

COMPARABILITY REQUIREMENTS

School administrative units (SAUs) with multiple attendance areas applying for grants under Title IA of the Elementary and Secondary Education Act (ESEA) have a requirement in Section 1118(c) to submit reports to determine that State and local funds will be used in the SAU to provide services in a Title IA school that are at least comparable to services being provided in areas of such SAU which are not receiving Title IA funds. Districts are considered to have multiple attendance areas if there is more than one school serving the same grade span and if the basic factor for determining which school the children attend is their place of residence.

Current requirements for Comparability specify that a SAU must meet either the staff/student ratio requirement or the per pupil cost using staff salary data. The staff/student ratio calculation is increased to 110% of the baseline average and all school level ratios must fall below the inflated ratio. The per pupil salary cost calculation is decreased to 90% of the baseline average and all school level per pupil amounts must fall above the decreased baseline average.

Please note that the need to meet the comparability requirements also extends to SAUs that serve all their schools under Title I. Any school with 100 or fewer students is exempt from comparability requirements as are single school SAUs and SAUs with only one building at each grade level.

In the event that the SAU does not meet these comparable standards, the SAU must immediately take steps to redistribute staff to ensure comparability for this current school year and continued receipt of Title I funds. The Maine DOE will forward approved reports to the SAUs, and we will be contacting SAUs directly if comparability is not met. In order for a school to meet comparability, just one of the standards must be met.

Worksheets and other source documents used in the development of these reports should be retained along with the current year's ESEA Consolidated Application for audit purposes.

Source Documentation Guideline

The source data used to develop these reports is a snapshot of the NEO certified October 1, 2021 student enrollment and December 1, 2021 instructional staff counts in the data warehouse. The count of instructional staff included is defined below.

Definitions for Worksheet Data used by the Maine DOE

Full time equivalent (FTE) Staff: The number of full-time equivalent instructional staff paid with state/local resources for each school. Each part-time staff person was counted based on the proportionate FTE entered in NEO. The same standard and definition of instructional staff and FTE was used across all schools. Time for stipend activities was not included in this FTE count.

Instructional Staff: Staff members who render direct and personal services that are in the nature of the teaching or the improvement of the teaching/learning situation in a school was counted. The term includes principals, librarians, guidance, teachers including art, music, physical education, etc. for a school. The term also includes educational technicians or other paraprofessional personnel who assist instructional staff members in providing these services.

EXCLUSION OF STAFF: Staff positions paid from federal funds such as Title IA, Class Size Reduction, etc. were not included. Special education and ESL staff regardless of funding were not included. In addition, any staff person paid with local funding who is providing Title IA supplemental services to students should not be included in the instructional staff count.

Salaries: This amount contains the total amount of state and local resources spent on salaries only, no benefits, for the staff members included in the FTE Staff count.

Grade Span: Determine grade spans that are most appropriate for the SAU that allows **comparison of similar grade level schools**. A one grade difference was allowed before a new grade span was created except PK and KG grade levels were considered the same level; therefore, a PK-3 and a KG-4 school could be considered in the same grade span.

Size Group: Size Group refers to the different sizes of schools in a grade span. The Larger and Smaller size groups in Part I were used if the larger school has an enrollment of two times greater than the smaller school. Any school whose enrollment falls between the two extremes were placed in the most appropriate group size. The system placed all schools with an enrollment of twice the smallest school in the larger group. The system used the Smaller Group Size if there is only one school in a grade span. Any school with 100 or fewer pupils was exempt.

WORKSHEET SELECTIONS AND SUBMISSION:

IF THE PART I Section B WORKSHEET...	THEN YOU MUST Submit...
Indicates that in <u>each grade span</u> there is <u>no</u> size groups with multiple attendance areas→	Only the Part I Worksheet was completed and Comparability has been met.
Indicates that for <u>any grade span</u> there is a size group with <u>both Title I and non-Title I schools</u> → → → → → → → →	Part I and Part II <u>and</u> III Worksheets for <u>each</u> such grade span and size group was completed.
Indicates that for <u>any grade span</u> there is a size group in which there are multiple <u>Title I schools only</u> → → → → → → → →	Part I and Part IV Worksheet for each such grade span and size group was completed.

Part I Worksheet, Section A provides the list of SAU schools and each school's Size Group based on the definition above.

Part I Worksheet, Section B groups schools by Grade Span Group (see definition above) and Size Group. For each Grade Span and Group Size that contains both Title I and Non-Title I schools a Part II and III worksheet is completed. For each Grade Span and Group Size that contains multiple Title I schools only, a Part IV worksheet is completed.

Part II Worksheet: For each Grade Span and Size Group, this worksheet is used for the Non-Title I school data and establishes the Staff/Student Ratio at 110% of the average. It also establishes the Per Pupil Cost at 90% of the average. These numbers will be used to determine if the Title I schools in Worksheet III meet comparability.

Part III Worksheet: This worksheet is used for the Title I school data that aligns with the Grade Span and Size Group from Part II Worksheet. Each Title I school's numbers are compared to the 110% Staff/Student Ratio and the 90% Per Pupil Cost numbers from Worksheet II to determine if comparability is met. A school must meet at least one indicator in order to meet comparability. A Title I school's Staff/Student Ratio must be below the 110% Staff/Student Ratio number or above the 90% Per Pupil Cost number as calculated in Worksheet II.

Part IV Worksheet: This worksheet is used if all schools in the Grade Span and Size Group are Title I. The average baseline is determined and is multiplied by 110% for the Staff/Student Ratio and by 90% for the Per Pupil Cost. Each Title I school's numbers are compared to the average baseline number to determine if comparability is met. A Title I school's Staff/Student Ratio must be below the 110% Staff/Student Ratio number or above the 90% Per Pupil Cost number.

Depending on the number of Grade Spans and Size Groups, there could be no Part II through IV worksheets or there could be multiple Part II through IV worksheets.

Questions regarding ESEA Title I Comparability and the reports can be directed to the Title I Program Coordinator on the [ESEA Team](#).