

**Michigan Department of Education  
Office of Educational Supports**

**Title I, Part A Comparability Report  
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**Q1 – What is comparability?**

**A1** – Comparability is a fiscal test to compare the distribution of state and local resources between schools in grade spans where the LEA provides Title I services to one or more schools. The comparability report is a tool that uses student to instructional staff ratios as the basis for the comparison. The tool helps LEAs remove staff who are not considered instructional for the purpose of the comparability and to identify instructional staff who should be excluded because they are federally funded and other staff who may optionally be excluded because they are funded by supplemental funds or provide eligible supplementary services.

**Q2 – How does an LEA meet comparability?**

**A2** - There are three possible ways an LEA may meet comparability, depending on the nature of the grade span where comparability is being determined:

In a Grade Span with Both Title I and Non-Title I Buildings:

- When the student to instructional staff ratio in Title I funded buildings is roughly equivalent to or lower than the ratio for its non-Title I buildings

In a Grade Span with all Title I Buildings

- When the student to instructional staff ratio for each building is roughly equivalent to all others; or
- When the student to instructional staff ratio for the highest poverty Title I buildings is roughly equivalent to or lower than the ratio for the lower poverty buildings.

**Q3 – Are students and staff in a junior kindergarten or developmental kindergarten class included in comparability?**

**A3** – All students assigned to each building as the Primary Education Providing Entity (PEPE) for which the LEA receives state aid and the staff responsible for instruction of those students are to be included in the comparability calculation. This would not include pre-school programs serving non-kindergarten age students such as Great Start for Readiness Programs (GSRP) or Head Start but would include any developmental kindergarten program serving kindergarten age students.

**Q4 – Can the LEA use a date other than the current year fall count date to report student count information?**

**A4** – Yes, when an LEA experiences significant changes in student enrollment information or significant changes in the low-income counts during the school year, it is permissible to use a different date from the current school year as the basis for student enrollment and low-income counts. The LEA should be consistent across buildings regarding what day of the year data collected reflect, including staffing data. Note that the data imported from the REP will include all staff identified in the REP using an instructional

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assignment code and who are assigned to the buildings on the date the data is imported. The LEA should retain records locally to support the enrollment and low-income counts entered on the report.

**Q5 – Should an LEA wait until the REP Report is done and submitted before beginning the Comparability Report?**

**A5** – No, LEAs are encouraged to coordinate the completion of the REP submission with the Comparability Report. The LEA may begin work on Comparability prior to completion of the REP but should ensure that a final import of REP data is done after all changes have been made to the REP, and REP data have been certified. As an LEA works on the staffing worksheets in the Comparability Report, it is not uncommon to identify data in REP that must be corrected for the LEA to meet comparability. If an LEA waits to work on the Comparability Report until after the REP closes, they will be unable to make corrections to the REP and as a result may be unable to demonstrate that the LEA meets comparability. The deadline for certification of the Fall REP is the first business day in December.

**Q6 – How do LEA’s account for a vacant position staffed with a sub?**

**A6** – If the substitute is a long-term sub (an individual employed as a regular or contract appointee employed in a single classroom or assignment for one semester or more) the LEA should have reported the assignment code for the position held by the long-term substitute teacher within the REP collection. For example, if the long-term substitute is assigned to a mathematics classroom, the assignment code would be "000EX." In those cases, the position will be included in the comparability report. If the LEA only used a day-to-day substitute code, neither the vacant position nor the sub position will show up in the staffing worksheet for the school. If the position is needed to show comparability but staffed with a day-to-day sub, the LEA will have to explain the situation and provide proof of the vacancy and current staffing situation via an upload of a job posting and a master schedule clearly showing that the position does exist. MDE staff will review the comparability report once it is submitted and any supporting documentation to make a final comparability determination.

**Q7 – Which staff members should be included as “instructional staff”?**

**A7** - The LEA should consistently include the same categories of staff members for both Title I and non-Title I schools. Instructional staff include teachers and other personnel assigned to schools who provide direct instructional services, such as music, art, and physical education teachers, guidance counselors, speech therapists, and librarians, as well other personnel who provide services that support instruction, such as school social workers and psychologists. An LEA should take care not to include aides not involved in providing instructional support in its comparability determinations. All staff identified in the REP using an instructional assignment code will be pulled into the report. The process automatically excludes all administrative (7xxx assignment codes) or non-instructional (8xxx-9xxx assignment codes, except 80002, 80005, or 80014).

