Title I, Part A Comparability

Office of Educational Supports

Michigan Department of Education

2024

MICHIGAN Department of Education

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

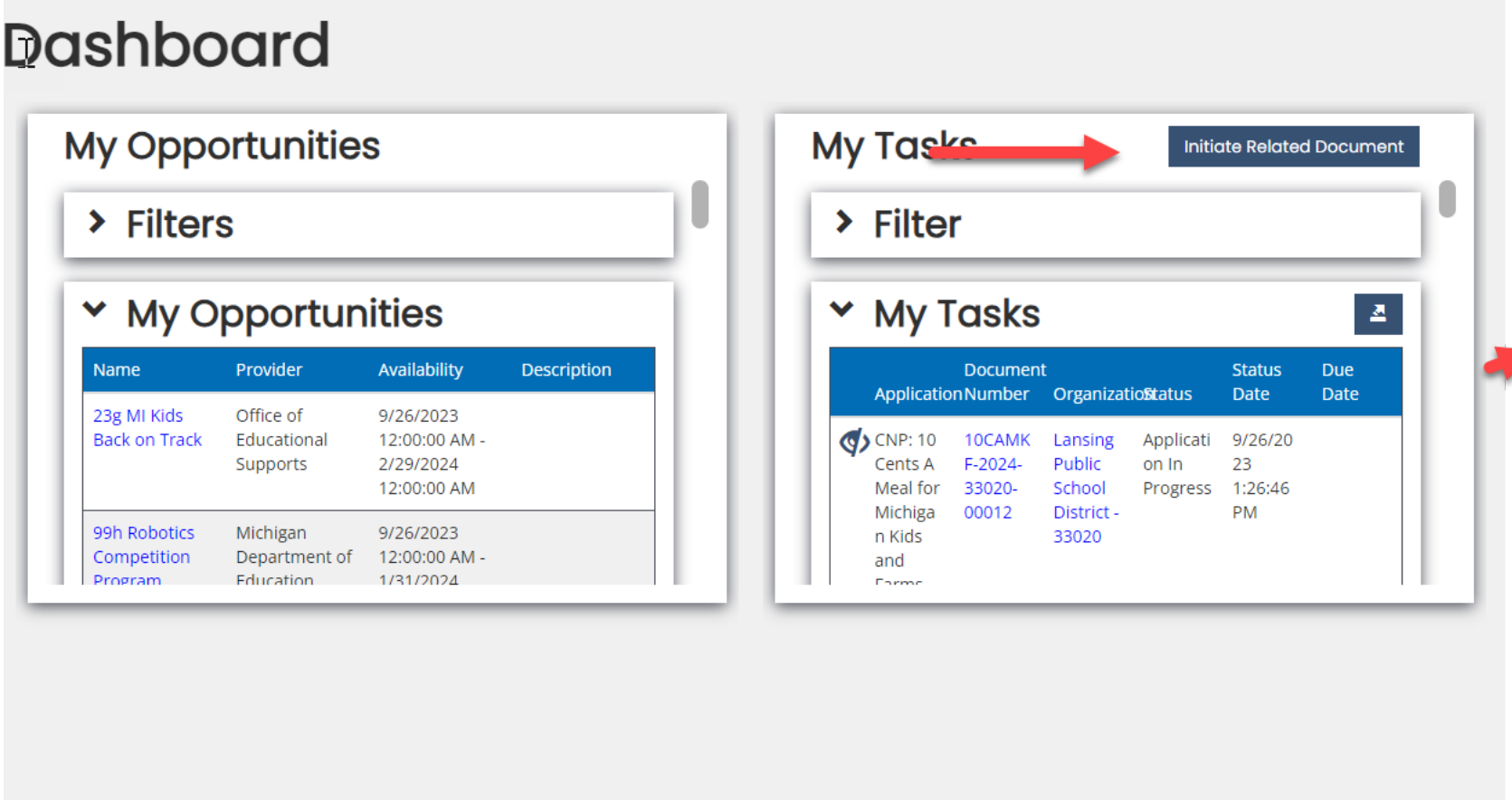
- **September 1, 2024:** Fall REP Collection Opens
- **October 2024:** Comparability Report Available
- **December 1, 2024:** Deadline for LEAs to validate REP data and ensure all staff have been properly entered and coded.
- **December 15, 2024:** Comparability Report submission deadline.
- **January 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.

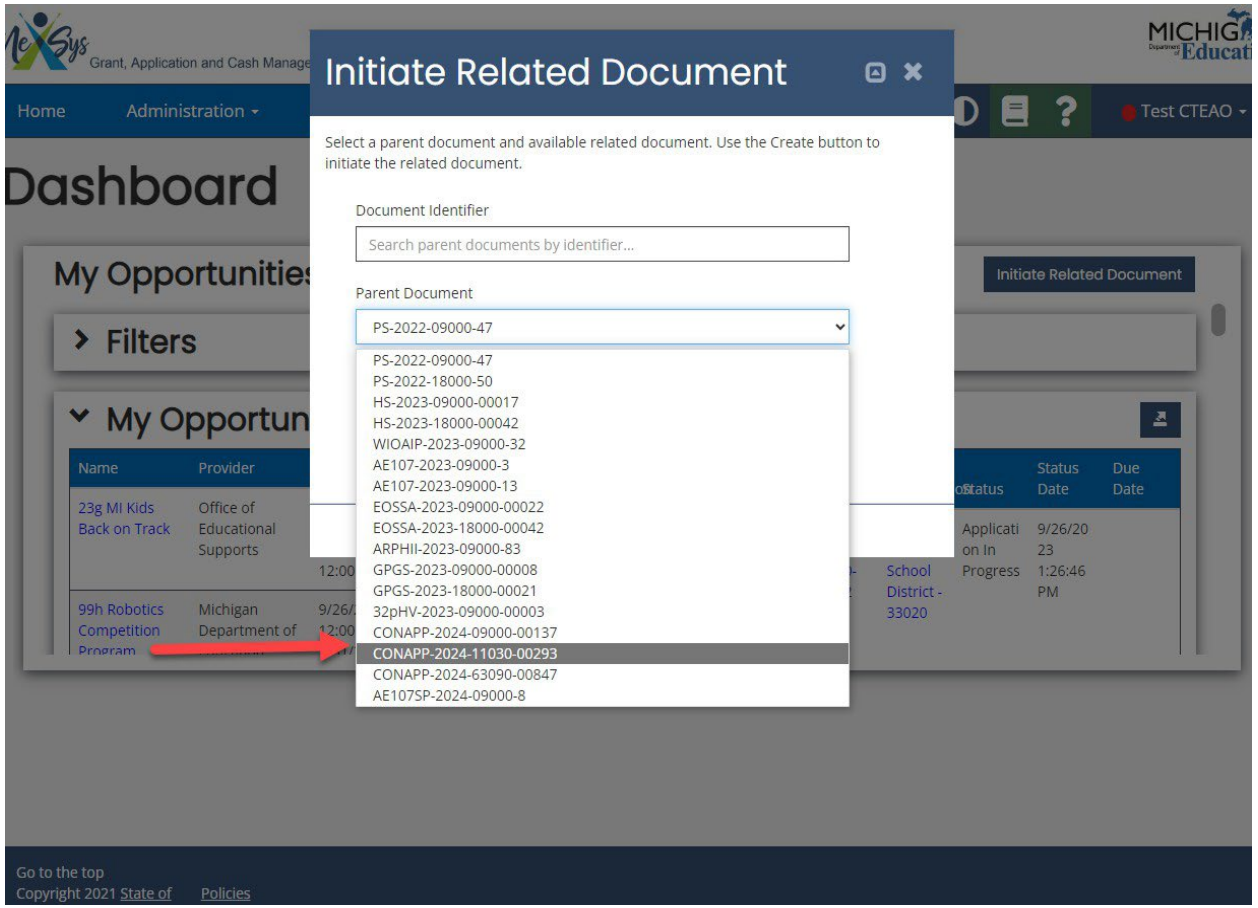
NexSys Title I, Part A Comparability Report

