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DEPARTMENT OF EDUCATION  
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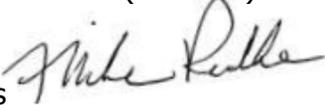
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November 4, 2013

**MEMORANDUM**

**TO:** Title I Comparability Contacts  
 Consolidated Application Contacts  
 Michigan Electronic Grants System *Plus* (MEGS+) Authorized Officials

**FROM:** Michael W. Radke, Ph.D.   
 Director, Office of Field Services

**SUBJECT:** 2013-14 Title I Comparability Worksheets and Certification

The 2013-14 Title I Comparability Worksheets are now available electronically on the Office of Field Services (OFS) website. School districts are required to complete the worksheets if they have more than one school in a grade span and at least one Title I school in that grade span. Grade spans should be identified in the same manner as you have defined them on Screen 1, Grade Span Groupings, in the 2013-14 Title I School Selection application.

Districts are required to submit the completed Title I Comparability Worksheets and Certification in MEGS+ by **December 9, 2013**. Instructions for completion and submission are detailed below.

In an effort to help districts complete the Title I Comparability Worksheets, instructional staff information (Name, Full Time Equivalent (FTE) assigned to school, Federal FTE, degree level, base salary and title) will be imported from the Registry of Educational Personnel (REP) when you copy your data from the Center for Educational Performance and Information (CEPI) to the Title I Comparability Worksheets.

**For this reason, you must ensure that information for each staff person has been entered correctly in the REP before you initiate the Title I Comparability process. We recommend that any district required to complete Comparability enter the required REP data prior to the due date for the REP to be loaded in CEPI in order to allow time for district staff to complete the 2013-14 Title I Comparability Worksheets.**

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The Title I Comparability Worksheets will determine comparability based on student/staff ratio. If comparability cannot be determined by student/staff ratio, the software will immediately compute the base salary/student ratio. If you have not entered Full-Time Base Salary data (Field 28) in the REP, please be sure to do so.

Title I Comparability should be completed based on the data from the fall pupil membership count day for the **2013-14** school year, unless the district's enrollment decreased significantly soon after the membership count day. Districts enrolling large numbers of migrant students for a limited time in the fall may base their comparability determinations on another date prior to the **December 9, 2013** submission date.

Title I Comparability must be completed using the Worksheets posted on the [OFS website](#) under Current Topics. **Due to the complexity of the Worksheets, we urge you to print the Directions provided on the OFS website to assist you in entering information.**

The PowerPoint provides a basic understanding of comparability and informs districts of challenges experienced in prior years related to the completion of comparability. Visit the [OFS website](#) under Current Topics to view the informational PowerPoint presentation.

Each district that is required to complete Title I Comparability must submit a Title I, Part A Comparability Certification in [MEGS+](#) initiated by a MEGS+ Authorized Official (Level 5) in the "View Available Applications/Tasks" screen. You will also be required to upload your Title I Comparability Worksheets in the View/Edit screen.

It is important for districts to establish an internal protocol to facilitate the completion of Title I Comparability so that there will be time allowed for the review and potential revision of the resources allocated to schools to ensure they are comparable.

**Since Title I Comparability is a test for supplanting, general fund staffing adjustments must be made by the end of January in the same year that comparability is not achieved in order to meet Federal requirements.**

If you have questions regarding Title I Comparability, please contact the Office of Field Services at 517-373-4212.

## **Title I Comparability Q & A**

### General Information

Only districts that have grade spans, or overlapping grade spans, that contain more than one school and contain at least one Title I school within the grade span are required to complete the Title I Comparability Report. There are approximately 200 districts in the state that meet these criteria. The following are questions and answers regarding general information about Title I Comparability.

#### **Q1: What is Comparability?**

A1: Comparability is one indication that a local school district is using Title I funds to supplement and not supplant other funding sources. A comparability study compares the distribution of State and local resources among the schools that include those grade spans providing Title I services. Meeting comparability means that the district provides services in the Title I schools that are at least comparable to that which the district provides in the non-Title I schools. If all of the schools in a grade span are Title I schools, meeting comparability means that the district provides services in the higher poverty Title I schools that are at least comparable to that which the district provides in the lower poverty Title I schools. A district is usually comparable if it implements a district-wide salary schedule and has procedures that ensure equivalence among schools in the allocation of staff, curriculum materials and instructional supplies.

