

Could SFSF and Ed Jobs be treated as GF to help in meeting MOE?

- Yes – with prior approval from Secretary, SEA or LEA may treat these expenditures as non-federal funds to maintain fiscal effort under any other program administered by Secretary, e.g., Title I, Part A
- Provision should help states and LEAs maintain fiscal effort in tough economic times

Prior Approval

SFSF

SEA maintains auditable data to demonstrate:

- SEA is complying with SFSF's maintenance of effort requirements (unless Secretary has waived those requirements); and
- Percentage of total state revenues for elementary, secondary and public higher education in most recently completed fiscal year did not decrease from previous year

ED JOBS

SEA maintains auditable data to demonstrate:

- SEA is complying with Ed Jobs' maintenance of effort requirements; and
- Percentage of total state revenues for elementary, secondary and public higher education in most recently completed fiscal year did not decrease from previous year

Annual Monitoring

Comparability *(ESEA 1120A)*

- Web-based system – completed annually
- Onsite reviews
- Self Evaluation

Maintenance of Effort *(ESEA 9521)*

- Calculation based on EMIS data
- Average daily membership
- State and local expenditures

Comparability Web-Based System

NCLB, Section 1120A

Comparability Report

Comparability Audit List

Starting Comparability Check with EMIS data for District Year 2011 at 2011-01-20 09:32:35.6739	
Checking Comparability by Grade Span with EMIS data...	
Checking for buildings with Missing Data...	
Checking for buildings below Minimum Pupil Count...	
Grouping buildings by Grade Span...	
GradeSpanGroup	K-5 group contains building 000398 Allen Elementary School (K-5)
GradeSpanGroup	K-5 group contains building 025841 Mt Logan Elementary School (K-5)
GradeSpanGroup	K-5 group contains building 037234 Tiffin Elementary School (K-5)
GradeSpanGroup	K-5 group contains building 042267 Worthington Elementary School (K-5)
GradeSpanGroup	9-12 group contains building 006296 Chillicothe High School (9-12)
GradeSpanGroup	6-8 group contains building 034736 Chillicothe Middle School (6-8)
Checking for Single Building 8+ Grade groups...	
Checking for all Single Building groups...	
Checking for all Not Served groups...	
All Buildings In Group Not Served Count: 0	
One-of-a-kind Count (1 Building Group): 0	
Checking comparability ratios for each pass 1 group	
Processing grade span group: K-5	
Checking Comparability for group K-5 using Form 5...	
Building group ratios using PupilTeacherCountRatio: average=19.42; 110%=21.36; 90%=17.48	
Is Group K-5 comparable?: TRUE	
Is District comparable by Grade Span with EMIS data?: True	
Ending Comparability Check with EMIS data for District Year 2011 at 2011-01-20 09:32:35.7051	

From start to finish:

0.0312 seconds



Ohio Department of Education

Overview

- Objectives
- System rules and logic
- System demonstration

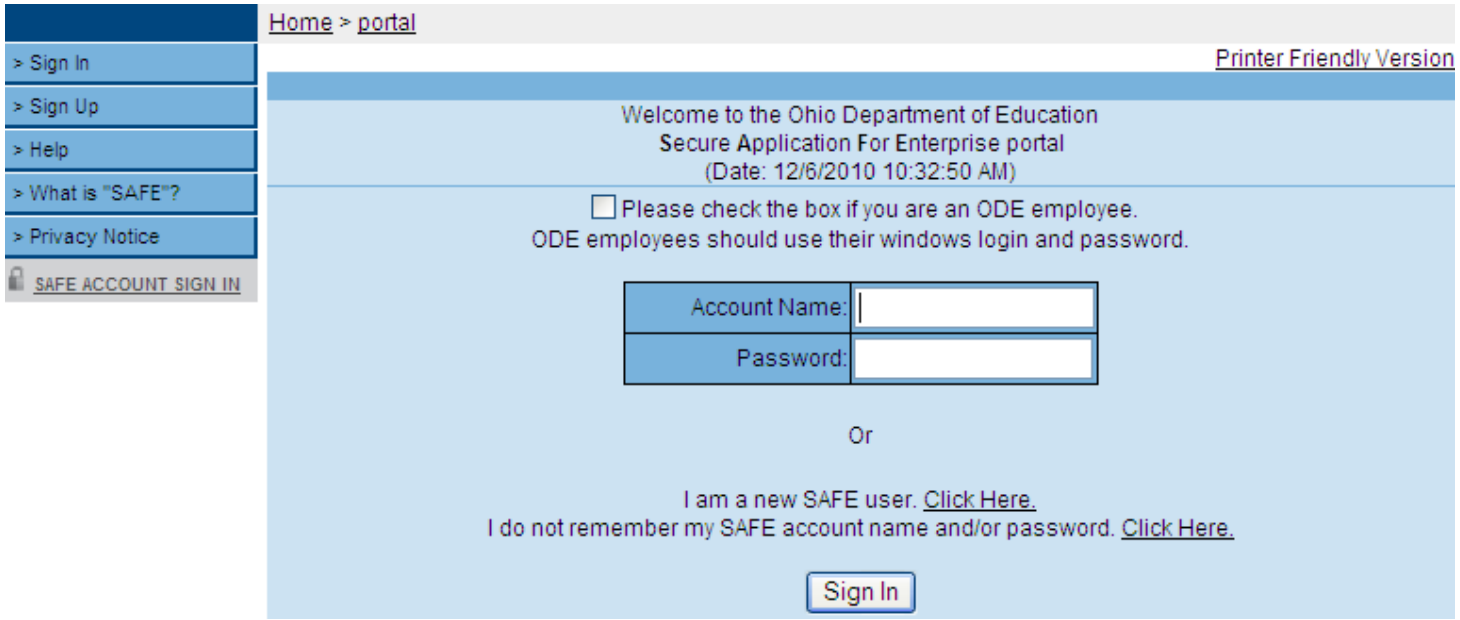
Objectives

- Data reliability
- Data integration (ODE data sources and reporting systems)
- Defining Business Rules
- Identifying EMIS data elements (instructional staff and pupil count)
- Source documentation
- Efficiency/Customer service