MICHIGAN Department of Education

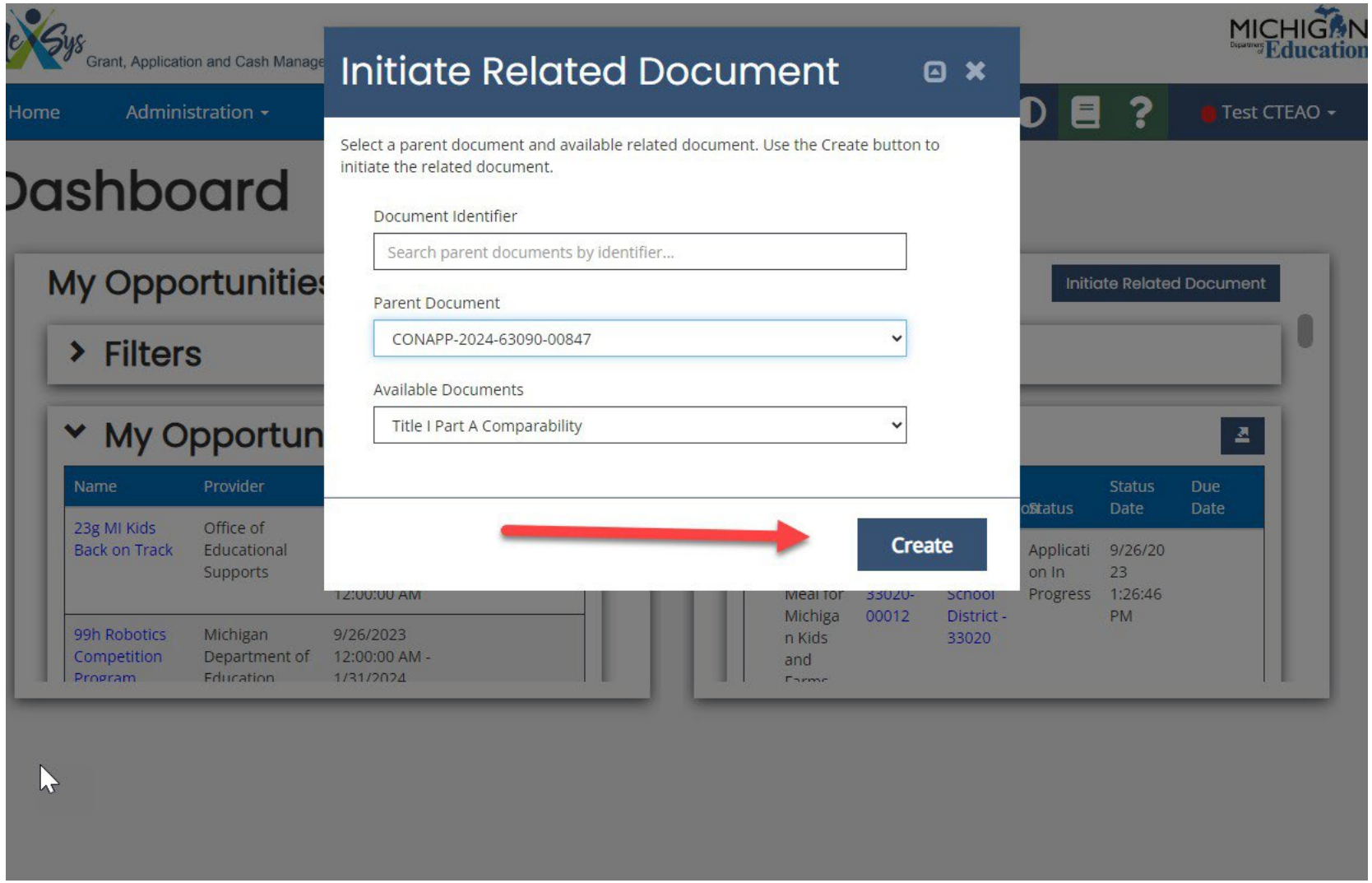
After logging into NexSys, you should see the “Initiate Related Document” button to the right of the My Tasks pane. Click on it.



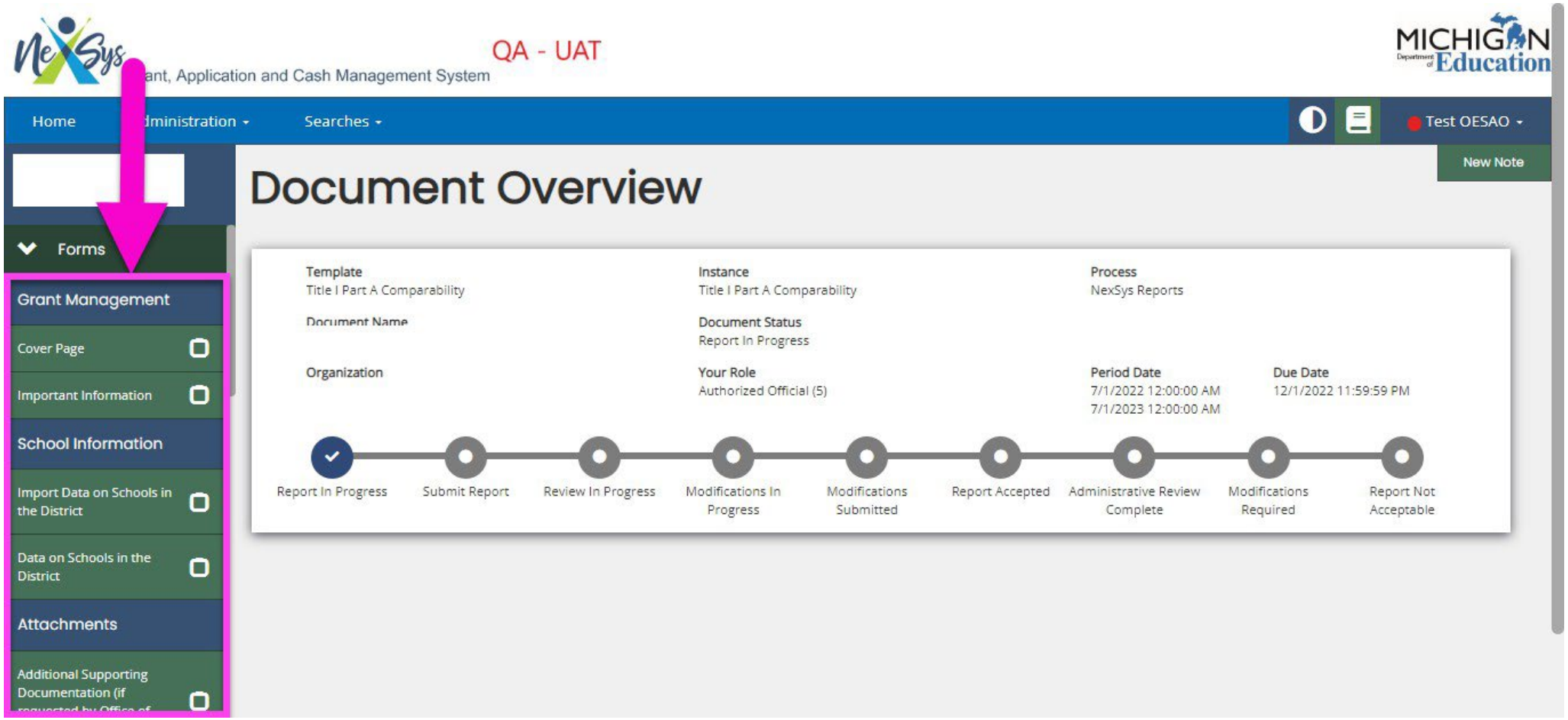
When the “Initiate Related Document” window appears, select the appropriate Parent Document from the drop down. This will be the Consolidated Application Document Number, which begins with CONAPP-2024.



