

Title I, Part A Comparability

Office of Educational Supports
Michigan Department of Education
2024



Overview

- Intent and Purpose of Comparability
- Review of Comparability Report in NexSys
- Common Errors
- REP Information and Helpful Links



What is Comparability?

- A test to ensure that state and locally funded services are substantially comparable among individual schools.
- The test prevents an LEA that receives Title I, Part A funding from diverting state and local resources away from its Title I, Part A school buildings.
- It helps to ensure that all Michigan students living in poverty are adequately and equitably served under the Every Student Succeeds Act guidelines.



What is Comparability - Part 2

- An LEA may receive Title I, Part A funds only if “such agency will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.” [ESEA Sec. 1118 (1)(B)]
- This does not apply to LEAs that do not have more than one building per grade span. [ESEA Sec. 1118 (4)]
- The Comparability Report is a tool that uses student to instructional staff ratios as the basis for comparison.



What is Comparability – Part 3

- All K-12th grade students for which the LEA serves as the Primary Educational Provider (PEPE) and the instructional staff responsible for those students are to be included in the calculation.
- Which staff members are included as “instructional staff”?
 - Teachers and other personnel who provide direct instructional services
 - Other personnel who provide services that support instruction



What is Comparability – Part 4

The Comparability Report only pulls in staff identified in the REP (Registry of Educational Personnel) as instructional or instructional support staff and assigned to a building.

Accurate REP reporting is essential!



How does an LEA meet comparability?

- 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 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.



Comparability Report

The comparability report helps LEAs remove staff who are not considered instructional for the purposes of 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.



Exemptions

- 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

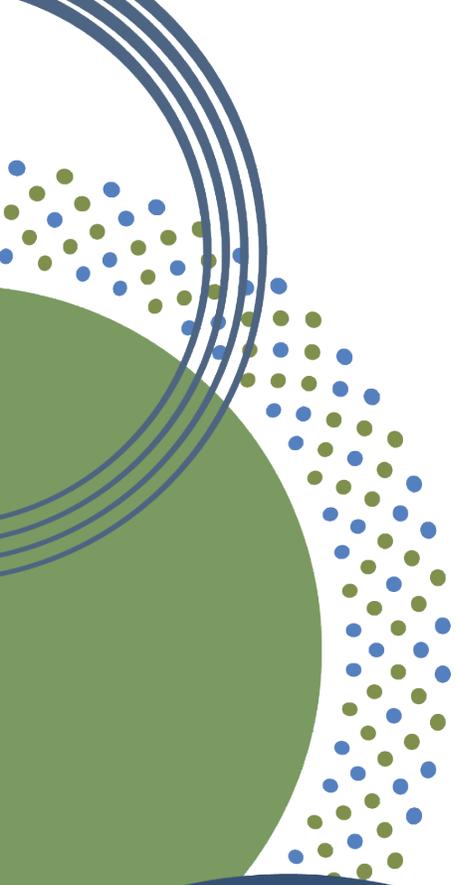


Comparability Timeline

- **September 1, 2024:** Fall REP Collection Opens
- **October 2024:** Comparability Report Available
- **December 1, 2024:** Deadline for LEAs to validate REP data and ensure all staff have been properly entered and coded.
- **December 15, 2024:** Comparability Report submission deadline.
- **January 31, 2025:** If the LEA does not meet comparability, staffing adjustments must be made by the end of January.



A [Title I, Part A Comparability FAQ](#)
is available on the Office of
Educational Supports Website for
assistance.



NexSys Title I, Part A Comparability Report

After logging into NexSys, you should see the “Initiate Related Document” button to the right of the My Tasks pane. Click on it.