System Rules: Security

Secure Application For Enterprise (SAFE)

Authorized access only



System Rules: OEDS Data

- Building Internal Retrieval Number (IRN)
- Building name
- Building grade span
- Personnel roles (access)
- Personnel contact information

System Rules: EMIS Data

- Pupil count (October Count Week)
- Instructional staff FTE (October Count Week)
  - Position codes
  - Assignment areas
  - Funding sources
- Excludes preschool staff and preschool students

EMIS Data Reporting
Instructional Staff:
Position Code 230 Teacher

Assignment Areas

- 999370 General Ed
- 999414 Special Ed
- 999380 Gifted and Talented
- 999800 Career-Technical Programs/ Career Pathways
- 999050 Art Ed K-8
- 999570 Music Ed K-8
- 999418 Physical Ed K-8
- 999365 LEP Instructional Program

EMIS Data Reporting
Instructional Staff Funding Sources

Fund Source Valid Options include:

- **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)

System Rules: CCIP Data

Comprehensive Continuous Improvement Plan (CCIP) Consolidated Application:

- FY12 Title I Building Page Service Type
- FY12 Title I Building Eligibility Page Low-Income Percentage

System Rules: Logic

- **Methods for determining comparability:**
  1. Student-instructional staff ratio
  2. Instructional staff salaries ratio
  3. Expenditures per pupil
- **Grade-span grouping or district-wide as a whole**

System Rules: Logic

- Compare each Title I school to average of non-Title I schools, or if all schools are Title I, to each other
- Current school year data
- Exclude federal funds
- Exclude pre-school staff and enrollment

System Rules: Logic

- Grade-span overlap rule
- Larger/smaller
- One of a kind – no comparison necessary
- Exclude schools with 100 or fewer students

System Rules: Logic

Variance Options

All served

- **10 Percent Tolerance** (90 or 110 percent, depending on method used) **or**
- **Within Range** (90 to 110 percent)

Some served and some not served

- **10 Percent Tolerance** (90 or 110 percent, depending on method used)

System Rules: Logic

Query of LEAs required to submit comparability report

- System-generated email notification to LEAs
- Automated message on SEA website
- System-generated required admin district list

Documenting Compliance

- Keep saved copy of completed report for audit purposes (PDF Report also saved in Web-based system by fiscal year)
- Maintain signed and dated records and source documentation (e.g., low income data, payroll records, EMIS records) for three years
- Early determination of comparability allows LEA to make adjustments with least amount of disruption

Documenting Compliance

- Include organizational chart as part of records
- Written procedures, including definition of instructional staff (refer to template)

Documenting Compliance

LEA Written Assurances

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

Miscellaneous

Expenditures Per Pupil Method

Now includes both state and local funds allocated for instructional staff **base** salaries **and** curriculum materials and instructional supplies

Miscellaneous

Schoolwide Program School

If LEA does not consolidate federal funds and continues to track expenditures of those funds to particular activities, LEA would calculate comparability for its schoolwide program schools as it would for its targeted assistance schools

Miscellaneous

Schoolwide Pooling

- LEA may determine percentage that federal funds constitute of total funds available in schoolwide program school
- LEA would assume that same percentage of instructional staff in school was paid with federal funds and delete those staff from its comparability determinations

Miscellaneous

Skipping an Eligible School

When calculating whether Title I schools are comparable, LEA must treat otherwise eligible Title I school that is skipped as if it were Title I school when determining comparability

Miscellaneous

Skipping an Eligible School

LEA would exclude any supplemental state and local funds expended in school in its comparability calculations

Exclusion of Funds

LEA may exclude state and local funds for language instruction educational programs, excess state and local costs of providing services to children with disabilities, as determined by LEA

Exclusion of Funds

Supplemental state or local funds may be excluded in any school for programs that meet intent and purposes of Title I, Part A

Exclusions

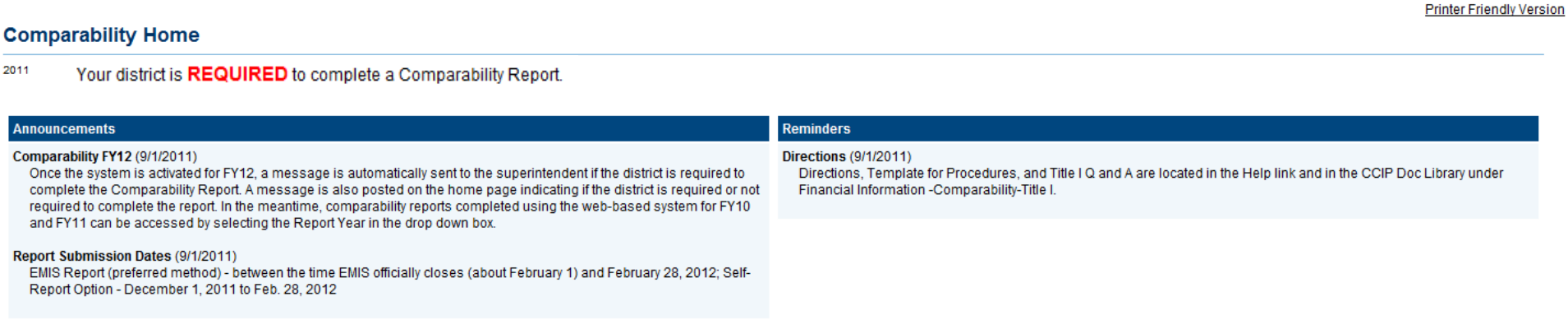
LEA need not include **unpredictable changes** in student enrollment or personnel assignments that occur after beginning of school year in determining comparability of services

