Title I Comparability-2012

ESEA, SEC. 1120A, Fiscal Requirements



Center for Accountability and Continuous Improvement

Office of Federal Programs

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Ohio Department of Education

Title I Fiscal Requirements



Maintenance of Effort (MOE)

Comparability of Services

Supplement, Not Supplant

Title I Fiscal Requirements



Prevent local school districts from using federal dollars to replace state and local education funding.

Maintenance of Effort General Requirement

LEA may receive funds under covered program for any fiscal year if SEA finds that either the combined fiscal effort per student or the aggregate expenditures of the LEA's 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.

Supplement Not Supplant

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

– ESEA 1120A (b)

Comparability Overview and Web-Based System



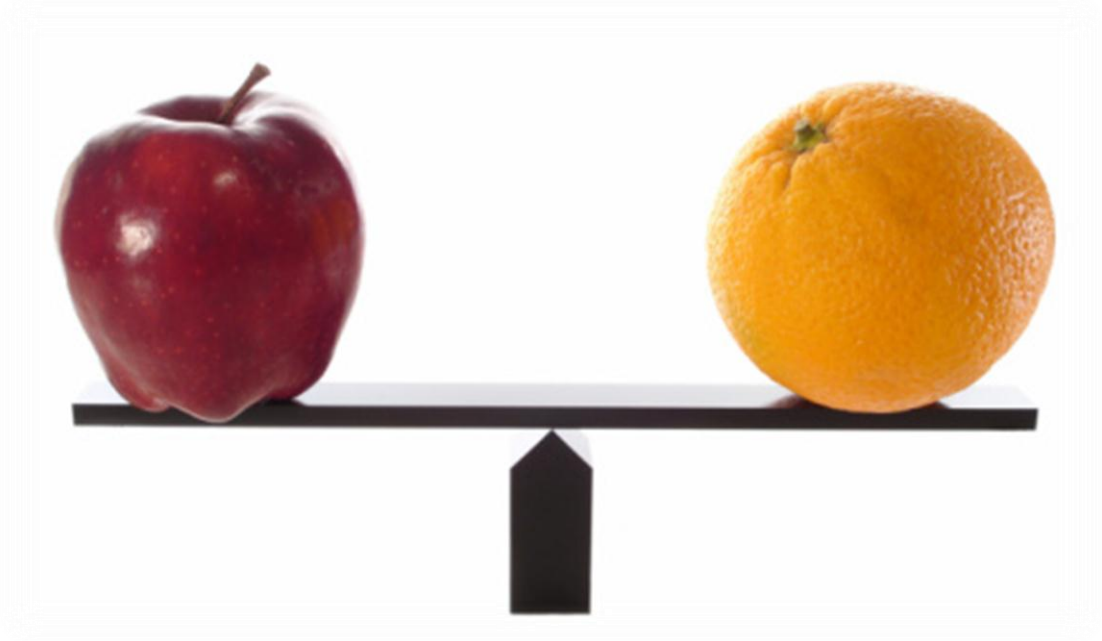
ESEA, Section 1120A(c) and (d)

34 CFR 200.79

Title I Fiscal Non-Regulatory Guidance, U.S. Dep't. of Ed., Rev., Feb. 2008

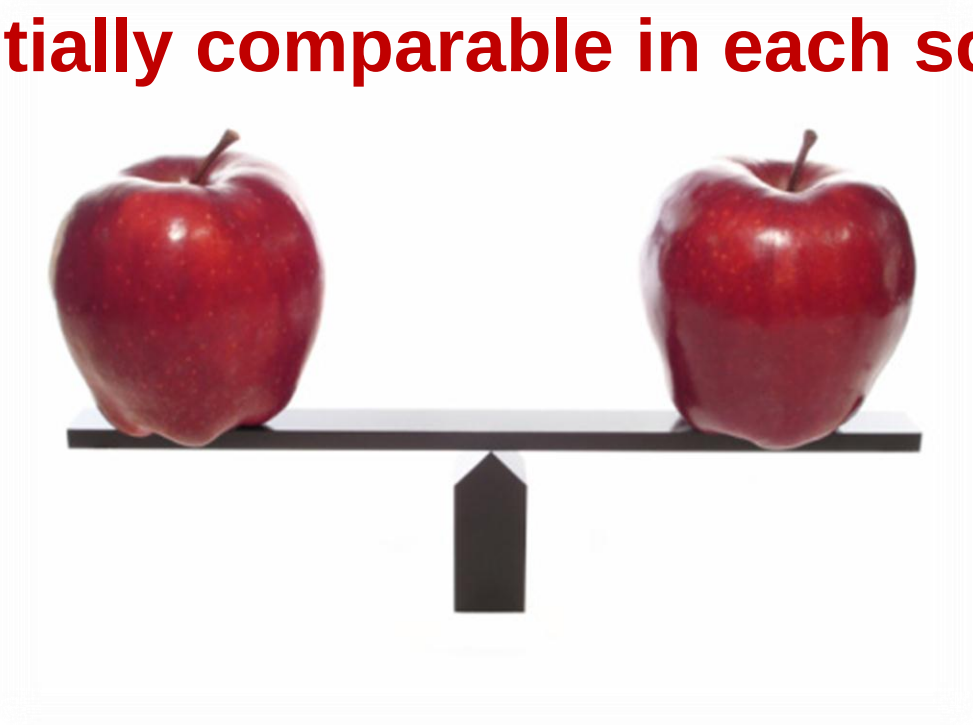
General Requirements

An LEA may receive **Title I, Part A** funds only if it uses State and local funds to provide services in Title I schools that, taken as a whole, are at least **comparable to the services provided in non-Title I schools.**



General Requirements

If all schools in an LEA are **Title I schools**, an LEA must use State and local funds to provide services that, taken as a whole, are **substantially comparable in each school.**



General Requirements

Because Title I allocations are made annually, comparability is an **ANNUAL** requirement.



Comparability

Prerequisite for receiving funds

Fairness, equitable services

Looks at state and local resources-not federal or private resources

Excludes pre-school staff and enrollment

Comparability

Determined based on current school year data

Compares each Title I school to the average of non-Title I schools

Compares to each other if all schools are Title I, or, …

Comparability

Compares the average of the lowest low-income Title I schools, beginning with the lowest low-income pct., next lowest, etc., up to half of the group), to each of the higher poverty Title I schools.



General Considerations



Early determination of comparability **allows LEA to make adjustments** with least amount of disruption.

General Considerations

Excel forms can be used to test comparability early (located in CCIP Doc Library under Financial).



Comparability Flexibility

Acceptable Methods for determining comparability:

- **Student-instructional staff ratios-** (most common, EMIS or Self Report)
- **Expenditures per pupil** (next most common, Self Report only)
- **Instructional staff salaries ratios** (Self Report only)

Comparability Flexibility

Variance Options

Group includes both Title I Served and Not Served Schools

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

All Title I Served Schools in the Group

- **10 Percent Tolerance Variance** (90 or 110 percent, depending on method used)
- **Within Range Variance** (each school falls within a range that is between 90 & 110 percent of the group ave., regardless of method used)

Comparability Flexibility

Variance Options

110 Percent (Served & Non-Served)

Student/instructional staff ratios: Each Title I school is comparable if its ave. does not exceed 110% of the ave. of non-Title I schools.

90 Percent (Served & Non-Served)

Student/Instructional staff salary ratios: Each Title I school is comparable if its ave. is at least 90% of the ave. of the non-Title I schools.

Expenditures per pupil: Each Title I school is comparable if its ave. is at least 90% of the ave. of the non-Title I schools.