Dashboard

My Opportunities

> Filters

My Opportunities

Name	Provider	Availability	Description
23g MI Kids Back on Track	Office of Educational Supports	9/26/2023 12:00:00 AM - 2/29/2024 12:00:00 AM	
99h Robotics Competition Program	Michigan Department of Education	9/26/2023 12:00:00 AM - 1/31/2024	

My Tasks

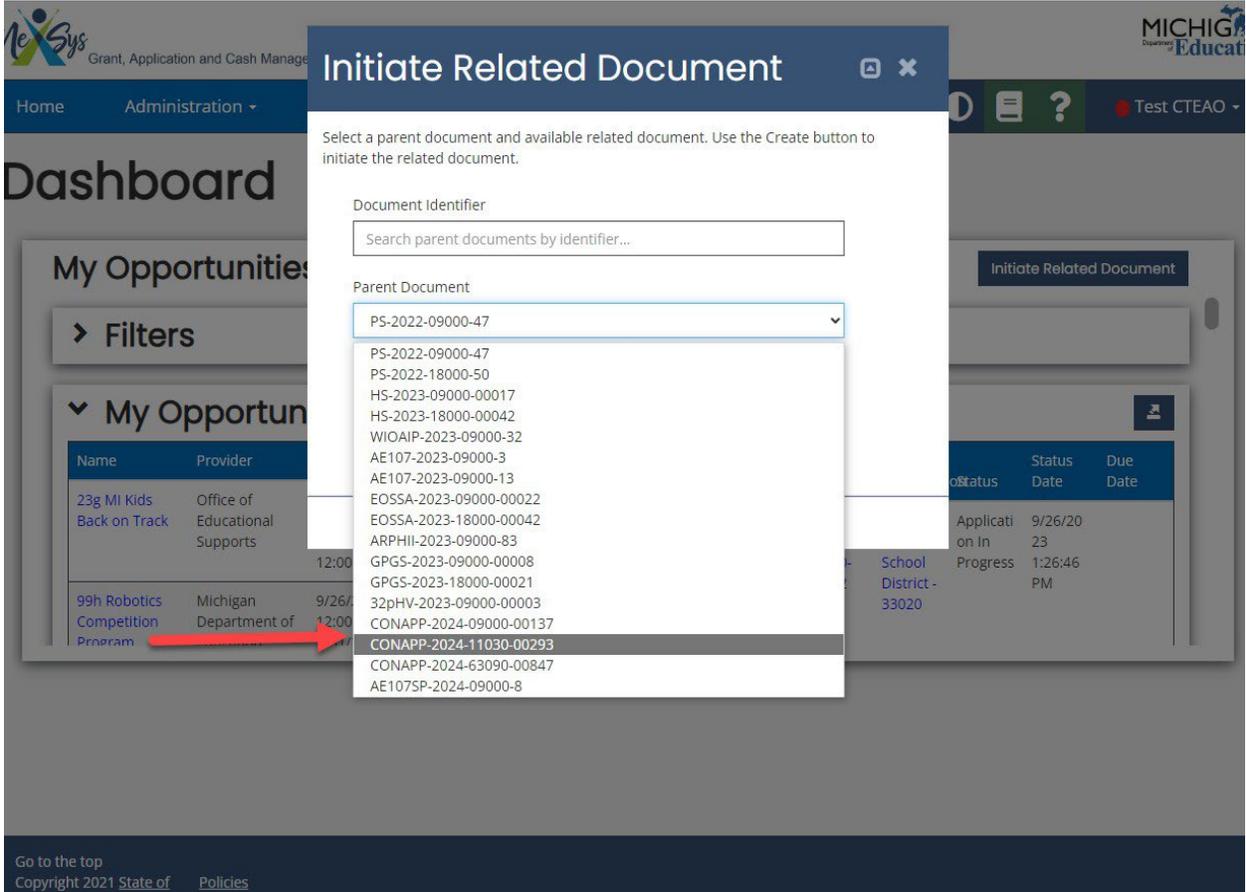
Initiate Related Document

> Filter

My Tasks

	Document	Organization	Status	Status	Due Date
	ApplicationNumber	Organization	Status	Date	Date
	CNP: 10 Cents A Meal for Michigan Kids and Farms	10CAMK F-2024-33020-00012	Lansing Public School District - 33020	Applicati on In Progress	9/26/2023 1:26:46 PM

When the “Initiate Related Document” window appears, select the appropriate Parent Document from the drop down. This will be the Consolidated Application Document Number, which begins with CONAPP-2024.



Click the "Create" button.