Click the “Create” button.

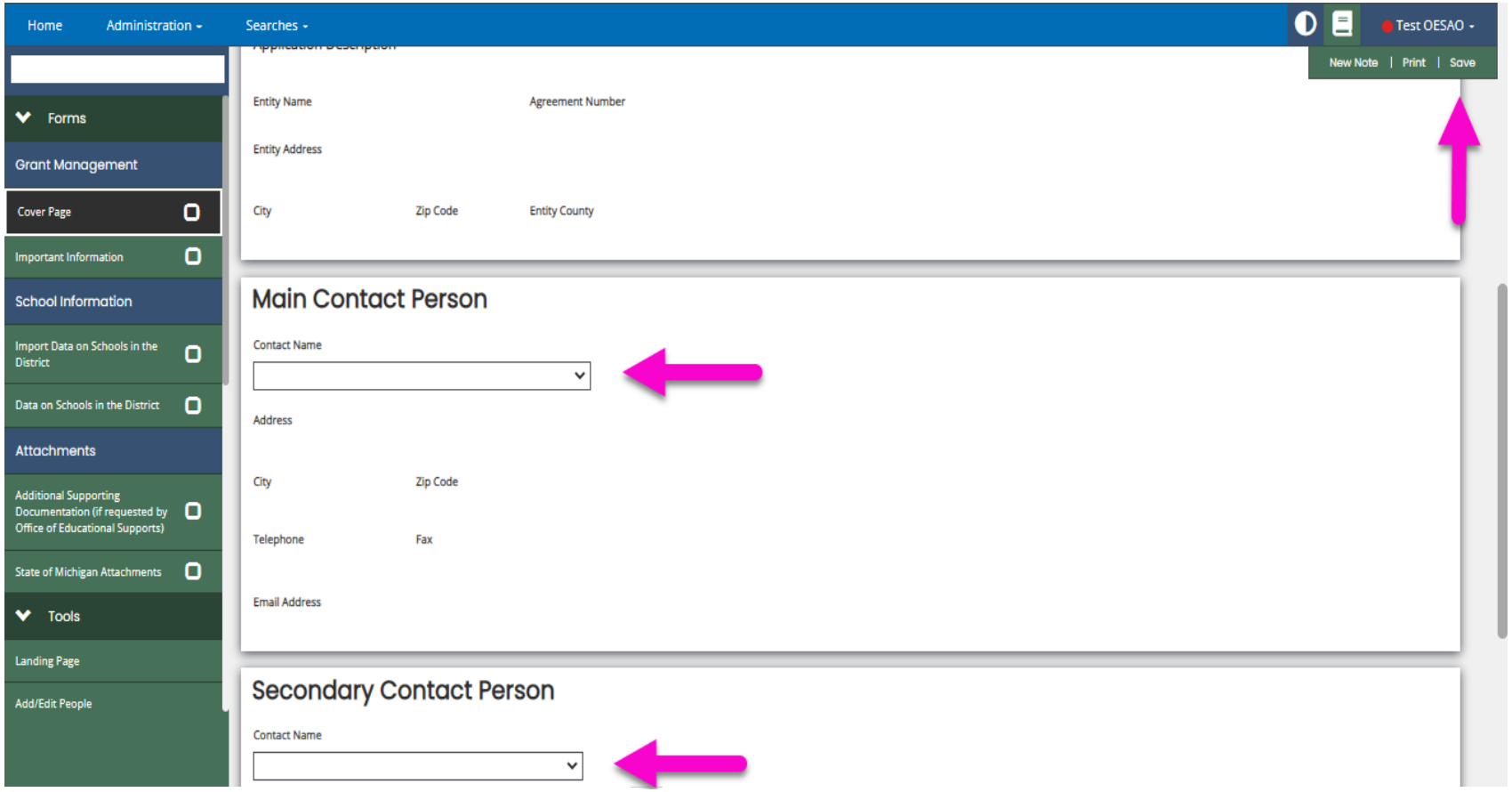


Proceed through each screen in the order they appear down the left side ribbon.

