

ALASKA DEPARTMENT OF EDUCATION & EARLY DEVELOPMENT

REPORT OF COMPARABILITY

for the

2022-2023 School Year



Submitted by:

Mat-Su

The Report of Comparability in Distribution of State/Local Funds must be submitted annually to the Alaska Department of Education & Early Development by February 10, 2023. Submit this report by email to Jeanny.Smith@alaska.gov.

Form #05-12-021



Report of Comparability in the Distribution of State & Local Funds

COMPARABILITY GUIDANCE

Please note that this entire workbook contains 15 tabs, including cover page.

An LEA may receive Title I, Part A, Basic and Title I, Part C, Migrant funds only if it uses State and local funds to provide services in Part A Basic and Part C Migrant schools that are at least comparable to the services provided in schools that are not receiving Part A Basic and Part C Migrant funds. If the LEA serves all of its schools with Part A Basic and Part C Migrant funds, the LEA must use State and local funds to provide services that are substantially comparable in each Part A Basic and Part C Migrant school.

An LEA may determine comparability on a districtwide basis for all schools or on a grade-span basis by comparing Title I schools to non-Title I schools.

For example, the LEA, in order to establish a comparison to determine that services are "substantially comparable," may calculate ratios for the group of schools serving program areas with the lowest percentage of children from low-income families. The ratio for each of the other program schools would then be compared with the average calculated for the comparison group of program schools.

Although there is no limitation on the number of grade spans an LEA may use, the number should match the basic organization of schools in the LEA. For example, if the LEA's organization includes elementary, middle, and senior high schools, the LEA would have three grade spans.

If there is a significant difference in the enrollments of schools within a grade span—for example, the largest school in the grade span has an enrollment that is two times the enrollment of the smallest school in the grade span—the LEA may divide grade spans into a large school group and a small school group.

Districts with all Title I schools: Even if all schools in the LEA or in a grade span grouping are served with Title I funds, the LEA must demonstrate that it will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school. **If the district only has Title I schools, complete only the tab for either Method A - ONLY Title I Schools or Method B - ONLY Title I Schools.**

Exclusions to comparability tests: The comparability requirement does not apply to an LEA with only one building for each grade span. **An LEA may also exclude schools with 100 or fewer students from its comparability determinations.**

An LEA may meet the comparability requirement if it establishes and implements measures for determining compliance such as student/instructional staff ratios or student/instructional staff salary ratios. For example, an LEA may--

Method A: Compare the **average number of students per instructional staff** in each Part A Basic and Part C Migrant school with the average number of students per instructional staff in schools not participating in Part A Basic and Part C Migrant programs. A Part A Basic and Part C Migrant school is comparable if its average does not exceed 110 percent of the average of schools not participating in Part A Basic and Part C Migrant programs.

Method B: Compare the **average instructional staff salary expenditure per student** in each program school with the average instructional staff salary expenditure per student in schools not participating under Part A Basic and Part C Migrant. A Part A Basic and Part C Migrant school is comparable if its average is at least 90 percent of the average of schools not participating in Part A Basic and Part C Migrant programs.

Staff salary differentials for years of employment **shall not be** included in comparability determinations.



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COMPARABILITY GUIDANCE

An LEA need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.

District Policy

An LEA shall be considered to have met the comparability requirement if the LEA files with the SEA a written assurance that it has established and implemented a--

- Districtwide salary schedule;
- Policy to ensure equivalence among schools in teachers, administrators, and other staff; and,
- Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

Records

If the LEA files a written assurance that it has established and implement a districtwide salary schedule and policies to ensure equivalence among schools in staffing and in the provision of materials and supplies, it must keep records to document that the salary schedule and policies were implemented and that equivalence was achieved among schools in staffing, materials, and supplies. If the LEA established and implemented other measures for determining compliance with comparability such as Method A or Method B, it must maintain source documentation to support the calculations and documentation to demonstrate that any needed adjustment to staff assignments were made and must submit the calculations for Method A or Method B to the state.

Developing Procedures for Compliance

An LEA must develop procedures for compliance with the comparability requirement and implement those procedures annually. ***An LEA is required to document compliance with the comparability requirement every year.***

Information to assist districts can be found under "Enrollment Totals" on the [DEED Data Center webpage](#).



Report of Comparability in the Distribution of State & Local Funds

Cover Sheet for Comparability Report

District: **Mat-Su**

School Year: **2022-2023**

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Jeanny.Smith@alaska.gov.