The screenshot shows a web application interface with a modal dialog box titled "Initiate Related Document". The dialog box contains the following elements:

- Document Identifier:** A text input field with the placeholder text "Search parent documents by identifier...".
- Parent Document:** A dropdown menu with the selected value "CONAPP-2024-63090-00847".
- Available Documents:** A dropdown menu with the selected value "Title I Part A Comparability".
- Create:** A blue button with the text "Create". A red arrow points to this button.

The background interface includes a navigation bar with "Home" and "Administration", a "Dashboard" section, and a "My Opportunities" section with a table of opportunities.

Name	Provider
23g MI Kids Back on Track	Office of Educational Supports
99h Robotics Competition Program	Michigan Department of Education

Status	Date	Due Date
Application In Progress	9/26/2023	9/26/2023
Progress	1:26:46 PM	

Proceed through each screen in the order they appear down the left side ribbon.

NexSys Grant, Application and Cash Management System QA - UAT **MICHIGAN** Department of Education

Home Administration Searches Test OESAO New Note

Document Overview

Template Title I Part A Comparability	Instance Title I Part A Comparability	Process NexSys Reports	
Document Name	Document Status Report In Progress		
Organization	Your Role Authorized Official (5)	Period Date 7/1/2022 12:00:00 AM 7/1/2023 12:00:00 AM	Due Date 12/1/2022 11:59:59 PM

Report In Progress (checked) | Submit Report | Review In Progress | Modifications In Progress | Modifications Submitted | Report Accepted | Administrative Review Complete | Modifications Required | Report Not Acceptable

Grant Management Section

The first screen that must be completed is the Cover Page. Choose a main contact from the drop-down menu. You may also choose a secondary contact if you wish.

The screenshot displays the Grant Management Section interface. The top navigation bar includes 'Home', 'Administration -', and 'Searches -'. The left sidebar contains a menu with 'Forms' expanded, showing 'Grant Management' selected, and 'Cover Page' with a checkbox. Below this are 'Important Information', 'School Information', 'Import Data on Schools in the District', 'Data on Schools in the District', 'Attachments', 'Additional Supporting Documentation (if requested by Office of Educational Supports)', 'State of Michigan Attachments', and 'Tools' expanded with 'Landing Page' and 'Add/Edit People'. The main content area is divided into three sections: 'Application Description' with fields for Entity Name, Agreement Number, Entity Address, City, Zip Code, and Entity County; 'Main Contact Person' with a Contact Name dropdown menu, Address, City, Zip Code, Telephone, Fax, and Email Address fields; and 'Secondary Contact Person' with a Contact Name dropdown menu. A pink arrow points to the 'Save' button in the top right corner, and two other pink arrows point to the 'Contact Name' dropdown menus in the 'Main Contact Person' and 'Secondary Contact Person' sections.

Next, move to the Important Information Screen, read through the information, and click "Save".

The screenshot displays the NeSys Grant, Application and Cash Management System interface. The top navigation bar includes 'Home', 'Administration -', and 'Searches -'. The user is logged in as 'QA - UAT' and is viewing the 'Test OESAO -' page. The left sidebar contains a menu with 'Forms' expanded, showing options like 'Grant Management', 'Cover Page', 'Important Information', 'School Information', 'Import Data on Schools in the District', 'Data on Schools in the District', 'Attachments', and 'Tools'. The main content area is titled 'Important Information' and contains the text 'Really important info!'. A pink arrow points to the 'Save' button in the top right corner of the content area.

School Information Section

The first screen to complete in this section is Important Data on Schools in the District. By clicking "Save" on this screen, the most recent data from the Data on Schools in the District screen in the NexSys Consolidated Application will be pulled in for applicable grade spans. Each time a change is made to the Data on Schools in the District screen in the Consolidated Application, this screen will need to be resaved to align

