

Virginia Department of Education  
Office of Program Administration and Accountability  
Title I, Part A, Comparability Report

### Overview

The *No Child Left Behind Act of 2001* (NCLB) under section 1120A(c) states that a local educational agency (LEA) may receive Title I, Part A, funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. Demonstrating comparability is a prerequisite for receiving Title I, Part A funds.

This Web-based Title I, Part A, Comparability Report is designed to provide the information that is necessary to show comparability and to meet the requirements specified in NCLB. The following required information has been pre-populated:

- all grade spans in the division;
- fall enrollment figures based on the current year's fall membership report (September 30, 2006);
- schools for which comparability is not applicable and the reason for not being applicable;
- a list of non-Title I schools per grade span and the enrollment figures; and
- a list of Title I schools per grade span and the enrollment figures.

If an error is found within the prepopulated data, please reference the applicable resource shown below:

Grade Span - Virginia Department of Education, Office of Information Management at (804) 786-3112 or [resultshelp@doe.virginia.gov](mailto:resultshelp@doe.virginia.gov);

Fall Enrollment – local school division's school records coordinator (SRC);

School Classification, Title I vs Non-Title I – Gabie Frazier, Title I specialist, at (804) 225-2907 or [Gabie.Frazier@doe.virginia.gov](mailto:Gabie.Frazier@doe.virginia.gov).

Also, the program will automatically perform required calculations and provide a verification report that must be signed by the superintendent or designee and faxed to the Department of Education.

### Examples for Meeting Title I Comparability Requirements

As indicated above, the purpose of the Title I Comparability Report is to verify that services provided in non-Title I schools are comparable to services provided in Title I schools. Therefore, a school division may use one or more of the three following examples to determine Title I comparability for the 2006-2007 school year, depending on the composition of Title I services in the various grade spans.

**1. Title I and non-Title I schools operate within the same grade span.**

If the division has Title I and non-Title I schools within the same grade span, each Title I school must be compared against the average of all the non-Title I schools within the same grade span.

**2. All schools within the same grade span are Title I.**

If all schools within the same grade span are Title I, the following actions must be taken:

- a. take the average of these schools and compare each Title I school to the average, or
- b. take the average of no more than 50 percent of the Title I schools with the lowest concentration of low-income students and compare the remaining Title I schools to the average.

**3. Comparability cannot be met by using grade spans because of diverse enrollment size.**

If comparability cannot be met by using the identified schools within the grade span because of the diverse enrollment range, a division can divide the schools into “smaller enrollment size range” and “larger enrollment size range.” This example can only be used provided the largest school in the “largest enrollment size range” is at least twice as large as the largest school in the “smaller enrollment size range.” (Example: A school division has an enrollment size range of 124 - 850 students. Schools could be divided into smaller and larger enrollment ranges as indicated in the following scenario. The smaller enrollment range is 124 - 400, and the larger enrollment range 401 - 850. This grouping reflects an enrollment (850) for the largest of the larger schools which is twice as large as the largest enrollment (400) in the smaller enrollment size range.)