Comparability Flexibility

Variance Options

110 Percent (All Served)

Student/instructional staff ratios: Each Title I school is comparable if its ave. does not exceed 110% of the ave. of the lowest low income school(s), up to half of the group

90 Percent (All Served)

Student/Instructional staff salary ratios: Each Title I school is comparable if its ave. is at least 90% of the ave. of the lowest low income school(s), up to half of the group

Expenditures per pupil: Each Title I school is comparable if its ave. is at least 90% of the ave. of the lowest low income school(s), up to half of the group

Comparability Flexibility

Type Comparison groups:

Grade span group (most common) **or** District-wide as a whole (less common)

May divide schools within a grade span or within the LEA as a whole by size – e.g., compare **large** schools with large schools and **small** schools with small schools (requires one school to be at least twice as large as another in the group)

Comparability Flexibility

One-of-a-kind school – no comparison necessary

May exclude schools with 100 or fewer students.

Eight or more grades above kindergarten may be grouped separately, for example, K-8, K-9 or 5-12.

Comparability Flexibility

Do not need to demonstrate comparability if the LEA only has one building for each grade span, e.g., K-5, 6-8, 9-12.

Grade-span overlap rule: If grade spans overlap by at least **two** grade levels, the comparability requirement applies unless there are **three** or more grade levels outside of the overlap, either above or below, but not combined.

Grade Span Overlap Illustration

↓ LEA 1	↓ LEA 2	↓ LEA 3	↓ LEA 4
K-1 SW	K-4 TA	K-4 NONE	K-4 SW
1-3 SW	2-4 TA	K-4 SW	K-5 SW
3-4 SW	K-2 TA	K-4 SW	5-8 SW
5-8 NONE	5 NONE	3-8 TA	6-8 NONE
	6-8 NONE		
No 2 grade level overlap	2 or more grade levels overlap	**2 or more grades overlap & 3 or more outside**	2 or more grades overlap & 3 or more outside
All one-of-a-kind, No comparison necessary	Grade Span Group: K-4, 2-4, K-2	**3-8 one-of-a-kind; Compare K-4 schools**	2 groups: • K-4 & K-5 • 5-8 & 6-8

SW=Title I Schoolwide; TA=Title I Targeted; NONE=Non-Served

Documenting Compliance



Develop & implement **written procedures** for compliance annually

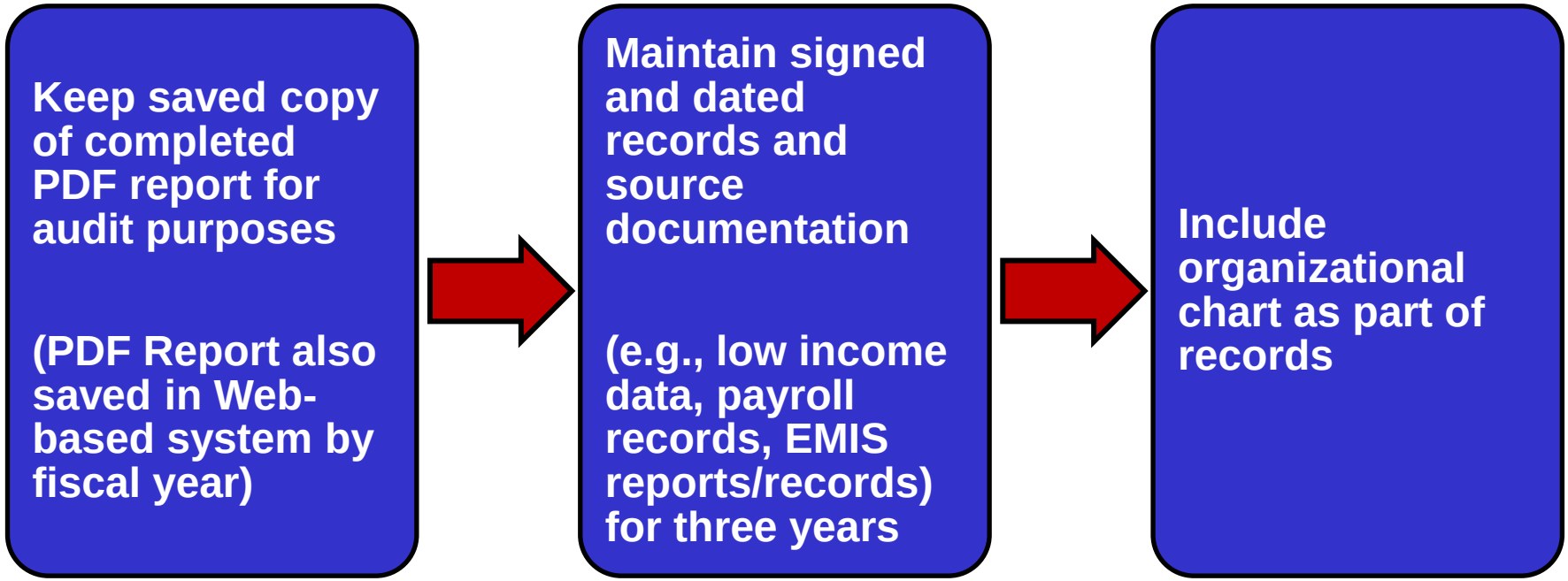
Written Procedures (continued)



Identify the measure and process used to determine whether schools are comparable.

Determine how and when the LEA makes adjustments in schools that are not comparable.

Documenting Compliance



Written Assurance

LEA written assurance filed with SEA of establishing and implementing:

- a district-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 provision of curriculum materials and instructional supplies

A simple written assurance alone is not sufficient to demonstrate comparability.

Comparability Web-Based System 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

Exhibit A: K-5 Grade Span (served and non-served schools)

FORM 1-TITLE I COMPARABILITY LEA REPORT -- (Exclude Federal Funds/Federally Funded Staff)

	DISTRICT NAME ---------->				DATE ----->		Comparison Group:	Enter (X)	
	DISTRICT IRN# ---------->				COUNTY->		Grade Span ---------->	X	
	PERSON Completing Form ---->				PHONE --->		District-wide ---------->		
	NAME OF TREASURER ------>				PHONE --->		Optional: Larger -------->		
	CONTACT Email Address ---->						Optional: Smaller ------->		
	Names of Served Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Pct. or Number of Low Income Students (Match CCIP Bldg. Eligibility Page) Pct. (%)	No. (#)	Grade Span- (Match CCIP)	Total Number of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	State & Local Funds Allocated for Instr. Staff Salaries, Curr. Materials & Instr. Supplies-Current SY	DIVIDE Col. D by E *Method A: (Student/Instr. Staff Ratio)	DIVIDE Col. F by D *Method B: (Per Pupil Expenditure)	"NC" If Not Comparable
	(A)	(B1)	(B2)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
1.	School A	27.50%		K-5	540.00	22.00		24.55		(G)NC
2.	School B	26.50%		K-5	530.00	22.00		24.09		
3.	School C	24.20%		K-5	450.00	19.00		23.68		
4.										
5.										
6.										
7.										
8.										
9.										
10.										
11.										
12.										
13.										
14.										
15.										
	COMPARISON of 2 SCHOOLS							(G16)	(H16)	
16.	AVERAGE -->	7.00%			387.50	17.50		22.14		Non-Served
								(G17)		
17.							110% OF G16 -->	24.35		
18.							90% OF H16 --->		(H18)	
	ONE-OF-A-KIND-NO COMPARISON NECESSARY									
	Middle School	20		6-8	800					
	High School	19		9-12	950					

*Method A or B must be applied consistently within each grade span report.