The screenshot displays the NexSys web application interface. At the top left is the NexSys logo with the text "Grant, Application and Cash Management System". In the top center, it says "QA - UAT". At the top right is the Michigan Department of Education logo. Below the logos is a navigation bar with "Home", "Administration -", and "Searches -". On the right side of the navigation bar, there is a user profile icon and a dropdown menu labeled "Test OESAO -". Below the navigation bar is a sidebar menu with categories: "Forms", "Grant Management", "Cover Page", "Important Information", "School Information", "Import Data on Schools in the District", "Data on Schools in the District", "Attachments", and "Tools". The main content area is titled "Import Data on Schools in the District". It contains instructions: "Use the 'Save' button to import data from your NexSys Consolidated Application into the Title I, Part A Comparability report. If changes are made to the data on schools contained within your NexSys Consolidated Application, you will need to re-save this screen to update the data contained within your Comparability Report. *WARNING: Clicking on the Consolidated Application link will exit you out of the Comparability Report*". Below the instructions is a table with two columns: "Import School Data" and "Last Import Date". In the top right corner of the main content area, there is a green bar with buttons for "New Note", "Print", and "Save". A pink arrow points to the "Save" button.

On the Data on Schools in the District Screen, the most current student count data for the buildings must be entered. Please note that this should be data from the Fall 2023 student count.

The screenshot shows a web application interface with a sidebar on the left containing navigation options like 'Forms', 'Grant Management', and 'Data on Schools in the District'. The main content area has a blue header with 'Home', 'Administration', and 'Searches'. Below the header, there are 'Instructions' and an 'Attention' callout box. The 'Attention' box contains two red warning icons and text stating: 'Current Fall Total Student Count is required for each school.' and 'Current Fall Low-Income Student Count is required for each school.' Below the instructions is a table titled 'DEFAULT SECTION' with columns: Agreement Number, School, Title I, Small School, Prior Fall Total Student Count, Current Fall Total Student Count, Prior Fall Low-Income Student Count, Current Fall Low-Income Student Count, and Exclude?. The 'Current Fall Total Student Count' and 'Current Fall Low-Income Student Count' columns are highlighted with a pink border. The table contains three rows of data with empty input boxes in the highlighted columns.

Instructions:

Title I, Part A Comparability will pull information on all applicable schools from your Consolidated Application. If the LEA has reconfigured, opened, or closed buildings, contact the Office of Educational Supports at 517-241-6970 for instructions on how to ensure the information in your Consolidated Application is updated. Based on data from the Consolidated Application, only schools from grade spans with more than one school and at least one Title I school will be listed. The Title I Targeted.

For each listed school:

- * In the "Current Fall Total Student Count" column enter the total number of students enrolled based on the **current year fall count**. Do not include preschool students or students in an ungraded program over the age of 18 in the count.
- * In the "Current Fall Low-Income Student Count" enter the number of low-income students enrolled based on the **current year fall count**. Do not include preschool students, shared-time students, or students in an ungraded program over the age of 18 in the count.
- * The district may choose to exclude any school with an enrollment of 100 or less from the comparability calculations. Check the box in the "Exclude?" column to designate any schools to be excluded.
- * If the total student count for the largest school in the grade span is two times or more than the smallest school, the district may choose to break the grade span into small and large schools. Click the box to make a school part of the "small school" group. Each small school must have a total student count that is half or less than the largest school in the grade span or not more than twice the size of the smallest school in the grade span. If designating small and large schools and there is only a single small or large school in a grade span, the school that ends up in a group by itself will not need to demonstrate comparability.