Web-Based Demonstration

Appendix A – Screen Shots

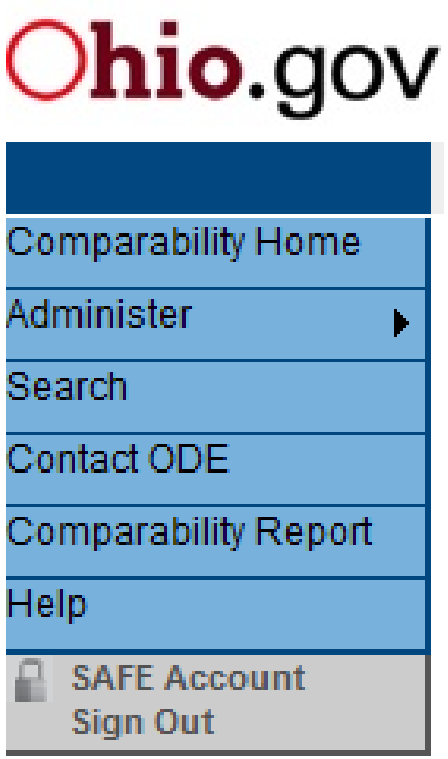
Appendix A – Screen Shots

Comparability Home



Appendix A – Screen Shots

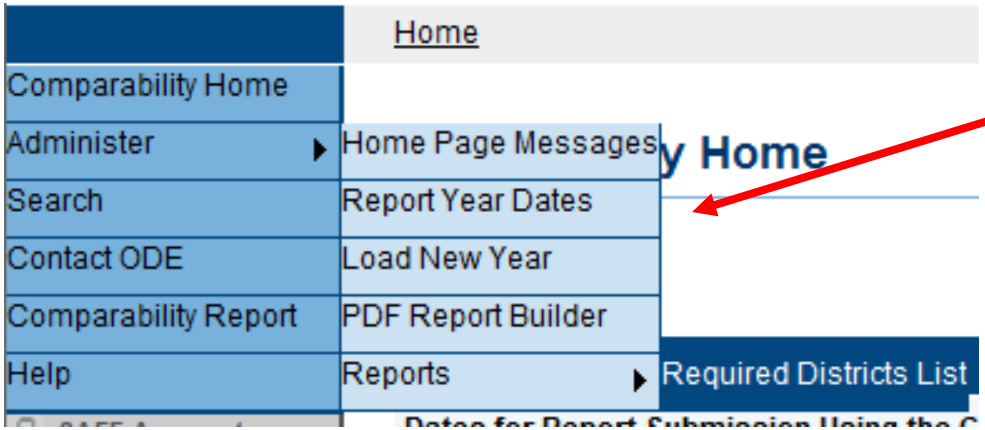
Internal Navigation



Users interface with left menu to navigate through system

Appendix A – Screen Shots

Administer Tools



Allows ODE to generate reports and control functions within system

Appendix A – Screen Shots

Contact ODE/Help

Contact ODE

Comparability - Contact ODE

2011

General Support or Technical Questions

If you have a question or issue with Comparability, please contact ODE at the following address:

Comparability@ode.state.oh.us

Help

Comparability Help

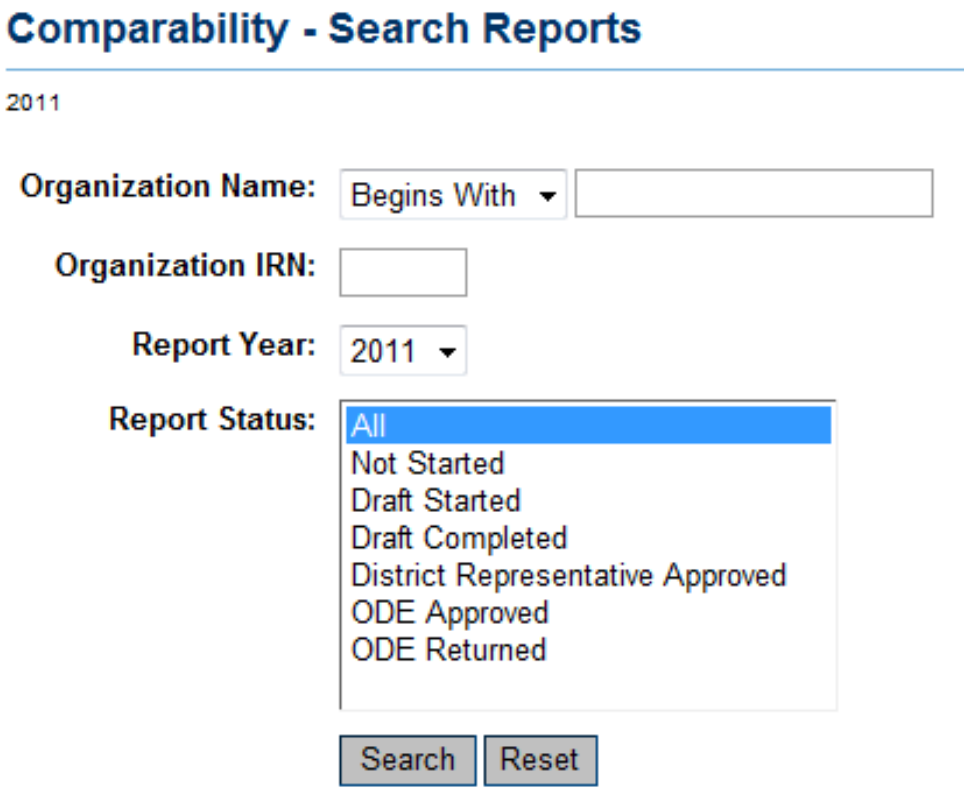
2011

Web-based Title I Comparability Application Directions for the current year can be found in the CCIP Doc Library under **Financial Information, Comparability-Title:**

1. Web-based Title I Comparability Application Directions for the current year
2. Title I Comparability Compliance Procedures (Word) Template
3. Title I Comparability Q&A

Appendix A – Screen Shots

Search



Allows ODE to search specific LEA or multiple LEAs in different fiscal years

Appendix A – Screen Shots

Comparability – District Report Section page

Comparability - District Report Section

Chillicothe City (043745) - 2011

- **Report Type**: The EMIS Data Report is the system default option.
- To initiate the Comparability process:
  - Change status from **Not Started** to **Draft Started**.
  - Click on the **Comparability Data Verification** link to verify the system-generated data from EMIS, OEDS and CCIP.

