



# COMPARABILITY REPORTING PROTOCOL

Ensuring that Federal Funds are Supplemental

North Carolina Department of Public Instruction  
Federal Program Monitoring and Support  
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## I. Introduction

A Local Education Agency / Charter (LEA/C) may receive Title I Part A funds only if it uses State and local funds to provide services in Title I schools that are “comparable” to services provided in non-Title I schools. Comparability is one indication that the LEA/C is using Title I funds to supplement and not supplant other funding sources. In North Carolina (NC), the LEA/C must determine comparability annually in order to receive Title I Part A funds [Section 1118(c)].

## II. Comparability Reporting – When

In NC, LEA/Cs are required to submit a comparability report using the Consolidated Continuous Improvement Plan (CCIP) system. LEA/Cs gain access to the CCIP on November 1<sup>st</sup>. The report must be submitted through the CCIP application to the North Carolina Department of Public Instruction (NCDPI) Federal Program Monitoring and Support Division by December 1<sup>st</sup> of the same year.

## III. Comparability Reporting – How

The LEA/C will submit the comparability report under Title I - Related Documents in the CCIP system.

- Template will be available in the CCIP system by November 1<sup>st</sup>.
- A webinar providing information and instructions on how to complete the comparability report is held before the template becomes available (The presentation and frequently asked questions are provided after the webinar and will be located on the NCDPI Federal Program Monitoring and Support Division website.).
- When uploading the report into the CCIP, it must be uploaded as a PDF.
- The report must have a signature on the cover page (the signature must be a supervisor to the person completing the report – the report requires two different people... the writer and the signer.)
- All LEA/Cs must submit a comparability report. In the event the LEA/C only has one site, the LEA/C will include a cover sheet indicating the LEA/C is exempt from comparability reporting and why.

## IV. How to complete the Comparability Report?

### A. Header Sheet

The Header Sheet is the first sheet in the report and has three sections.

- Section one of the Header Sheet will include the LEA/C name, code, and the name of the person completing the report.

- Section two of the Header Sheet will include three questions to determine if Pathway A is met. All three questions must be answered using the dropdown box. The LEA/C will date the report in this section and note if the LEA/C is exempt.
- Section three of the Header Sheet will include the supervisor's signature and date (this must be a separate person from the report writer).

#### B. Three methods for determining comparability

- Method One: Pathway A is indicated on the header sheet by answering "yes" to each of the three questions in section two. This indicates that the district/charter has board policies that outline:
  - LEA/C salary schedule
  - Equivalence among schools in teachers, administrators, and other staff
  - Equivalence among schools in the provision of curriculum materials and instructional supplies.

If the LEA/C has these three documents in place and board approved, then the district / school has met comparability. These documents must be uploaded into CCIP as documentation along with the header sheet. The LEA/C must maintain local documentation ensuring compliance to the board policies provided. This documentation will be requested during the consolidated monitoring event.

- Method Two: Pathway B is the traditional way to demonstrate comparability. There are two measures of comparability:
  - Student to Instructional Staff Ratio
  - Student to Instructional Staff Salary Ratio

In calculating these ratios, only non-federally funded staff are included. The definition of instructional staff lies with the district / charter, however the staff included must be instructional and must remain consistent for the district / school for all calculations. There are four forms that may be used to demonstrate comparability using Pathway B:

- Form A – Title I and non-Title I schools – Student to Instructional Staff Ratio
- Form B – Title I and non-Title I schools – Student to Instructional Staff Salary Ratio
- Form C – Title I only – Student to Instructional Staff Ratio
- Form D – Title I only – Student to Instructional Staff Salary Ratio

A district may use one or more forms to show comparability. The form(s) used for Pathway B and the Header Sheet must be printed, scanned, and uploaded into the CCIP Title I Related Documents.

- Method Three: Exempt – If a LEA/C meets the following criteria, then they are exempt from comparability reporting requirements:
  - A school with 100 or fewer students
  - An LEA/C with only one school for each grade span
  - A school with no comparison school in the same grade span grouping by enrollment size

If the LEA/C determines that they are exempt, it must be indicated on the Header Sheet in section three. The Header Sheet must be printed, scanned, and uploaded into the CCIP Title I Related Documents.

### C. Allowable Groupings

This report will describe the broad categories in which schools may be divided into groups based upon:

- Large vs. Small: A large school is considered to be any school with 450 or more students enrolled.
- Grade Spans (elementary, middle, high)

In creating groups based upon schools served with Title I funds, or schools skipped within rank order, multiple Pathway B forms may have to be used. A separate form will be used for each grouping. If you need clarification, contact the Federal Program Administrator responsible for Comparability.

### D. Which form do I use?

Once you have established your school comparison groups, you will decide which form is appropriate for each group. If the group includes Title I and not-Title I schools (i.e. not all elementary schools in the district receive Title I funds), then the LEA/C will use either form A or B, depending on which ratio is appropriate. If all of the schools are served with Title I funds, then either form C or D will be used. A different form may be used for each group. The Pathway B form(s) for each group and the Header Sheet must be printed, signed, scanned, and uploaded into the CCIP Title I Related Documents Section.

## V. Noncomparable

Comparability is required by federal statute to be determined every two years. North Carolina requires comparability reporting yearly. As a result, an LEA/C determined to be noncomparable will be placed on a probation status. Should the LEA/C be noncomparable for two consecutive years, the federal funds for the LEA/C will be frozen until comparability is demonstrated. The federal requirement for comparability is to ensure the federal funds are used to supplement and not supplant state and local funds.

## VI. Conclusion

Comparability is the main supplement, not supplant test. All federal funds must be used to supplement state and local funds. The baseline for a district / school is determined by the methodology submitted in the Title I funding application within the CCIP system. The methodology outlines how state and local funds are distributed equitable to all schools, both Title I served and non-Title I. Comparability is required by federal statute to be determined every two years. North Carolina requires comparability reporting yearly.