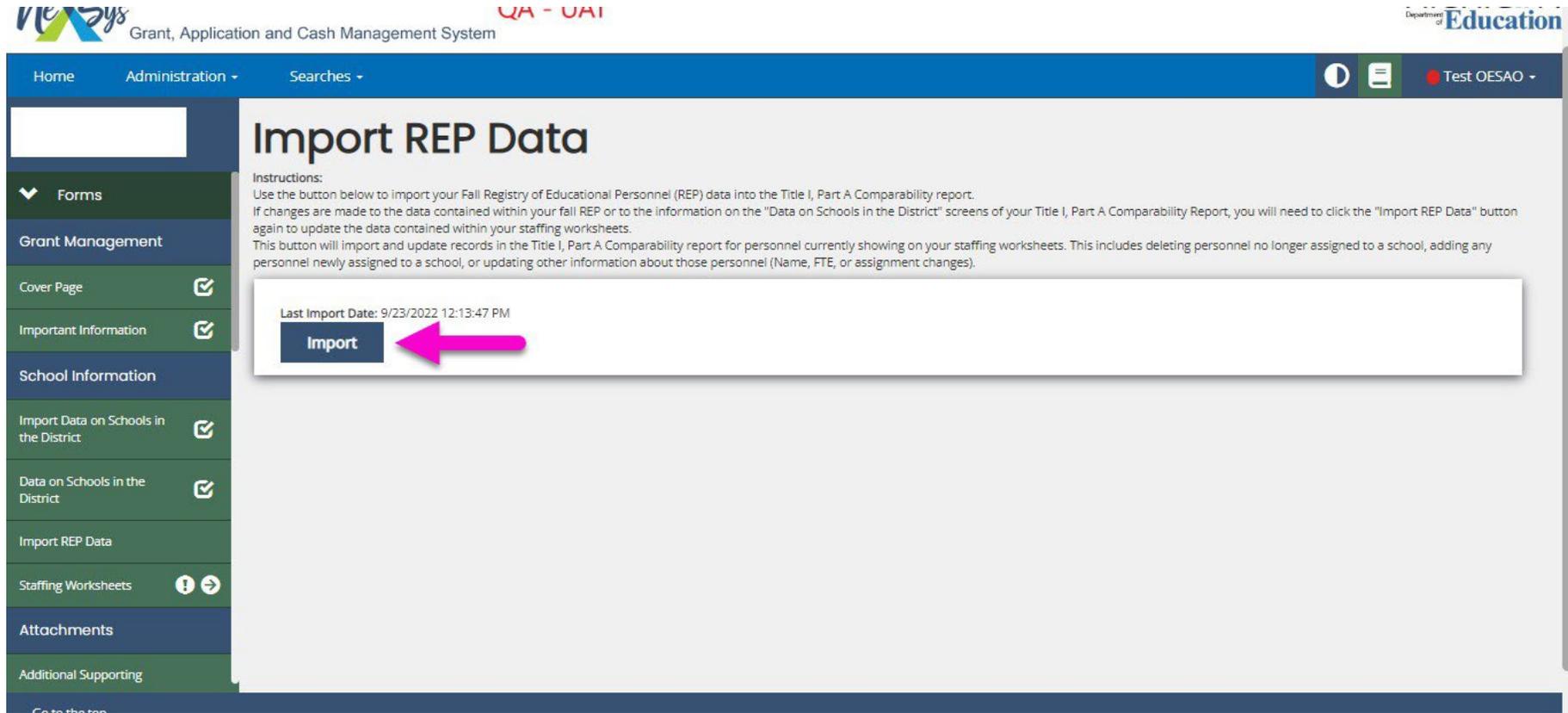
Attention

- Current Fall Total Student Count is required for each school.
- Current Fall Low-Income Student Count is required for each school.

DEFAULT SECTION

Agreement Number	School	Title I	Small School	Prior Fall Total Student Count	Current Fall Total Student Count	Prior Fall Low-Income Student Count	Current Fall Low-Income Student Count	Exclude?
	-	<input type="checkbox"/>	<input type="checkbox"/>	667	<input type="text"/>	349	<input type="text"/>	<input type="checkbox"/>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	364	<input type="text"/>	311	<input type="text"/>	<input type="checkbox"/>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	514	<input type="text"/>	409	<input type="text"/>	<input type="checkbox"/>

The next screen to visit in the School Information section is Import REP Data. Simply click on the "Import REP Data" button. The import process could take several minutes, so please only click once. You will know that the data was imported by the date and time stamp that appears. Each time the REP report is altered, this process must be redone.



School Staffing Worksheets – Part 1

After the REP data has been imported, the School Staffing Worksheets should appear. To access each, you will need to click on the circle/arrow icon and click on each school that appears. Note that schools may have multiple pages due to the number of staff at each building.