#### **Q2: How often does comparability need to be determined?**

A2: Districts must implement procedures to comply with the comparability requirements annually. Districts must also maintain records that are updated biennially documenting their compliance with the comparability requirements.

#### **Q3: How is comparability determined?**

A3: The Title I Comparability Worksheets and the Directions document are available on the Office of Field Services (OFS) website. Comparisons are made between schools within grade spans that contain at least one Title I school. Comparability is determined by using the student/instructional staff ratio method, or the instructional staff base salary per student ratio method. Districts must demonstrate comparability by means of one of these methods.

#### **Q4: Does every district need to complete the Title I Comparability Report?**

A4: No. A district that has only one school per grade span, with no overlapping grades between schools does not need to complete a comparability study. Only grade spans that contain more than one school and contain at least one Title I school need to have comparability computed.

#### **Q5: When should the Title I Comparability Worksheets be completed?**

A5: It is expected that the Title I Comparability Worksheets will be available on the OFS website by October 15, 2013. The submission deadline is **December 9, 2013**.

**Q6: How are schools compared in determining comparability?**

A6: For grade spans containing both Title I and non-Title I schools, each Title I school is compared to a criterion that is computed across the non-Title I schools. If all the schools in the grade span are Title I schools, each higher poverty school is compared to a criterion that is computed across the lower poverty schools. In this case, no more than half of the schools may be used to establish the comparison criterion. The Worksheet is programmed automatically to perform these comparisons for Title I Comparability.

**Q7: How is the criterion established?**

A7: "At least comparable" is defined as being within a 10% variance of the established comparison ratio. Therefore, the criterion for determining comparability using the student/instructional staff ratio means that in a Title I school a district cannot exceed 110% of the average student/instructional staff ratio that was established as a criterion in the non-Title I schools. The criterion for determining comparability using the instructional staff base salary per student ratio means that a district cannot have an average base salary per student in a Title I school that is less than 90% of the average instructional staff base salary per student that was established in the non-Title I schools. The Worksheet automatically calculates these comparison values for Title I Comparability.

**Q8: What does a district need to do if comparability is not met?**

A8: If comparability cannot be demonstrated, the district must make adjustments to the general funded staffing in order to become comparable. These changes **must** be made no later than the beginning of the second semester of the school year in which comparability was not met.

**Q9: What happens if a district fails to make the adjustments necessary to achieve comparability?**

A9: The consequence of non-compliance with comparability is the loss of a portion of Title I funds from the beginning of the non-comparability period. The portion of funds is determined by the amount that the district would have to contribute from general funds to achieve comparability.

**Note:** Previously, Public School Academies (PSAs) did not operate schools with overlapping grade levels. However, now that the legislation has changed, PSAs must calculate Title I Comparability if they operate schools with overlapping grade levels.

## Title I Comparability Directions for 2013-14

**Title I Comparability is a test to determine if all the schools in a district are receiving a comparable amount of district general fund support prior to the allocation of Title I funds. If you have two or more schools within a given grade span, and at least one of those schools receives Title I funding, then you must complete the Title I Comparability report. Skipped schools in the Title I School Selection Application are considered Title I schools for the purposes of Comparability. The final MEGS+ certification and upload is due by December 9, 2013.**

**If all of the schools in a grade span are Title I schools, the district must provide general fund resources to the higher-poverty schools that are at least comparable to the general fund resources provided to the lower-poverty schools.**

**A Title I school with 100 students or fewer is exempt from the Title I Comparability report.**

**The 2013-14 Comparability Worksheet (in Excel) will allow you to use the same files as used in MEGS Legacy to compute Title I Comparability.**

**These are your Excel worksheets:**

**Macros:** This is the sheet you will enter to access the various macros to compute your data.

**Data:** This is where you will load your XML data file from CEPI.

**Grade Ranges:** On this page you will enter the same grade range groupings that you used on the 2013-14 Title I School Selection application, Screen #1, Grade Span Groupings.

**Student FTEs:** This is your primary screen for collecting district data including the listing of all schools, School ID number, identification of grade span groupings, Title I participation, Student FTEs, Staff FTEs, Total Staff Base Salaries, and, if necessary, High Poverty designations for districts where all the schools within a grade range are Title I funded.

**Non-Title I Comp:** Non-Title I schools will appear here and this screen will compute your comparability Student/Staff and Salary/Student comparison ratios.

