

# MILLBRAE SCHOOL DISTRICT

## PROCEDURES FOR DEMONSTRATING TITLE I COMPARABILITY COMPLIANCE

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Part A allocations are made annually, comparability is an annual requirement. The District must perform comparability calculations every year to demonstrate that all of its Title I schools are in fact comparable and make adjustments if any are not. A District must develop procedures for complying with comparability requirements. [ESEA § 1120A(c)(3)]

**1. Responsible Office:** It is the responsibility of the Chief Business Official along with the Supervisor of Business Services and Director of Educational Services, to ensure that the District remains in compliance with the Title I comparability requirements. The designated office will oversee the process to ensure all procedures are followed and all deadlines are met.

### 2. Deadlines:

#### January – April

Engage in district-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, Part A comparability requirements for the **upcoming school year**.

#### May – July

- Conduct meetings with appropriate District representatives to discuss the requirements for completing the annual comparability calculations.
- Establish participant roles and responsibilities.
- Establish and implement a:
  - District-wide salary schedule
  - policy to ensure equivalence among schools in full-time equivalent (FTE) teachers; and
  - policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.
- Develop and/or update written procedures for complying with the comparability requirements
- Establish specific timelines for completion of the calculations.

#### August

- Obtain preliminary information from appropriate District staff.

#### September

- Identify date and collection methodologies for gathering data needed to complete calculations.

#### October

- Collect data.
  - FTE Teacher and Student Enrollment data must be captured on the same date.
- Meet with appropriate staff and calculate comparability.
- Make corrections to schools shown to be non-comparable.

## November

- Reconvene appropriate District staff to address any outstanding issues.
- Maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all schools are comparable.

**3. Basis for Demonstrating Comparability:** The Millbrae School District may calculate comparability on a district-wide or grade span basis.

**4. Data Collection:** It is the responsibility the Director of Educational Services to collect all data from the appropriate school sites, that are required by the department to demonstrate comparability. The designated office will ensure all required data is submitted to appropriate staff within the defined timeline. Free and reduced lunch data is collected from Calpads Coordinator and Child Nutrition Director, or designated staff. Student numbers are collected from Student Services Director along with Supervisor of Business Services. Accurate lists of certified and classified instructional employees (by school) are prepared Human Resources and Business Services Department, or designated staff.

**5. Data Verification:** It is the responsibility of the Director of Educational Services to verify the accuracy of the data used to demonstrate comparability and to ensure the calculations are performed correctly using the method established by the department.

**6. Reallocation:** If the initial calculations indicate that a school is not receiving comparable services, the Director of Educational Services will notify Chief Business Official and Supervisor of Business Services immediately. The District will then take immediate steps, as early in the school year as possible and with minimum disruption to the learning environment, that are necessary to demonstrate comparability for all Title I schools. Appropriate steps may include, but need not be limited to, reallocation of funding sources and/or reassignment of personnel. Reallocations must be determined no later than Dec. 1 of the same school year and all corrected comparability forms retained with the Business Office and Educational Services to be entered into the CARS reporting system or uploaded to CDE as applicable.

**7. Records:** It is the responsibility of the Director of Educational Services to ensure that all comparability reports, records, and source documentation of the District's comparability analysis and calculations are retained for at least five years for audit purposes. The District's organizational chart must also be included as part of the records. In addition, the District will maintain up-to-date records of having established and implemented an agency- wide salary schedule; policies ensuring equivalence among schools in teachers, administrators, and other staff; equivalence among schools in the provision of curriculum materials and instructional supplies; ensuring the hiring practices meet state and federal licensure requirements; teachers are highly qualified; and written District comparability procedures.

**8. Complaints:** It is the responsibility of the Director of Educational Services to handle all complaints from parents, community members or the District and school staff members, that a school is not receiving comparable services.