

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.

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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 the district compliance with comparability requirements. 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 is 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. School enrollment is based upon the October SIMS report and instructional staffing is based on the October Education Personnel Information Management System (EPIMS) report.

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

EPIMS 1305	Principal
EPIMS 1310	Asst/Vice Principal
EPIMS 2305	Teacher
EPIMS 2310	Teacher – support content instruction
EPIMS 2325	Long Term Substitute Teacher
EPIMS 2330	Instructional Coach
EPIMS 3329	Guidance Counselor

Staff paid from Title I or other federal funds are excluded.

The Title I office will perform the comparability demonstration calculations using the Massachusetts Department of Elementary and Secondary Education comparability instructions and forms. The Comparability demonstration will be completed by October 31 so that any necessary adjustments in staffing can be in place by November 30.

When a Title I school does not meet comparability, state and local resources that are provided to the school will be adjusted to bring the school into comparability with the 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. Adjustments will be made in a timely manner by no later than November 30 to get schools back into a comparable position to avoid Title I financial sanctions.