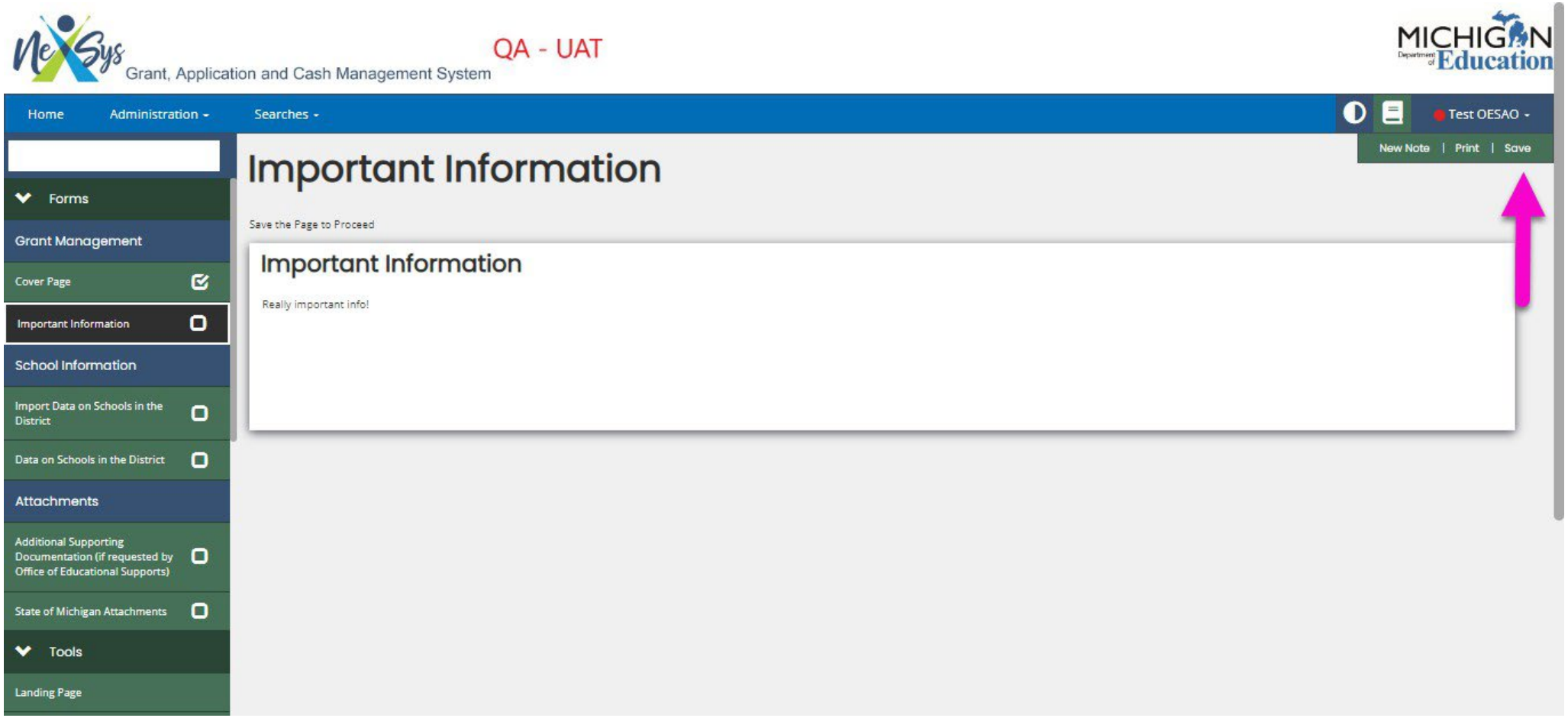


Grant Management Section

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.

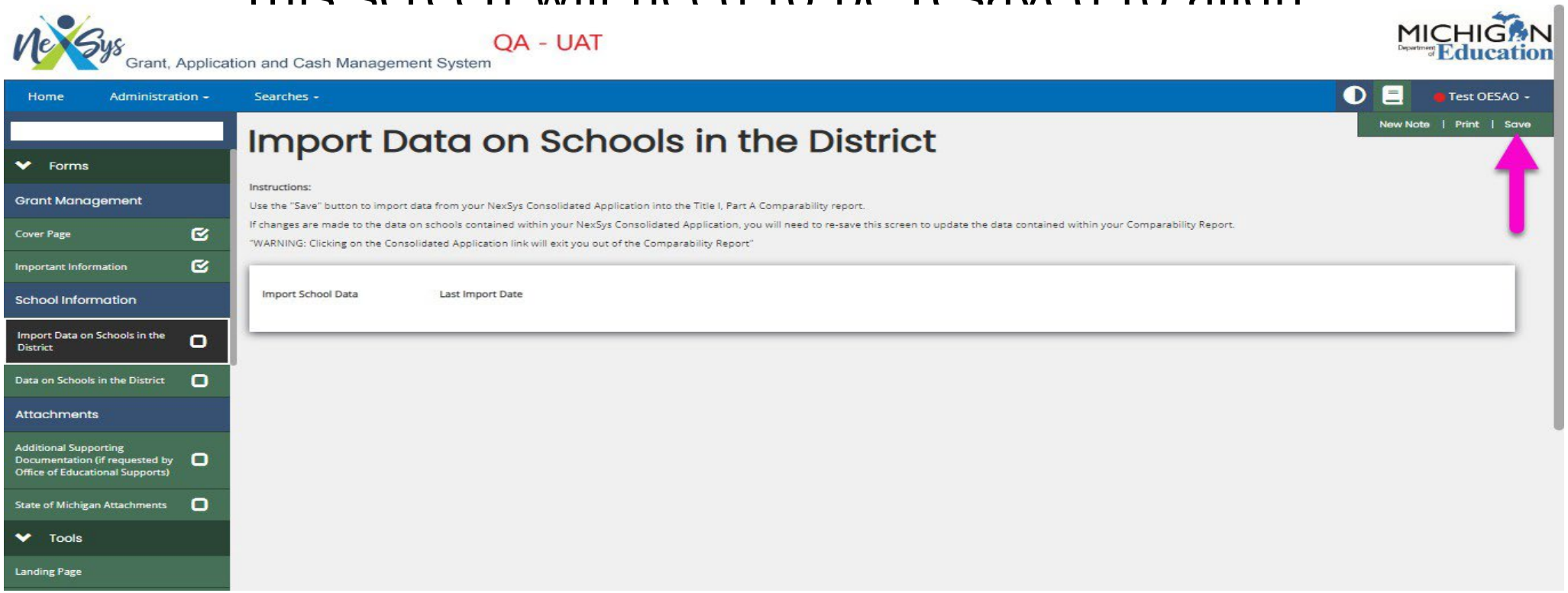


Next, move to the Important Information Screen, read through the information, and click “Save”.

