



Comparability Overview

Section 1118(c) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), requires that local educational agencies (LEAs) provide state and locally-funded services in Title I schools that, taken as a whole, are at least comparable to services provided in schools that do not receive Title I, Part A (TIPA) funding. This comparability requirement ensures that federal TIPA funds are not spent on resources that non-Title I schools obtain with state and local funds. Statute requires that LEAs provide services that meet comparability requirements each year and maintain documentation to demonstrate compliance biennially. However, statute also stipulates that LEAs must **annually** provide services in Title I schools that are, in fact, comparable to those in non-Title I schools. Therefore, LEAs must annually conduct local analyses to ensure comparable services are being provided.

All LEAs are required to meet comparability of service requirements using the pupil-teacher ratios method for every school within the LEA. Charter schools must be included with traditional public schools to determine comparability. LEAs may select an approved alternative method in which schools are determined comparable via grade span grouping or using each school's enrollments to group schools based on smaller and larger enrollment sizes.

Comparability Action Plan Overview

All LEAs that are **unable to demonstrate comparability** for the current school year using the pupil-teacher ratio or an FDOE approved alternative method must submit a **Comparability Action Plan** that describes the LEA's plan to resolve non-comparable circumstances within the current school year.

To ensure the LEA is on-track to meet these requirements, any LEA with non-comparable schools at the close of the reporting cycle must submit the following:

- A list of non-comparable schools and a brief description of the context contributing to non-comparability; and
- A narrative description of the LEA's action plan and timeline for implementation to meet comparability, including the responsible party.

Questions and Answers

Q: Who should submit a plan?

A: All LEAs that are unable to demonstrate comparability for all eligible schools through local analyses using the pupil-teacher ratio or an FDOE approved alternative method.

Q: What is required?

A: A written action plan is required to be carried out from the previous school year and must come into compliance by December 1, of the current school year.

Q: What components should be included in the plan?

A: Specific action steps designed to resolve non-comparable findings, timeline and benchmarks for implementation, and the individual responsible for ensuring the completion of the plan.

Q: How should the plan be submitted?

A: The Cycle A and Cycle B LEAs submit the completed form to TIPA@fldoe.org.

Q: When is the plan due?

A: By the close of the current school year reporting cycle due date.

Comparability Action Plan



LEA Name: _____

Instructions

Complete the tables below to describe the steps that will be taken to resolve the non-comparable circumstances. A change in the allocation of staff or instructional resources may be necessary to meet TIPA comparability requirements.

A copy of this form must be signed and dated by the designated comparability certifying official. This Comparability Action Plan form must be submitted to TIPA@fldoe.org by the close of the comparability reporting period, January 31, of the current year.

The Title I program office will review the information provided to ensure the LEA is on track to being in compliance with the ESSA requirements.

I. Table of Non-Comparable Schools

Complete the table for Title I schools that are unable to demonstrate comparability. Include the School Number, School Name, Grade Span School Type (Elementary, Middle, High, or Combination), and a brief explanation of the context contributing to the non-comparability status.

School Number	School Name	Grade Span School Type	Brief Explanation of Context Contributing to Non-Comparability

Continue to the next page to complete the action plan narrative and describe the steps the district will implement to ensure all schools listed above meet the comparability requirements set forth by Section 1118(c) of the Elementary and Secondary Education Act of 1965, as amended by ESSA.

II. Action Plan: Narrative and Action Steps

Describe how the LEA will resolve non-comparable conditions. This narrative description should summarize the key strategies that inform the action steps and timeline. It should also include the responsible parties.

III. Signature

By signing below, the LEA affirms that the above plan will be carried out in the current school year to come into compliance by December 1, of the following school year.

LEA Name

Printed Name of Certifying Official*

Certifying Official Title

Signature of Certifying Official

Date

* The certifying official should be an LEA administrator whose salary is not paid wholly, or in part, by Title I.