

Title I Comparability Requirement

ESEA, as amended, section 1118(c)...a local educational agency may receive funds under this part only if State and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part.

- Submission window opens October 7, 2024.
- **Due December 1st of each year.**
- Form 3A is built into SharePoint this year (new).
- Every district and state charter school completes Form 3A.
- Form 3B is required for some districts or state charter schools.

[Link To Comparability Reporting in SharePoint](#)

General Overview

What is Comparability?

- Title I fiscal requirement intended to ensure that Title I schools are provided state and local educational resources that are equitable or comparable to those received by schools not participating in Title I.
- Title I schools are compared against non-Title I schools in terms of student/teacher ratios or per pupil expenditures. In addition, they are compared to other Title I schools within the district.
- Comparability was codified into law in 1970 in response to early actions by school districts that either shifted state funds away from Title I schools or failed to provide comparable services to Title I schools.



Form 3A in SharePoint



TITLE I, ESEA, COMPARABILITY REPORT

District Name	<input type="text" value="_Test_district"/>
DistrictCode	<input type="text" value="999"/>
SchoolYear	<input type="text" value="2024-2025"/>

Created at 9/30/2024 2:01 PM by Sriram Varanasi
Last modified at 10/4/2024 11:07 AM by Sriram Varanasi

Save

Cancel

1. Form 3A

Edit	Which of the following options apply for your district?	Purpose Of Report
		Original submission as of the fall date designated by the State Education Agency (SEA).

Form 3A

1. Form 3A

Local Education Agencies (LEA) applying for grants under Title I are required to assure that State and local funds will be used to provide services in schools receiving Title I funds which are at least comparable to services being provided in schools which are not receiving Title I funds. They must further assure that, if all schools are receiving Title I funds, State and local funds must be used to provide services which are comparable in all schools. Elementary and Secondary Education Act (ESEA), as amended, section 1118(c) provides the criteria for determinations of the comparability of State and locally-funded services of schools funded under Title I. By completing this form, a local educational agency will know which groups of schools, if any, must be included on the attached "Detailed School Data" form (3b). Please note that if one of their schools has less than 100 students, the school does not need to be included in the "Detailed School Data" form (3b).

- If the LEA only has one school and that school receives Title I funds, please select "only one Title I School". Complete the Purpose of Report below and upload a signed copy of the Assurances document.
- If the LEA only has one school per grade span, please select "only one school per grade span". Only complete the Purpose of Report below & upload a signed copy of the Assurances document.
- If the LEA does not meet either criteria, please leave blank and continue to fill in the information required, the Purpose of Report below, and upload a signed copy of the Assurances document.

Which of the following options apply for your district?

- Only One Title I School
- Only One School Per Grade Span

Number of Schools by Grade and Size			
i) Grade Spans (Example K-6)	ii) Enrollment, or For More Than One School, Enrollment Size Range (Example, 351-468)	iii) Number of Schools	
		Title I	Non-Title I
A = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
B = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
C = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X1 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X2 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X3 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X4 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		

Form 3A (Continued)

- Grade spans are identified.
 - i.e., K-6, 7-8, 9-12, K-8, etc.
- Schools can be separated into size categories, smaller and larger
- LEAs add the number of schools they have and include their enrollment numbers based on the 40-day enrollment report.
- If there are multiple schools within the same grade span and size category, LEAs will show the enrollment range of those schools.

Number of Schools by Grade and Size			
i) Grade Spans (Example K-6)	ii) Enrollment, or For More Than One School, Enrollment Size Range (Example, 351-468)	iii) Number of Schools	
		Title I	Non-Title I
A = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
B = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
C = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		

Example:

District Z has 4 small elementary schools with the following enrollment counts; 105, 127,150,156.

In Comparability report 3A, they would list the range of their small elementary schools: 105-156.