District:	**Chillicothe City**
Report Year:	2011
Report Status:	**Draft Started**
Change Status To:	Draft Completed

[Comparability Data Verification] [View History Log]

Appendix A – Screen Shots

EMIS Data Verification (part 1)

Comparability Data Verification

Chillicothe City (043745) - 2011

EMIS Data (Student/Instructional Staff Ratio method):

- Click on **Check Comparability** at the bottom of the page to test comparability. It is recommended that the data be periodically reviewed and comparability checked throughout the EMIS reporting period since EMIS Data keeps changing.
- After EMIS closes in February, click on **Comparability Data Verification** to verify the data. Next, click on **Check Comparability** to test comparability and review the report.
- Click the **SAVE** button on the report form page to generate a PDF Report.

Note: Refer to the Web-based directions in the Help section on using the system to report Comparability

REPORT STATUS: Draft Started
REPORT TYPE: EMIS Reported
CURRENT DATA VIEW:

Appendix A – Screen Shots

EMIS Data Verification (part 2)

EMIS DATA SELF-REPORTED DATA (Editable)

Page: 1 of 1 << >>

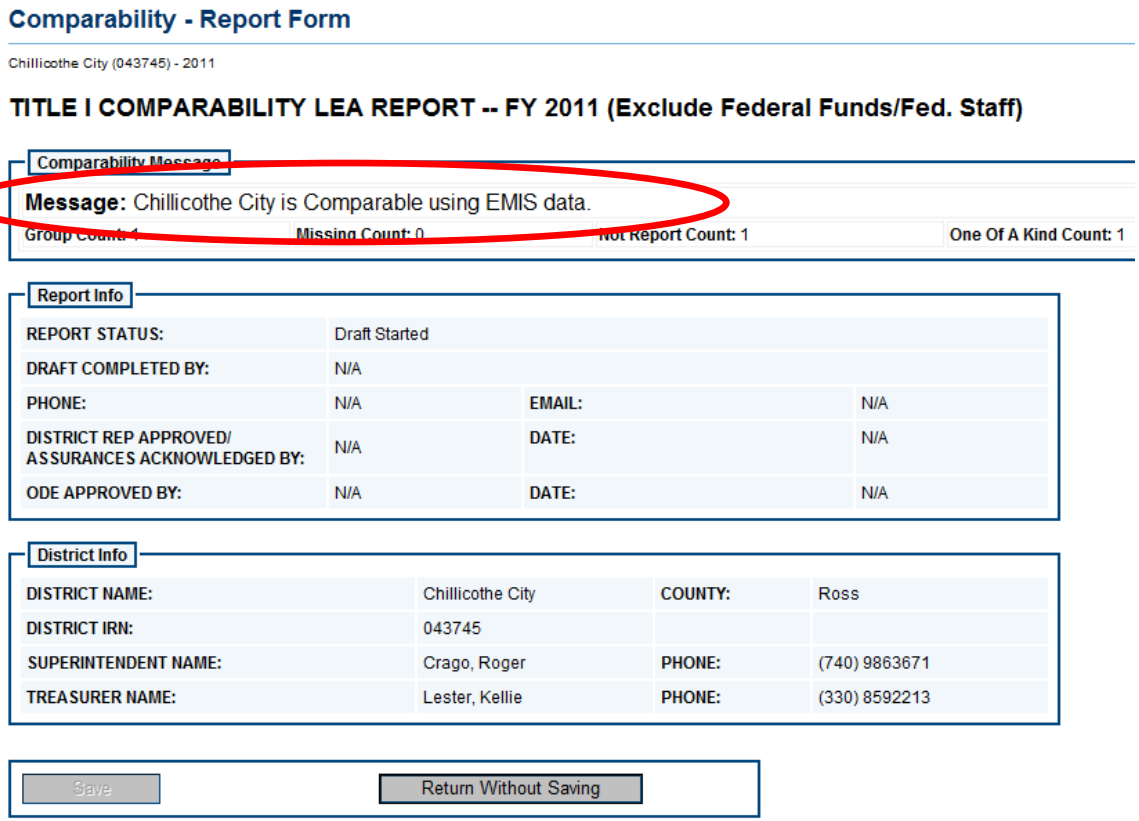
Building IRN	Building Name (6 Buildings)	Grade Span	Low Income % (CCIP)	Pupil Count	FTE Instructional Staff	Instr. Staff Base Salaries, Supplies & Curriculum Material Funds Allocated	Monies Budgeted For Base Instructional Staff Salaries	Title I Served
000398	Allen Elementary School	K-5	44.62	318.00	15.00	0.00	0.00	SERVED
025841	Mt Logan Elementary School	K-5	84.67	397.00	21.00	0.00	0.00	SERVED
037234	Tiffin Elementary School	K-5	80.79	280.00	14.50	0.00	0.00	SERVED
042267	Worthington Elementary School	K-5	59.44	336.00	18.00	0.00	0.00	SERVED
006296	Chillicothe High School	9-12	41.53	928.42	41.29	0.00	0.00	None
034736	Chillicothe Middle School	6-8	58.73	659.00	30.79	0.00	0.00	SERVED

Page: 1 of 1 << >>

Check Comparability Cancel Save

Appendix A – Screen Shots

Comparability – Report Form (part 1)



Comparability - Report Form

Chillicothe City (043745) - 2011

TITLE I COMPARABILITY LEA REPORT -- FY 2011 (Exclude Federal Funds/Fed. Staff)

Comparability Message

Message: Chillicothe City is Comparable using EMIS data.

