



New Hampshire

# Department of Education

## Federal Title Program Development Process

### Mini - Lesson

# Comparability Reporting

NH Department of Education  
Office of ESEA Programs  
Bureau of Instructional Support

Complete program details at <https://www.education.nh.gov/who-we-are/division-of-learner-support/bureau-of-instructional-support/integrated-programs>



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# *Agenda* | Comparability Reporting

*Part 1* | **Annual Title I, Part A Requirement**

*Part 2* | **Identifying Schools**

*Part 3* | **2023-2024 Comparability Forms**

*Part 4* | **Enrollment and Staffing Data**

*Part 5* | **Enter Enrollment and Staffing Data**

*Part 6* | **Review Automatically Calculated Information**

*Part 7* | **Take Action if Schools Are Not Comparable**

*Part 8* | **Complete, Submit and File**

*Part 9* | **Questions?**



# *Part 1* | Annual Title I, Part A Requirement

- 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).



## Part 2 | Identifying Schools

- 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.
- 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.

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



# Part 3 | 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 \(nh.gov\)](#)

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.

## Part 4 | Enrollment and Staffing Data

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.

# Part 4 | Enrollment and Staffing Data

## 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 endorsed 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.



# Part 5 | Enter Enrollment and Staffing Data

1. 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.
2. Verify school code, school name, grades served, and Title I, Part A status. You may also add schools that have newly opened and that are not listed automatically.

District Name: select from menu ----->  
 Click yellow cell at right, then downward arrow

**Concord**

District ID: 111

White cells: Information may be changed/added  
 Yellow cells: Information must be entered  
 Green cells: Auto-calculated; cannot be changed  
 Do not cut and paste!

School Information				Comparison Schools	Calculating Ratios			Comparability		
1	2	3	4	5	6	7	8	9	10	
School Code	School Name	Grades Served	Title I, Part A Status	Use as Comparison School (See instructions)	School Enrollment (Enter most current data)	State and Locally Funded Staff FTE Count (Enter most current data)	Ratio of Enrollment to Staff (Col. 6 / Col. 7)	Average Ratio for Gradespan Comparison	% Difference	Comparable? (within 10% to 10%)
20285	Concord High School	9-12	Title I School	NO			0.00			
20240	Abbot-Downing School	K 1-5	NOT Title I School	NO			0.00			
20270	Rundlett Middle School	5-8	Title I School	NO			0.00			
26490	Beaver Meadow School	K 1-5	Title I School	NO			0.00			
20305	Christa McAuliffe School	K 1-5	Title I School	NO			0.00			
20250	Mill Brook School	K 1-2	Title I School	NO			0.00			
20260	Broken Ground School	3-5	Title I School	NO			0.00			



# Part 5 | Enter Enrollment and Staffing Data

3. 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'.
4. 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'.

District Name:   
*Click yellow cell at right, then downward arrow*

**Concord**

District ID: **111**

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School Information				Comparison Schools	Calculating Ratios			Comparability		
	1	2	3	4	5	6	7	8	9	10
School Code	School Name	Grades Served	Title I, Part A Status	Use as Comparison School <i>(See instructions)</i>	School Enrollment <i>(Enter most current data)</i>	State and Locally Funded Staff FTE Count <i>(Enter most current data)</i>	Ratio of Enrollment to Staff <i>(Col. 6 / Col. 7)</i>	Average Ratio for Gradespan Comparison	% Difference	Comparable? <i>(within 10% to 10%)</i>
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20305	Christa McAuliffe School	K 1-5	Title I School	NO			0.00			
20250	Mill Brook School	K 1-2	Title I School	NO			0.00			
20260	Broken Ground School	3-5	Title I School	NO			0.00			

## Part 6 | 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. Ratios of enrollment to staff for each school will be calculated and will automatically appear in Column 8.
2. An average ratio for grade span comparison will appear in Column 8 next to each of the Title I, Part A schools listed.
3. The percentage difference between the compared schools average school ratio of enrollment to staff populates in Column 9.
4. An indication of whether a Title I, Part A school is comparable or not based on the current calculations will appear in Column 10.

## *Part 7* | **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.

## *Part 8* | Complete, Submit and File

### **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.

## *Part 8* | Complete, Submit and File

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

1. Copies of the Detailed School Data and Comparability Certification;
2. If applicable, Non-Comparable CAP;
3. 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;
4. Schedules of instructional staff serving more than one school building; and
5. Resource records, including high level school enrollment records. *\*No detailed student records.*

Comparability Workbook must be sent to NHED annually:

**Email to [ESEA@doe.nh.gov](mailto:ESEA@doe.nh.gov) by March 8, 2024.**



## Part 7 | Questions