**Title I Comp:** Title I schools will appear here with their individual Student/Staff and Salary/Student ratios. A note next to each school's ratio will indicate if the school is comparable. If you have multiple grade level groupings that receive Title I funding, they will appear as separate reports on this screen. A note at the bottom of the screen will tell you if your district has made comparability.

**Low Poverty Comp:** If you need to use the High Poverty versus Low Poverty computation, your Low Poverty Student/Staff and Salary/Student ratios will appear on this screen.

**High Poverty Comp:** If you need to use the High Poverty versus Low Poverty computation, your High Poverty school ratios will appear on this screen. A note next to each school's ratio will indicate if the school is comparable. A note at the bottom of the screen will indicate if your district has made comparability.

**School Sheets:** Individual schools will appear on sheets that are labeled with the schools' five digit code. The tabs will have the school code numbers and the sheets will list all staff members that are reported to CEPI with their FTE for each school.

### **Use these directions to maneuver through the Title I Comparability process:**

When opening the Title I Comparability Worksheet, be sure to click "Enable Editing" and then "Enable Content". This will show up as an option in the security banner at the top of the screen.

**Macros Sheet:** This sheet has five Macros labeled Parse Teachers, Make Comp, ReCompute Schools, Add Teachers, and High Low Compute.

### **Data Sheet:**

1. Copy the current CEPI XML REP file for your district. Select the entire worksheet and paste it into your Excel **Data** Sheet as an XML Table (Option 1). Social Security numbers are suppressed by CEPI. Confirm that the data is located correctly for the macros to function by checking that the Column **J** heading is "Date Of Hire".

**Note:** The REP file may contain staff members who are no longer in a school building. You may change the data file in two ways: 1) change the data in the REP file in CEPI and then download the new data to the Excel **Data** sheet, or 2) copy the old REP file from CEPI and make your changes on the **Data** sheet.

Teachers may be removed from the **Data** sheet by deleting those rows from the file. You may also add or correct teacher information at this time. Insert rows to add staff and enter the teacher's information. Be sure to include the teacher's location, grade level at that location, FTE in the school, Federally-funded FTE, and Base Salary.

2. Go to the **Macro** sheet and run the macro called "Parse Teachers". This will sort staff to create a sheet for each school and populate the **Student FTEs** sheet.

**Warning: If you run "Parse Teachers" at any time after making changes to your school sheets, it will wipe out all your changes on the school sheets.**

### **Grade Ranges Sheet:**

3. Go to the **Grade Ranges** sheet and enter your grade span groupings in Columns **B** and **C** as they are entered on your 2013-14 MEGS+ Title I School Selection (TISS) application, Screen #1, Grade Span Groupings. You may label the grade ranges with a descriptive name in Column **A**.

### **Student FTEs Sheet:**

4. The displayed Grade Ranges Low and High may be wrong on this sheet. This is because it populates by the grade spans with which teachers are associated and teachers in multiple buildings will affect this entry. Adjust the Low and High grade ranges in Columns **D** and **E** for each school to match the Grade Span Groupings you entered on the previous screen.
5. Enter your official, audited student FTE count in Column **F** for each school.
6. Enter Title I participation in Column **A**. Be sure to identify every school that receives Title I funding. Use a Yes, Y or X to identify your schools. You **must** leave this field blank for any school that is not a Title I school.

**Important:** Eligible Title I schools that were skipped in the TISS are counted as Title I schools for computing comparability.

7. **If all schools within a grade range are Title I**, then the information from the Title I school(s) with the lowest concentration of poverty is used to establish the criteria for determining whether or not each Title I school with a higher concentration of poverty is comparable. Go to Column **I** and identify the highest poverty schools in that grade span. You must select at least 50% of the schools for this comparison. You may select more than 50%, but not less, for computing comparability.

### **School Sheets:**

8. Go to your individual school sheets and review the staff assignments for accuracy of information. The tabs will have the school code numbers and the screens will list all teachers that are reported to CEPI with their FTE for each school. In Column **E** you may change the FTE of any teacher's salary that is Federally-funded. You should do this for all staff members who are Federally-funded out of Title I, Title II or Special Education IDEA.

**Warning: If you run "Parse Teachers" at any time after making changes to your school sheets, it will wipe out all your changes on the school sheets.**

### **Omitting Staff:**

9. The school sheets have Column **J** for omitting staff. You may use this option to omit any staff member who is not in that school or who does not have duties that are related to instruction. The following are considered instructional staff function codes (FCs): 111, 112, 113, 122, 125, 127, 211-218, 222, 224, 225, 241, and 249. To use the Omit option, place an X in Column **J** for the staff member. Their data will be suppressed.