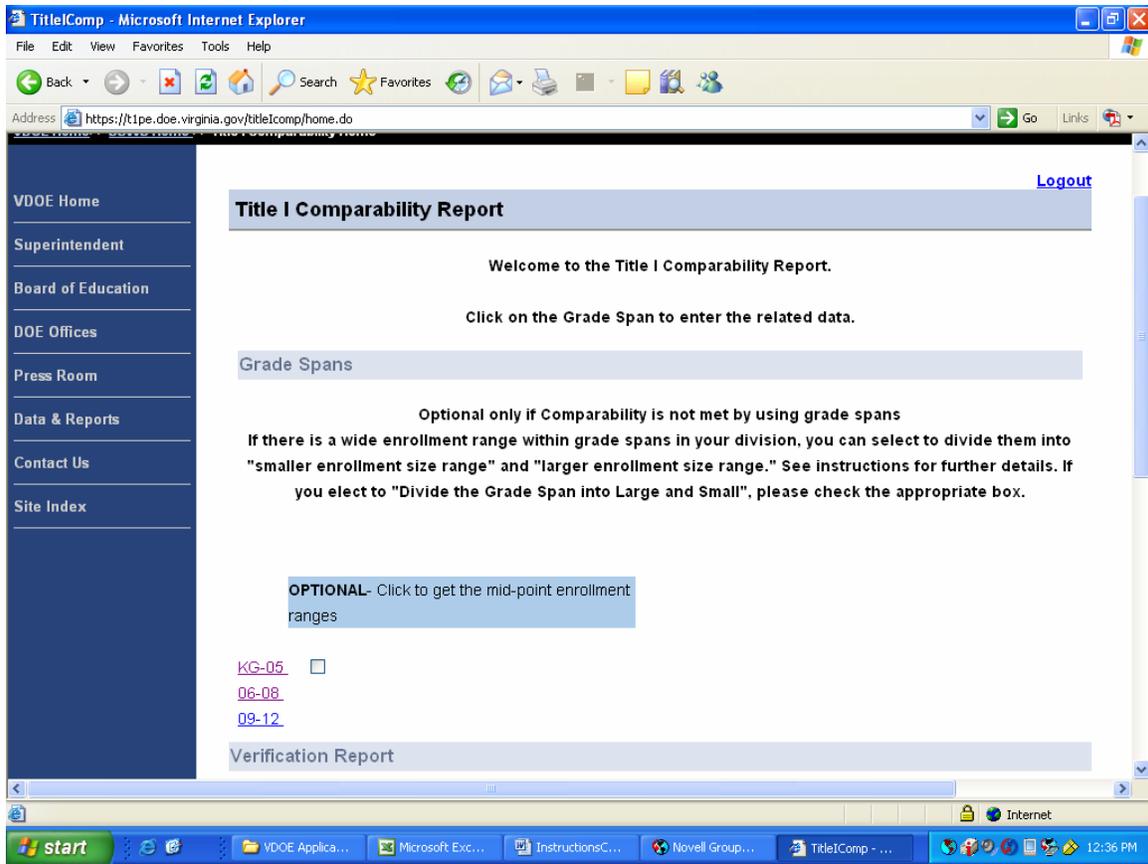
### **Completing the Title I, Part A Comparability Report**

For divisions in which comparability is not applicable: If the division has only one school per grade span, comparability of services is not applicable. Therefore, skip to the verification report section on page 8. Print this report, have it signed by the superintendent or designee, fax it to the Department, and maintain a copy of the signed report for your records.

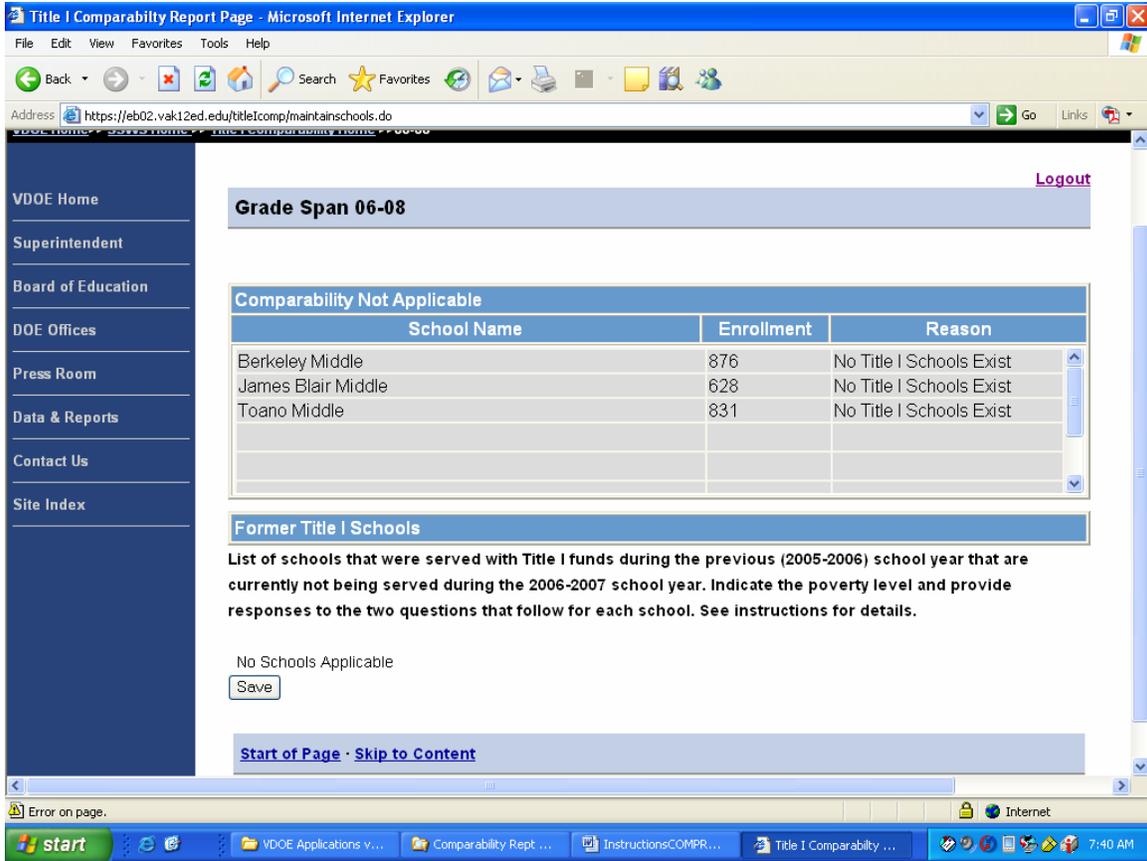
For all other divisions:

The following pages contain the screen shots from the Web-based report and the accompanying instructions. The information provided is exactly the same as the information and instructions contained in the report.

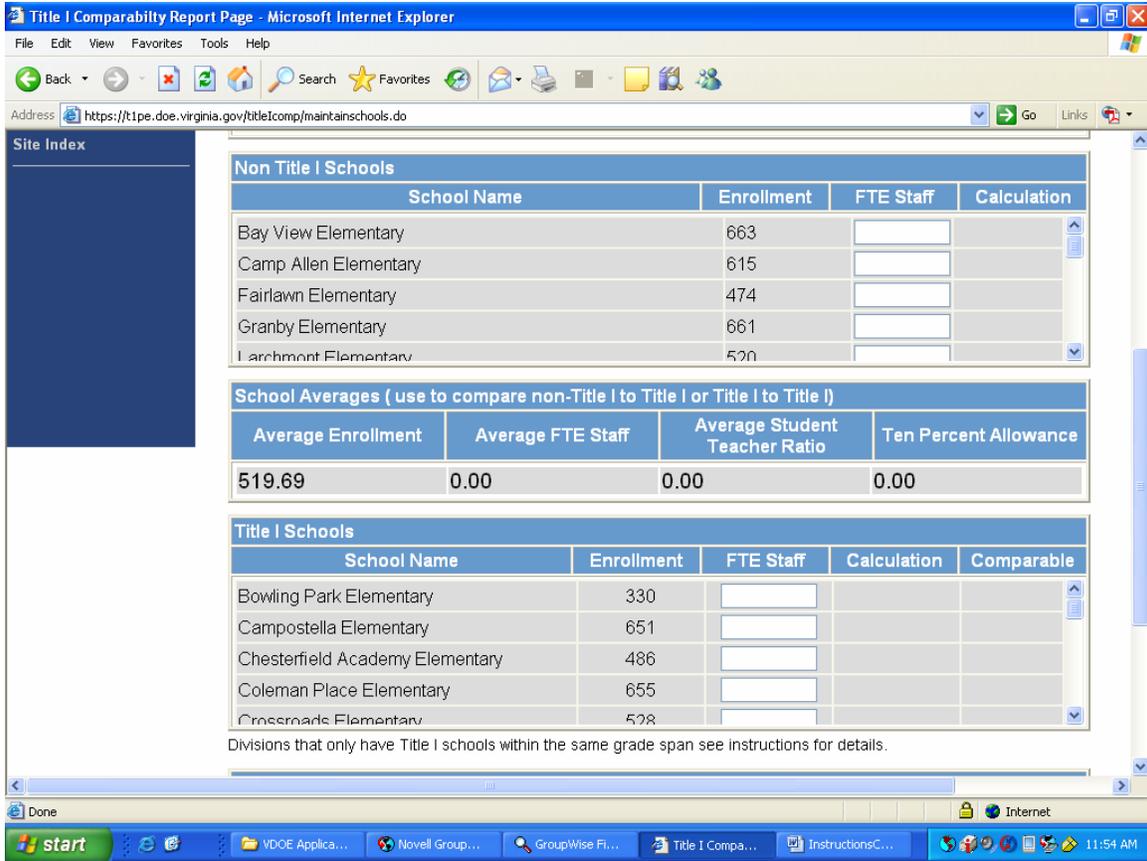
- Select the grade span from the list provided by moving the cursor over the grade span to be selected. Click the grade span (the hand with pointer will show the grade span to be selected).