Group Count: 1 | Missing Count: 0 | Not Report Count: 1 | One Of A Kind Count: 1

Report Info

REPORT STATUS:	Draft Started		
DRAFT COMPLETED BY:	N/A		
PHONE:	N/A	EMAIL:	N/A
DISTRICT REP APPROVED/ ASSURANCES ACKNOWLEDGED BY:	N/A	DATE:	N/A
ODE APPROVED BY:	N/A	DATE:	N/A

District Info

DISTRICT NAME:	Chillicothe City	COUNTY:	Ross
DISTRICT IRN:	043745		
SUPERINTENDENT NAME:	Crago, Roger	PHONE:	(740) 9863671
TREASURER NAME:	Lester, Kellie	PHONE:	(330) 8592213

Save | Return Without Saving

Appendix A – Screen Shots

Comparability – Report Form (part 2)

Comparability Report Groups [Expand All Groups] [Collapse All Groups]

K-5

Comparability Report Group: Grade Span K-5

FORM TYPE:	Form 5 (AllServed)						
CALCULATION METHOD:	PupilTeacherCountRatio						
GRADE SPAN:	☑ K-5		LARGER:	☐		COMPARISON/CONTROL:	☐
DISTRICT-WIDE:	☐		SMALLER:	☐			

IRN	BUILDING NAME	GRADE SPAN	PUPIL COUNT	FTE INSTRUCTIONAL STAFF	LOW INCOME %	SERVED?	PUPIL/ INSTRUCTIONAL STAFF RATIO
025841	Mt Logan Elementary School	K-5	397.00	21.00	84.67	☑	18.90
037234	Tiffin Elementary School	K-5	280.00	14.50	80.79	☑	19.31
042267	Worthington Elementary School	K-5	336.00	18.00	59.44	☑	18.67
000398	Allen Elementary School	K-5	318.00	15.00	44.62	☑	21.20
Total:			**1,331.00**	**68.50**			
Average:			**332.75**	**17.13**			**19.42**
						110%:	**21.36**
						90%:	**17.48**

Appendix A – Screen Shots

Comparability – Report Form (part 3)

Building Lists - No Comparisons Necessary

Missing Data

BLDG IRN:	BLDG NAME:	GRADE SPAN:	REASON:

Not Report

BLDG IRN:	BLDG NAME:	GRADE SPAN:	REASON:
006296	Chillicothe High School	9-12	All Buildings In Group Not Served

One-Of-A-Kind

BLDG IRN:	BLDG NAME:	GRADE SPAN:	REASON:
034736	Chillicothe Middle School	6-8	Single Building In Grade Span

Appendix A – Screen Shots

Comparability – Report Form (part 4)

Comparability Audit List

Starting Comparability Check with EMIS data for District Year 2011 at 2011-01-20 09:32:35.6739	
Checking Comparability by Grade Span with EMIS data...	
Checking for buildings with Missing Data...	
Checking for buildings below Minimum Pupil Count...	
Grouping buildings by Grade Span...	
GradeSpanGroup	K-5 group contains building 000398 Allen Elementary School (K-5)
GradeSpanGroup	K-5 group contains building 025841 Mt Logan Elementary School (K-5)
GradeSpanGroup	K-5 group contains building 037234 Tiffin Elementary School (K-5)
GradeSpanGroup	K-5 group contains building 042267 Worthington Elementary School (K-5)
GradeSpanGroup	9-12 group contains building 006296 Chillicothe High School (9-12)
GradeSpanGroup	6-8 group contains building 034736 Chillicothe Middle School (6-8)
Checking for Single Building 8+ Grade groups...	
Checking for all Single Building groups...	
Checking for all Not Served groups...	
All Buildings In Group Not Served Count: 0	
One-of-a-kind Count (1 Building Group): 0	
Checking comparability ratios for each pass 1 group	
Processing grade span group: K-5	
Checking Comparability for group K-5 using Form 5...	
Building group ratios using PupilTeacherCountRatio: average=19.42; 110%=21.36; 90%=17.48	
Is Group K-5 comparable?: TRUE	
Is District comparable by Grade Span with EMIS data?: True	
Ending Comparability Check with EMIS data for District Year 2011 at 2011-01-20 09:32:35.7051	