### **Adding Staff:**

10. You may also add a staff member at this stage. Go to the **Macro** sheet and select the "Add Teachers" macro. You will be prompted to enter the school (five digit code), teacher name (last, then first), teacher title, FTE in the school, degree level and base salary. When you have completed these steps and click OK, the information will be entered automatically on the school sheet.

### **Excluding Staff:**

11. You may now exclude the portion of any staff member that is Federally-funded. In Column **E** enter the teacher's FTE for the Federally-funded portion of their salary. This should include all staff members that are paid any portion of their salary out of Title I, Title II or Special Education IDEA funds.

**Important:** Section 31a instructional staff funded for the purpose of providing a Title I-like program at a skipped school as described on Screen #8 of the TISS are considered virtual Federally-funded staff and must also be excluded as Federal FTEs. **This does not make it mandatory for all other Section 31a-funded staff.**

**Warning: If you run "Parse Teachers" at any time after making changes to your school sheets, it will wipe out all your changes on the school sheets.**

12. In Column **F** you may also choose to exclude from comparability any non-Federally-funded Special Education staff, or additional Section 31a program staff that meet the intent and purposes of Title I. You should not make these exclusions before running comparability for the first time. If you do not make comparability, then you may exclude these staff members and run comparability again.

**Important: If you chose to exclude general fund Special Education or additional Section 31a staff beyond the skipped school-excluded Section 31a staff, then you must do it for all Section 31a-funded staff in all schools. This requirement does not apply when you only exclude Section 31a staff in a skipped school.**

13. **IMPORTANT!** Whenever you Omit, Add or Exclude staff you must then go to the **Macro** sheet and run the "ReCompute Schools" macro. This will update your **Student FTEs** sheet for staff data. If you do not run "ReCompute Schools", your changes will not appear on the **Student FTEs** sheet. Check all the data on these sheets for accuracy.
14. You are now ready to compute Comparability. If you have both Title I and non-Title I schools in your grade span grouping, go to the **Macro** sheet and run the "Make Comp" macro. Your results will appear on the **Non-Title I Comp** and the **Title I Comp** sheets (the 10% variance is already built into the computation of the Student/Staff ratio and the Salary/Student ratio for making these comparisons).
15. **If all schools within a grade range are Title I under Column A on the Student FTEs sheet**, then the information from the Title I school(s) with the lowest concentration of poverty is used to establish the criteria for determining whether or not each Title I school with a higher concentration of poverty is comparable. Go to Column **I** and identify the highest poverty schools in that grade span. You must select at least 50% of the schools for this comparison. You may select more than 50%, but not less, for computing comparability. Now run the "High Low Compute" macro. These results will appear on the **Low Poverty Comp** and **High Poverty Comp** sheets.
16. If you have Title I buildings in multiple grade span groupings, then you will receive multiple reports on the **Title I Comp** or the **High Poverty Comp** sheets. A note next to each school's ratio will indicate if the school is comparable. A note at the bottom of the screen will tell you if your district has made comparability.
17. If the district is not comparable using Student/Staff ratio, the system will automatically check for Staff Salary/Student ratio comparability and display the results in a similar manner.
18. **FINALLY!** Save your results electronically and print hard copies of all your sheets in the event that your auditor requests this information during your annual audit. Go to the Title I, Part A Comparability Certification screen in MEGS+ to **certify** that you have completed this process successfully, and **upload** your Title I Comparability Worksheets.

### **Additional Information:**

#### **Federal Program Information**

The district must exclude all Federally-funded FTEs for instructional staff. Eligible Title I schools that were skipped in the TISS are counted as Title I schools for comparability, and all Section 31a instructional staff funded for the purpose of providing a Title I-like program at a skipped school as described on Screen #8 of

the TISS are considered virtual Federally-funded staff and must also be excluded as Federal FTEs.

The following are considered instructional staff FCs: 111, 112, 113, 122, 125, 127, 211-218, 222, 224, 225, 241, and 249.

### **Supplemental State and Local Program Information**

The Office of Field Services does not recommend that districts initially exclude any staff from State or locally-funded Special Education or Section 31a instructional program categories not designated as part of a skipped school Title I-like program requirement. Only exclude one or more of these categories of staff if comparability is not achieved after your first attempt.