- The next screen is divided into six sections. Enter the information required to complete the report in this section. If applicable, all six sections must be completed.
  1. **Comparability Not Applicable** – This section lists those schools for which comparability is not applicable and the reason it is not applicable.
    - The school division has only one school per grade span.
    - There are no schools in a given grade span receiving Title I funds.
    - There are only two schools in the grade span. One school has an enrollment of 250, and one school has an enrollment of 600. Since the enrollment of one school is twice as large as the enrollment of the other school, the division may choose the option of dividing into larger and smaller enrollment size range, leaving only one school in each size range.



2. **Non-Title I Schools** – This section lists the school name and enrollment of all non-Title I schools in the selected grade span. Under FTE staff (white box), enter the number of full-time equivalent (FTE) staff paid with state and local fund for those schools that are “non-Title I schools”. Prorate the positions as necessary, and record the number to the tenth (ex., 12.7). A school division may exclude state and local funds expended for bilingual education for children of limited English proficiency and excess costs of providing services to children with disabilities as determined by the division. Whichever option is used, it must be applied consistently across the division. Also, exclude from comparability calculations custodial staff, cafeteria staff, nurses, clerical staff, and volunteers. Staff counted for comparability compliance includes state and locally funded staff at the building level who provide direct instruction: instructional staff, including teachers and administrators; music, art, and physical education teachers; guidance counselors; speech therapists; librarians; and instructional aides. School social workers and psychologists may also be included because they provide services that support instruction.