Provides detailed report showing steps system used to demonstrate comparability

Appendix A – Screen Shots

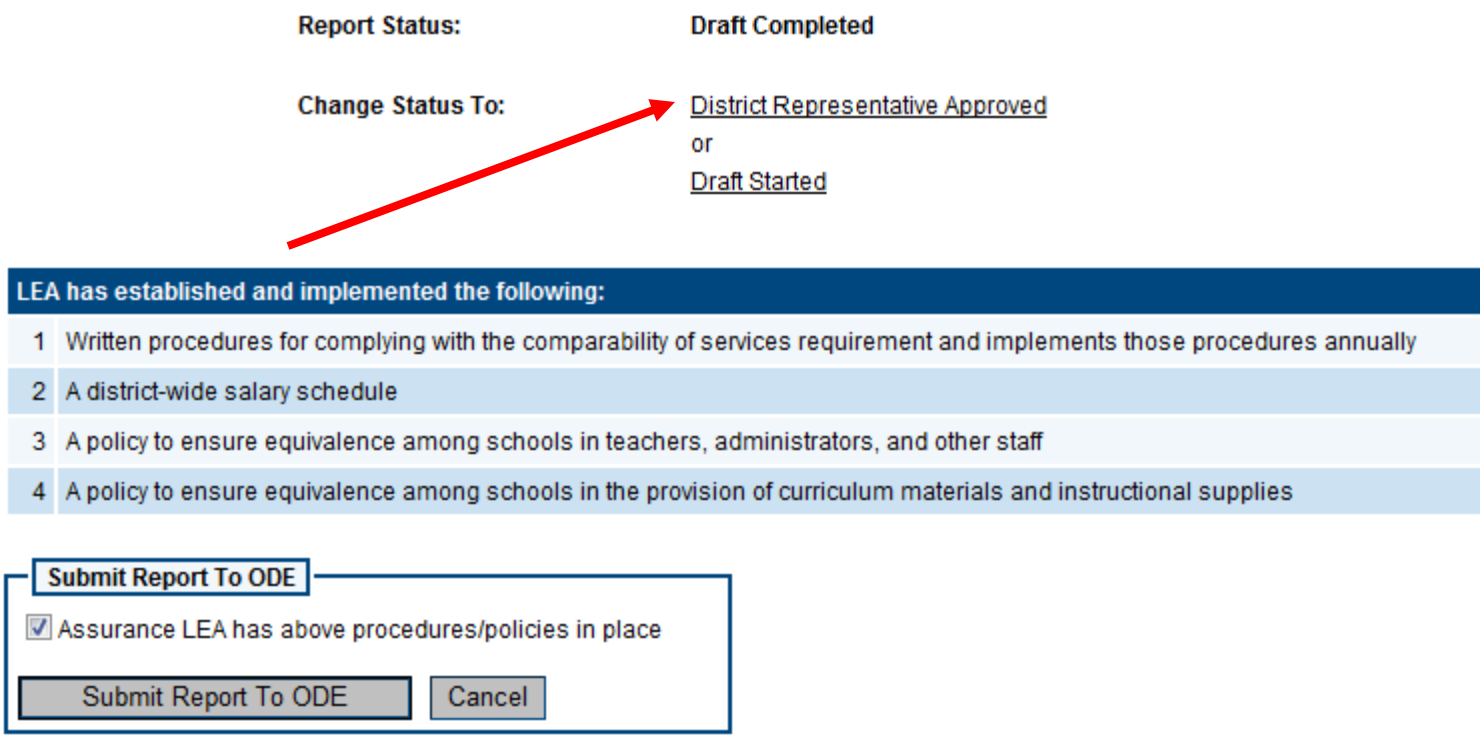
Comparability PDF Reports

[Comparability Data Verification] [View History Log]

PDF Report Links:	Last Modified Date:
Comparability Data	12/29/2010
History Log Update	1/11/2011
Comparability Report	1/11/2011

Appendix A – Screen Shots

District Representative Approved Process



Appendix A – Screen Shots

Self-Report Data

Self-Report Data:

- Check the **pre-populated data** from OEDS (**Building IRN**, **Building Name**, and **Grade Span** columns) and CCIP (**Low Income Pct.** and **Title I Service** columns)
- Select **one** of the following **Methods** to report comparability:
  - **Student/Instructional Staff Ratio**
    - Enter **current** school year pupil enrollment in the **Pupil Count** column
    - Enter **current** school year instructional staff full time equivalency as defined within the LEA written procedures in the **FTE Instructional Staff** column
    - It is **recommended** that all figures used (enrollment and instructional staff FTE) reflect the EMIS October reporting period (October Count Week); otherwise, the figures should be consistent with regard to what day of the year the data collected reflects.
  - **Expenditures Per Pupil**
    - Enter **current** school year pupil enrollment in the **Pupil Count** column
    - Enter **current** school year instructional staff base salaries AND state and local funds allocated for instructional supplies and curriculum materials in the **Instr. Staff Base Salaries, Supplies & Curr. Material Funds Allocated** column
  - **Student/Instructional Staff Salary Ratio**
    - Enter **current** school year pupil enrollment in the **Pupil Count** column
    - Enter **current** school year state and local funds allocated for instructional staff salaries using base salary, not salary differential, for each instructional staff position in the **Monies Budgeted For Base Instructional Staff Salaries** column
- **Exclude** Federal funds
- **Exclude** preschool staff and preschool students
- Click on **Check Comparability** at the bottom of the page to test comparability and review the report
- Click the **SAVE** button on the report form page to generate a PDF Report

Note: Refer to the Web-based directions in the Help section on using the system to report Comparability

Appendix A – Screen Shots

Self-Reported Data

REPORT STATUS: District Representative Approved
REPORT TYPE: Self Reported
CURRENT DATA VIEW:

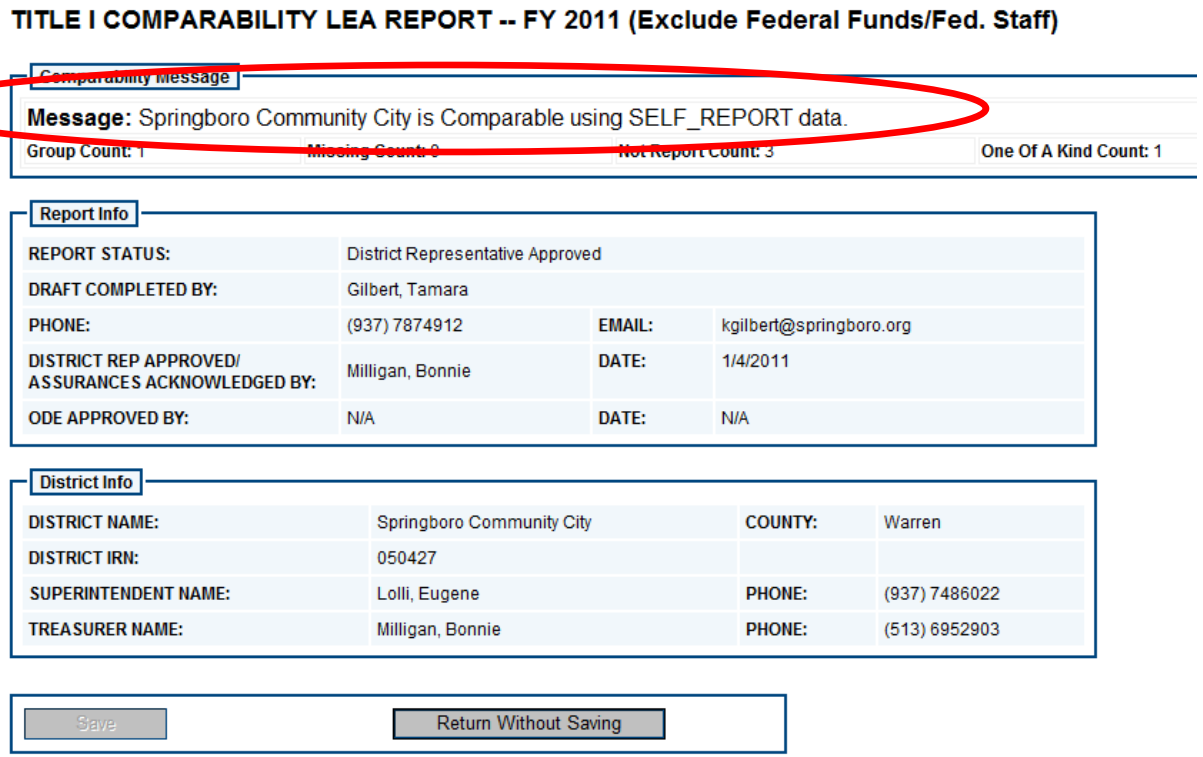
EMIS DATA SELF-REPORTED DATA (Editable)

