

COMPARABILITY

An 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. If the LEA serves all of its schools with Title I funds, it must use State and local funds to provide services that, taken as a whole, are substantially comparable in each Title I school.

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Part A allocations are made annually, comparability is an ANNUAL requirement. Because the SEA is ultimately responsible for ensuring that LEAs comply with the comparability requirement, the SEA may establish the method a district uses to determine comparability.

Delaware's criterion for meeting comparability is based on student/instructional staff ratios. Comparability is submitted to the SEA annually by November 30. LEAs are encouraged to use the DDOE provided [Excel Templates for Calculating Comparability](#). LEAs must also submit documentation of their procedures for calculating comparability annually and are encouraged to use the DDOE provided [Word Template for Documenting Comparability Procedures](#). If comparability cannot be demonstrated in the November 30 submission, LEAs must make appropriate adjustments to staffing and re-submit comparability calculations by February 28.

EXCEPTIONS AND EXCLUSIONS

1. LEAs with only one building or only one building for each grade span are not required to demonstrate comparability.
2. LEAs with only one large school and one small school in total or in a grade span are also not required to demonstrate comparability for those schools. Similarly, LEAs with only one high poverty school and one low poverty school in total or in a grade span are also not required to demonstrate comparability for those schools.
3. LEAs may also exclude schools with 100 or fewer students from comparability calculations.
4. Section 1120A(c)(5)(B) of the ESEA allows an LEA to exclude state and local funds expended for the excess cost of providing services to children with disabilities as determined by the LEAs. Thus, to demonstrate comparability for non-traditional schools with 100 or more students an LEA could calculate how many teachers the LEA would need to allocate to the school if it were not a school that served children with disabilities.

ADDITIONAL RESOURCES

[Excel Template for Calculating Comparability](#)
[Word Template for Documenting Comparability Procedures](#)
[Comparability PowerPoint](#)
[Comparability Recorded Webinar](#)
[Comparability Quick Guidance](#)
[US ED Non-Regulatory Guidance: Fiscal](#)