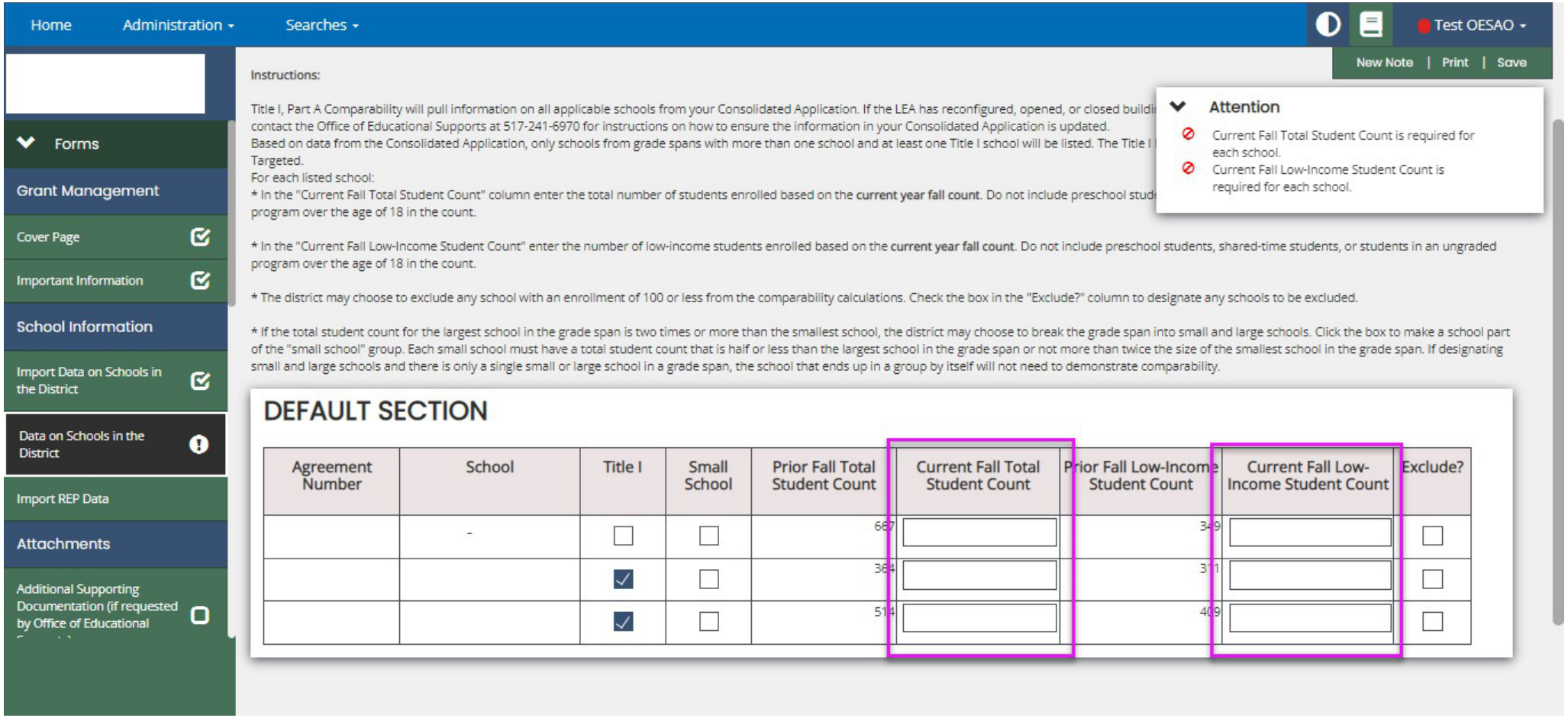


School Information Section

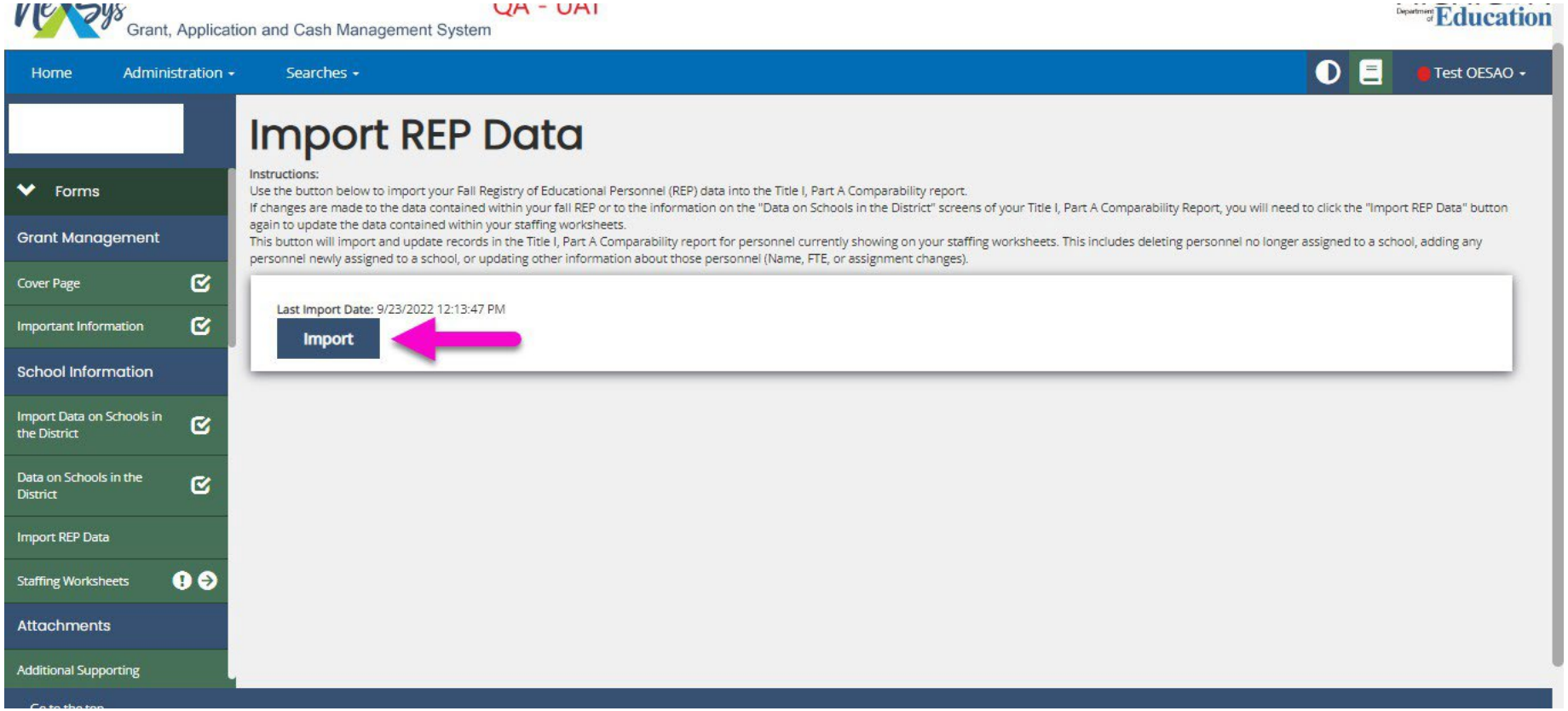
The first screen to complete in this section is Important Data on Schools in the District. By clicking "Save" on this screen, the most recent data from the Data on Schools in the District screen in the NexSys Consolidated Application will be pulled in for applicable grade spans. Each time a change is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



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.

