

**ADMINISTRATIVE
DIRECTIVE**

Administrative Directive Title: Demonstrating Title I Comparability Compliance	AD Number: 2.300.1	Adopted: November 2020 Former Descriptor: BO15
Policy References: Board Policy 2.300 - Comparability of Services	Revised: 11/24	

1 Each local educational agency must demonstrate, through appropriate documentation, that it is
 2 compliant with Title I comparability requirements as a prerequisite to receiving Title I, Part A
 3 funds. Murfreesboro City Schools must perform comparability calculations annually to
 4 demonstrate that all Title I schools are comparable and make adjustments if any schools are
 5 noncompliant. The district may calculate comparability on a district or grade-level basis.

6 **RESPONSIBLE OFFICE**

7 It is the responsibility of the Federal Programs Office to ensure that the district remains in
 8 compliance with Title I comparability requirements. The Federal Programs Office will oversee the
 9 process to ensure all procedures are followed and deadlines are met. It is the responsibility of the
 10 Federal Programs Office to address all complaints related to receipt of comparable services.

11 **DATA COLLECTION AND VERIFICATION**

12 The Federal Programs Office will also be responsible for collecting all data from the appropriate
 13 district departments required to demonstrate comparability. The Federal Programs Office will be
 14 responsible for verifying the accuracy of the data used to demonstrate comparability and to ensure
 15 the calculations are performed correctly using a method established by the Tennessee Department
 16 of Education.

17 **DEADLINES**

18 No later than the deadline designated by the Tennessee Department of Education, MCS shall
 19 complete the comparability application supplement and upload any required forms to the
 20 Tennessee Department of Education through methods identified by the department. To ensure the
 21 deadlines are met, the Federal Programs Office shall be responsible for ensuring compliance with
 22 the following timelines:

- 23 1. January-April: Engage in LEA-level budget (state and local funds) discussions concerning
 24 the allocation of instructional staff (i.e., hiring additional teachers) and resources to schools
 25 for the upcoming school year to ensure compliance with Title I comparability requirements.
- 26 2. May-June: Conduct meetings with appropriate LEA representatives to discuss the
 27 requirements for completing the annual comparability calculations. Establish participant
 28 roles and responsibilities. Select the basis for demonstrating comparability that will be used
 29 for calculations (LEA or grade- span basis). Continue to engage in LEA-level discussions

- 30 concerning the allocation of instructional staff (i.e. hiring additional teachers) and
31 resources to schools for the upcoming school year to ensure compliance with Title I
32 comparability requirements.
- 33 3. July-August: Obtain preliminary information from appropriate LEA staff. Identify LEA
34 Title I and non-Title I schools. Identify data and collection methodologies for gathering
35 data needed to complete calculations.
- 36 4. September–October: Collect data. Meet with appropriate LEA staff and calculate
37 comparability. Make recommendations regarding the necessary reallocation of resources
38 to ensure comparability of Title I schools shown not to be comparable. Maintain all
39 required documentation supporting the comparability calculations and any corrections
40 made to ensure that all Title I schools are comparable.
- 41 5. November: Reconvene appropriate LEA staff to address any outstanding issues that have
42 arisen, such as, notification from the Department of non-compliance of any Title I schools.
43 Make necessary reallocation of resources to ensure comparability of Title I schools shown
44 not to be comparable. No later than the due date established by the Tennessee Department
45 of Education, complete the Comparability Application Supplement.
- 46 6. December: No later than December 1st of the same school year, make the corrected
47 comparability changes in the Comparability Application Supplement.

48 **REALLOCATION**

49 If initial calculations indicate that a school is not receiving comparable services, the Federal
50 Programs Office will be immediately notified. The district will then take immediate action, as
51 early in the school year as possible and with minimum disruption to the learning environment, to
52 demonstrate comparability for all Title I schools. Appropriate actions include, but are not limited
53 to, reallocation of funding sources and/or reassignment of personnel.

54 Reallocations must be determined no later than December 1st of the same school year and all
55 corrected comparability forms submitted to the Tennessee Department of Education through
56 methods identified by the department.

57 **RECORDS**

58 The Federal Programs Office is responsible for ensuring that all documentation related to the
59 district's comparability analysis and calculations is retained for a period of at least five (5) years.
60 A district organizational chart must also be included as part of the records. In addition, the district
61 will maintain the following:

- 62 1. Current district-wide salary schedule;
63 2. Policies ensuring equivalence among schools in teachers, administrators, and other staff;
64 3. Equivalence among schools in the provision of curriculum materials and instructional
65 supplies;
66 4. District hiring practices to meet State and federal licensure requirements and ensure
67 teachers are highly qualified; and,
68 5. Written district comparability procedures.

Legal References
20 USCA 6321
ESEA 1120A(c)(3)