Col. B1: Highest LI Pct. to Lowest

Columns A, B, and C data matches the FY12 CCIP Title I Building Eligibility Application page. Columns D, E, and F includes current SY data.

One-of-a-kind

Tolerance

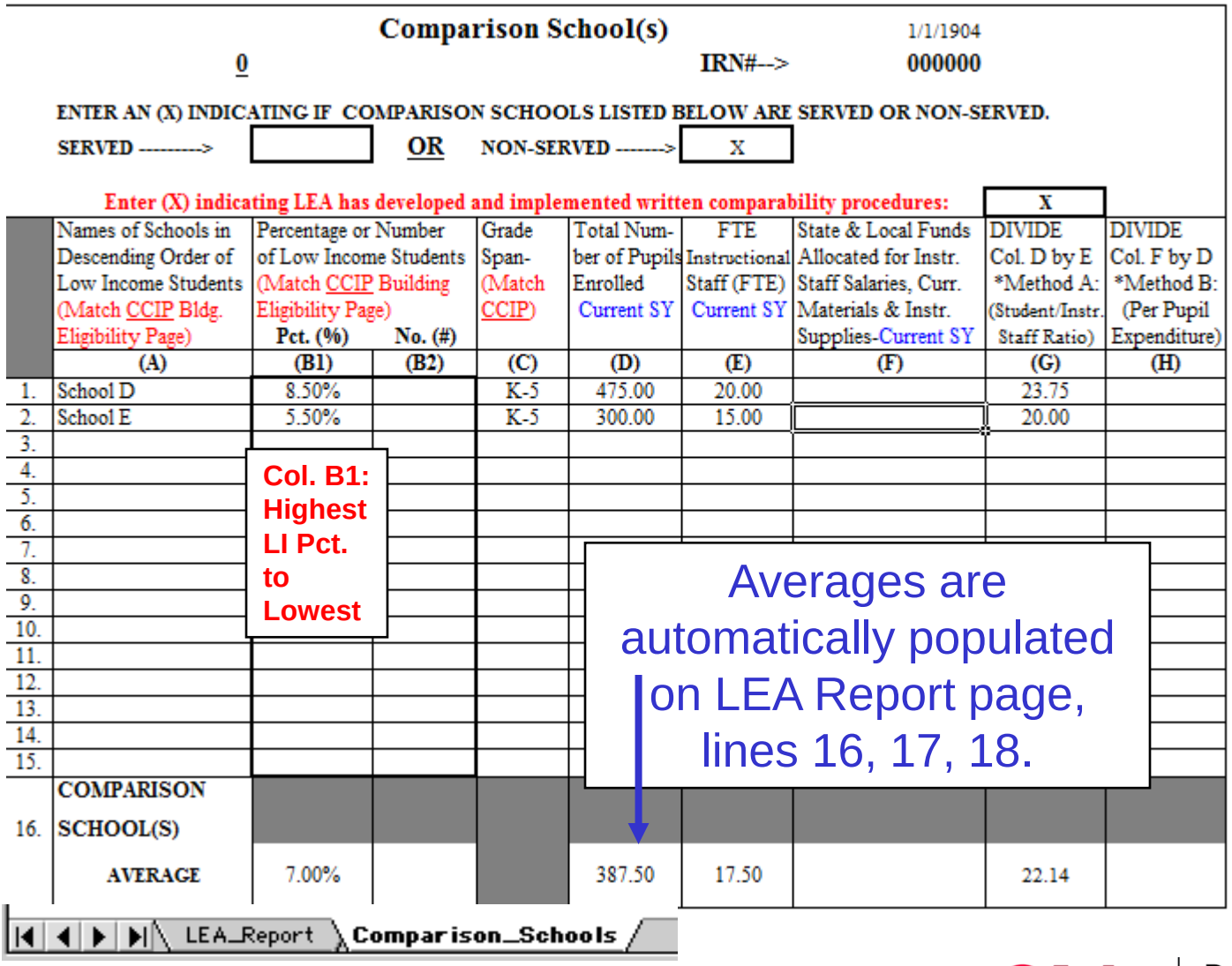
Tabs

LEA_Report | Comparison_Schools

Student/Instr. Staff Ratio. Each bldg. must be equal to or less than G17.

Per Pupil Exp. Each bldg. must be equal to or greater than H18.

Exhibit A: K-5 Grade Span (served and non-served schools)



Comparison School(s) 1/1/1904

0 IRN#--> 000000

ENTER AN (X) INDICATING IF COMPARISON SCHOOLS LISTED BELOW ARE SERVED OR NON-SERVED.

SERVED ---------> [ ] OR NON-SERVED -------> [X]

Enter (X) indicating LEA has developed and implemented written comparability procedures: [X]

	Names of Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Percentage or Number of Low Income Students (Match CCIP Building Eligibility Page) Pct. (%)	No. (#)	Grade Span- (Match CCIP)	Total Number of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	State & Local Funds Allocated for Instr. Staff Salaries, Curr. Materials & Instr. Supplies-Current SY	DIVIDE Col. D by E *Method A: (Student/Instr. Staff Ratio)	DIVIDE Col. F by D *Method B: (Per Pupil Expenditure)
	(A)	(B1)	(B2)	(C)	(D)	(E)	(F)	(G)	(H)
1.	School D	8.50%		K-5	475.00	20.00		23.75	
2.	School E	5.50%		K-5	300.00	15.00		20.00	
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									
11.									
12.									
13.									
14.									
15.									
16.	COMPARISON SCHOOL(S) AVERAGE	7.00%			387.50	17.50		22.14	

Col. B1: Highest LI Pct. to Lowest

Averages are automatically populated on LEA Report page, lines 16, 17, 18.

LEA_Report | Comparison_Schools

Exhibit B: Form 1 – All Title I Served Schools

FORM 1-TITLE I COMPARABILITY LEA REPORT -- (Exclude Federal Funds/Federally Funded Staff)

	DISTRICT NAME ---------->				DATE ----->		Comparison Group:		Enter (X)
	DISTRICT IRN# ---------->				COUNTY->		Grade Span ---------->		X
	PERSON Completing Form ---->				PHONE --->		District-wide ---------->		
	NAME OF TREASURER ------>				PHONE --->		Optional: Larger -------->		
	CONTACT Email Address ---->						Optional: Smaller -------->		
	Names of Served Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Pct. or Number of Low Income Students (Match CCIP Bldg. Eligibility Page) Pct. (%)	No. (#)	Grade Span- (Match CCIP)	Total Num-ber of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	State & Local Funds Allocated for Instr. Staff Salaries, Curr. Materials & Instr. Supplies-Current SY	DIVIDE Col. D by E *Method A: (Student/Instr. Staff Ratio)	DIVIDE Col. F by D *Method B: (Per Pupil Expenditure)	"NC" If Not Comparable
	(A)	(B1)	(B2)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
1.	School A	52.00%		K-5	540.00	22.00		24.55		(G)NC
2.	School B	48.00%		K-5	530.00	22.00		24.09		(G)NC
3.	School C	43.00%		K-5	450.00	19.00		23.68		(G)NC
4.	School D	35.00%		K-5	475.00	20.00		23.75		(G)NC
5.										
6.										
7.										
8.										
9.										
10.										
11.										
12.										
13.										
14.										
15.										
	COMPARISON of 1 SCHOOL							(G16)	(H16)	
16.	AVERAGE -->	15.00%			420.00	20.00		21.00		Served
								(G17)		
17.							110% OF G16 -->	23.10		
									(H18)	
18.							90% OF H16 --->			

There are 5 Title I served schools in the K-5 Grade Span. In this instance, the lowest low income school, School E, is compared to the higher low income schools. Schools A-D are not comparable. Why?