Page: 1 of 1

Building IRN	Building Name (8 Buildings)	Grade Span	Low Income % (CCIP)	Pupil Count	FTE Instructional Staff	Instr. Staff Base Salaries, Supplies & Curriculum Material Funds Allocated	Monies Budgeted For Base Instructional Staff Salaries	Title I Served
008290	Dennis Elementary East	1-5	10.15	599.00	31.70	0.00	0.00	SERVED
008291	Dennis Elementary West	1-5	9.83	585.00	32.90	0.00	0.00	SERVED
008293	Five Points Elementary East	1-5	4.70	606.00	31.00	0.00	0.00	None
008294	Five Points Elementary West	1-5	5.41	609.00	33.00	0.00	0.00	None
006593	Springboro High School	9-12	5.91	1570.00	75.40	0.00	0.00	None
065417	Springboro Junior High School	7-8	7.12	885.00	50.42	0.00	0.00	SERVED
006577	Clearcreek Elementary School	K	3.27	477.00	9.00	0.00	0.00	None
138602	Springboro Intermediate School	6	4.82	426.00	22.20	0.00	0.00	None

Appendix A – Screen Shots

Comparability – Report Form (part 1)



TITLE I COMPARABILITY LEA REPORT -- FY 2011 (Exclude Federal Funds/Fed. Staff)

Comparability Message

Message: Springboro Community City is Comparable using SELF_REPORT data.

Group Count: 1 | Missing Count: 0 | Not Report Count: 3 | One Of A Kind Count: 1

Report Info

REPORT STATUS:	District Representative Approved		
DRAFT COMPLETED BY:	Gilbert, Tamara		
PHONE:	(937) 7874912	EMAIL:	kgilbert@springboro.org
DISTRICT REP APPROVED/ ASSURANCES ACKNOWLEDGED BY:	Milligan, Bonnie	DATE:	1/4/2011
ODE APPROVED BY:	N/A	DATE:	N/A

District Info

DISTRICT NAME:	Springboro Community City	COUNTY:	Warren
DISTRICT IRN:	050427		
SUPERINTENDENT NAME:	Lolli, Eugene	PHONE:	(937) 7486022
TREASURER NAME:	Milligan, Bonnie	PHONE:	(513) 6952903

Save | Return Without Saving

Appendix A – Screen Shots

Comparability – Report Form (part 2)

Comparability Report Groups [Expand All Groups] [Collapse All Groups]

1-5

Comparability Report Group: Grade Span 1-5

FORM TYPE:	Form 1 (Mixed)						
CALCULATION METHOD:	PupilTeacherCountRatio						
GRADE SPAN:	☑ 1-5		LARGER:	☐		COMPARISON/CONTROL:	☑
DISTRICT-WIDE:	☐		SMALLER:	☐			

COMPARISON/ CONTROL	IRN	BUILDING NAME	GRADE SPAN	PUPIL COUNT	FTE INSTRUCTIONAL STAFF	LOW INCOME %	SERVED?	PUPIL/ INSTRUCTIONAL STAFF RATIO
COMPARISON	008290	Dennis Elementary East	1-5	599.00	31.70	10.15	☑	18.90
COMPARISON	008291	Dennis Elementary West	1-5	585.00	32.90	9.83	☑	17.78
CONTROL	008294	Five Points Elementary West	1-5	609.00	33.00	5.41	☐	18.45
CONTROL	008293	Five Points Elementary East	1-5	606.00	31.00	4.70	☐	19.55
Control Total:				**1,215.00**	**64.00**			
Control Average:				**607.50**	**32.00**			**18.98**
							110%:	**20.88**

Appendix A – Screen Shots

Comparability – Report Form (part 3)

Building Lists - No Comparisons Necessary

Missing Data

BLDG IRN:	BLDG NAME:	GRADE SPAN:	REASON:

Not Report

BLDG IRN:	BLDG NAME:	GRADE SPAN:	REASON:
006593	Springboro High School	9-12	All Buildings In Group Not Served
006577	Clearcreek Elementary School	K	All Buildings In Group Not Served
138602	Springboro Intermediate School	6	All Buildings In Group Not Served

One-Of-A-Kind

BLDG IRN:	BLDG NAME:	GRADE SPAN:	REASON:
065417	Springboro Junior High School	7-8	Single Building In Grade Span

Appendix A – Screen Shots

Comparability – Report Form (part 4)

Comparability Audit List

Starting Comparability Check with Self-Report data for District Year 2011 at 2011-01-18 04:08:10.1016	
Checking Comparability by Grade Span with Self-Reported data...	
Checking for buildings with Missing Data...	
Checking for buildings below Minimum Pupil Count...	
Grouping buildings by Grade Span...	
GradeSpanGroup	1-5 group contains building 008290 Dennis Elementary East (1-5)
GradeSpanGroup	1-5 group contains building 008291 Dennis Elementary West (1-5)
GradeSpanGroup	1-5 group contains building 008293 Five Points Elementary East (1-5)
GradeSpanGroup	1-5 group contains building 008294 Five Points Elementary West (1-5)
GradeSpanGroup	9-12 group contains building 006593 Springboro High School (9-12)
GradeSpanGroup	7-8 group contains building 065417 Springboro Junior High School (7-8)
GradeSpanGroup	K group contains building 006577 Clearcreek Elementary School (K)
GradeSpanGroup	6 group contains building 138602 Springboro Intermediate School (6)
Checking for Single Building 8+ Grade groups...	
Checking for all Single Building groups...	
Checking for all Not Served groups...	
All Buildings In Group Not Served Count: 0	
Checking Comparability Using Form 1...	
Group 1-5 is Mixed	
Max control building count: 1	
Control group ratios using PupilTeacherCountRatio: average=18.98; 110%=20.88; 90%=17.08	
Is Group 1-5 comparable?: TRUE	
Is District comparable by Grade Span with Self-Report data?: True	
Ending Comparability Check with Self-Report data for District Year 2011 at 2011-01-18 04:08:10.1329	