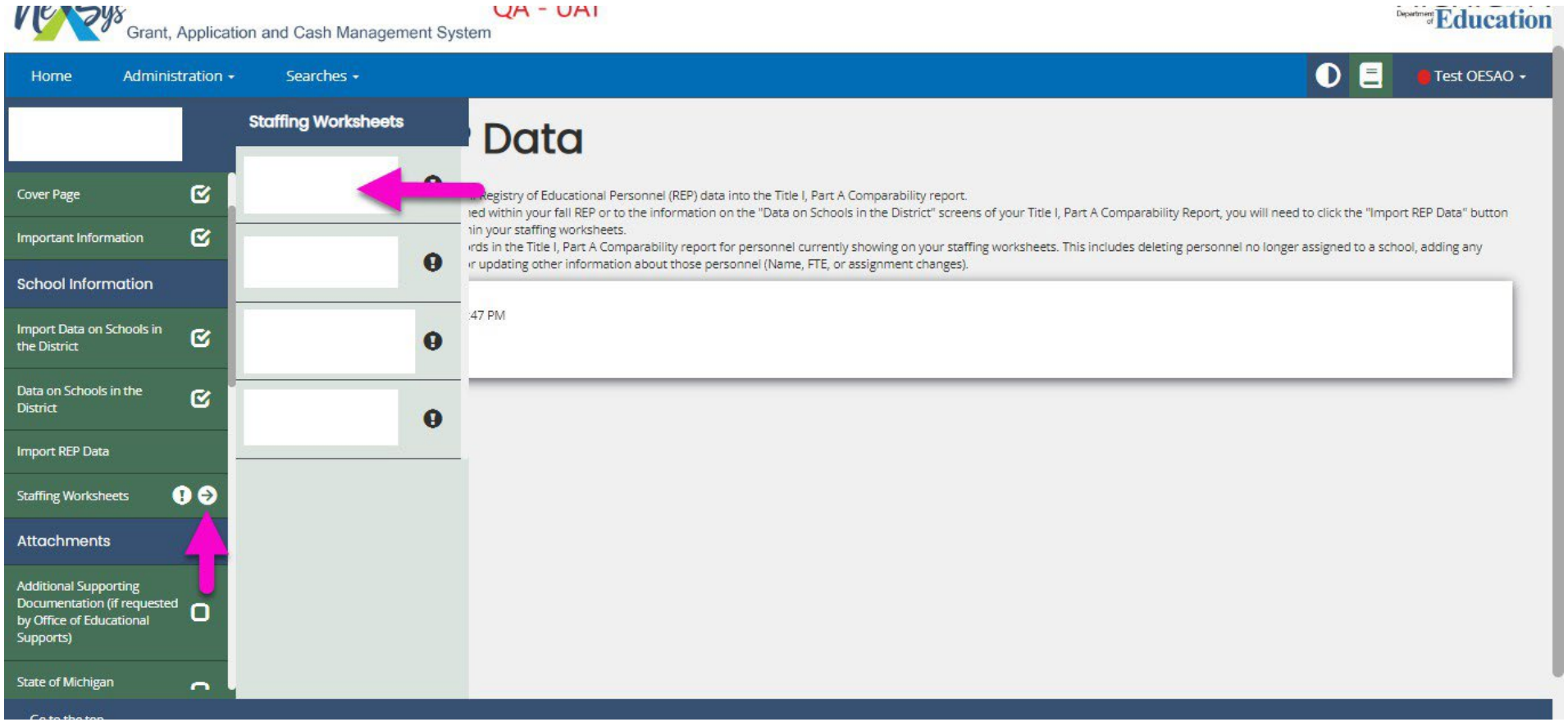


The next screen to visit in the School Information section is Import REP Data. Simply click on the "Import REP Data" button. The import process could take several minutes, so please only click once. You will know that the data was imported by the date and time stamp that appears. Each time the REP report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



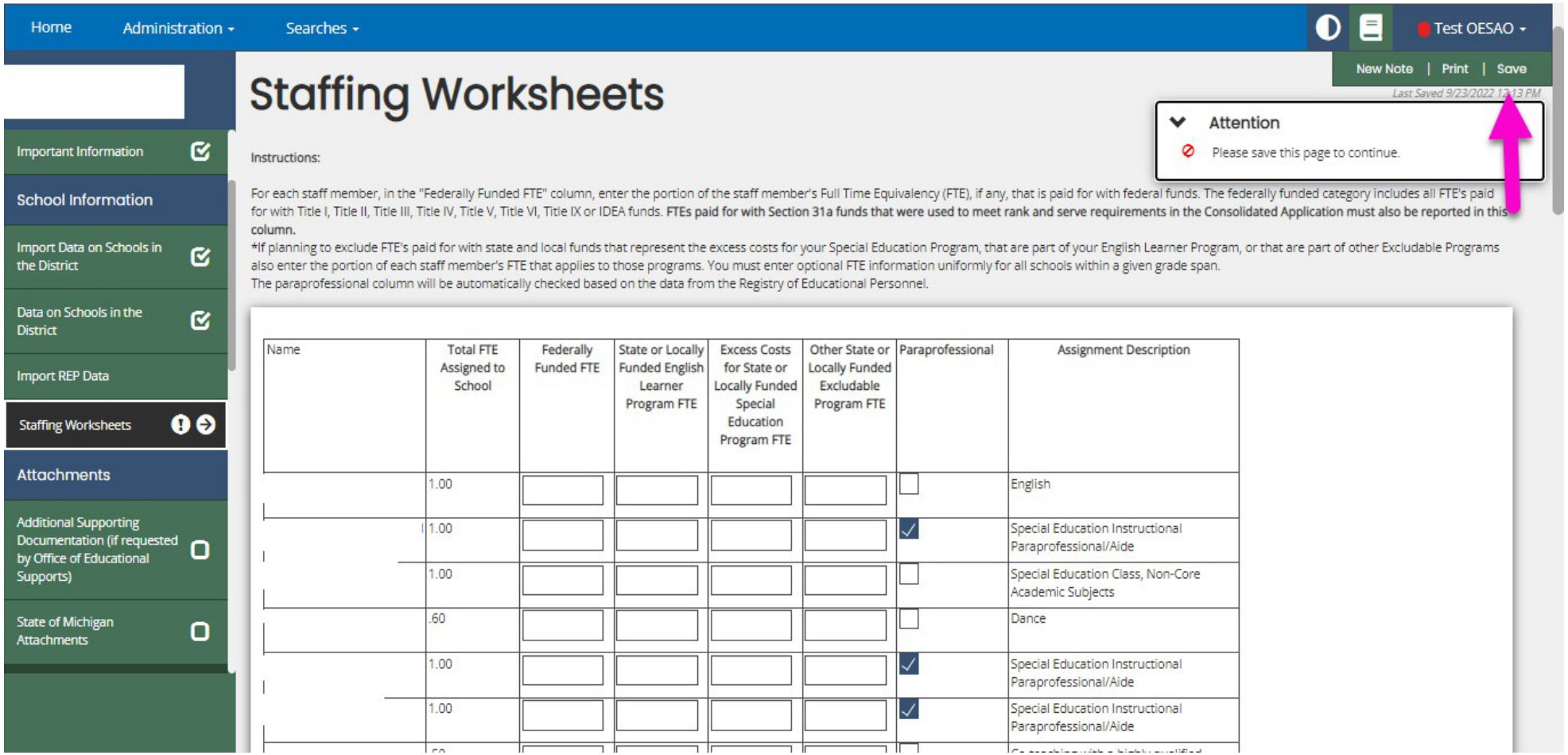
School Staffing Worksheets – Part 1

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.



