

Memorandum

To: Superintendents and Title I Program Administrators

From: Nathan Williamson, Director of Title Grants and Support

Subject: 2021 Title I Comparability Report for SY 2020-2021

Date: September 17, 2020

BACKGROUND INFORMATION:

Sec. 1118 of the Every Student Succeeds Act (ESSA) states that a local educational agency may only receive Title I, A funding if state and locally funded services are at least comparable in Title I schools when compared to non-Title I schools. The Comparability Report, required by Office of Title Grants and Support, ensures that Indiana Local Education Agencies (LEAs) comply with regulatory requirements.

NOTE: For school year 2020-2021, only those LEAs whose corporation number ends in (5) will be reviewed and approved by IDOE. However, all LEAs should complete within the Title I app center and retain comparability reports since ESSA requires it annually. *Current year data* must be used when completing the comparability report. Typically, data are based on fall counts for enrollment and staffing. In any case, two criteria apply: (1) the data collection date being used by the LEA may be no later than October 1, 2020; and (2) all data reported--enrollments, staff FTEs/salaries--must reflect conditions as of the *same* date.

For the purpose of comparability alone, the LEA shall report 1.0 FTE non-certified staff as 0.5, as the value of a full-time non-certified staff is not equal to the value of a full-time certified staff member. If a non-certified staff member is 0.5 for FTE, then for comparability, the LEA shall report half of that as 0.25. Also, staff members funded through federal programs, such as Title I or IDEA, are not included in the staff member count. Only state or locally funded staff are included.

LEAs with only one school building in each grade span (e.g., K-6, 7-8, 9-12; or K-12; etc.) or a total enrollment of 1,000 students or less are exempt from calculating comparability. However, those LEAs must still submit a comparability report including school and enrollment data to verify an exempt status. Please note, the supplement not supplant methodology is a different fiscal test under ESSA, and the requirements for it are different than comparability.

Comparability reports are due to the State Education Agency (SEA) on or before **October 30, 2020**. Every LEA will complete the comparability report online. General instructions are provided on the [Comparability Online Application Guide](#).

Online reporting is currently open, and may be accessed through the [Title I Application Center](#).

Any building reported as not comparable by October 30, 2020 must be brought into compliance no later than December 30, 2020. A revised comparability report must be completed and submitted along with documented evidence of how comparability has been met.

If you have questions regarding comparability reporting, please contact Adis Coulibaly at acoulibaly1@doe.in.gov.