Smaller Schools vs Larger Schools Within a Grade Span

- Schools within a single grade span must be compared to other schools with similar enrollment numbers and not to schools that are significantly larger or smaller.
- When differentiating between smaller and larger schools, **please note that largest school must be at least twice as large as the smallest.**

Example #1: Smaller – 100-250
 Larger – 500-1,125

Example #2: Smaller – 200
 Larger - 400

Number of Schools by Grade and Size			
i) Grade Spans (Example K-6)	ii) Enrollment, or For More Than One School, Enrollment Size Range (Example, 351-468)	iii) Number of Schools	
		Title I	Non-Title I
A = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
B = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		

Grade Span X Visual

There will be four grade span "X" options

Number of Schools by Grade and Size			
i) Grade Spans (Example K-6)	ii) Enrollment, or For More Than One School, Enrollment Size Range (Example, 351-468)	iii) Number of Schools	
		Title I	Non-Title I
A = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
B = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
C = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X1 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X2 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X3 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		
X4 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		



Form 3A (Continued)

- Grade Span X – for non-traditional or uncommon grade spans.
 - Example:
 - 9th Grade Academy that is in its own building
 - A school that is K-8 while your other schools are in grade spans grouped differently, such as K-5 and 6-8.
- If a district or State charter school only has one building per grade span, they will only fill out form 3A. If there is more than one building per grade span, Form 3B will also need to be completed.

Purpose of Report

- Please check the box that reflects the status of your submission. This is at the bottom of Form 3A, and it is required.

X4 = <input type="text"/>	Smaller <input type="text"/>	<input type="text"/>	<input type="text"/>
	Larger <input type="text"/>		

PURPOSE OF REPORT Select the appropriate option indicating the purpose for which the report is submitted.

Original submission as of the fall date designated by the State Education Agency (SEA).

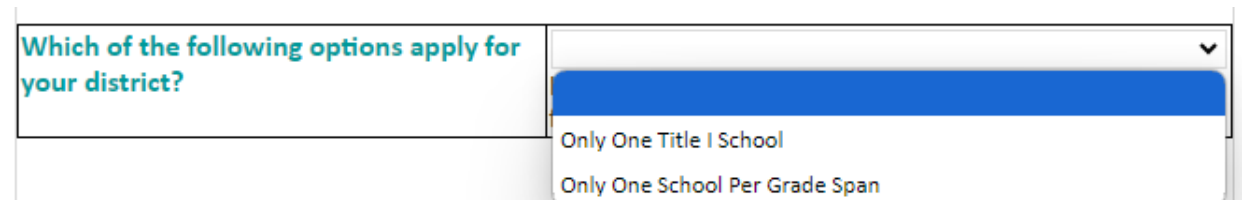
- Original submission as of the fall date designated by the State Education Agency (SEA).
- Revised submission following reallocation of resources
- Special report to verify that comparability previously demonstrated is being maintained as of date specified by the Secretary of Education or the SEA
- To demonstrate comparability of schools serving school attendance areas not previously designated for projects

Comparability Example: Only One Title I School

District: Sunny Side State Charter

of Building(s): 1

Title I: Sunny Side Charter K-12
(enrollment **82**)



Which of the following options apply for your district?

- Only One Title I School
- Only One School Per Grade Span

This State charter school only has one building for their entire school. They would choose “Only One Title I School”, fill out the purpose of report, and sign and upload the Assurances Document

Comparability Example: Only One School Per Grade Span

District: Middle District

of Building(s): 3

Title I: Pinecone Elementary K-5 (enrollment **272**)

Acorn Middle 6-8 (enrollment **130**)

Manzanilla High 9-12 (enrollment **288**)

Which of the following options apply for your district?

- Only One Title I School
- Only One School Per Grade Span

This district has a separate building for each grade span. They would choose “Only One School Per Grade Span”, fill out the purpose of report, and sign and upload the Assurances Document.

