

North Country Supervisory Union Common Board Policy Manual

Instruction

G.12 TITLE I PART A COMPARABILITY POLICY

If a school in the North Country Supervisory Union becomes eligible to receive Title I funds, the school district in which the school is located shall provide comparable services, staffing levels, curriculum materials and instructional supplies for Title I eligible and non-Title I eligible schools. The district shall use local and state funds to ensure equivalence among schools in staffing and the provision of curricular materials and instructional supplies. Students in all schools shall be eligible for comparable programs and supplemental supports. The district shall utilize district-wide salary schedules for professional and non professional staff.

The superintendent or his or her designee shall utilize procedure G.12P for compliance with this policy and shall maintain records that are updated biennially documenting the district's compliance with this policy.¹

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ADMINISTRATIVE PROCEDURE

G.12P TITLE I PART A COMPARABILITY COMPLIANCE PROCEDURE

Comparability is an annual requirement for the North Country Supervisory Union to be eligible to receive Title I Part A funds. To demonstrate comparability on an annual basis, the North Country Supervisory Union's Human Resources team oversees the computation of the ratio of students to instructional staff at each school within a grade span. To ensure accuracy of reporting, data will be collected on the same date within the school year.

The Human Resources team, in partnership with the Learning Design team, will perform the comparability demonstration calculations using the Vermont Agency of Education comparability instructions and forms within the Grants Management System. The comparability demonstration will be completed by November 1st of each year so that any necessary adjustments in staffing can be in place by December 1st.

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 North Country Supervisory Union's Superintendent and/or designee responsible for staffing will participate in making staff adjustments. Adjustments will be made in a timely manner to get schools into a comparable position, as local school boards and contracts allow, to avoid Title I financial sanctions.

Comparability Compliance Tasks

Fall/Winter

- Conduct meetings with appropriate LEA representatives to discuss and review the

- requirements for completing the annual comparability calculations.
 - Review and establish (if needed) participants' roles and responsibilities. •
- Review and update timeline for completion of the calculations.
- Obtain preliminary information from appropriate LEA staff.
 - Be aware and look for notifications from the Vermont Agency of Education regarding updates on the Title I Comparability Report module.
 - Determine the date and collection methodologies for gathering data needed to complete calculations.
 - Complete Comparability Report within the Grants Management System. •
- Make adjustments as allowed to get schools back into a comparable position.

Ongoing

- Periodically verify the data and check comparability throughout the second half of the school year.
 - Continue to make adjustments as needed to get schools back into a comparable position. •
- The LEA will keep the comparability requirement in mind as it plans for the allocation of instructional staff and resources to schools for the coming school year. This would enable the LEA to minimize the potential for disruption in the middle of a school year, should adjustments need to be made to ensure that Title I schools are comparable to non-Title I schools.
- Key stakeholders engage in LEA-level budget (State and local funds) discussions concerning staff assignments, and distribution of equipment and materials for the purpose of ensuring compliance with Title I comparability requirements for the upcoming school year.
 - Identify LEA Title I schools and non-Title I schools.

Records and Documentation:

- The North Country Supervisory Union will keep a copy of the completed comparability report(s) with the Learning Design Administrative office for audit purposes.
- The North Country Supervisory Union will maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I schools are comparable. Any report used for documentation will be signed and dated by the person issuing the report.

References:

- Every Student Succeeds Act (ESSA) – Section 1118(c)
 - The U.S. Department of Education Non-Regulatory Guidance: Title I Fiscal Issues •
- The Vermont Agency of Education Title I Part A Comparability Guidance Document

Cross References:

- Title I Part A Comparability Policy G.12

Date of last review: 12/21/2021