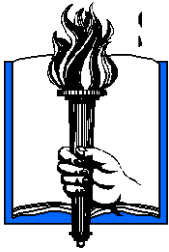


**MURFREESBORO CITY SCHOOLS  
ADMINISTRATIVE DIRECTIVES**



<b>Descriptor Term:</b>  <b>Procedures for Demonstrating Title I Comparability Compliance</b>	<b>Descriptor No:</b> <b>AD BO15</b>	<b>Effective Date:</b>  <b>11-4-20</b>
	<b>Revised:</b>	

1 Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Part  
2 A allocations are made annually, comparability is an annual requirement. Murfreesboro  
3 City Schools must perform comparability calculations every year to demonstrate that all  
4 of its Title I schools are in fact comparable and make adjustments if any are not. An LEA  
5 must develop procedures for complying with comparability requirements. [ESEA §  
6 1120A(c)(3)]

- 7 1. **Responsible Office:** It is the responsibility of the Federal Programs Office to  
8 ensure that the LEA remains in compliance with the Title I comparability  
9 requirements. The designated office will oversee the process to ensure all procedures  
10 are followed and all deadlines are met.
- 11
- 12 2. **Deadlines:** No later than Nov. 13, Murfreesboro City Schools shall annually  
13 complete the comparability application supplement and upload to ePlan the required  
14 forms to the Tennessee Department of Education (the department) demonstrating  
15 comparability. To ensure the Nov. 13 deadline is met, the attached comparability  
16 timeline will be followed.
- 17
- 18 3. **Basis for Demonstrating Comparability:** The LEA may calculate comparability  
19 on an LEA or grade- span basis.
- 20
- 21 4. **Data Collection:** It is the responsibility of the Federal Programs Office staff to  
22 collect all data from the appropriate LEA office(s), that are required by the  
23 department to demonstrate comparability. The designated office will ensure all  
24 required data is submitted to appropriate staff within the defined timeline.
- 25
- 26 5. **Data Verification:** It is the responsibility of the Federal Programs Office staff to  
27 verify the accuracy of the data used to demonstrate comparability and to ensure the  
28 calculations are performed correctly using the method established by the

29 department.

30 6. **Reallocation:** If the initial calculations indicate that a school is not receiving  
31 comparable services,

32 a. \_\_\_\_\_ the Federal Programs Office will be immediately notified.

33 The LEA will then take immediate steps, as early in the school year as possible  
34 and with minimum disruption to the learning environment, that are  
35 necessary to demonstrate comparability for all Title I schools. Appropriate  
36 steps may include, but need not be limited to, reallocation of funding sources  
37 and/or reassignment of personnel. Reallocations must be determined no later  
38 than Dec. 1 of the same school year and all corrected comparability forms  
39 uploaded to ePlan.

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

50  
51 8. **Complaints:** It is the responsibility of the Federal Programs Office to handle all  
52 complaints from parents, community members or LEA and school staff members, that  
53 a school is not receiving comparable services.  
54  
55

## 56 **Comparability Timeline**

57 The timeline below is established to ensure all LEA-level comparability procedures are carried  
58 out and comparability is demonstrated for all Title I schools.  
59

### 60 **Jan.–April**

- 61 • Engage in LEA-level budget (state and local funds) discussions concerning the  
62 allocation of instructional staff (i.e. hiring additional teachers) and resources to  
63 schools for the upcoming school year to ensure compliance with Title I  
64 comparability requirements.  
65

### 66 **May–June**

- 67
- Conduct meetings with appropriate LEA representatives to discuss the requirements for completing the annual comparability calculations.
  - 68
  - 69 • Establish participant roles and responsibilities.
  - 70 • Select the basis for demonstrating comparability that will be used for calculations (LEA or grade- span basis).
  - 71
  - 72 • Continue to engage in LEA-level discussions concerning the allocation of instructional staff (i.e. hiring additional teachers) and resources to schools for the upcoming school year to ensure compliance with Title I comparability requirements.
  - 73
  - 74
  - 75

76 **July–Aug.**

- 77 • Obtain preliminary information from appropriate LEA staff.
- 78 • Identify LEA Title I and non-Title I schools.
- 79 • Identify date and collection methodologies for gathering data needed to complete calculations.
- 80
- 81

82 **Sept.–Oct.**

- 83 • Collect data.
- 84 • Meet with appropriate LEA staff and calculate comparability.
- 85 • Make necessary reallocation of resources to ensure comparability of Title I schools shown not to be comparable.
- 86
- 87 • Maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I schools are comparable.
- 88

89 **Nov.**

- 90 • Reconvene appropriate LEA staff to address any outstanding issues that have arisen, such as, notification from the department of non-compliance of any Title I schools.
- 91
- 92
- 93 • Make necessary reallocation of resources to ensure comparability of Title I schools shown not to be comparable.
- 94
- 95 • No later than Nov. 13, complete the Comparability Application Supplement in [ePlan.tn.gov](http://ePlan.tn.gov)
- 96
- 97

98 **Dec.**

- 99 • No later than Dec. 1 of the same school year, make the corrected comparability changes in the Comparability Application Supplement in [ePlan.tn.gov](http://ePlan.tn.gov)
- 100
- 101
- 102