ONE-OF-A-KIND-NO COMPARISON NECESSARY				
Middle School	20		6-8	800
High School	19		9-12	950

*Method A or B must be applied consistently within each grade span report. Method A is preferred. If Method B isused, the district must be prepared to verify expenditures in the event of an audit at the end of the fisca

Reporting School Year: Date:

LEA_Report | Comparison_Schools

Ohio Department of Education

Exhibit B: Form 1 – All Title I Served Schools

ENTER AN (X) INDICATING IF COMPARISON SCHOOLS LISTED BELOW ARE SERVED OR NON-SERVED.

SERVED ---------> X **OR** NON-SERVED ------->

Enter (X) indicating LEA has developed and implemented written comparability procedures: X

	Names of Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Percentage or Number of Low Income Students (Match CCIP Building Eligibility Page) Pct. (%)	No. (#)	Grade Span- (Match CCIP)	Total Number of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	State & Local Funds Allocated for Instr. Staff Salaries, Curr. Materials & Instr. Supplies-Current SY	DIVIDE Col. D by E *Method A: (Student/Instr. Staff Ratio)	DIVIDE Col. F by D *Method B: (Per Pupil Expenditure)
	(A)	(B1)	(B2)	(C)	(D)	(E)	(F)	(G)	(H)
1.	School E	15.00%		K-5	420.00	20.00		21.00	
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									
11.									
12.									
13.									
14.									
15.									
16.	**COMPARISON SCHOOL(S)**								
	AVERAGE	15.00%			420.00	20.00		21.00	

LEA_Report | Comparison_Schools

Ohio Department of Education

Exhibit C: Form 1 – All Title I Served Schools

FORM 1-TITLE I COMPARABILITY LEA REPORT -- (Exclude Federal Funds/Federally Funded Staff)

	DISTRICT NAME ---------->				DATE ----->		Comparison Group:		Enter (X)
	DISTRICT IRN# ---------->				COUNTY->		Grade Span ---------->		X
	PERSON Completing Form ---->				PHONE --->		District-wide ---------->		
	NAME OF TREASURER ------>				PHONE --->		Optional: Larger -------->		
	CONTACT Email Address ---->						Optional: Smaller -------->		

	Names of Served Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Pct. or Number of Low Income Students (Match CCIP Bldg. Eligibility Page) Pct. (%)	No. (#)	Grade Span- (Match CCIP)	Total Number of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	State & Local Funds Allocated for Instr. Staff Salaries, Curr. Materials & Instr. Supplies-Current SY	DIVIDE Col. D by E *Method A: (Student/Instr. Staff Ratio)	DIVIDE Col. F by D *Method B: (Per Pupil Expenditure)	"NC" If Not Comparable
	(A)	(B1)	(B2)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
1.	School A	52.00%		K-5	540.00	22.00		24.55		
2.	School B	48.00%		K-5	530.00	22.00		24.09		
3.	School C	43.00%		K-5	450.00	19.00		23.68		
4.										
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9.										
10.										
11.										
12.										
13.										
14.										
15.										
	COMPARISON of 2 SCHOOLS							(G16)	(H16)	
16.	AVERAGE -->	25.00%			447.50	20.00		22.38		Served
								(G17)		
17.							110% OF G16 -->	24.62		
18.							90% OF H16 --->		(H18)	

These are the same 5 Title I served schools shown in Exhibit B. School D has been removed from this page and placed on the comparison school page with School E since up to half of the group, beginning with the lowest low income school, can be grouped together for comparison purposes. What happened as a result?

ONE-OF-A-KIND-NO COMPARISON NECESSARY				
Middle School	20		6-8	800
High School	19		9-12	950

*Method A or B must be applied consistently within each grade span report. Method A is preferred. If Method B isused, the district must be prepared to verify expenditures in the event of an audit at the end of the fisca

Reporting School Year: Date:

LEA_Report | Comparison_Schools

Ohio Department of Education

Exhibit C: Form 1 – All Title I Served Schools

ENTER AN (X) INDICATING IF COMPARISON SCHOOLS LISTED BELOW ARE SERVED OR NON-SERVED.

SERVED ---------> [X] **OR** NON-SERVED -------> [ ]

Enter (X) indicating LEA has developed and implemented written comparability procedures: [X]

	Names of Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Percentage or Number of Low Income Students (Match CCIP Building Eligibility Page) Pct. (%)	No. (#)	Grade Span- (Match CCIP)	Total Number of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	State & Local Funds Allocated for Instr. Staff Salaries, Curr. Materials & Instr. Supplies-Current SY	DIVIDE Col. D by E *Method A: (Student/Instr. Staff Ratio)	DIVIDE Col. F by D *Method B: (Per Pupil Expenditure)
	(A)	(B1)	(B2)	(C)	(D)	(E)	(F)	(G)	(H)
1.	School D	35.00%		K-5	475.00	20.00		23.75	
2.	School E	15.00%		K-5	420.00	20.00		21.00	
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									
11.									
12.									
13.									
14.									
15.									
16.	**COMPARISON SCHOOL(S) AVERAGE**	25.00%			447.50	20.00		22.38	

By including School E with School D, it increased the average so that Schools A, B and C are now at or below G17, which makes them comparable.

LEA_Report | Comparison_Schools

Ohio Department of Education

Exhibit D: Form 5 – All Title I Served Schools

FORM (5)-TITLE I COMPARABILITY LEA REPORT -- (Exclude Federal Funds/Federally Funded Staff)
Student/Instructional Staff Ratio (For use only when ALL SCHOOLS ARE TITLE I SERVED in the Grade Span)

DISTRICT NAME				DATE		Comparison Group:	Enter (X)
DISTRICT IRN#				COUNTY		Grade Span	X
PERSON Completing Form				PHONE		District-wide	
NAME OF TREASURER				PHONE		Optional: Larger	
CONTACT Email Address						Optional: Smaller	

	IRN	Names of Served Schools in Descending Order of Low Income Students (Match CCIP Bldg. Eligibility Page)	Grade Span- (Match CCIP)	Total Number of Pupils Enrolled Current SY	FTE Instructional Staff (FTE) Current SY	DIVIDE Col. C by D (Student/ Instructional Staff Ratio)	Comparable?
		(A)	(B)	(C)	(D)	(E)	(F)
1	04555	School A	K-5	450	25.00	18.00	Yes
2	04666	School B	K-5	400	20.00	20.00	Yes
3	04777	School C	K-5	380	17.00	22.35	No
	Total			1230	62.00		
	AVERAGE			410.00	20.67	19.84	
					110%	21.82	
					90%	17.86	
	ONE-OF-A-KIND SERVED-NO COMPARISON NECESSARY				ENTER (X) ASSURANCE LEA HAS WRITTEN PROCEDURES IN PLACE--->		X
					Reporting School Year:		
					Date:		

If all the schools in the comparison group are **Title I** served, this form can be used to determine comparable services if the ratio for each school falls within a range that is between 90 and 110 percent of the average for all **Title I** served schools in the comparison group.