Comparability Example: Large District

District: Large District

of Building(s): 8

Title I:

- Dora Explorer Elementary K-6 (enrollment **153**)
- Boots Elementary K-6 (enrollment **90**)
- Swiper Middle 7-8 (enrollment **200**)
- Tico Middle 7-8 (enrollment **320**)
- Diego Early College High 11-12 (enrollment **50**)
- Isa High 9-12 (enrollment **332**)

Non-Title I:

- A. Grande Elementary K-6 (enrollment **160**)
- W. Houston Early Elementary K-3 (enrollment **210**)

Which of the following options apply for your district?

- Only One Title I School
- Only One School Per Grade Span

Leave blank

Number of Schools by Grade and Size			
i) Grade Spans (Example K-6)	ii) Enrollment, or For More Than One School, Enrollment Size Range (Example, 351-468)	iii) Number of Schools	
		Title I	Non-Title I
A = K-6	Smaller 90-160 Larger	2	1
B = 7-8	Smaller 200-320 Larger	2	
C = 9-12	Smaller 332 Larger	1	Need to compare
X1 = 11-12	Smaller 50 Larger	1	
X2 = K-3	Smaller 210 Larger	1	
X3 =	Smaller Larger		
X4 =	Smaller Larger		13

Need to Compare

Form 3B in SharePoint

Resources - Report Files

Guidelines

Form 3B

Form 3B Instructions

Assurances

*For form 3B, please do not include any schools to that have an enrollment number that is less than 100.

Form 3B

	A	B	C	D	E	F	G	H	I	J
1										
2										
3	Grade Span Instructions:									
4	If your district analyzes comparability by grade span, please follow the instructions below:									
5	1. Complete one workbook per grade span.									
6	2. Do not copy the Title I Schools worksheet from within the workbook. This will result in data errors.									
7	3. Save the entire workbook individually for each grade span.									
8	<i>Example: District ABC has three grade spans: Elementary, Middle, and High School</i>									
9	<i>There should be three separate workbooks or files for each grade span.</i>									
10	<i>1st file name/title: Comparability Form 3B ABC Elementary Grade Span 2024-2025</i>									
11	<i>2nd file name/title: Comparability Form 3B ABC Middle Grade Span 2024-2025</i>									
12	<i>3rd file name/title: Comparability Form 3B ABC High School Grade Span 2024-2025</i>									
13										
14										
15										

< > Grade Span Instructions | Non-Title I Schools | Title I Schools | + | ⋮ | ◀



Note: If your district only has one building or one building per grade span, you do not need to fill out this form.

*For form 3B, please do not include any schools to that have an enrollment number that is less than 100.

Form 3B (Continued)

1	Title I ESEA Detailed School Data Comparability Report (Comp Form 3B) Non-Title I Schools	Instructions: Complete this page first if your district has public schools that do not participate in Title I. Next, complete "Title I Schools" worksheet. If all schools in your district participate in Title I, complete the "Title I Schools" worksheet only.						
2								
3								
4								
5								Name of District:
6								
7								
8								
9	Non-Title I Schools	X	Percent Low Income	Actual Grade Span	Students Enrolled	State Funded FTE	Salaries Excluding Longevity	
10	Name of School							
11	(1)		(2)	(3)	(4)	(5)	(6)	
12			0.00%	-	0.00	0.00	\$0.00	
13								
14								
15								

*For form 3B, please do not include any schools to that have an enrollment number that is less than 100.

Form 3B (Continued)

After adding school information into the non-Title I section, the averages for non-Title I schools are auto-populated.