An LEA must develop procedures for compliance with the comparability requirement and implement those procedures annually.

Read the Comparability Guidance and the Instructions for Methods A & B tabs before completing this report. (Click on link below.)

[Comparability Guidance](#)

[Method A \(Staff/Pupil Ratio\) Instructions](#)

[Method B \(Staff Salary per Pupil\) Instructions](#)

Section I. Method of Determining Comparability

Choose the method of determining comparability and complete all appropriate sections.
(Click on the link to go to the appropriate tab.)

☒ **Method A**

(Staff to Pupil Ratio)

Submit: [Method A tab for Non-Title I Schools, and](#)

AND Submit: [Method A tab for Title I Schools, OR](#)

OR Submit Only: [Method A tab for ONLY Title I Schools](#)

☐ **Method B**

(Staff Salary per Pupil Ratio)

Submit: [Method B tab for Non-Title I Schools, and](#)

AND Submit: [Method B tab for Title I Schools, OR](#)

OR Submit Only: [Method B tab for ONLY Title I Schools](#)

☐ **Single Site District**

(One building per gradespan, or
all schools have enrollment <
100)

Submit: [Section I tab \(this page\), and](#)

AND Submit: [Section II, Part 1 tab, and](#)

AND Submit: [Section II, Part 2 tab](#)

☐ **District Policy**

(Must also submit either
Method A or Method B)

Optional: [District Policy Checklist](#)

Superintendent or
Designee Signature:

Printed Name & Title:

Kendra Bartz, Associate Superintendent of Instruction

Date:

2/9/23



Report of Comparability in the Distribution of State & Local Funds



Report of Comparability in the Distribution of State & Local Funds

Section II. Determine Grade Span Categories and Schools Excluded

Define three or four grade span categories that generally reflect the organization of the district, i.e. elementary, middle schools, etc. Actual grade spans served by schools in the category may differ, for example, a K-8 category might include schools that serve grades K-6, K-5, and 6-8.

If there is a significant range in the enrollments of schools within a grade span, the district may divide the grade span into a large-school group and a small-school group, and determine comparability separately for each group. Indicate the number of Title I schools and non-Title I schools in each grade span category. **NOTE: For purposes of comparability, Title I schools are those receiving Title I Part A Basic funds to provide a Basic Program for Disadvantaged students AND/OR receiving Title I Part C funds to provide a Migrant Education Program.**

Districts have the option to exclude from the analysis any school with less than 100 students. Section III need not be completed for grade spans that have no Title I schools. If all schools in a grade span are Title I schools, the district must still demonstrate that the distribution of state/local funds is substantially comparable among those schools. In that case, complete the ONLY Title I tab for Method A or B. Enter the list of schools that were excluded from this analysis on the Section II, Part 2 tab.

1. Total number of schools in district:

48

Total number of schools must include charter, cyber, correspondence, and alternative schools

Grade Span Category	Enrollment Range	Number of Title I Schools	Number of Non-Title I School	Option to Exclude (check all that apply)
Elementary Grade Span	K-5	19	2	<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Elementary - Small School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Elementary - Large School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Middle School Grade Span	6-8th	5	2	<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Middle - Small School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Middle - Large School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
High School Grade Span	9-12th	5	4	<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
High School - Small School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
High School - Large School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Other Grade Span	K-12	3	8	<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Other - Small School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Other - Large School Group (if split-category option is used)				<input type="checkbox"/> All are Non-Title I <input type="checkbox"/> All under 100 <input type="checkbox"/> Some under 100
Totals:		32 = (A)	16 = (B)	

#2. Total Title I Schools (A) + Total Non-Title I Schools (B):

48

Are #1 and #2 equal? (Must be "Yes"):

Yes



Districts have the option to exclude from the analysis any school with less than 100 students, or that is the only school for its gradespan.

[illegible]



Report of Comparability in the Distribution of State & Local Funds

Section III. Title I and Non-Title I Schools Analysis

For each grade span category, select either Method A or Method B to demonstrate comparability.