The screenshot displays the Michigan Department of Education's GACS interface. The top navigation bar includes 'Home', 'Administration', and 'Searches'. The main content area is titled 'Staffing Worksheets' and 'Data'. The left sidebar contains a navigation menu with the following items: 'Cover Page', 'Important Information', 'School Information', 'Import Data on Schools in the District', 'Data on Schools in the District', 'Import REP Data', 'Staffing Worksheets' (highlighted with a pink arrow), 'Attachments', 'Additional Supporting Documentation (if requested by Office of Educational Supports)', and 'State of Michigan'. The main content area shows a 'Data' section with a table of schools. A pink arrow points to a circle/arrow icon in the table header, and another pink arrow points to the 'Staffing Worksheets' menu item.

School Staffing Worksheets – Part 2

For each Staffing Worksheet, follow the directions on the screen and save.

Staffing Worksheets

Attention
Please save this page to continue.

Instructions:

For each staff member, in the "Federally Funded FTE" column, enter the portion of the staff member's Full Time Equivalency (FTE), if any, that is paid for with federal funds. The federally funded category includes all FTE's paid for with Title I, Title II, Title III, Title IV, Title V, Title VI, Title IX or IDEA funds. FTEs paid for with Section 31a funds that were used to meet rank and serve requirements in the Consolidated Application must also be reported in this column.

*If planning to exclude FTE's paid for with state and local funds that represent the excess costs for your Special Education Program, that are part of your English Learner Program, or that are part of other Excludable Programs also enter the portion of each staff member's FTE that applies to those programs. You must enter optional FTE information uniformly for all schools within a given grade span. The paraprofessional column will be automatically checked based on the data from the Registry of Educational Personnel.

Name	Total FTE Assigned to School	Federally Funded FTE	State or Locally Funded English Learner Program FTE	Excess Costs for State or Locally Funded Special Education Program FTE	Other State or Locally Funded Excludable Program FTE	Paraprofessional	Assignment Description
	1.00					<input type="checkbox"/>	English
	1.00					<input checked="" type="checkbox"/>	Special Education Instructional Paraprofessional/Aide
	1.00					<input type="checkbox"/>	Special Education Class, Non-Core Academic Subjects
	.60					<input type="checkbox"/>	Dance
	1.00					<input checked="" type="checkbox"/>	Special Education Instructional Paraprofessional/Aide
	1.00					<input checked="" type="checkbox"/>	Special Education Instructional Paraprofessional/Aide

Comparability Analysis Section

Check the far-right column in the chart on this page to see if schools are comparable. If the schools are comparable, you will see a “yes” in this column. If all “yes” answers appear, you are ready to submit, and no additional work or attachments are needed. Please move to the “Report Submission” directions.

Will indicate if each school is comparable in the table below, review the results to verify if all of the Part A schools have met comparability. If a school is not comparable, adjust optional exclusions and/or enter in values in the State and Locally Funded FTE Adjustments column, then save the screen to update calculated values.

English Learner Program Staff?

Special Education Program Staff?

Other Excludable Program Staff?

Element Number	School	Title I School?	Total Student Count	Balance of Non-Federally Funded Staff FTE	EL Program FTE	Special Education Program FTE	Other Excludable Program FTE	State and Locally Funded FTE Adjustments	Balance of FTE for Comparability	Student/ Instructional Staff Ratio	Comparable by Staffing?
22	[Redacted]	<input type="checkbox"/>	670	50.000	3.000	3.000	3.000	<input type="text"/>	31.000	21.613	
61	[Redacted]	<input checked="" type="checkbox"/>	365	10.360	0.000	0.000	3.550	10.000	16.810	21.713	Yes
61	[Redacted]	<input checked="" type="checkbox"/>	515	20.800	0.000	0.000	0.000	5.000	25.800	19.961	Yes
Non-Title I Schools			670	50.000	3.000	3.000	3.000	-10.000	31.000	21.613	

If making any adjustments, please click the assurance below and use the text box to describe the specific actions that will be taken.



What if schools are not comparable – Part 1

If any schools are not comparable, there are multiple ways to try to meet comparability:

1. Verify that the REP data and staffing worksheets are correct. Make any corrections needed in the staffing worksheets and resave.

