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DEPARTMENT OF EDUCATION

*Creating Opportunities
for Students to Keep
Wyoming Strong*

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MEMORANDUM NO. 2018-012

TO: School District Superintendents
Title I Coordinators

FROM: Brent Bacon, Chief Academic Officer

DATE: February 12, 2018

SUBJECT: Title I Comparability and Staffing

TITLE I COMPARABILITY AND STAFFING

Section 1118 of the Elementary and Secondary Education Act (ESEA) requires that services provided with state and local funds to Title I schools be comparable to the services provided to non-Title I schools - or that if all schools within a district are Title I, that the services among schools are comparable to each other. As the legislative session proceeds, and districts begin to make staffing and funding decisions, it is important for districts to make note of comparability requirements and ensure that any cuts made at Title I schools do not move those schools out of the range of comparability options.

If using instructional Full-Time Equivalent (FTE) ratios as a means of determining comparability, Title I schools cannot exceed 110 percent of the average instructional FTE ratio for non-Title I schools. Calculations must be done with only state and local funded positions. If all schools within the district are Title I, each school must be within 90 to 110 percent of the average. If using state and local per pupil allocations at the school level, the percentage ranges are the same.

Districts that are required to calculate comparability must submit the calculations annually to the Wyoming Department of Education as a component of the consolidated grant application. These calculations are then reviewed by the Title I program manager. If the comparability requirement is not met, the district application cannot be approved. If comparability is shown to be out of compliance in the middle of the year, staffing or per pupil allocations must be changed before additional Title I funds can be released.

For questions, contact Jon Lever, Title I program manager, at jon.lever@wyo.gov or 307-777-6216.