



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING


GRETCHEN WHITMER
GOVERNOR

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STATE SUPERINTENDENT

MEMORANDUM

DATE: November 6, 2023

TO: Select Local Educational Agencies
NexSys Authorized Officials
Consolidated Application Main Contacts

FROM: Dr. Corinne E. Edwards, Director
Office of Educational Supports 

SUBJECT: 2023-24 Title I, Part A Comparability Report in NexSys

The 2023-24 Title I, Part A Comparability Report is now available in NexSys. Local educational agencies (LEAs) are required to complete and submit the Title I, Part A Comparability Report by **December 15, 2023**, 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 of services is a fiscal requirement for recipients of Title I, Part A funds under the Every Student Succeeds Act (ESSA). The primary purpose is to prevent LEAs that receive 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 ESSA guidelines.

Exempt Local Educational Agencies

An 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 demonstrate that they fully comply with provisions of [[ESEA § 1118\(c\)\(3\)](#)].

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Title I, Part A Comparability Calculations

LEAs should use information about instructional staff from their fall submission to the Registry of Educational Personnel (REP) as they complete the Title I, Part A Comparability Report. The Full Time Equivalent (FTE) for all staff assigned to a building on October 4, 2023, 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 the 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 **2023-24** 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.**

Title I, Part A Comparability Report in NexSys Training Video

For access to the new pre-recorded training video, [click here](#).

Title I, Part A Comparability Report resource documents are posted on the Title I, Part A Comparability web page under Current Topics on the Office of Educational Supports website, including:

- [Title I, Part A Comparability Frequently Asked Questions Document](#)
- [Title I, Part A Comparability Report in NexSys Help Document](#)
- [Title I, Part A Comparability PowerPoint Presentation](#)

If you have questions regarding the REP, contact the Center for Educational Performance and Information (CEPI) customer support at 517-335-0505, Option 3, or via email at CEPI@Michigan.gov.

If you have questions regarding the Title I, Part A Comparability Report, contact your regional education consultant or the Office of Educational Supports (OES) at 517-241-6970. Please email questions to MDE-TitleIPartAComparability@Michigan.gov.