Method A: Compares Title I schools to non-Title I schools in terms of **pupil-staff ratios and the amounts allocated for materials/supplies.**

Method B: Compares Title I schools to non-Title I schools in terms of **salary expenditures and amounts allocated for materials and supplies.**

Depending on the method selected, **tabs should be completed for each grade span category.**

The method selected does not have to be the same for all grade spans. If a grade span category was split into large-school and small-school groups, determine comparability for each group using either

Section IV. Comparability Compliance Demonstrated

Compliance has been demonstrated if all Title I schools receive comparable amounts for staffing and/or supplies/materials (Method A) or for salaries and/or supplies/materials (Method B). Unpredictable changes in student enrollment, and related adjustments in personnel assignments, which occur after the beginning of the school year shall not be a factor in determining comparability. Districts not meeting this requirement are not eligible to receive Title I Part A Basic or Title I Part C Migrant funds. Waivers to the comparability requirement are prohibited by federal statute.

**The Report of Comparability in Distribution of State/Local Funds
must be submitted annually to the
Department of Education & Early Development by February 10, 2023.**

Submit this report by email to Jeanny Smith at

Jeanny.Smith@alaska.gov

For questions regarding this form, regulations governing comparability, or other Title I/ESEA issues, contact

Courtney Preziosi at

Courtney.Preziosi@alaska.gov



Report of Comparability in the Distribution of State & Local Funds

METHOD A - Staff to Pupil Ratio

Instructions

Grade Span/Enrollment Size Category:

Complete tabs Method A - Non Title I Schools and Method A - Title I Schools for each grade span category for which Method A has been selected. List the schools in this grade span category.

Actual Grade Span:

Indicate the actual grades served, which may differ among schools in a given category. For example, a K-8 grouping might include one school serving grades K-6 and another serving K-5.

Number of Students Enrolled:

Use the number of students enrolled on October 1, as reported to DEED on the annual Fall OASIS Student Enrollment Report OR use the Average Daily Membership for the 20-day period in October as reported to EED.

Number (FTE) of Non-federally-funded Staff:

Using full-time equivalents (1.0, 0.5, 0.25, etc.), indicate the number of instructional staff paid by state/local funds. Staff members, certified or classified, who provide instruction or who assist or supervise instructional providers are included, as well as staff who support instruction such as librarians, counselors, staff trainers, instructional aides/assistants. FTEs supported by federal funds should not be included.

Number of Pupils Per Staff:

For each school, divide the number of students enrolled by the number of staff to determine the number of pupils per 1.0 FTE staff.

Average Number of Pupils Per Staff:

On the Method A - Non-Title I Schools tab, total the number of students enrolled in all schools and divide this by the total FTE of staff in all schools to determine the average number of pupils per FTE in non-Title I schools.

On the Method A - Title I Schools tab, multiply the average for non-Title I Schools Method A non-Title I tab by 110% and then compare each Title I school to the result. Indicate comparability status for Title I schools in the designated column. (Title I schools are comparable if the number of pupils per FTE is less than or equal to 110% of the average for non-Title I schools.)

Allocation for Instructional Supplies/Curriculum Materials:

Indicate the amount of state/local funds allocated to each school for instructional supplies and materials.

Per Pupil Amount for Supplies/Materials:

Divide the amount allocated by the number of students enrolled to obtain the per pupil amount for each school.

Average Per Pupil Amount for Supplies/Materials:



Report of Comparability in the Distribution of State & Local Funds

METHOD A - Staff to Pupil Ratio

On the Method A - Non-Title I Schools tab, total the allocated amounts for all schools and divide by the total number of students enrolled in all schools to determine the average per pupil amount in non-Title I schools. Multiply the average for non-Title I schools by 90%, indicate the result on the Method A - Title I Schools tab and compare each Title I school to that figure. Indicate comparability status for Title I schools in the designated column. (A Title I school is comparable if the per pupil amount is greater than or equal to 90% of the average for non-Title I schools.)

District: Mat-Su

Grade span category: Elementary

Enter grade span, if other:

Enrollment size category: if applicable	Larger

Enter information for non-Title I schools in this grade span and size category.

Districts may exclude State/local funds expended for:

1. Limited-English-proficient students and
2. Excess costs of providing services to children with disabilities.

Name of School	State School ID #	Actual Grade Levels	Number Students Enrolled	Number (FTE) Staff	# Pupils Per 1.0 FTE Staff	School Allocation for Instructional Supplies & Curriculum Materials	Instructional Supplies & Curriculum Materials Per Pupil Amount
Fred & Sara Machetanz Elementary School	330530	K-5	465	42.94	10.82	\$282,608.00	\$608.28
Pioneer Peak Elementary School	330300	K-5	515	48.13	10.71	\$171,768.00	\$333.44
District Total & Average for Non-Title I Schools			980	91.06		\$454,376.00	
Average Number of Pupils/Staff in Non-Title I Schools					10.76		
Average Per Pupil Amount for Materials & Supplies in Non-Title I Schools							\$463.74

District: Mat-Su

Grade span category: Middle

Enter grade span, if other:

Enrollment size category: if applicable	Larger
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Enter information for non-Title I schools in this grade span and size category.