1	Title I ESEA		Instructions: Complete this page first if your district has public schools that do not participate in Title I. Next, complete "Title I Schools" worksheet. If all schools in your district participate in Title I, complete the "Title I Schools" worksheet only.						
2	Detailed School Data								
3	Comparability Report								
4	(Comp Form 3B)								
5	Non-Title I Schools								
6	Name of District:								
7									
8									
9	Non-Title I Schools	X	Percent Low Income	Actual Grade Span	Students Enrolled	State Funded FTE	Salaries Excluding Longevity		
10	Name of School								
37									
38									
39									
40									
41									
42									
43									
44									
45									
46					Average of Students	Average FTE	Average Or Comparison Salary	Average Students Per FTE	Average Dollars Per Studnets
47								7A	8A
48									
49	Averages for non-title I schools				0.00	0.00	\$0.00	#DIV/0!	#DIV/0!

*For form 3B, please do not include any schools to that have an enrollment number that is less than 100.

Form 3B (Continued)

1	Title I ESEA Detailed School Data Comparability Report (Comp Form 3B) Title I Schools	Instructions: If your district has schools that do not participate in Title I, complete the "Non-Title I Schools" worksheet, first. Complete the table below for Title I schools.															
2		When completing the form, items to remember: *Use State Year (SY) 2024-25 NOVA 40th day Average Daily Membership (ADM) data *Include only operational full-time equivalent (FTE) *Do not include Pre-K students or PreK FTE															
3																	
4																	
5		Name of District:															
6		Upon completion of the data the comparability formula will be auto calculated. Choose one of the comparability measures, either Measure 7B or 8B (highlighted in green) in the Comparability Formula Option I and apply it consistently for each Title I School. If all schools in the district participate in Title I, then complete the table below and choose Comparability Formula Option 2. Once the data is entered, the comparability measures will be auto calculated and will appear in the green highlighted boxes. Choose one measure and apply it consistently for each Title I School.															
7																	
8																	
9	Title I Schools	X	Percent Low Income	Actual Grade Span	Students Enrolled	State Funded FTE	Salaries Excluding Longevity	Students Per FTE	Dollars per Student	Mark X if not comparable							
10	Name of School																
11	(1)		(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)							
12			0.00%		0.00	0.00	\$0.00	#DIV/0!	#DIV/0!								
13								#DIV/0!	#DIV/0!								
14								#DIV/0!	#DIV/0!								
15								#DIV/0!	#DIV/0!								

*For form 3B, please do not include any schools to that have an enrollment number that is less than 100.

Choose Comparability Formula Option 1 or 2

Name of District:									
Upon completion of the data the comparability formula will be auto calculated. Choose one of the comparability measures, either Measure 7B or 8B (highlighted in green) in the Comparability Formula Option 1 and apply it consistently for each Title I School. If all schools in the district participate in Title I, then complete the table below and choose Comparability Formula Option 2. Once the data is entered, the comparability measures will be auto calculated and will appear in the green highlighted boxes. Choose one measure and apply it consistently for each Title I School.									
Title I Schools	X	Percent Low Income	Actual Grade Span	Students Enrolled	State Funded FTE	Salaries Excluding Longevity	Students Per FTE	Dollars per Student	Mark X if not comparable
Name of School									
Comparability Formula Option 1 - Select this option if district has Non-Title I Schools.									
Total Non-Title I									
Averages for non-title I schools entered automatically after "Non-Title I Schools" worksheet is completed.				AVERAGE OF STUDENTS	AVERAGE FTE	AVERAGE OR COMPARISON SALARY	AVERAGE STUDENTS PER FTE	AVERAGE DOLLARS PER STUDENT	
				0.00	0.00	\$0.00	7A	8A	
							#DIV/0!	#DIV/0!	
							Measure 7B	Measure 8B	
							#DIV/0!	#DIV/0!	
							110% of Box 7A	90% of Box 8A	
Comparability Formula Option 2 - Select this option if district Has 100% participation of schools in Title I.									
All Schools Participate in Title I									
If all schools participate in Title I, enter the enrollment, FTE and salary for the school with the lowest percentage of low income students.				ENROLLMENT	FTE	SALARY	AVERAGE STUDENTS PER FTE	AVERAGE DOLLARS PER STUDENT	
				0.00	0.00	\$0.00	7A	8A	
							#DIV/0!	#DIV/0!	
							Measure 7B	Measure 8B	
							#DIV/0!	#DIV/0!	
							110% of Box 7A	90% of Box 8A	

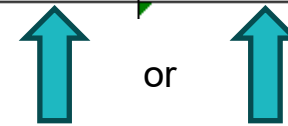
Refer to this if district/State charter has one or more non-Title I schools.

