



New Hampshire | LIVE FREE AND LEARN
Department of Education

New Hampshire Department of Education ESEA Local Educational Agency Title I, Part A Comparability Instructions

Bureau of Instructional Support
Office of ESEA Programs
25 Hall Street
Concord, NH 03301

February 2, 2024



2023-2024 Title I, Part A Comparability Instructions

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Since Title I, Part A allocations are made annually, comparability is an ANNUAL requirement. Districts must demonstrate comparability in student to staff ratios by completing comparability forms provided by the New Hampshire Department of Education (NHED).

Step One: Identify the schools for which the district must demonstrate comparability

- a. Districts that comprise more than one school serving similar grade spans, if at least one of the schools provides Title I, Part A services, must complete a full comparability report each year. Such districts must demonstrate comparability for all schools except:
 - a Title I, Part A school that is the only school serving a particular grade span;
 - a school with an enrollment of less than 100 students.
- b. Districts that only have one school per grade span or that only comprise a single school are exempt from the comparability demonstration requirement. However, such a school district must complete and submit the Comparability Certification sheet in the comparability forms annually to document this fact.

The table below summarizes which districts must complete the annual comparability demonstration –

District Type	Only one school per grade span	More than one school per grade span	Comparability demonstration required?
Multi-school	--	✓	Yes
Multi-school	✓	--	Comparability Certification only
Single-school	✓	--	Comparability Certification only

Step Two: Familiarize yourself with the 2023-2024 Comparability Forms

After determining the schools for which the district must demonstrate comparability, access the Comparability Workbook available on the NHED ESEA Title Programs, Title I, Part A website, following the 'Instructions' Sheet within the workbook: [Title I Part A | Department of Education \(nh.gov\)](https://www.nh.gov/education/title-i-part-a)

The Excel workbook consists of eight separate worksheets: Guidance, Instructions, EIS Codes, Detailed School Data, Staff Data, Comparability Certification, Non-Comparable CAP, and PDF Print Instructions.

Detailed School Data -

After reviewing the instructions, click on the Detailed School Data sheet and select your district name from the yellow cell at the top of the sheet. Selecting the district name populates a listing of all schools in the district as of the beginning of the 2023-2024 school year, including the grades served, Title I, Part A status of the schools and low-income percentage.

The cells in the worksheet are color-coded. Information in white cells may be changed or added, information in yellow cells must be entered, and information in green cells is auto calculated and therefore cannot be changed. **Please do not cut and paste data in the worksheet, as doing so may create errors in the embedded formulas.**

Once enrollment and staff data is entered for all schools, the worksheet will automatically color-code identifying each school according to;

- exempt = yellow,
- comparable = green and,
- not comparable = red.

Comparability Certification –

LEAs are to complete this certification annually, indicating if their schools demonstrate comparability or if they are exempt from comparability requirements. The LEA is to ensure it has established and implemented a district-wide salary schedule and policies, as well as proper recorded keeping, [in accordance with 2 CFR § 200.334](#).

If comparability is not demonstrated at the time data is compiled, the district must complete and submit a Non-Comparable Corrective Action Plan (CAP) supporting certification, found on the Non-Comparable CAP sheet.

Staff Data –

Districts must compile school-by-school lists of all State and locally funded staff working in each school included in the comparability demonstration. These lists are used to complete the school-level comparability calculations, and also serve as evidence of those calculations. The Staff Data worksheet lists the required data elements, including school, name, work assignment, and full-time equivalent (FTE) staff calculation. This should include all applicable staff for each school included in the district's comparability demonstration.

District-based education personnel information management systems or other staffing reports, by school, containing the required data elements detailed under "Staffing Data" below may be used instead of the Staff Data worksheet as evidence of the calculations used in the other forms. Please note that districts are not required to transpose information into the Staff Data worksheet if other data reports containing the same information by school are provided.

Step Three: Collect and prepare enrollment and staffing data

To complete the comparability demonstration, the district must collect and enter enrollment and staff data for all schools included in the demonstration (See Step One). The data should be current for the 2023-2024 school year as of **January 1, 2024. Be sure to use the same date for all schools being compared.**

Enrollment Data

Collect a count of the actual number of students enrolled in each school included in the comparability demonstration. Student enrollment data needs to be based off the same year the teacher data is reflective of.

If children in kindergarten attend only half-day sessions, the district may prorate such enrollment to reflect the actual Full Time Equivalent (FTE) school enrollment. In such a case, the total of the half-day students should

be divided by 2 before adding kindergarten FTE to the school total to accurately reflect the FTE enrollment of the school.

Staffing Data

Collect names, work assignments (function and/or grade level taught), and FTE counts for all State and locally funded school staff who are assigned to schools included in the comparability demonstration, whether full or part-time (though only staff assigned on a regularly scheduled basis).