Appendix A – Screen Shots

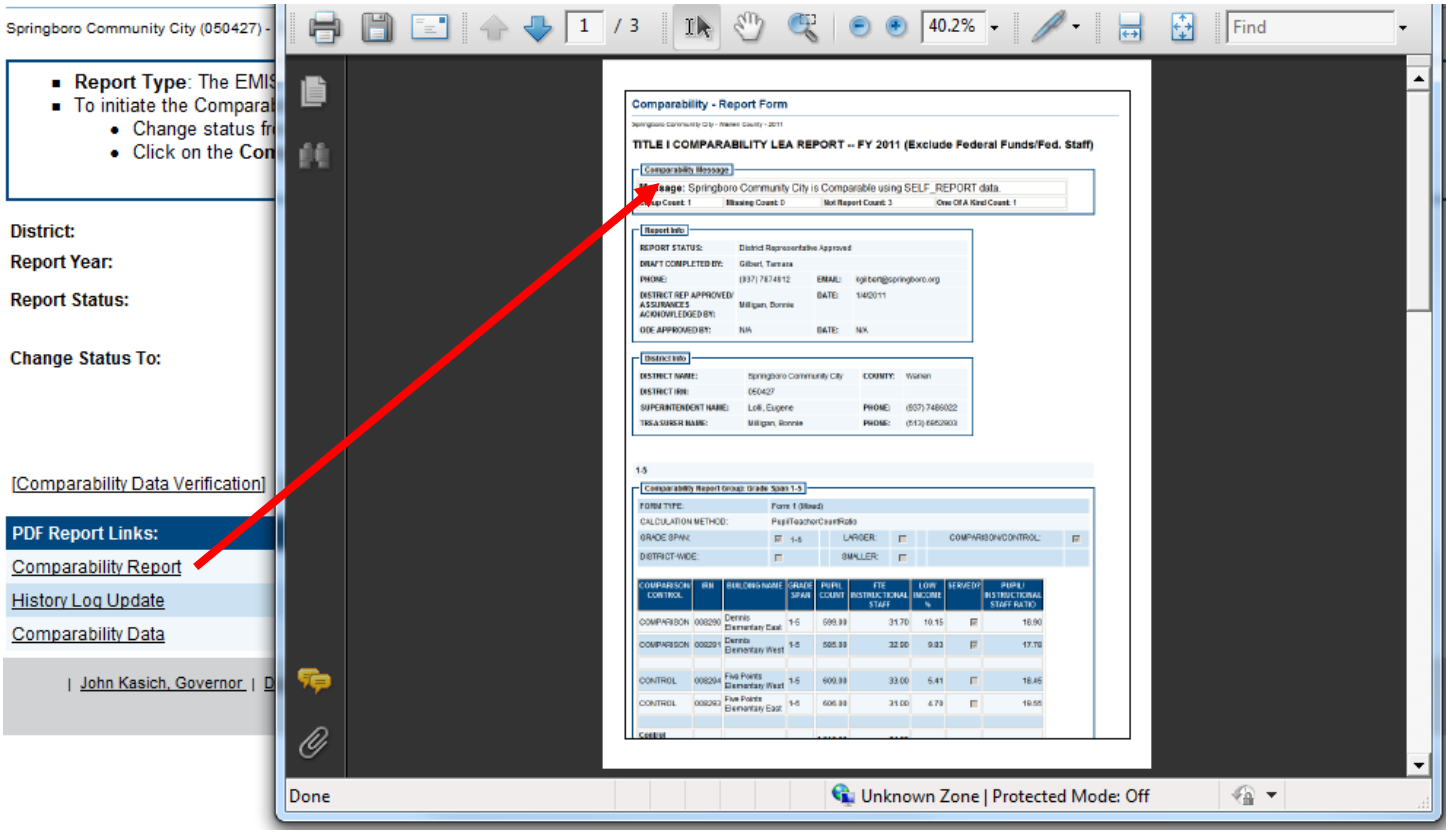
Comparability PDF Reports

[Comparability Data Verification] [View History Log]

PDF Report Links:	Last Modified Date:
Comparability Data	12/29/2010
History Log Update	1/11/2011
Comparability Report	1/11/2011

Appendix A – Screen Shots

Comparability Report PDF



Ohio Department of Education

Supplement Not Supplant

LEA must use Part A funds to supplement, not supplant regular non-federal funds

– NCLB 1120A (b)

Supplement Not Supplant

In general, requirement intended to ensure that services provided with federal funds are in addition to, and do not replace or supplant, services that students would otherwise receive

Presumptions of Supplanting
Required by Law

Presumed that supplanting has occurred if:

LEA uses federal funds to provide services that LEA is required to make available under federal, state or local law

Presumptions of Supplanting
Prior Year

Presumed that supplanting has occurred if:

LEA used Title I funds to provide services that LEA provided with non-federal funds in prior years

Presumptions of Supplanting

Same Services to Non-Title I Students or in Non-Title I Schools

Presumed that supplanting has occurred if:

LEA used Title I funds to provide services for children participating in Title I program that LEA provided with non-federal funds to children not participating in Title I

Rebutting a Supplanting Determination

Presumptions are refutable if:

District can demonstrate that it would not have been able to provide services in question with non-federal funds had federal funds not been available

Rebutting a Supplanting Determination

LEA must be able to:

- Demonstrate loss of state and local funds from prior year
- Show increase in standard operating costs
- Demonstrate that state/local funds have not been redirected to new activity

Rebutting a Supplanting Determination

LEA must be able to:

- Document that board of education was on record to eliminate activity unless new source of funds was made available (in absence of state and local funds)
- Document that activities are consistent with purposes of federal program

Exclusion from Comparability and Supplement, Not Supplant

LEA may exclude supplemental state and local funds expended in any school attendance area or school from both supplement, not supplant and comparability determinations, if expenditures are for programs that meet intent and purposes of Title I, Part A

– 1120A(d) of *ESEA* 34 *CFR* 200.79

Supplement Not Supplant Considerations

- Supplant is very fact specific
- Objective to increase awareness
- Contact your federal program consultant regarding fact-specific situations


Questions?