P-12: Administrative Procedures
Comparability of Services

REFERENCES
Board Policy P-12
General Education Standard Allocations

DEFINITIONS
Comparability: Comparability is a test of fairness. Schools receiving federal Title I funds must receive state and local funds comparable to the state and local funds given to non-Title I schools. In other words, Title I schools must get their fair share of state and local funds before they receive Title I funds. Title I funds, by law, are therefore supplemental to state and local funds.

PROCEDURES FOR IMPLEMENTATION

I. Meeting the Comparability Requirement
   A. Comparability must be tested every year in which the district receives Title I funds.
   B. The comparability of services requirement applies to the use of state and local funds, not federal funds.
   C. The district has chosen to meet the comparability requirement by establishing and implementing the following:
      1. a district-wide salary schedule;
      2. a district policy to ensure equivalence among schools in staffing
         a. The district has chosen to demonstrate comparability by using the student/teacher FTE ratios method.
      3. a district policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. See, Board Policy I-7: Curriculum and Instruction Materials and its accompanying administrative procedures.

II. District-wide Salary Schedule
   A. The district has district-wide salary schedules for all its employees.
   B. There are different salary schedules for certified teachers, administrators, classified contract employees, and hourly employees.
   C. Employees are paid based on experience, education and task assignment.
   D. There are no different pay schedules for different sites.

III. The Student/Teacher FTE Ratio Method
   A. The procedure for utilizing the student/instructional staff ratio method is as follows:
      1. Students and instructional staff must be counted on the same day;
      2. Title I schools are compared to non-Title I schools;
      3. Schools are compared by grade span;
      4. Students are counted at each school using the district Average Daily Membership (ADM), excluding 3 and 4 year olds.
      5. Instructional staff can be counted in a number of ways, including using payroll or finance data. Staff are counted as full (1.0) or fractional (less than 1.0) Full Time Equivalents (FTE).
      6. In determining comparability, staff salary differentials for years of employment shall not be included.
      7. The district may exclude:
         a. unpredictable changes in student enrollment or personnel assignments that occur after the beginning of the school years,
         b. state and local funds expended for language instruction education programs,
         c. state and local funds expended for the excess costs of providing services to special education services, and
         d. supplemental state or local funds expended in any school attendance area or school for program that specifically meeting the intent and purposes of Title I.
      8. School personnel who are paid with State Fiscal Stabilization Funds under the American Recovery and Reinvestment Act of 2009 may or may not be included.
   B. Comparability is achieved when the student/teacher FTE ratios in the Title I schools do not exceed 110% of the average ratio for non-Title I schools.
   C. Comparability testing should be completed at the district level by mid-November of each year.
D. If any instances of noncomparability are identified, the superintendent or business administrator shall promptly implement adjustments as needed to ensure comparability.