Ohio Department of Education

Web-Based System Comparability Report

Start:

09:32:35.6739



Finish:

09:32:35.7051

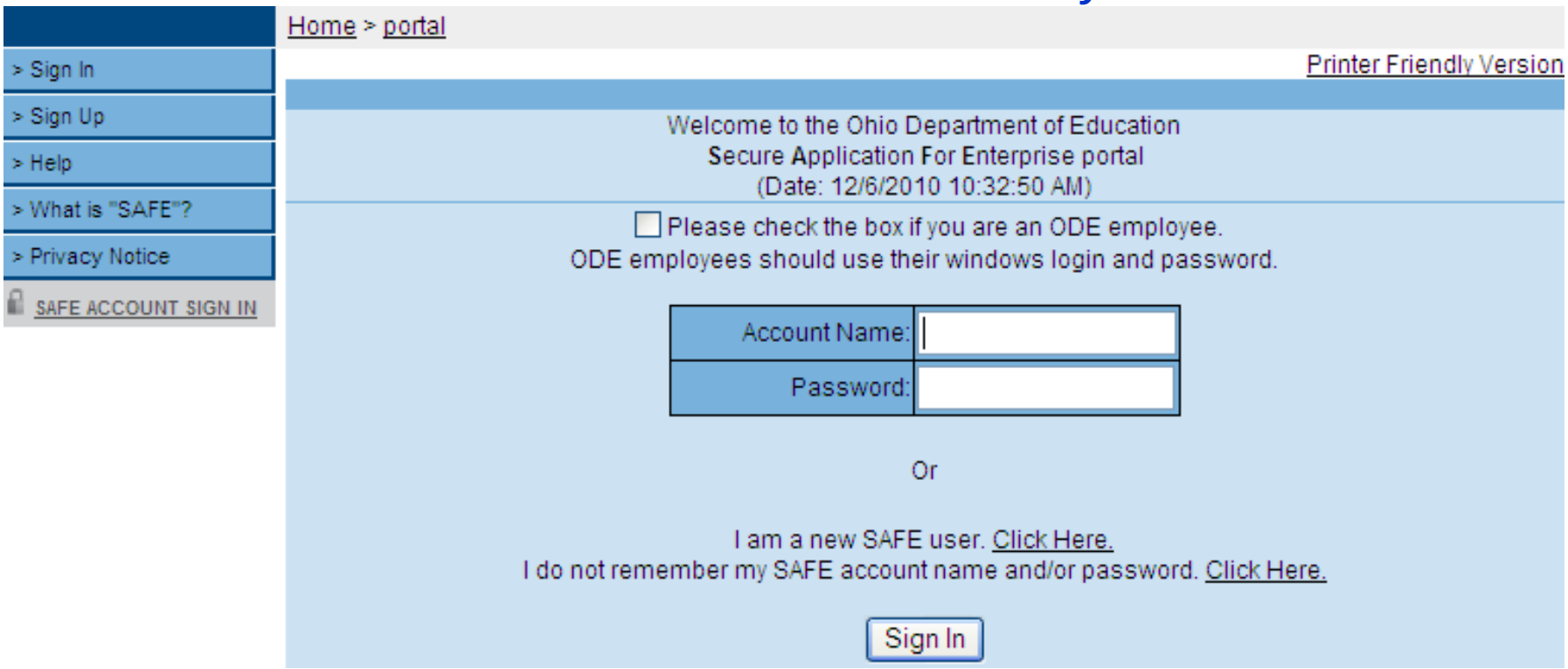
From start to finish:

0.0312 seconds

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

Query of LEAs required to submit comparability report

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

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

LEAs do not need to 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

Comparability Home

2012 Your district is **REQUIRED** to complete a Comparability Report.

Announcements

SELF-REPORT Submission Dates (2/8/2012)
February 9 through March 7, 2012

Comparability Report Update (2/7/2012)
Districts will need to use the Self-Report Option this year due to comparability reporting timelines and the EMIS closing date being extended to later in March. Change status to draft started. Click Comparability Data Verification. Click on the Self-Reported Data tab. Check the pre-populated data from OEDS (Building IRN, Building Name, & Grade Span columns) & CCIP (Low Income Pct. & Title I Service Columns). Select one of three methods for reporting comparability and follow the instructions outlined on the Data Verification Page.

Student/Instructional Staff Ratio Method Note (2/7/2012)
When using the SELF-REPORT Option, it is recommended that all figures used (pupil count and instruction 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, no later than February 1, 2012.

EMIS DATA NOTE (2/6/2012)
If you prefer using the EMIS Data Report Option, are confident that your district is going to be comparable and don't mind waiting until EMIS closes in March, send an email to the comparability mailbox, comparability @ode.state.oh.us, indicating that you will submit the report the first week of April so we have a record.

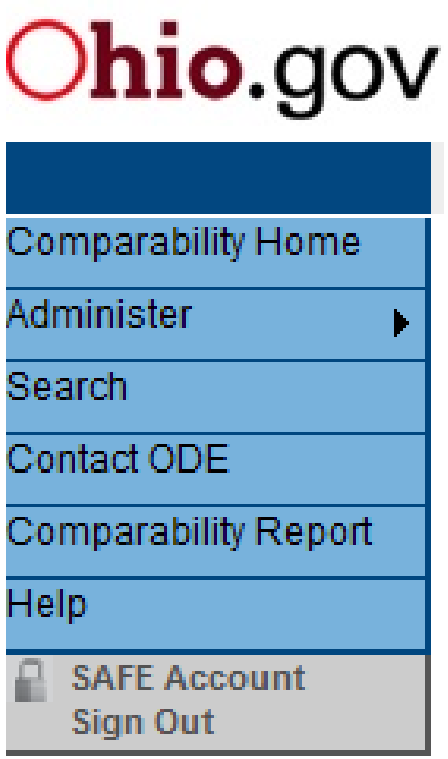
Comparability FY12 (9/1/2011)
Once the system is activated for FY12, a message is automatically sent to the superintendent if the district is required to complete the Comparability Report. A message is also posted on the home page indicating if the district is required or not required to complete the report. In the meantime, comparability reports completed using the web-based system for FY10 and FY11 can be accessed by selecting the Report Year in the drop down box.

Reminders

Directions (9/1/2011)
Directions, Template for Procedures, and Title I Q and A are located in the Help link and in the CCIP Doc Library under Financial Information -Comparability-Title I. If you have questions, please contact your federal programs consultant (614-466-4161), Ed Peltz (614-752-1571) or Elena Sanders (614-752-1561). For technical assistance, contact Karl Koenig (614-752-1597).