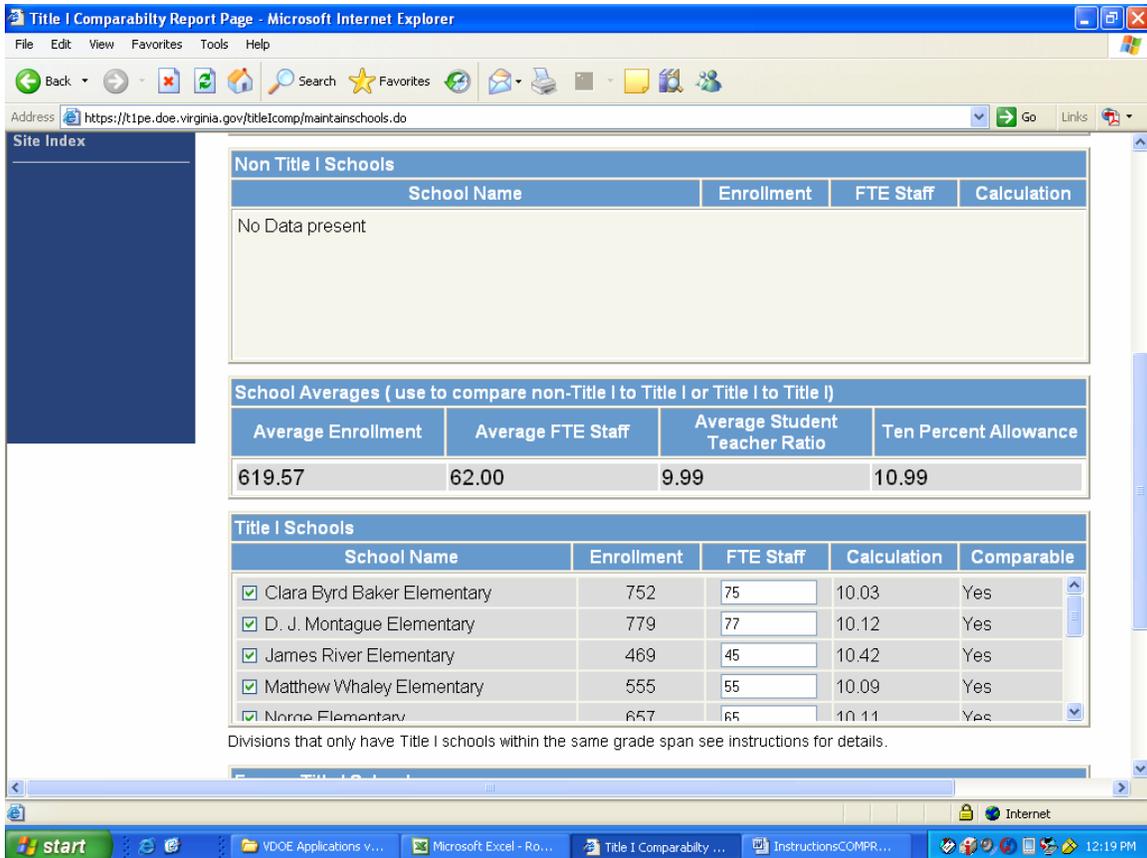


3. **School Averages (used to compare non-Title I to Title I or Title I to Title I)** -The system automatically calculates the average enrollment, average FTE staff, average student teacher ratio, and 110 percent of the average of non-Title I schools. As stated in the guidance, a Title I school is considered comparable if its average does not exceed 110 percent of the average of non-Title I schools.
4. **Title I Schools** - This section lists the school name and enrollment for all Title I schools in the selected grade span. Under “FTE Staff” (white box), enter the number of FTEs for Title I schools (see instructions under non-Title I section for this process). The system will automatically calculate and compare this average to the average of the non-Title I schools, including the ten percent allowance, to determine whether these schools are comparable (yes) or not comparable (no).
  - o **Only Title I Schools in grade span** – determine comparability by using one of the following methods:
    1. **50 percent of schools as comparison** - By using the check box found to the left of the school name, choose no more than 50 percent of the Title I schools with the lowest concentrations of low-income children to serve as the comparison schools. If more than 50 percent of the schools are checked, a warning message will appear

that says, “One may check either up to 50 percent of the total Title I schools or check all the Title I schools.”

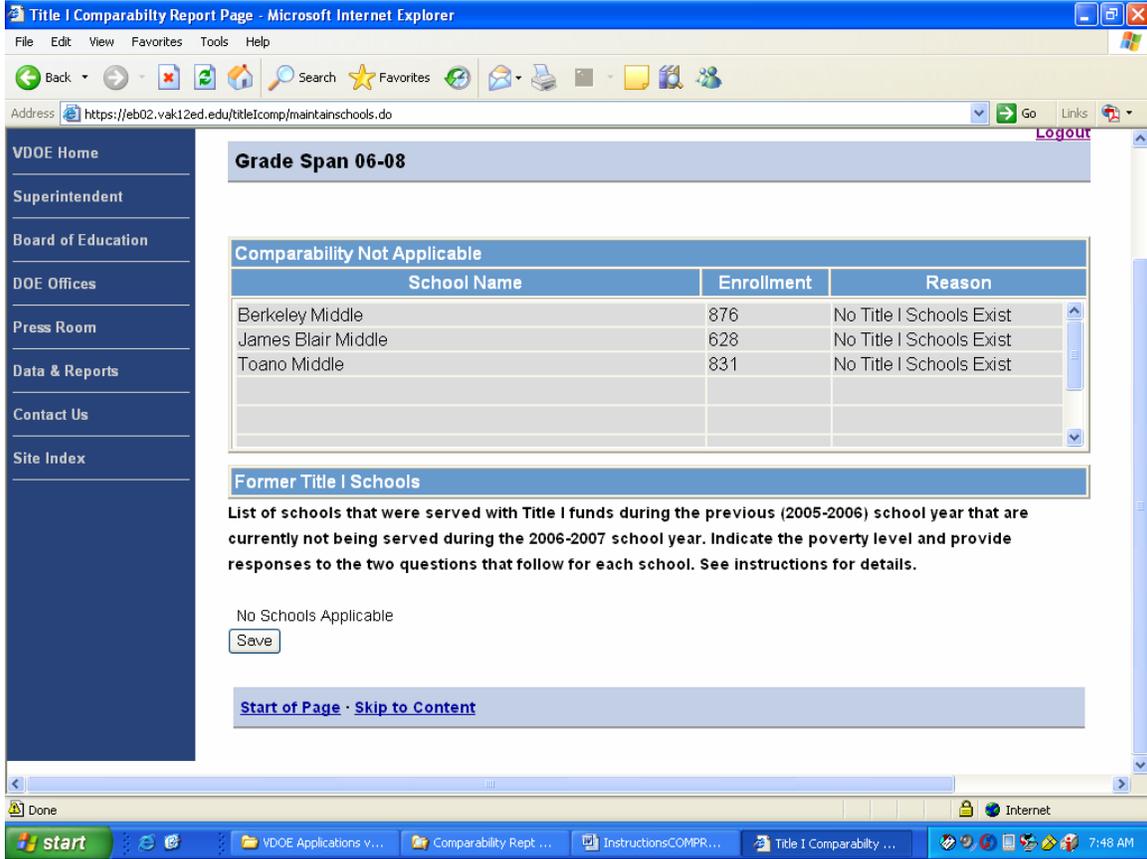
Once the schools are checked, enter the FTE staff. These totals will be rolled up to the “School Average” section to determine comparability for each of the Title I schools in the grade span; or

