



Notice to Title I Local Education Agencies

To: Local Education Agency Data Coordinators
cc: Local Education Agency Administrators
From: Academic Achievement
Date: December 11, 2024
Subject: Guidance on Comparability for Local Education Agencies

The Elementary and Secondary Education Act (ESEA), reauthorized as the Every Student Succeeds Act (ESSA), states that the purpose of Title I, Part A is to “provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.” Section 1118 of the ESSA requires local educational agencies (LEAs) to provide state- and locally-funded services in schools receiving support under Title I, Part A that, taken as a whole, are at least comparable to services provided in schools that do not receive support under Title I, Part A. This requirement must be met for schools in the same grade spans – elementary, middle, and high school (EMH).

Title I, Part A funds are intended to provide additional resources for low-performing students from high-poverty neighborhoods, beyond what is provided with state and local funds. The comparability requirement within The Elementary and Secondary Education Act (ESEA) seeks to ensure that Title I, Part A funds are not used to provide services that would otherwise be paid for with State and local funds, thus undermining the supplemental nature of Title I, Part A funds. Comparability, however, focuses on educational materials and services provided with the State and local funds, as opposed to the supplement, not supplant requirement, which ensures schools receive the funds they would have received if the school had not participated in Title I, Part A.

Each year, local educational agencies (LEA) with Title I schools must show that state and local resources are allocated at the same level for all schools as aligned to federal comparability calculation methods. The Arizona Department of Education (ADE) uses an annual reporting cycle to process and review calculations to ensure that each Title I school receives its share of state and local funds.

Tom Horne, Superintendent of Public Instruction

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Annual Comparability Reporting Process

Through feedback, research and internal auditing, it was determined that the Arizona Department of Education's comparability procedures limited local educational agencies (LEA) on the methods they were able to use to demonstrate comparability. Additionally, it was determined that the supports and definitions provided were also limiting. The Arizona Department of Education collaborated with stakeholder groups and the US Department of Education to revise our annual comparability procedures. These refinements support local educational agencies (LEA) with Title I schools in their efforts to maintain comparability. We sincerely appreciate everyone's input and patience as we work to build more systems of support for the field.

While the statutory requirements have not changed, and the data local educational agencies (LEA) use to determine comparability have not changed, some local educational agencies (LEA) may find they need to change the method used previously. We also recognize that with the opening of Educational Monitoring, Assistance and Compliance (EMAC) and the updated guidance release on the website, local educational agencies (LEA) may need additional time to process and implement comparability calculations. To afford LEAs time to meet this requirement, the initial date of submission will be extended to **January 13, 2025**. The Arizona Department of Education also recognizes the first round of comparability submissions using these methods may show a local educational agency (LEA) as not meeting comparability requirements. However, in such cases the Arizona Department of Education will assist and work with the local educational agency (LEA) to adjust and correct to meet comparability by the final comparability submission date of February 2, 2025. Early submission affords the local educational agency (LEA) and The Arizona Department of Education (ADE) the time to adequately work in collaboration to assist the local educational agency (LEA) in meeting final comparability.

Prior to logging onto Educational Monitoring, Assistance and Compliance (EMAC), please visit our website at: <https://www.azed.gov/titlei/comparability>. Please use the website tools and resources that will help determine which method is most appropriate for your LEA to demonstrate comparability.

If you need assistance, please contact Academic Achievement at ESEA@azed.gov.

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