Appendix A – Screen Shots

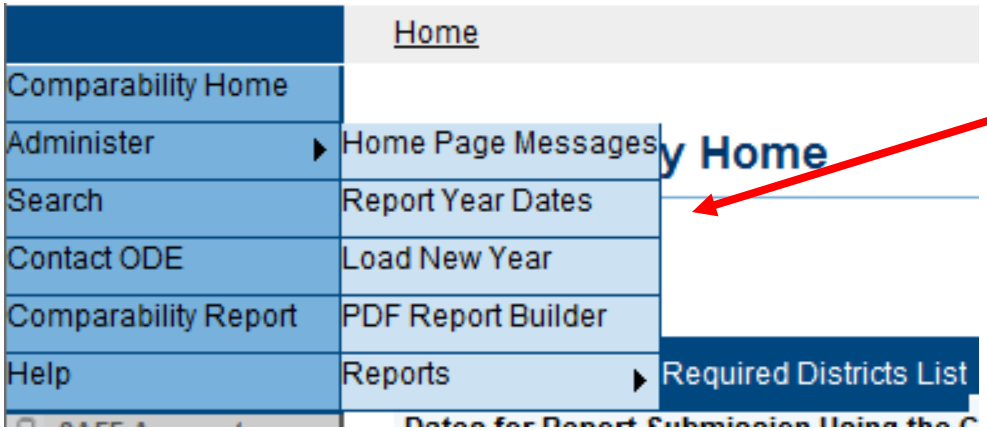
Internal Navigation



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

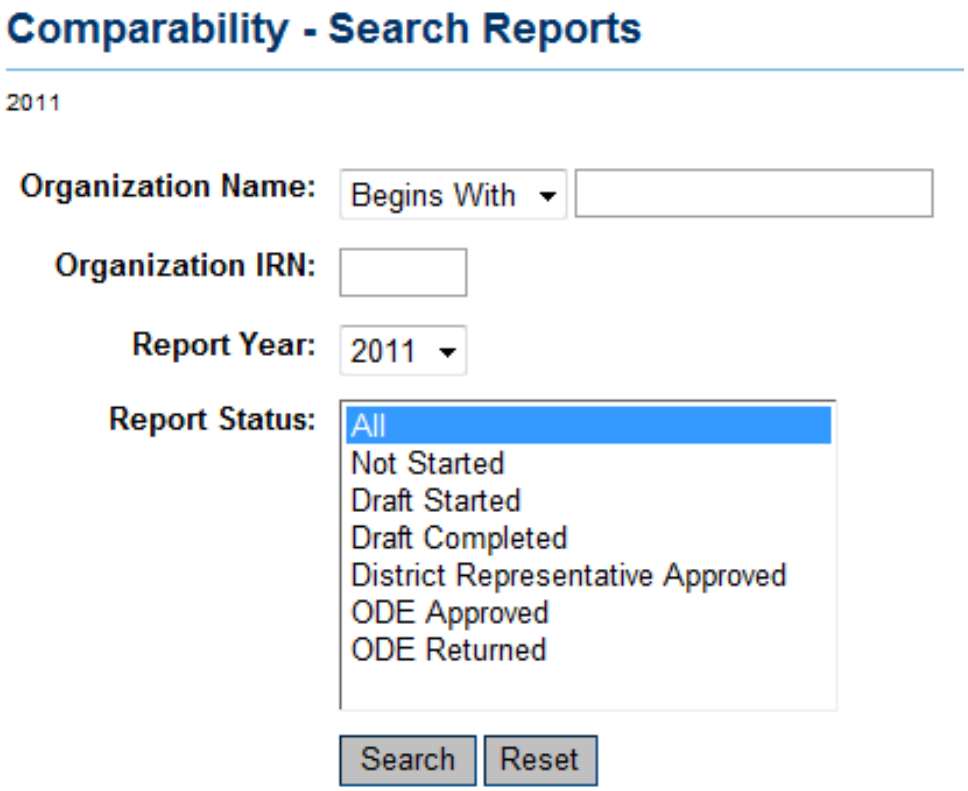
2011

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 << >>

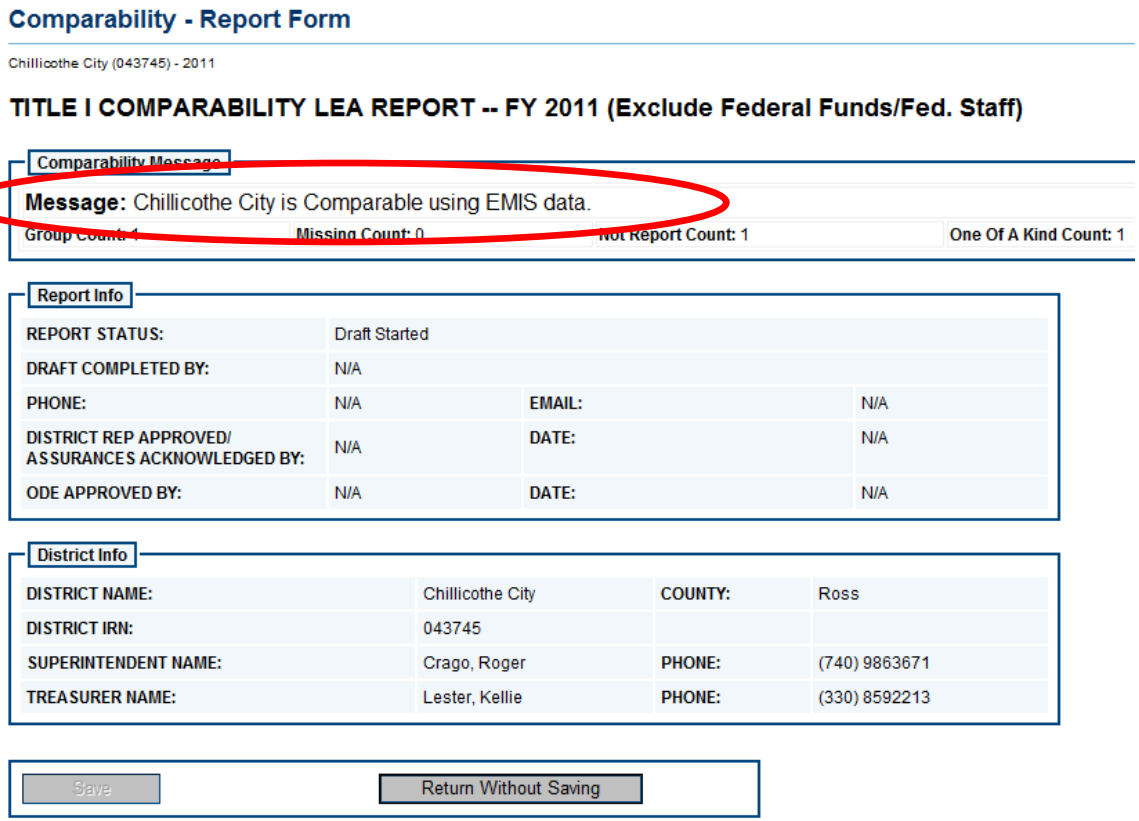
Building IRN	Building Name (6 Buildings)	Grade Span	Low Income % (CCIP)	Pupil Count	FTE Instructional Staff	Instr. Staff Base Salaries, Supplies & Curriculum Material Funds Allocated	Monies Budgeted For Base Instructional Staff Salaries	Title I Served
000398	Allen Elementary School	K-5	44.62	318.00	15.00	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**

Form Type: 5 (All Served)

- Represents Excel Forms 5 (Pupil/Teacher Ratios), 6 (Per Pupil Expenditures), 7 (Student/Instructional staff salary ratios)
- All Schools are Title I Served
- 90-110 % within range variable

Form Type: 1 (Mixed)

- Mixed (Title I and non-Title I Schools)
- Represents Excel Forms 1 & 2 (Pupil Teacher Ratios or Per Pupil Expenditures) and Forms 3 & 4 (Pupil Teacher Ratios or Student/Instructional staff salary ratios)
- 10% Tolerance (90 or 110% Variance depending on method used)

Form Type: 1 (All Served)

- All Schools are Title I Served
- Represents Excel Forms 1 & 2 (Pupil Teacher Ratios or Per Pupil Expenditures) and Forms 3 & 4 (Pupil Teacher Ratios or Student/Instructional staff salary ratios)
- 10% Tolerance (90 or 110% Variance depending on method used)