For computations, include only the endorsement instructional staff at each school who are paid through State or local funds, a list is provided on the 'Educator Information system (EIS) Codes' Sheet. **Exclude staff paid with Title I, Part A or other Federal funds.**

No other school staff may be included. In determining comparability, a district may choose to exclude State and local funds expended for staffing for language education for children of limited English proficiency, and excess costs of providing staffing services to children with disabilities as determined by the district. **The exclusion or inclusion of such funds must be done consistently for the entire district.**

As noted in step two above, districts may use district-based education personnel information management systems or other staffing reports, by school, instead of the Staff Data worksheet in the comparability forms as evidence of the staff FTE calculations which are the basis for the comparability demonstration, if such data reports containing the same information by school are provided.

For each staff member, indicate the decimal proportion (to the nearest tenth) of the individual's time spent at the school. For example, in the case of an art supervisor who may visit the school one day a week, you should determine the proportion of his/her time received by that school (i.e. 0.2) and list that proportion. Total the FTE counts for all staff in each school included in the comparability demonstration.

Step Five: Review automatically calculated information

Step Four: Enter enrollment and staffing data into the 2023-2024 Comparability Forms

1. If you have not already done so, select your district name from the yellow cell at the top of the Detailed School Data sheet. Selecting the district name populates a listing of all schools in the district as of the beginning of the 2023-2024 school year, including the grades served and the Title I, Part A status of the schools. If necessary, you may change any data in cells with a white background, such as school code, school name, grades served, Title I, Part A status and low income counts. You may also add schools that have newly opened and that are not listed automatically. Please note each school must have a school code, school name, grades served, and Title I, Part A status for the worksheets to operate properly. This data will determine which schools are being used as 'Comparison Schools' and will indicate this in Column 4 'Use as Comparison School'.
2. Enter school enrollment counts for each school included in the comparability determination, both Title I, Part A and non-Title I, Part A in Column 5 'School Enrollment'.
3. Enter the State and locally funded staff FTE count for each school included in the comparability determination, both Title I, Part A and non-Title I, Part A in Column 6 'State and Locally Funded Staff FTE Count'.

Step Five: Review automatically calculated information

When you enter school enrollment and State and locally funded staff FTE data into Columns 6 and 7 in the Detailed School Data sheet, several things happen automatically:

1. First, ratios of enrollment to staff for each school will be calculated and will automatically appear in Column 8.
2. Second, an average ratio for grade span comparison will appear in Column 8 next to each of the Title I, Part A schools listed. The comparison ratio is the average of all non-Title I, Part A school enrollment to staff ratios in a particular grade span. A district, for example, with Title I, Part A elementary and middle schools that also has non-Title I, Part A elementary and middle schools will have two different comparison ratios: one for the elementary schools and one for the middle schools. If there are no non-Title I, Part A schools to compare against, the Title I, Part A schools will compare against the average ratio of school enrollment to staff among all Title I, Part A similar grade span schools.
3. Third, the percentage difference between the compared schools average school ratio of enrollment to staff populates in Column 9. **To be comparable the percentage of the Title I, Part A school needs to fall within -10% to 10% of the average non-Title I, Part A school enrollment to staff ratio or if there are no non-Title I, Part A schools, the percentage needs to fall within -10% to 10% of the average Title I, Part A school enrollment to staff ratio in a particular grade span.**
4. Fourth, an indication of whether a Title I, Part A school is comparable or not based on the current calculations will appear in Column 10. This is established by comparing the percentage difference of the enrollment to staff ratio for the school with its comparison ratio. If a school is exempt from demonstrating comparability the data will note this in column 10.

Review the automatically calculated information after all data has been entered on this sheet before proceeding to the next step.

Step Six: Take action if schools are not comparable

If schools are found not to be comparable, adjustments in staffing in the non-comparable schools must be made promptly in collaboration with the district business manager and district supervisory personnel responsible for staffing.

A Non-Comparable Corrective Action Plan (CAP) must be submitted with the Comparability Certification sheet documenting the measures the district plans to take in order to bring their schools into compliance with comparability requirements. Comparability must be demonstrated prior to the next fiscal year to be considered eligible for Title I, Part A Federal funding.

Step Seven: Complete, submit and file comparability documentation

Complete the Comparability Certification:

1. Enter the details for the person who had primary responsibility for compiling and verifying the data.
2. Select purpose of documentation.
3. If applicable, indicate the reason the LEA is exempt from demonstrating comparability.
4. Certify that comparability has been demonstrated or that comparability was not demonstrated and a Non-Comparable CAP is attached.
5. Superintendent / Charter School Administrator reviews and signs.

Save, print, sign, submit to NHED and maintain on file the following:

- a. Copies of the Detailed School Data and Comparability Certification;
- b. If applicable, Non-Comparable CAP;
- c. Staff rosters by school. As noted previously, **districts may either use copies of the Staff Data worksheet or other district records containing the requisite staff information, including FTE counts, by school to meet this requirement;**
- d. Schedules of instructional staff serving more than one school building; and
- e. Resource records, including school enrollment records.

This documentation will serve as the district's annual comparability demonstration, and must be retained and made available for outside review.

Comparability Workbook must be sent to NHED annually:

Email to ESEA@doe.nh.gov by **March 1, 2024**.