Districts may exclude State/local funds expended for:

1. Limited-English-proficient students and
2. Excess costs of providing services to children with disabilities.

Name of School	State School ID #	Actual Grade Levels	Number Students Enrolled	Number (FTE) Staff	# Pupils Per 1.0 FTE Staff	School Allocation for Instructional Supplies & Curriculum Materials	Instructional Supplies & Curriculum Materials Per Pupil Amount
Colony Middle School	330260	6-8	729	56.06	13.00	\$448,189.00	\$615.10
Teeland Middle School	330440	6-8	717	58.75	12.20	\$438,342.00	\$611.46
District Total & Average for Non-Title I Schools			1,446	114.81		\$886,531.00	
Average Number of Pupils/Staff in Non-Title I Schools					12.59		
Average Per Pupil Amount for Materials & Supplies in Non-Title I Schools							\$613.30

Section III. Method A: Non-Title I Schools Analysis

District: Mat-Su

Grade span category: High

Enter grade span, if other:

Enrollment size category: if applicable	Larger

Enter information for non-Title I schools in this grade span and size category.

Districts may exclude State/local funds expended for:

1. Limited-English-proficient students and
2. Excess costs of providing services to children with disabilities.

Name of School	State School ID #	Actual Grade Levels	Number Students Enrolled	Number (FTE) Staff	# Pupils Per 1.0 FTE Staff	School Allocation for Instructional Supplies & Curriculum Materials	Instructional Supplies & Curriculum Materials Per Pupil Amount
Colony High School	330270	9-12	1,121	78.88	14.21	\$710,691.00	\$634.15
Mat-Su Career & Tech High School	330520	9-12	750	65.24	11.50	\$526,567.00	\$701.72
Palmer High School	330050	9-12	732	68.94	10.63	\$666,997.00	\$910.60
Wasilla High School	330120	9-12	845	76.38	11.07	\$783,406.00	\$926.57
District Total & Average for Non-Title I Schools			3,449	289.43		\$2,687,661.00	
Average Number of Pupils/Staff in Non-Title I Schools					11.92		
Average Per Pupil Amount for Materials & Supplies in Non-Title I Schools							\$779.24

Totals from Method A - Non-TTde | Schools tab

Average Number of Pupils/Staff in Non-Title 1 Schools	10.76
Average Pupils/Staff x 110% = Pupils/Staff Ratio	11.84
Average Per Pupil Amount for Materials & Supplies in Non-Title 1 Schools	\$463.74
Average Per Pupil Amount x 90% = Supplies/Materials Ratio	\$417.37

District: Mat-SuGrade span category: Elementary

Enter grade span, if other:

Enrollment size category: Larger

if applicable

Enter information for Title I schools in this grade span and size category.

Districts may exclude State/local funds expended for:

1. Limited-English-proficient students and
2. Excess costs of providing services to children with disabilities.

*NOTE: A school is comparable if it meets either the Pupil/staff ratio (<110% of the non-Title I ratio) OR the instructional supplies/materials (> 90% of the Non Title I) OR both of the comparable columns.