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

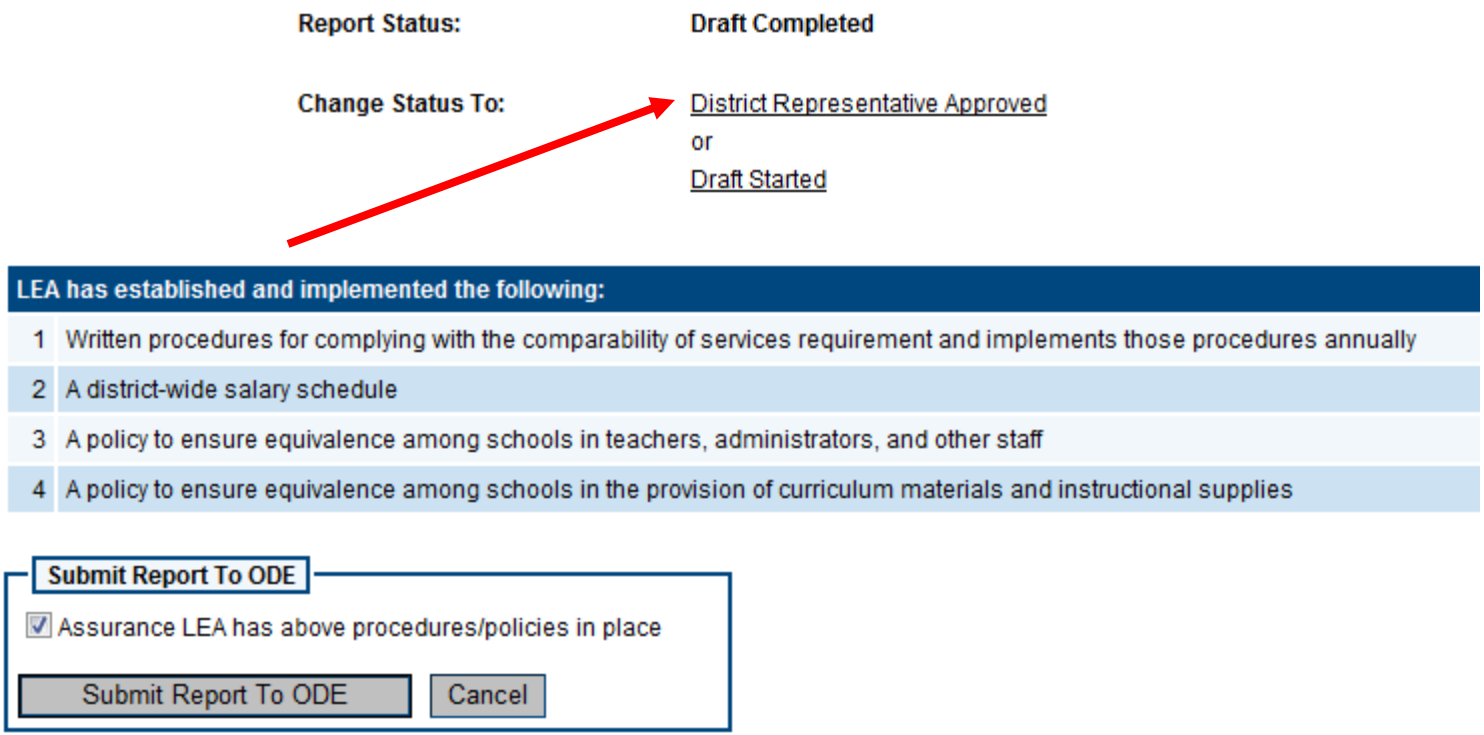
Comparability PDF Reports

[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:

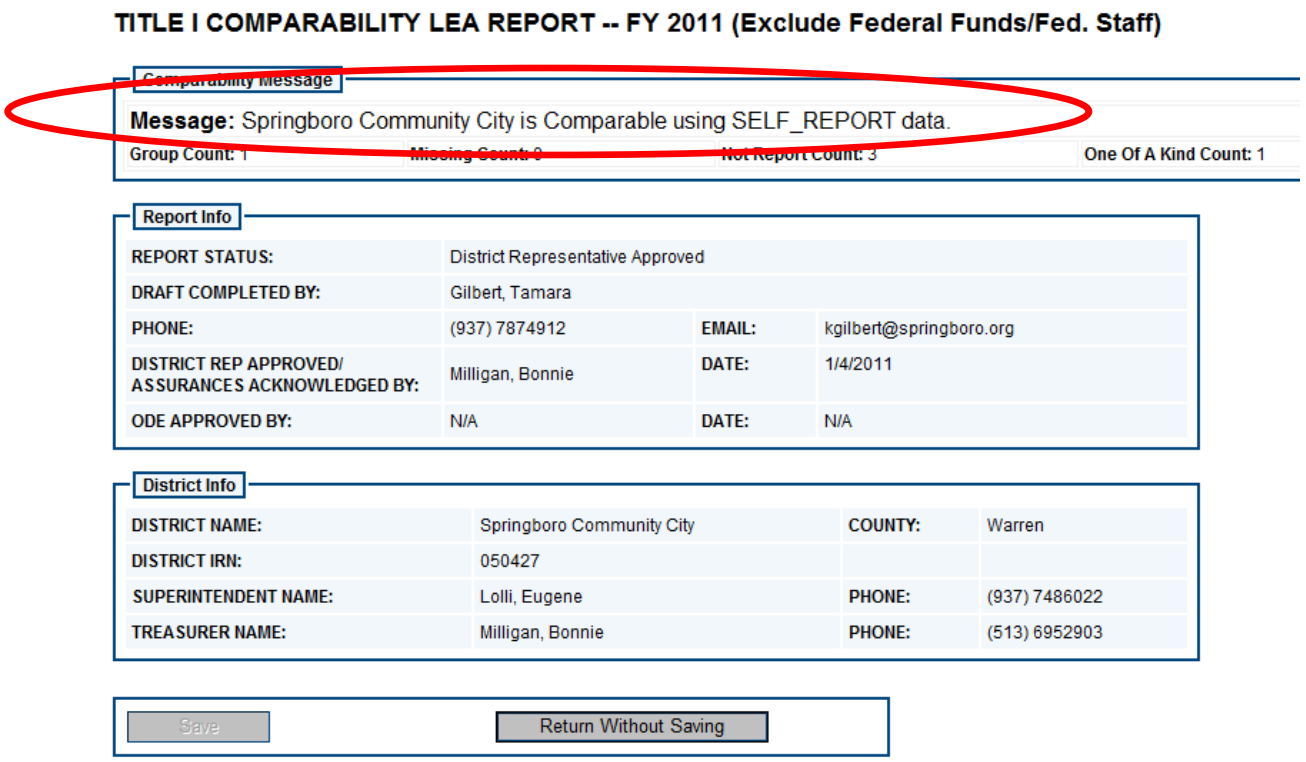
EMIS DATA SELF-REPORTED DATA (Editable)