What if schools are not comparable – Part 2

2. Utilize the optional exclusions drop-downs at the top of this page (English Learner staff, Special Education Program Staff, Other Excludable Program Staff (i.e., Section 31a)).

Analysis

23,774 All Title I, Part A schools listed below must have a Student/Instructional Staff Ratio below this value.

NexSys will indicate if each school is comparable in the table below, review the results to verify if all of the Title I, Part A schools have met comparability. If any school is not comparable, adjust optional exclusions and/or enter in values in the State and Locally Funded FTE Adjustments column, then save the screen to update calculated values.

Exclude English Learner Program Staff?

Exclude Special Education Program Staff?

Exclude Other Excludable Program Staff?

Agreement Number	School	Title I School?	Total Student Count	Balance of Non-Federally Funded Staff FTE	EL Program FTE	Special Education Program FTE	Other Excludable Program FTE	State and Locally Funded FTE Adjustments	Balance of FTE for Comparability	Student/ Instructional Staff Ratio	Co by
		<input type="checkbox"/>	670	50.000	3.000	3.000	3.000		31.000	21.613	
		<input checked="" type="checkbox"/>	365	10.360	0.000	0.000	3.550	10.000	16.810	21.713	
		<input checked="" type="checkbox"/>	515	20.800	0.000	0.000	0.000	5.000	25.800	19.961	
Total for Non-Title I Schools			670	50.000	3.000	3.000	3.000	-10.000	31.000	21.613	

If entering in any adjustments, please click the assurance below and fill out the text box to describe the specific actions that will be taken.

What if schools are not comparable – Part 3

3. Use the State and Locally Funded FTE Adjustments column to meet comparability. Please note that any adjustments in staffing made must be further explained in the box at the bottom of this page. All staffing adjustments must be made by the end of January in the same school year that comparability is not achieved.

No

New Note | Print | S

Agreement Number	School	Title I School?	Total Student Count	Balance of Non-Federally Funded Staff FTE	EL Program FTE	Special Education Program FTE	Other Excludable Program FTE	State and Locally Funded FTE Adjustments	Balance of FTE for Comparability	Student/ Instructional Staff Ratio	Cor by
		<input type="checkbox"/>	670	50.000	3.000	3.000	3.000		31.000	21.613	
		<input checked="" type="checkbox"/>	365	10.360	0.000	0.000	3.550	10.000	16.810	21.713	
		<input checked="" type="checkbox"/>	515	20.800	0.000	0.000	0.000	5.000	25.800	19.961	
Total for Non-Title I Schools			670	50.000	3.000	3.000	3.000	-10.000	31.000	21.613	

If entering in any adjustments, please click the assurance below and fill out the text box to describe the specific actions that will be taken.

Assurance:

By checking this box, I, Erin Porteous, assure that the actions described below will be taken by January 31st of the current school year to ensure that each of the schools listed above meets the Title I, Part A comparability requirements. The described actions fully support and explain any state and locally funded FTE adjustments entered into the table above.

Actions:

Describe the specific action or actions that will be taken to meet comparability requirements or the rationale supporting the need for the staffing adjustments identified in the table above. Be specific including names of staff being changed (if known), their specific role, the specific building(s) impacted, the specific FTE amount being adjusted, and the breakdown of how that FTE will be funded. If additional room is needed please attach additional supporting documentation.

We will be adding 10 FTEs to X School and 5 FTEs to Y School for the second semester to bring the non-comparable schools into comparability.

140 of 5000

Add FTE to each non-comparable building and provide a detailed explanation.

If a district has all Title I, Part A schools within a grade span, you will have the option to choose to compare schools by Grade Span Average or Poverty Concentration at the top of this page.

You may choose either one of these to try to meet comparability.

Title I, Part A School Analysis

Instructions:

Choose the comparability criteria to be used for this group from the options below:

- Method One: Grade Span Average** - compare an individual school to a range which is between 90%-110% of the value for all schools in the group.
13.41 Highest permitted Student/Instructional Staff ratio
10.97 Lowest permitted Student/Instructional Staff ratio
- Method Two: Compare Based on Poverty Concentration** - compare individual high-poverty schools to 110% of the value for the low-poverty group.
13.89 All High-poverty schools must be below this value

For method two please click the check boxes to indicate the schools that will form the low-poverty comparison group, beginning with the school with the lowest percent low-income. Not more than one-half of the Title I, Part A schools can be selected for the comparison group.