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**Q8 – We contract with the ISD to provide instructional staffing for some programs. Who is responsible for reporting those instructional staff?**

**A8** – Either the ISD or the LEA may report the employee, as long as both are not reporting the same assignment. It is up to the ISD and the LEA to determine how best to report the employee to meet their needs. For the purpose of demonstrating comparability, state and locally funded instructional staff that are providing services to students in a particular school should be reported in the REP with the applicable FTE assigned to that school, including employees contracted through an ISD.

**Q9 - Why is the value of a Paraprofessional FTE reduced by ½ for inclusion in the comparability calculations?**

**A9** – Since paraprofessionals must work under the direct supervision of a teacher, federal non-regulatory guidance states to consider carefully whether a paraprofessional should be considered equivalent to a teacher or other instructional staff members in comparability determinations. Although paraprofessional staff provide a valuable benefit to many schools, for the purpose of comparability, individuals working under a paraprofessional assignment code are not considered comparable to a fully licensed and certified teacher.

**Q10 – The Title I, Part A staff or other staff I wish to exclude are not all showing up on the staffing worksheets. What do I need to do to correct this issue?**

**A10** – The Title I, Part A Comparability Report only pulls in staff identified in the REP as instructional or instructional support staff. The REP assignment codes include several state and federal program positions and Title I positions that are classified as administrative (7xxxx assignment codes) or non-instructional (8xxxx-9xxxx assignment codes, except 80002, 80005, or 80014). If you used one of those assignment codes for your Title I, Part A or other instructional staff, those staff will not appear in the Title I, Part A Comparability Report. If those staff were to be excluded there is no need at to adjust the assignment code for the comparability calculations to be correct. If those instructional staff members were not supposed to be excluded, you will need to correct the REP assignment data to ensure that they are assigned one of the instructional or instructional support assignment codes.

**Q11 – Why don't my Title I, Part A teachers show up in the Comparability Report?**

**A11** -Title I, Part A teachers should be coded using an assignment code that aligns with the grade level and subject area they are teaching. Note that the comparability report does not include early childhood programs, so early childhood staff with an assignment codes of 60100 through 60501, will not show up in the report. Elementary and middle school Title I, Part A teachers should be reported as 000ZG (Elementary Education for K-8 self-contained classrooms) or subject-specific assignment codes such as 000BA (English) when specific subject areas are taught. Depending on the specific assignment of the Title I, Part A teacher codes such as 000NN (Non-Academic/Non-Core Instruction) or 000NX (Other) may also be appropriate. All secondary teachers should be reported with a subject specific assignment code or the 000NN (Non-Academic/Non-Core Instruction) or 000NX (Other) codes as appropriate to the

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assignment. Additionally, the 96200 (Tutor (Non Title I Supplemental Education Services)) code or the 95600 (Title I Supplemental Education Services Tutor) code will not show up in the report as these are considered non-instructional/non-certified roles.

**Q12 – Why don't our instructional coaches show up in the Comparability Report?**

**A12** – For instructional coaches to show up in the Comparability Report they must have a portion of their FTE assigned to a specific building rather than the district and should not be coded using administrative assignment codes (70000 range). Literacy coaches should be coded using “00378” Literacy Coach, other content area coaches could be coded as “00380” Miscellaneous other Professional Personnel to ensure they show up in the report.

**Q13 – Why don't my paraprofessionals show up in the Comparability Report?**

**A13** – Only instructional paraprofessionals will show up in the Comparability Report. The LEA should select the code that applies to the specific role of the paraprofessional. Any of the instructional paraprofessional codes could be used to ensure the position is included in the report, these include: 80002 (Instructional Paraprofessional/Aide in a Title I Schoolwide Program (Title IA)), 80005 (Instructional Paraprofessional/Aide in a Title I Targeted-Assistance Program (Title IA)), 00403 (Special Education Instructional Paraprofessional/Aide), 00410 (MEP Instructional Paraprofessional/Aide (Title IC)), 00412 (MEP Instructional Paraprofessional/Aide – Summer only (Title IC)), or 80014 (Instructional Paraprofessional/Aide). The 96200 (Tutor (Non-Title I Supplemental Education Services)) code and the 95600 (Title I Supplemental Education Services Tutor) code will not show up in the report as they are considered non-instructional/non-certified roles.