Name of School	State School ID #	Actual Grade Levels	Number of Students Enrolled	Number (FTE) Staff	# Pupils Per 1.0 FTE Staff	* Comparable? Y/N	School Allocation for Instructional Supplies & Curriculum Materials	Instructional Supplies & Curriculum Materials Per Pupil Amount	* Comparable? Y/N2
Big Lake Elementary School	330380	K-5	353	40.16	8.79	Yes	\$208,463.00	\$590.30	Yes
Butte Elementary School	330350	K-5	248	34.18	7.24	Yes	\$149,593.00	\$604.42	Yes
Cottonwood Creek Elementary School	330280	K-5	435	42.05	10.34	Yes	\$255,140.00	\$586.76	Yes
Dena'ina Elementary School	330550	K-5	398	40.69	9.79	Yes	\$170,242.00	\$427.42	Yes
Finger Lake Elementary School	330290	K-5	388	44.50	8.43	Yes	\$183,188.00	\$471.59	Yes
Goose Bay Elementary School	330390	K-5	282	37.94	7.43	Yes	\$189,937.00	\$673.89	Yes
Ildilard Elementary School	330040	K-5	397	40.97	9.69	Yes	\$186,518.00	\$469.82	Yes
John Shaw Elementary School	330500	K-5	497	48.81	10.17	Yes	\$228,799.00	\$460.68	Yes
Knik Elementary School	330510	K-5	345	30.44	11.35	Yes	\$207,595.00	\$601.11	Yes
Meadow Lakes Elementary School	330420	K-5	288	37.81	7.62	Yes	\$243,421.00	\$844.63	Yes
Ron Larson Elementary School	330430	K-5	368	42.25	8.72	Yes	\$219,202.00	\$595.25	Yes
Sherrod Elementary School	330060	K-5	393	34.44	11.42	Yes	\$197,291.00	\$501.63	Yes
Snowshoe Elementary School	330190	K-5	342	36.68	9.33	Yes	\$180,507.00	\$527.49	Yes
Swanson Elementary School	330080	K-5	386	36.94	10.46	Yes	\$197,221.00	\$510.47	Yes
Tanatina Elementary School	330180	K-5	384	39.36	9.77	Yes	\$182,107.00	\$473.74	Yes
Willow Elementary	330320	K-5	127	16.85	7.53	Yes	\$198,366.00	\$1,562.55	Yes

Totals from Method A - Non-Title I Schools tab

Average Number of Pupils/Staff in Non-Title Schools	10.76
Average Pupils/Staff $\times 110\%$ = Pupils/Staff Ratio	11.84
Average Per Pupil Amount for Materials & Supplies in Non-Title Schools	\$463.74
Average Per Pupil Amount $\times 90\%$ = Supplies/Materials Ratio	\$417.37

District: Mat-Su

Grade span category: Middle

Enter grade span, if other:

Enrollment size category: Larger

if applicable _____

Enter information for Title I schools in this grade span and size category.

Districts may exclude State/local funds expended for:

- ### 1. Limited-English-proficient students and

2. Excess costs of providing services to children with disabilities.

*NOTE: A school is comparable if it meets either the Pupil/staff ratio (<110% of the non-Title I ratio) OR the instructional supplies/materials (> 90% of the Non Title I) OR both of the comparable columns.

[illegible]

Totals from Method A - Non-Title I Schools tab

Average Number of Pupils/Staff in Non-Title I Schools	10.76
Average Pupils/Staff \times 110% = Pupils/Staff Ratio	11.84
Average Per Pupil Amount for Materials & Supplies in Non-Title I Schools	\$463.74
Average Per Pupil Amount \times 90% = Supplies/Materials Ratio	\$417.37

District: Mat-Su

Grade span category: High

Enter grade span, if other:

Enrollment size category:
Larger

if applicable

Enter information for Title I schools in this grade span and size category

Districts may exclude State/Local funds expended for:

1. Limited-English-proficient students and
2. Excess costs of providing services to children with disabilities.

*NOTE: A school is comparable if it meets either the Pupil/staff ratio (<110% of the non-Title I ratio) OR the instructional supplies/materials (> 90% of the Non Title I) OR both of the comparable columns.

[illegible]



Report of Comparability in the Distribution of State & Local Funds

DISTRICT POLICY CHECKLIST

The purpose of the ESEA Title I comparability requirement is to ensure that school districts provide equitable State/local funding to schools receiving Title I Part A Basic and/or Part C Migrant funds when compared with those schools not receiving Title I funds.

In order to meet the Title I comparability requirement through a district salary schedule and policy, a district must have all of the following:

- ☐ have a districtwide salary schedule;
- ☐ have a written policy to ensure equivalence among schools in teachers, administrators, and auxiliary personnel;
- ☐ have a written policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies;
- ☐ document the implementation of these policies by annually submitting the Report of Comparability in Distribution of State/Local Funds to the DEED Title I Administrator;
- ☐ modify distribution practices as necessary to achieve comparable* funding for Title I schools, within the ten percent range defined in federal statute; and,
- ☐ retain documentation at the district office for single-audit and onsite compliance review purposes.

Significant, unpredictable changes in student enrollment or personnel assignments which occur after the beginning of a school year should not be included as a factor in determining comparability.

Districts submitting this policy checklist must also demonstrate through Method A or Method B that comparability has been met.