



Book	Policy Manual
Section	100 Programs
Title	Title I - Comparability of Services
Code	150
Status	First Reading
Adopted	December 4, 2017
Last Revised	August 19, 2019
Last Reviewed	April 12, 2021

Purpose

The equivalent distribution of district resources is one means the district shall use to ensure all students receive a quality education. This policy demonstrates the district's commitment to ensure that no discrimination occurs in the distribution of resources funded by state and local sources, regardless of the receipt of federal funds.

Authority

The Board directs that each district school receiving Title I funds must use state and local funds to provide services that, taken as a whole, are at least comparable to services in those schools in the district that do not receive Title I funds.[\[1\]](#)

If all schools in the district receive Title I funds, the Board directs that state and local funds shall be used to provide services that, taken as a whole, are substantially comparable in each school.[\[1\]](#)

The Board acknowledges that comparability may be measured on a grade-span by grade-span basis or a school-by-school basis.

Definition

For purposes of this policy, **grade span** is defined as a similar two-grade span difference or less. For example, a grade span of K-2 to K-4, not a grade span of K-2 to K-5.

Delegation of Responsibility

If the district has more than one (1) building per grade span, the Federal Programs Coordinator shall complete a Detailed School Data Sheet.

Regardless of buildings per grade span, the Federal Programs Coordinator shall annually complete a Comparability Assurance Form to provide written assurance of equivalence among schools, including the provision of curriculum materials; instructional supplies; and teachers, administrators and other staff.

Guidelines

Method of Determination

For purposes of determining Title I comparability, the district will calculate in a manner allowed by the state ~~shall use a current year student to staff ratio calculation or a previous year per pupil expenditure determination, whichever is more favorable to the district.~~

Allowable Exclusions

For the purposes of determining comparability, the district may exclude:[\[1\]](#)

1. State and local funds expended for language instruction education programs.[\[2\]](#)
2. Excess costs associated with providing services to students with disabilities.[\[3\]](#)[\[4\]](#)[\[5\]](#)
3. Unpredictable changes in enrollment or personnel assignments occurring after the beginning of the school year.
4. Other expenditures from supplemental state or local funds consistent with the intent of Title I.

Complaints

Complaints by individuals and organizations regarding implementation of equivalence between schools shall be processed in accordance with Board policy.[\[6\]](#)

- Legal
1. [20 U.S.C. 6321](#)
 2. Pol. 138
 3. Pol. 103.1
 4. Pol. 113
 5. Pol. 114
 6. Pol. 906