**Q14 – Why don't my Counselors show up in the Comparability Report?**

**A14** – Counselors who are responsible for teaching a class should be reported using code “000NT”. Counselors providing non-instructional services should be reported with assignment code “00376” and would be included in the report. Counselors reported in the REP using the 95300 (Title I Counselor) code will not show up in the report as this code represents a non-instructional/non-certified assignment.

**Q15 – Our district has established virtual learning programs within our schools. In these programs a teacher from one school may be assigned to teach students from other schools in the same virtual classroom. How should this be reflected to support comparability calculations?**

**A15** – If a district is participating in hybrid or fully virtual instruction, all teachers should be reported within the content specific assignment code and grades/educational settings applicable for the course. For comparability to run correctly, a teacher's FTE must be prorated in the REP, by building, to align with the number of students from each building that they are serving. For example, if the teacher is serving 10 students (50%) who were reported at building A and 10 students (50%) who were reported at building B the teacher's FTE should be split with 0.50 FTE in building A and 0.50 FTE in building B.

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**Q16 – What is the purpose of the optional exclusions? When would they be used?**

**A16** – The optional exclusions allow an LEA to remove certain categories of staff from the comparability calculations who may be funded with state and local funds. The categories of staff include those working in an English learner program paid with state and local funds (Section 41), those working in a special education program but paid for with state and local funds who represent the excess costs for that program, and those funded with other state and local supplemental funds working in a program that meets the intent and purpose of Title I, Part A (Section 31a, Section 31n, Section 35a, etc.). These may be useful for LEAs where the distribution of students and staff in such programs are not even across buildings. For example, in cases where special education students may be concentrated in one or two buildings due to specialty classrooms located in those buildings, an LEA may choose to exclude the excess costs for special education program staff from the calculations to avoid the impact of the lower student to staff ratios often present in such programs. LEAs may need to experiment with different combinations of optional exclusions to see how such combinations may impact their ability to demonstrate comparability. If an LEA chooses to utilize the optional exclusions, the use and identification of excluded staff must be uniform across all buildings in each grade span.

**Q17 – What FTEs should be included as part of the Excess Costs for Special Education?**

**A17** – For comparability, any portion of staff funded with IDEA funds must be reported under the “Federally Funded” heading. Other staff working in the special education program including special education and resources room teachers, speech and language providers, psychologists, special education paraprofessionals, etc. should be included as part of the special education program only to the degree that their FTE represents an “excess cost” for the special education service. A special education teacher who is delivering core instruction for a student would not be considered excess cost except to the degree that their classroom maintains a smaller class size relative to other general education classes. For example, if the standard elementary class size is 20 students but the special education class size is 10 students, then 0.5 FTE of the special education teacher could be considered “excess costs” and reported under the special education program rather than the full FTE for that teacher. Generally, all special service providers (special education paraprofessionals, speech and language teachers, psychologists, teacher consultants, etc.) could be considered “excess costs”. Special education teachers providing core instruction may not be able to be fully considered an excess cost.

**Q18 – If we are still unable to meet comparability in all schools, what is our next step?**

**A18** – The LEA will need to make staffing adjustments to reach comparability in all Title I, Part A schools. The district should check the assurance and fill out the description on screen 4 or 5 for the group where comparability has not been met. The description should explain any planned adjustments the LEA will make to bring all buildings into comparability which may include moving staff, hiring additional staff, changing how staff are funded, or eliminating extra staff as needed. The impact of those adjustments should also be shown using the “State and Locally Funded FTE Adjustments” column on the applicable screen. A negative adjustment reflects a staff member removed from state and local funding while a

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positive adjustment reflects a staff member added to state and local funding. Failure to provide an adequate description of the steps that will be taken may result in the withholding of the LEA's Title I, Part A funds. Any adjustments must be made by January 31<sup>st</sup>.