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

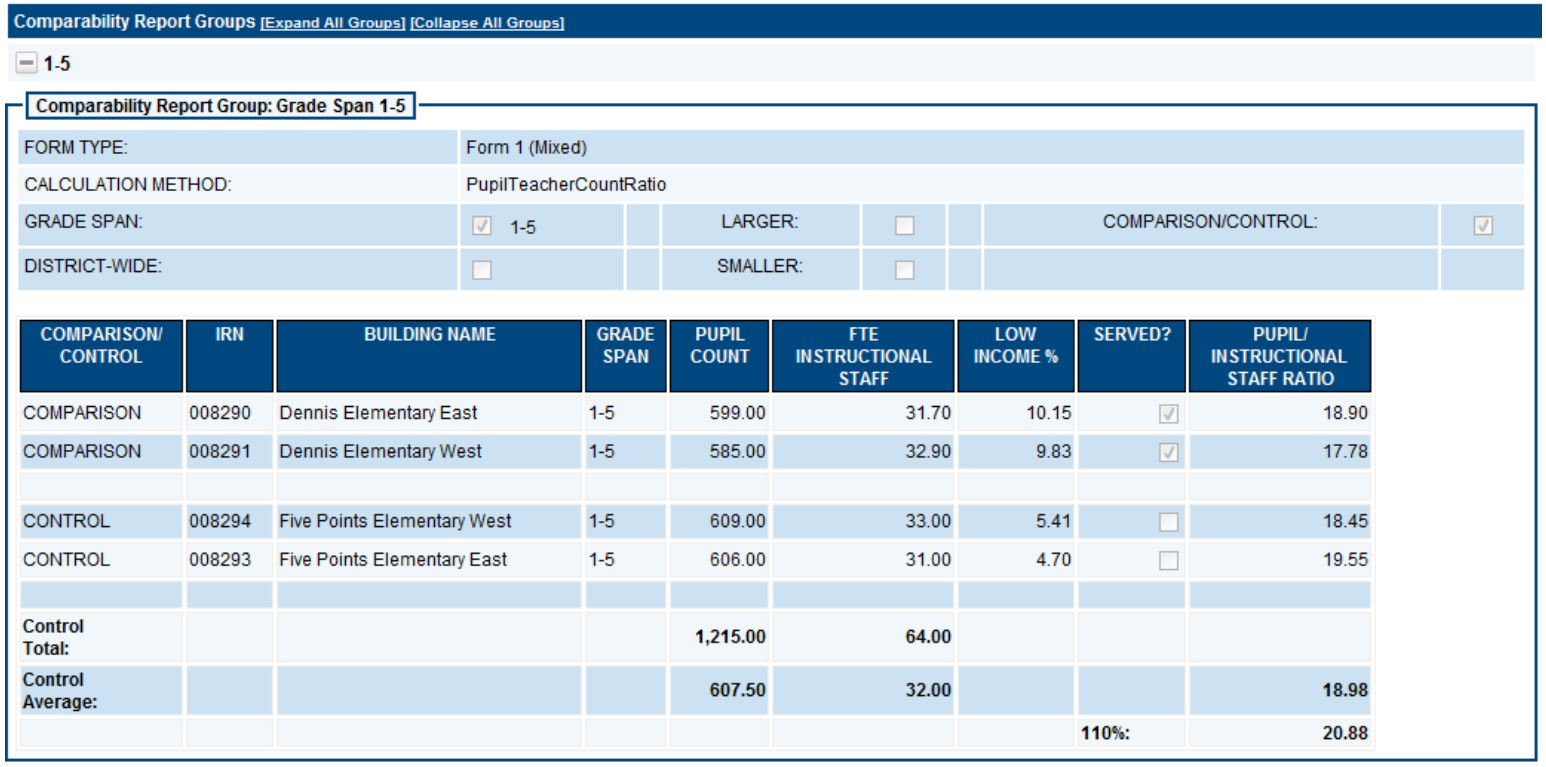
District Info

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

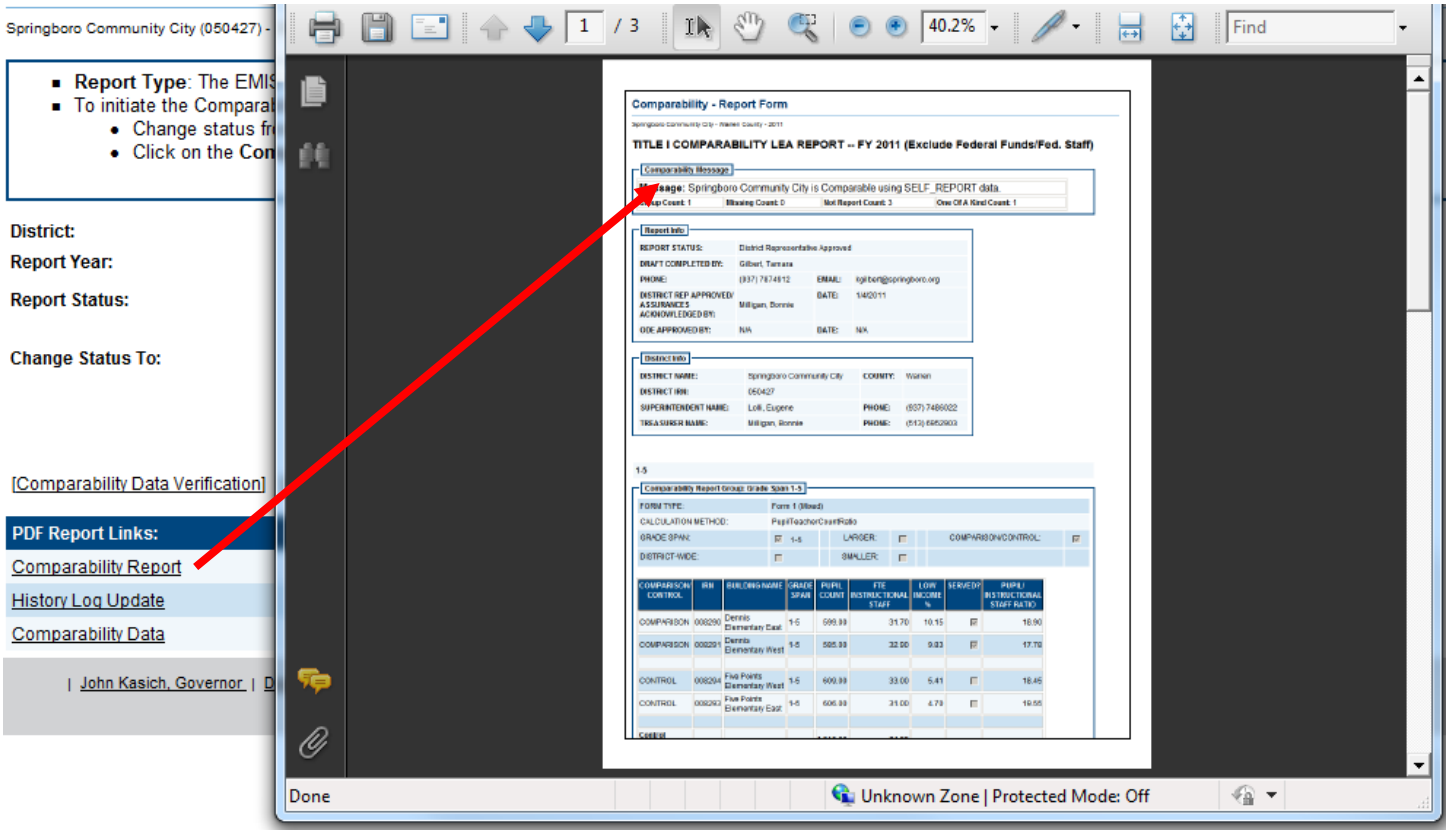
Comparability PDF Reports

[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

LEA Online Illustrations




Questions?

U.S. Government Accountability Office

The GAO Report is available at

http://www.gao.gov/Products/GAO-11-258

GAO Report (GAO-11-258), Feb. 28, 2011

U.S. Government Accountability Office

Report addresses which methods are used by school districts in selected states, monitoring and audit findings, benefits and drawbacks of requiring an expenditure per student ratio that includes actual teacher salaries to demonstrate comparability

U.S. Government Accountability Office

- Found in selected states most common method used was student-teacher ratios
- Potential changes in requirements could increase funding to some Title I schools, but may be challenging for some districts to implement

Reauthorization Bill

Introduced in 112th Congress by Senator Harkin to amend the ESEA of 1965 as the Elementary and Secondary Education Reauthorization Act of 2011

Reauthorization Proposal

- Requires districts to demonstrate comparability using an **expenditure per pupil measure** that **includes actual teacher salaries**
- **Eliminate any funding discrepancies** between Title I and non-Title I schools


Questions?