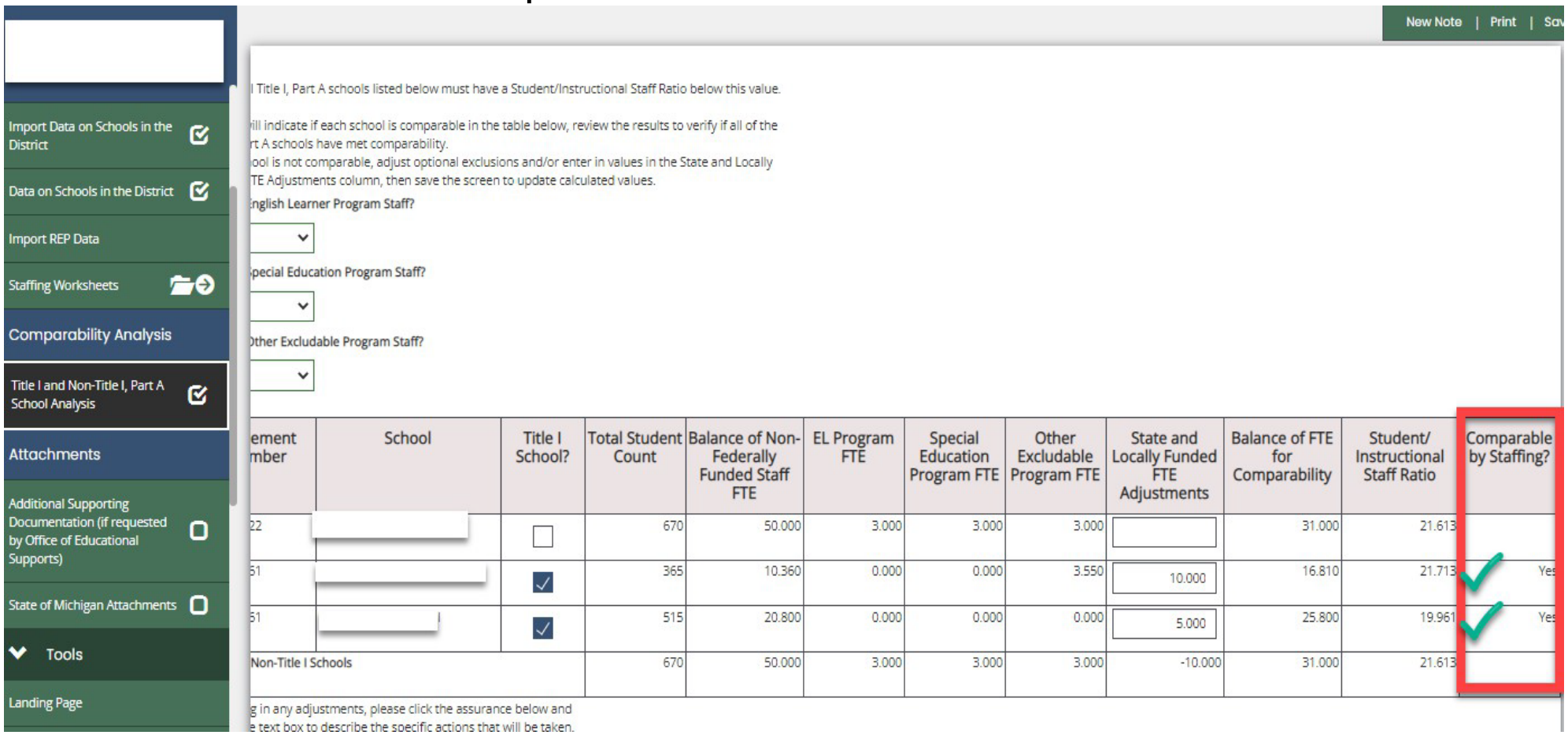
School Staffing Worksheets – Part 2

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



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.



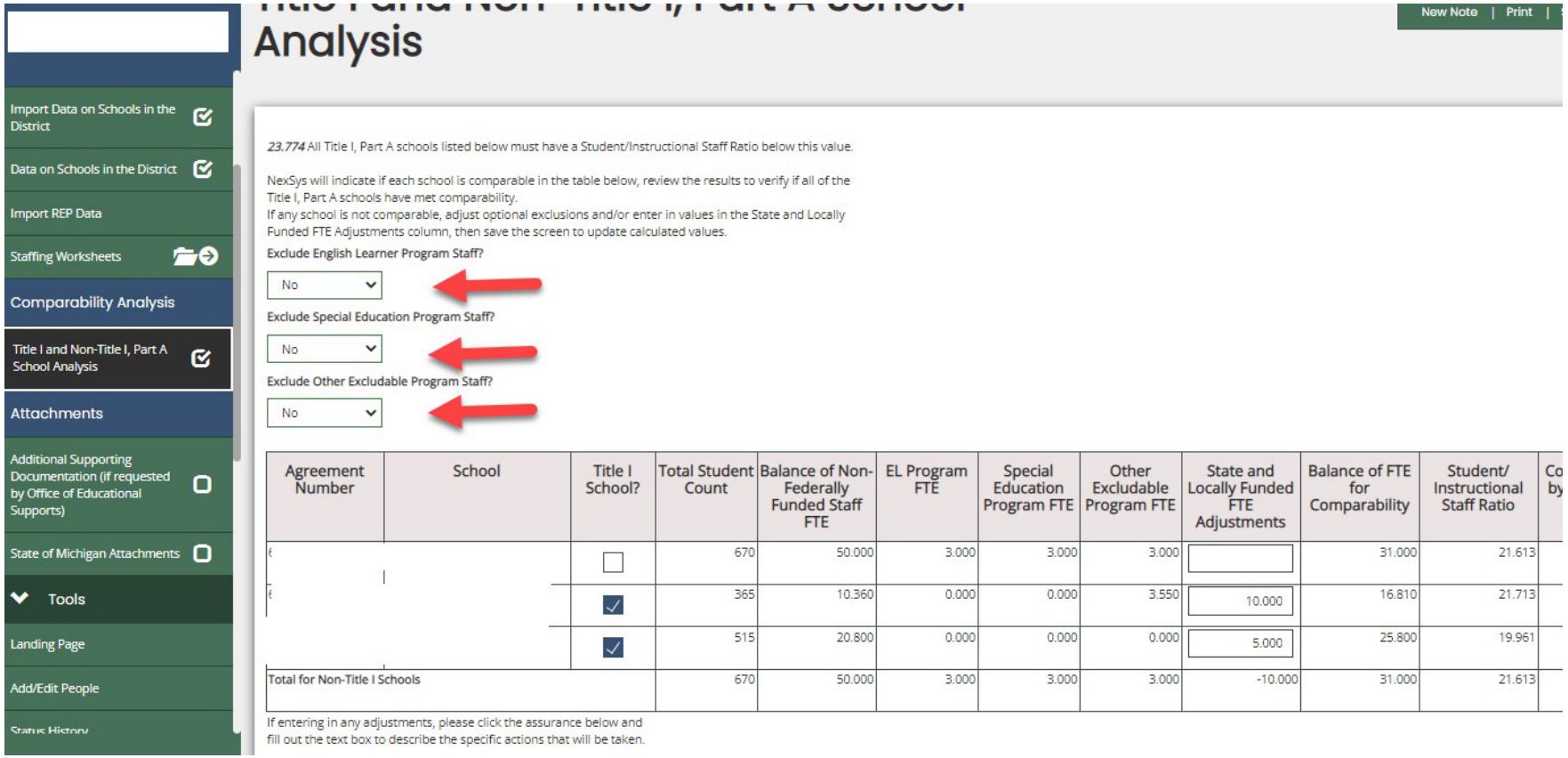
What if schools are not comparable – Part 1

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.