NexSys will indicate if each school is comparable in the table below, review the results to verify if all of the Title I, Part A schools have met comparability. If using method two, schools in the comparison group do not need to meet comparability. If any school is not comparable, adjust optional exclusions and/or enter in values in the State and Locally Funded FTE Adjustments column, then save the screen to update calculated values.



Attachments: This section may be used if a district needs to attach any documents to further explain their plan to adjust staffing in order to meet comparability.

Report Submission: To submit the completed report, choose “Submit Report” under the Status Option menu.



Common Errors (Student Counts) – Part 1

- Inclusion of "non-eligible" students:
 - Shared-time
 - Private school
 - Non-grade-assigned
 - Younger than 5 on December 1
- Not including all eligible Free and Reduced Students
 - Include direct certification and categorically eligible students



Common Errors (Staff Counts) – Part 2

- Instructional staff are coded incorrectly in the REP
 - Wrong building
 - Administrative – will not show up
 - Non-certified/Non-instructional – will not show up
 - FTE errors in REP
 - Staff members missing from the REP
 - Long-term vs day-to-day subs
- Improper division of FTE between fund source/program on the staffing worksheets

REP FAQ Document 2023 – Part 1

Q: Which employees must be reported in the REP?

A: Effective January 1, 2006, Michigan law requires that criminal history checks be conducted by the Michigan State Police and the Federal Bureau of Investigation for all regular and contract employees hired or assigned by public schools in Michigan. Therefore, all school districts in the state of Michigan are required by statute to submit all school personnel data to the state via the Registry of Educational Personnel so that the checks may be conducted. As a guideline, if an individual is employed or contracted by the school, they need to be reported in REP (MCL 380.1230; 380.1230a; 380.1230d; 380.1539b; 380.1535a). This reporting mandate includes educators contracted to provide virtual instruction. Unpaid volunteers do not need to be reported in REP. Individuals who provide services such as roof repairs, furnace maintenance, serve as guest speakers or other sporadic or intermittent services are not required to be reported in the REP (Source: MDE, OEE).

REP FAQ Document 2023 – Part 2

Q: Which substitute employees must be reported in the REP?

A: All full-time, part-time, contracted, and substitute employees must be reported in the REP regardless of the assignment code or FTE. This includes substitute teachers, substitute support staff, secretaries, bus drivers, janitors, etc. For example, if the school secretary's position is being filled by a substitute employee while the secretary is out on sick leave, the substitute must be reported. Report the appropriate assignment code for the position being covered by the substitute

REP FAQ Document 2023 – Part 3

Q: What is the definition of a day-to-day substitute teacher?

A: A day-to-day substitute is an individual employed by the district to serve in short-term assignments that are less than one semester in length. Therefore, a school district can employ a person under a substitute permit as long as the assignment is less than one semester. These employees are considered day-to-day substitute teachers. (Source: MDE, OEE)

Q: Is there a unique assignment code for reporting day-to-day substitute teachers and day-to-day substitute paraprofessionals/aides?

A: Yes. Assignment code "00SUB" was created for day-to-day substitute teachers and assignment code "00PAR" was created for day-to-day substitute paraprofessionals/aides.

REP FAQ Document 2023 – Part 4

Q: What is the definition of a long-term substitute teacher?

A: A long-term substitute teacher is an individual employed as a regular or contract appointee to a single classroom or assignment for one semester or more. (Source: MDE, OEE)

Q: Is there a unique assignment code for reporting long-term substitute teachers?

A: No. District users are to report the assignment code for the position held by the long-term substitute teacher. For example, if the long-term substitute is assigned to a mathematics classroom, the assignment code would be “000EX.”



Helpful Links and Resources

- [MDE Office of Educational Supports Site](#)
- [Registry of Educational Personnel \(REP\)](#)
- [REP FAQ Document](#)



Questions?

Please contact your Regional Consultant at 517-241-6970