



D4

Title One Comparability Procedure

Policy D4 Title One Comparability

Specific Procedures Outline:

Title I, Part A Comparability Requirements and Compliance

Title I, Part A of the Elementary and Secondary Education Act (ESEA) provides financial assistance to LEAs to offer supplemental services to meet the educational needs of disadvantaged children. The legislation requires LEAs to provide state and local resources in Title I schools that are comparable to the services provided in non-Title I schools.

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Title I, Part A allocations are made annually, therefore comparability is an ANNUAL requirement.

District Procedures to Ensure Comparability Compliance

The Superintendent will ensure that the district will maintain annual documentation and respond to all requests from the State Education Agency (SEA) to demonstrate district and member school compliance to Comparability requirements, including:

- Establishing and implementing a district-wide salary schedule;
- Adopting and conducting an periodic review of a district Title I Comparability Policy.

There are four options to document meeting Title I, Part A comparability requirements:

Option 1: Equivalence in the Student to Instructional Staff Ratios:

Each LEA may demonstrate that the student to instructional staff ratio in each Title I school within a grade span is equal to or not more than 110 percent of the average student to instructional staff ratio for all non-Title I schools within that grade span. A ten percent variance is allowed when comparing Title I to non-Title I schools. Whether an LEA chooses to measure compliance by comparing student to instructional staff ratios or student to instructional staff salary ratios, the LEA must consistently include the same categories of staff members in the ratios for both Title I and non-Title I schools. When making decisions as to which instructional staff to include for comparability determinations, LEAs must exclude staff paid with federal and private funds. See

Section IV of this document for more details on the exclusion of supplemental state and local funds such as Economic Impact Aid (EIA), and Quality Education Investment Act (QEIA).

Option 2: Equivalence in the Student to Instructional Staff Salary Ratios:

The LEA may choose to demonstrate comparability by comparing student to instructional staff salary ratios of the Title I schools with the average ratio of student to instructional staff salaries of the non-Title I schools in the same grade span. A ten percent variance is also allowed when the ratio of each Title I schools is compared to the average ratio of all the non-Title I schools in the same grade span. In other words, a Title I school is considered comparable if its ratio is at least 90 percent of the average ratio of the non-Title I schools. Instructional staff salary differentials for years of employment and salary increases for additional educational credits shall not be included in such determinations. Use base salaries only. Please note that paraprofessionals should not be included in any of the calculations.

Option 3: Equivalence in the Provision of Curriculum Materials and Instructional Supplies:

As an alternative, an LEA may demonstrate comparability based on the per-pupil amount of state and local funds that a school uses to purchase curriculum materials and instructional supplies. The LEA examines whether the per-pupil amount for each school falls within a range that is between 90 and 110 percent of the district-wide average. No form is provided for this calculation.

Option 4: Equivalence in the Provision of Resource Allocations:

An LEA may choose to compare its Title I and non-Title I schools based on the amount of state and local funds allocated per pupil for each grade span as a whole. To determine comparability, the LEA compares the per-pupil amount allocated to each Title I school within a grade span to a range that falls within 90 and 110 percent of the per-pupil average for a grade span as a whole of the non-Title I schools.

Source: Non-regulatory guidance/Title I Fiscal Issues: Maintenance of Effort Comparability Supplement, not Supplant Carryover Consolidating Funds in Schoolwide Programs Grant Back Requirements (2008, pp 16-30) retrieved from www2.ed.gov/programs/titleiparta/fiscalguid.doc

Clarification: This most recent procedure is the one that is to be used. All prior drafts are null and void