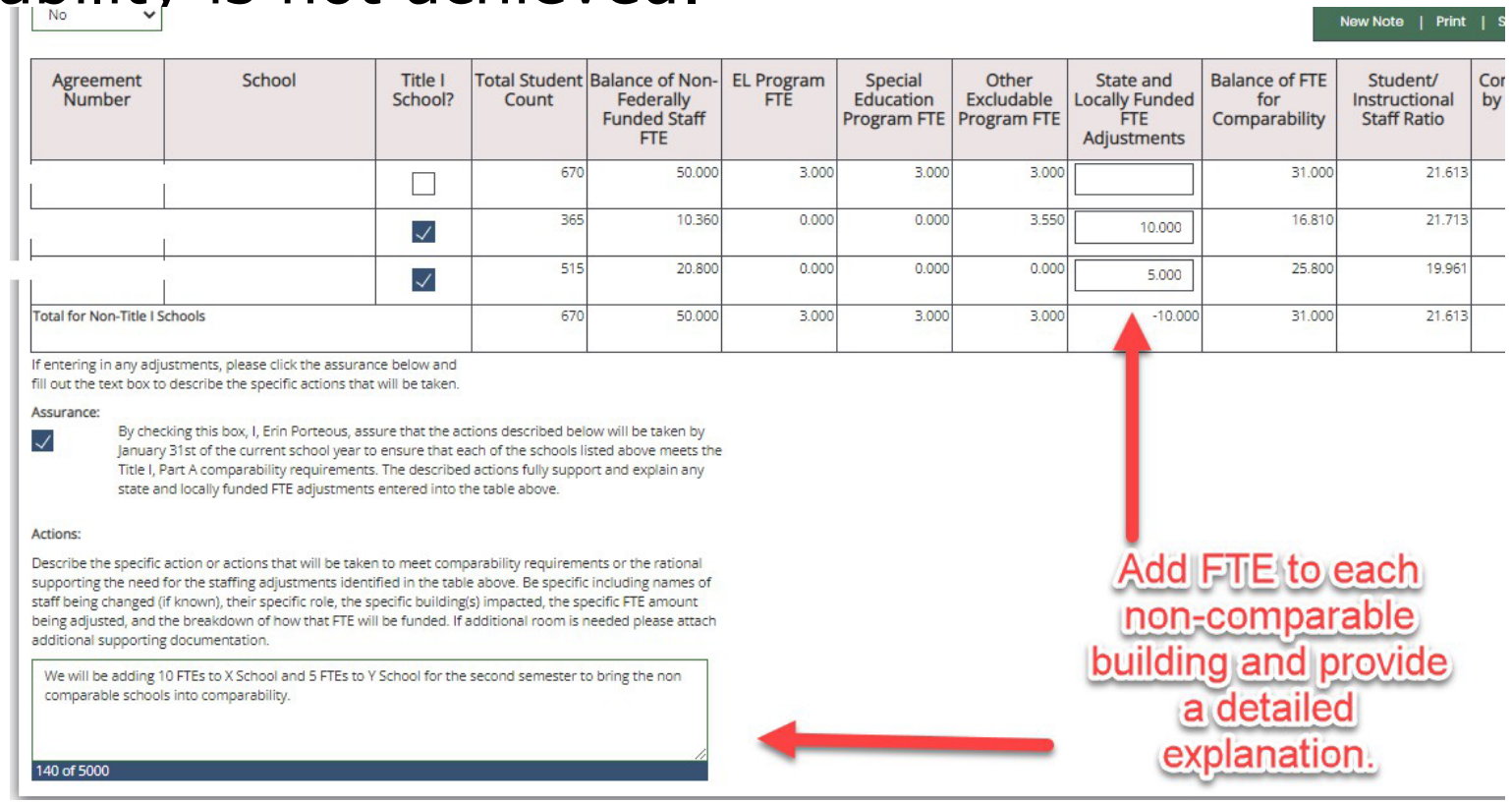
What if schools are not comparable – Part 2

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).

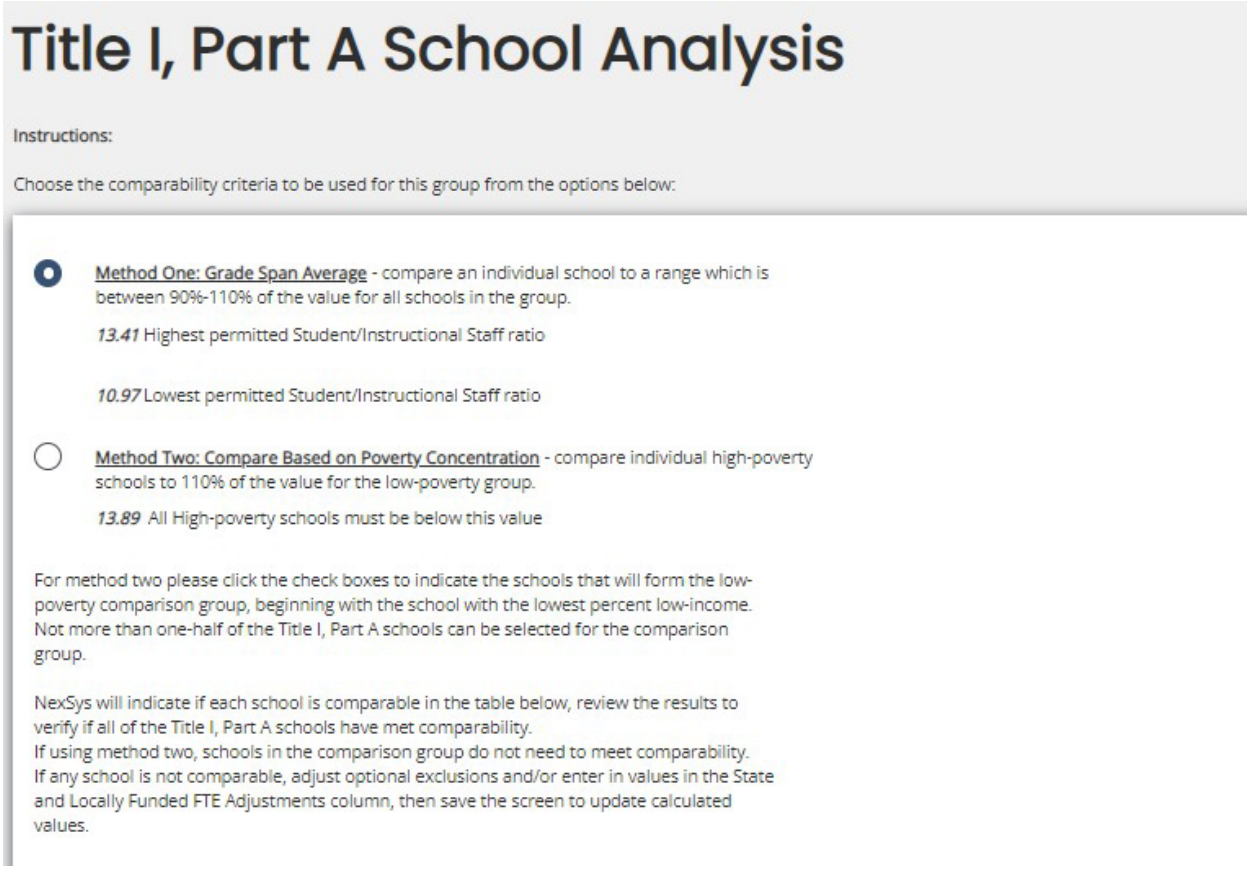


What if schools are not comparable – Part 3

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.



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