



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING


GRETCHEN WHITMER
GOVERNOR

MICHAEL F. RICE, Ph.D.
STATE SUPERINTENDENT

MEMORANDUM

DATE: December 17, 2021

TO: Select Local Educational Agencies (LEAs)
Michigan Electronic Grants System *Plus* (MEGS+) Authorized Officials
Consolidated Application Main Contacts

FROM: Dr. Paula Y. Daniels, Director 
Office of Educational Supports

SUBJECT: 2021-22 Title I, Part A Comparability Assurances Certification in
GEMS/MARS

The 2021-22 Title I, Part A Comparability Assurances Certification is now available in GEMS/MARS. Local educational agencies (LEAs) are required to complete and submit the Title I, Part A Comparability Assurances Certification by **January 31, 2022**, if they receive Title I, Part A funds and have two or more schools with identical or overlapping grade levels in a grade span.

Comparability is an annual requirement. The main purpose is to prevent an LEA that receives Title I, Part A funding from diverting state and local resources away from its Title I, Part A school buildings. Thus, comparability testing helps to ensure that all Michigan students living in poverty are adequately and equitably served under the federal Every Student Succeeds Act guidelines.

Exempt Local Educational Agencies

A Local Educational Agency (LEA) is exempt from the comparability testing requirement based on one of the following criteria [ESEA § 1118(c)(4)]:

- One school building per grade span group
- More than one school in a grade span group, but no Title I, Part A, or skipped schools in the group
- Exclusion of a school building or building results in no basis for comparison

Comparability Certification is a condition for receipt of Title I, Part A funds. All non-exempt LEAs must submit a written assurance to the Michigan Department of Education that they fully comply with provisions of ESEA § 1118(c)(3).

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For the 2021-22 School Year, to allow flexibility in keeping with ESEA § 1118(c)(3)(B), LEAs will not be required to submit their calculations demonstrating actual compliance with the Title I, Part A Comparability requirements. However, LEAs are required to submit a certification that they have local processes and procedures in place to ensure they remain fully compliant with the comparability requirements. This certification includes the following two assurances:

1. The LEA assures it has all of the following [ESEA § 1118(c)(3) and 34 CFR 76.730]:

- Written procedures for complying with the comparability requirements including:
 - The LEA's timeline for demonstrating comparability
 - Identification of the office responsible for making the comparability calculations
 - The measure and process used to determine whether schools are comparable
 - How and when the LEA makes adjustments in schools that are not comparable
- Documentation to support comparability calculations
- Documentation to demonstrate that any needed adjustments to staff assignments are made

2. The LEA also assures that it has conducted testing using student to staff instructional ratios to demonstrate the following as applicable [ESEA § 1118(c)(1)]:

- In grade spans with both Title I, Part A and Non-Title I, Part A schools, the services provided with State and local funds to the Title I, Part A schools are at least comparable to services provided to the non-Title I, Part A schools; and
- In a grade span with only Title I, Part A schools, the services provided with State and local funds are substantially comparable in each school.

The required certification will be made available to districts in the GEMS/MARS portal and must be submitted by January 31, 2022. To complete and submit the 2021-22 Title I, Part A Comparability Assurances Certification in GEMS/MARS, please visit the following link: [Comparability Assurances](#)

Title I, Part A Comparability Calculations

Although LEAs will not need to submit their actual calculations this year, LEAs should keep a record of their Title I, Part A Comparability calculations on file. A template workbook that can be used for this purpose is provided under the [Title I, Part A Comparability link](#) on the Office of Educational Supports website.

LEAs should use information about instructional staff from their fall submission of the Registry of Educational Personnel (REP) as they fill out the Title I, Part A Comparability Workbook. The Full Time Equivalent (FTE) for all staff assigned to a building on October 6, 2021, with an assignment code considered to be instructional, should be included on the staffing worksheet for each building. Errors in the REP data may result in an inaccurate determination of comparability. For this reason, you must

ensure that information for each staff person has been entered correctly in REP before using that information for the Title I, Part A Comparability calculations.

The Title I, Part A Comparability report should be completed based on the date of the fall pupil membership count day for the **2021-22** school year, unless the LEA's enrollment decreased significantly soon after the membership count day.

LEAs enrolling large numbers of migrant students for a limited time in the fall may base their comparability determinations on a date that more accurately reflects the average enrollment for the school year. This data must reflect students who are enrolled in the LEA for most of the school year.

It is important for LEAs to establish an internal protocol to facilitate the completion of the Title I, Part A Comparability calculations so that there will be time allowed for review and potential revisions of the resources allocated to schools to bring them into comparability. **If comparability is not achieved, staffing adjustments must be made by the end of January in the same year that comparability is not achieved.**

The following Title I, Part A Comparability resource documents are posted under Current Topics on the Office of Educational Supports [OES Website](#).

- 2021-22 Title I, Part A Comparability FAQ
- 2021-22 Title I, Part A Comparability Workbook
- 2021-22 Title I, Part A Comparability Workbook Help Document
- Title I, Part A Comparability Presentation

If you have questions regarding the REP, please contact the Center for Educational Performance and Information (CEPI) Customer Support at 517-335-0505, Option 3, or via e-mail at CEPI@michigan.gov.

If you have questions regarding the Title I, Part A Comparability report, please contact the Office of Educational Supports (OES) at 517-241-6970 to be connected to a member of the Title I, Part A Comparability Team.