

# P-12: Administrative Procedures

## Comparability of Services



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### REFERENCES

- [Board Policy P-12](#)
- [General Education Standard Allocations](#)

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### DEFINITIONS

**Comparability:** Comparability is a test of fairness. Schools receiving federal Title I funds must receive state and local funds comparable to the state and local funds given to non-Title I schools. In other words, Title I schools must get their fair share of state and local funds before they receive Title I funds. Title I funds, by law, are therefore supplemental to state and local funds.

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### PROCEDURES FOR IMPLEMENTATION

#### I. Meeting the Comparability Requirement

- A. Comparability must be tested every year in which the district receives Title I funds.
- B. The comparability of services requirement applies to the use of state and local funds, not federal funds.
- C. The district has chosen to meet the comparability requirement by establishing and implementing the following:
  - 1. a district-wide salary schedule.
  - 2. a board policy to ensure equivalence among schools in staffing
    - a. The district has chosen to demonstrate comparability by using the student/teacher Full-Time Equivalent ("FTE") ratios method.
  - 3. a board policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. See, Board Policy I-7: Curriculum and Instruction Materials and its accompanying administrative procedures.

#### II. District-wide Salary Schedule

- A. The district has district-wide salary schedules for all its employees.
- B. There are different salary schedules for certified teachers, administrators, education support professionals, and hourly employees.
- C. Employees are paid based on experience, education, and task assignment.
- D. There are no different pay schedules for different sites.

#### III. The Student/Teacher FTE Ratio Method

- A. The procedure for utilizing the student/instructional staff ratio method is as follows:
  - 1. Students and instructional staff must be counted on the same day.
  - 2. Title I schools are compared to non-Title I schools.
  - 3. Schools are compared by grade span.
  - 4. Students are counted at each school using the district Average Daily Membership ("ADM"), excluding 3- and 4-year-olds.
  - 5. Instructional staff can be counted in a number of ways, including using payroll or finance data. Staff are counted as full (1.0) or fractional (less than 1.0) FTE.
  - 6. In determining comparability, staff salary differentials for years of employment shall not be included.
  - 7. The district may exclude:
    - a. unpredictable changes in student enrollment or personnel assignments that occur after the beginning of the school years,
    - b. state and local funds expended for language instruction education programs,
    - c. state and local funds expended for the excess costs of providing services to special education services, and
    - d. supplemental state or local funds expended in any school attendance area or school for program that specifically meeting the intent and purposes of Title I.
- B. Comparability is achieved when the student/teacher FTE ratios in the Title I schools do not exceed 110% of the average ratio for non-Title I schools.
- C. Comparability testing should be completed at the district level by mid-November of each year.

- D. If any instances of noncomparability are identified, the superintendent or business administrator shall promptly implement adjustments as needed to ensure comparability.

No district employee or student shall be subjected to discrimination in employment or any district program or activity on the basis of age, color, disability, gender, gender identity, genetic information, national origin, pregnancy, race, religion, sex, sexual orientation, or veteran status. The district is committed to providing equal access and equal opportunity in its programs, services and employment including its policies, complaint processes, program accessibility, district facility use, accommodations and other Equal Employment Opportunity matters. The district also provides equal access to district facilities for all youth groups listed in Title 36 of the United States Code, including scouting groups. The following person has been designated to handle inquiries and complaints regarding unlawful discrimination, harassment, and retaliation: Tina Hatch, Compliance and Investigations/Title IX Coordinator, 406 East 100 South, Salt Lake City, Utah 84111, (801) 578-8388. You may also contact the Office for Civil Rights, Denver, CO, (303) 844-5695.