2. **All Title I schools as average for comparison** - All Title I schools in the grade span may be averaged and each school compared against the average. If more than 50 percent of the schools are checked, a warning message will appear that says, “One may check either up to 50 percent of the total Title I schools or check all the Title I schools.” For this method continue to check all the schools. Once the schools are checked and the FTE staff has been entered, these totals will be rolled up to the “School Average” section to determine comparability for each of the Title I schools in the grade span.



5. **Former Title I Schools** – This section will list only those schools that were served with Title I funds in the previous year and are not being served in the current year. Three questions will need to be answered if

this is applicable for the grade span or the message will indicate “No Schools Applicable.”



6. **Save** - Once you have completed the information for the grade span, the screen will automatically save the information, or click save at the bottom of each page. If a zero has been entered in any of the FTEs, an error message will appear that says, an error FTE > 0. Indicate the number of FTEs. The program will return to the top of the current page; and the message “Data saved successfully” will appear. Click on the *Title I Comparability Home* link at the top of the page to select another grade span. The program will go back to the list of grade spans indicated on the home page.

**Optional only if Comparability cannot be met by using grade spans.** If this option is needed, the applicable grade spans have been identified. Click the box to the right of the grade span and it will automatically show the mid-point enrollment range (this will overwrite the data that were previously entered for that grade span only). Next, click the grade span; the phrases “less than (specified number)” and “greater than (specified number)” will appear. This number will be based on the actual enrollment range of that grade span. It will be half of the largest enrollment number in this grade span. These phrases are active links. Click the phrase “less than” first to go to the schools in that range. Complete the calculations according to the instructions previously provided. Once you complete that range, go back to the home page. Repeat the process by clicking

the phrase “greater than” to go to the schools in that range. If this option has been selected, perform this function only for those grade spans that have been identified with the box. The information for the other grade spans was previously saved. Proceed to the verification report section.

## Verification Report

Once this process is completed for each grade span, go to the right side of the screen and print verification report. Verify the report for accuracy and have it signed by your superintendent or designee. Fax the signed verification page to Mrs. Helen Tucker, administrative support, at (804) 371-7347 before January 29, 2007. Maintain a copy of the signed report for your records.

https://eb02.vak12ed.edu/titlecomp/verification\_report.do - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address [https://eb02.vak12ed.edu/titlecomp/verification\\_report.do](https://eb02.vak12ed.edu/titlecomp/verification_report.do) Go Links

**Virginia Department of Education**  
**Office of Program Administration and Accountability**  
**Title I Comparability Verification Report**  
**School Year 2006-2007**

**121-PORTSMOUTH CITY**

**Superintendent**  
Dr. David C. Stuckwisch , Superintendent

Person completing this report:  
**Name:** Becky Marable  
**Title:** Grants Administrator  
**Phone:** 804-225-3349  
**Email:** rebecca.marable@doe.virginia.gov

This report represents the status of the Title I Comparability Report for the 2006-2007 school year. A copy of this report needs to be kept on file in the central office.

Signature: \_\_\_\_\_  
Superintendent/Designee

Date: \_\_\_\_\_

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## Additional Assistance

If there are questions regarding access to the Web-based form, contact your local division administrator. The contact person can be found at [http://www.doe.virginia.gov/VDOE/Publications/ADMN/datacoll/schid\\_contacts.xls](http://www.doe.virginia.gov/VDOE/Publications/ADMN/datacoll/schid_contacts.xls)

For questions related to the mechanics of this report, please contact Becky Marable, Title I grants and reports manager, at (804) 371-0044 or [Rebecca.Marable@doe.virginia.gov](mailto:Rebecca.Marable@doe.virginia.gov). For questions related to the content of this report, please contact Gabie Frazier, Title I specialist, at (804) 225-2907 or [Gabie.Frazier@doe.virginia.gov](mailto:Gabie.Frazier@doe.virginia.gov).