

Title I Comparability Procedure

Districts are required to use district funds to provide educational services in Title I schools that are comparable to the services provided in non-Title I schools. The district's Comparability Procedure and annual Demonstration describe district compliance with comparability requirements. In addition, districts must file a written assurance that it has established and implemented (a) a district-wide salary schedule; (b) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and (c) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

This sample template is not an official Massachusetts Department of Elementary and Secondary Education document. It is provided only as an example.

Title I Comparability Procedure

Each district must develop procedures for complying with the annual comparability requirement. These procedures should be in writing and should, at a minimum include:

1. the district's timeline for demonstrating comparability;
2. identification of the office responsible for making comparability calculations and sources of data;
3. the measure and process used to determine whether schools are comparable;
4. and how and when the district makes adjustments in schools that are not comparable.

Following is an illustration of a Title I comparability procedure which should be structured with the minimum requirements:

Comparability is an annual requirement for the district to be eligible to receive Title I, Part A funds. To demonstrate comparability on an annual basis, the district's Title I office oversees the computation of the ratio of pupils to total instructional staff at each school within a grade span. By September 15th, the Title I office will send to each school leader (principal) a copy of the staff members who were in the building the previous year. Blank copies will be provided for staff lists to be updated for the present year. By October 1st, each school building leader will send to the Title I office the updated listing of staff members, assignments, and FTEs.

For these computations, the following personnel at each school, who are paid out of State or local funds, are to be included:

1. Certified classroom teachers
2. Other certified staff (principal, guidance counselors, specialists, librarians, etc.)
3. Paraprofessionals and clerical staff

Cafeteria workers, custodians, nurses, playground aides, student teachers, and volunteers and other non-instructional personnel SHALL NOT be included. All staff paid with Title I or other federal funds are to be EXCLUDED.

Upon receipt of school personnel lists, the Title I office will perform the comparability demonstration calculations using the Massachusetts Department of Elementary and Secondary Education comparability forms. The Comparability demonstration will be completed by October 15 so that any necessary adjustments in staffing can be in place by the end of October.

If and when a school does not meet the comparability, state and local resources that are provided to the school will be adjusted to bring the school into comparability with all other schools at the same grade-span. The school district business manager and district supervisory personnel responsible for staffing will participate in making staff adjustments. Resources that are available for adjustment include teaching staff. Where needed, such adjustments will be made in a timely manner by no later than October 31 so as to get schools back into a comparable position as soon as possible and to avoid Title I financial sanctions.