Refer to this if district/State charter **only** has Title I schools within this grade span.

*For form 3B, please do not include any schools to that have an enrollment number that is less than 100.

Using Comparability Formula

Title I Schools	X	Percent Low Income	Actual Grade Span	Students Enrolled	State Funded FTE	Salaries Excluding Longevity	Students Per FTE	Dollars per Student	Mark X if not comparable
(1)		(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Carol Elementary		66.83%	K-6	234.00	14.00	\$1,023,532.78	16.71	\$4,374.07	
Sweeney Elementary		81.70%	K-6	463.00	35.50	\$1,991,469.60	13.04	\$4,301.23	



Comparability Formula Option 2 - Select this option if district Has 100% participation of schools in Title I.						
All Schools Participate in Title I						
If all schools participate in Title I, enter the enrollment, FTE and salary for the school with the lowest percentage of low income students. Enrollment, FTE, and Salary must be manually entered.					AVERAGE STUDENTS PER FTE	AVERAGE DOLLARS PER STUDENT
		ENROLLMENT	FTE	SALARY	7A	8A
		234.00	14.00	\$1,023,532.78	16.71	\$4,374.07
				Measure 7B	Measure 8B	90% of
			110% of Box 7A	18.38	3936.663	Box 8A

Only choose 7A or 7B.

Amount in column 7 must be less than the amount in measure 7B.

Amount in column 8 must be greater than the amount in Measure 8B

Comparability Formula

- After the figures have been calculated for the Non-Title I schools, boxes 7B and 8B will contain the numbers used for comparison with the Title I schools. Choose either Measure 7B or Measure 8B and apply it consistently for each Title I School.
- B: Compare the entries in Column 7 for each Title I school to the figure in Box 7B. If all entries in Column 7 are less than the green box in 7B, all schools meet the comparability measure. If one or more entries do not meet the measure, move to Measure 8B.
- Measure 8B: Compare the entries in Column 8 for each Title I school to the figure in Box 8B. If all entries exceed the green box in 8B, they meet the comparable measure.
- If an entry does not meet the comparability measure in either column 7 or 8, mark an X on the same line in Column 9.

*Please note: All districts must meet the criteria for Comparability each year. If a school(s) is out of compliance, a plan must be implemented to correct it.

Documents to Upload

- Please be sure to upload the following documents:
 - A signed copy of the assurances document (found in SharePoint) certifying that all information contained in the comparability report as provided is accurate and complete and that supporting documentation is being held at the district.
 - Form 3B (if applicable)

Resources - Report Files

Guidelines

Form 3B

Form 3B Instructions

Assurances

2. Upload Documents

Edit Title

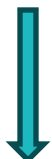
Test

Upload documents

Submit Report

3. Submit Report

Edit Status
Submit
Submit Your Report



3. Submit Report

Status
Created at 10/4/2024 11:58 AM by Sriram Varanasi
Last modified at 10/4/2024 11:58 AM by Sriram Varanasi

Report Status

4. Report Status

Edit Status Comments

Accepted Testing

Update the Status



4. Report Status

Status Accepted

Comments Accepted

Needs further action

Created at 10/4/2024 11:42 AM by Sriram Varanasi

Last modified at 10/4/2024 11:42 AM by Sriram Varanasi

Save Cancel

Questions?



Contact Information-

Jessica Pacheco

Title I Coordinator

Jessica.Pacheco@ped.nm.gov

(505) 695-3638