1. Which schools are included in comparability calculations?

All schools (Title I and non-Title I) within the grade spans(s) served with Title I funds are to be included in comparability calculations, unless the following exceptions are true. There are three exceptions: 1) the school has less than 100 students; 2) the school served is the only school within the grade span; 3) LEA only has one school per grade span.

2. How is the definition of Instructional Staff developed?

The LEA determines the definition of Instructional Staff. It is required that all personnel funded through federal funds be removed from the definition. Any state or local funded position that impacts student achievement may be included in the Instructional Staff definition.

3. Are charters required to demonstrate comparability?

LEAs that only have one school per grade span are exempt from comparability reporting. This would include virtually all charters. Feel free to email Alex Charles (Christopher.charles@dpi.nc.gov) if you have questions about if your school is exempt from comparability. If your charter is exempt, you are still required to upload the Comparability Header indicating “exempt” in the Title I Related Documents of CCIP.

4. Are Alternative Schools included in comparability calculations?

Yes – alternative schools are included in comparability reporting, unless they meet a comparability exemption.

5. Who is required to submit the comparability header?

All LEAs are required to submit the comparability header. If your LEA is exempt, this must be indicated on the header. All comparability documentation is uploaded into CCIP.

6. If my LEA / Charter is exempt, what are my responsibilities?

If your LEA / Charter is exempt, you are still required to upload the Comparability Header. You will indicate on this form that your LEA / Charter is “exempt” from comparability requirements. You will not have to complete any other comparability form. The Comparability Header must be uploaded into CCIP Title I Related Documents.

7. Who should sign the comparability report?

Comparability Reporting is a federal requirement. Due to the importance of this calculation, there will need to be more than one person checking this report. This will be demonstrated to the SEA by asking for the preparers name and position and also requiring a signature from a second LEA representative. The LEA representative must be the supervisor of the person completing the report, at minimum. For example, if a Title I director completes the report, then the Federal Program Director should sign the report; or if a Federal Program Director completes the report, then an Assistant Superintendent should sign the report. It is always acceptable for the Superintendent to sign the comparability report.
8. What is Pathway A?

Every Student Succeeds Act (ESSA) allows for two ways to demonstrate comparability. Pathway A allows comparability to be demonstrated through providing the following three documents:

- LEA-wide salary schedule (1118(c)(2)(A)(i))
- A policy to ensure equivalence among schools in teachers, administrators, and other staff (1118(c)(2)(A)(ii))
- A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies (1118(c)(2)(A)(iii))

It is understood that LEAs use the state salary schedule, so the documentation required to demonstrate bullet one is a detailed description of the LEA supplement and bonus guidelines.

The policies listed in bullets two and three must be board approved. An important note to remember is that the policy has to move beyond just “ensuring” to specific details as to how equitable distribution will occur and how it will be measured.

It is encouraged that if you choose to pursue Pathway A, an email be sent to Alex Charles (Christopher.charles@dpi.nc.gov) including the policies listed above in bullets two and three. Feedback will be given on the policies as to let you know if they meet the comparability requirements. If the policies do not meet the specificity required to demonstrate comparability, time needs to be allowed to complete the comparability worksheet.

9. Should only one form be used to demonstrate comparability?

One comparability form (A-D) should be used for each school grouping within the LEA. LEAs are allowed to group all schools into one grouping or to group based on grade span or school size or both grade span and school size. All forms not used should be deleted prior to uploading report into CCIP.

10. Are we allowed to create smaller grade spans?

Yes – LEAs are allowed to separate schools into non-traditional grade spans. For example, an LEA with non-traditional grade spans may decide to compare K-2 schools together and compare 3-5 schools as a different grouping.

11. How is a school that bridges multiple grade spans reported?

A school that bridges multiple grade spans should be compared with the grade span most like the bridge school. For example, a school that serves grades 4-8 overlaps both the elementary and middle grade spans. The LEA would make the determination of the most appropriate group to place the school (elementary or middle).

12. Will the PowerPoint be shared?

The PowerPoint and this FAQ will be posted on the “resource” page of the Federal Program Monitoring and Support webpage. The PowerPoint and FAQ were emailed out on the Title I listserv.

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