



**Provo City School District**  
**Policy Series: 6000 Finances and Operations**

**Policy No. 6023**

## **Title I, Part A Comparability**

### **Purpose:**

The purpose of the comparability policy is to demonstrate the fiscal requirement that ensures that an LEA provides services with state and local funds in Title I schools that are comparable to the services provided in non-Title I schools.

### **Comparability**

Provo City School District is committed to ensuring that all students receive a high-quality education, regardless of the Title I status of their school. Provo City School District will allocate state and local funds to its schools in a manner that does not take into account the Title I funds that a school receives. The LEA will also ensure that the staffing and instructional resources in its Title I schools are comparable to those in its non-Title I schools, or substantially comparable in the case of an LEA that serves all of its schools with Title I funds by establishing and regularly reviewing:

- An LEA-wide salary schedule;
- A policy to ensure equivalent distribution among schools in teachers, administrators, and other staff; and
- A policy to ensure equivalent allocation among schools in the provision of instructional resources.

The district will annually measure and document the comparability of services in its schools, using the criteria and procedures outlined in this document, and will take corrective action if any instances of non-comparability are identified.

### **Comparability Process**

The district will:

- Use student enrollment data from the October 1 count to determine the number of students in each school.
- Ensure that the October 1 student-instructional staff ratio in each Title I school is equal to or lower than the average ratio in the non-Title I schools within the same grade span.

- In the event of non-compliance with comparability using October 1 data, use data from a different date in the first two weeks of October. The data from the same date will be used for all schools.
- Use state and local funds to provide a base level of funding for each student in each school, regardless of the Title I status of the school.
- Use a district-wide salary schedule to pay all teachers and instructional staff, regardless of the Title I status of the school where they work.
- Ensure that the average years of experience and the percentage of state-qualified teachers and instructional staff in each Title I school are equal to or higher than the average in the non-Title I schools within the same grade span.
- Ensure that the instructional materials and supplies, library and media resources, and technology resources in each Title I school are comparable to those in the non-Title I schools within the same grade span.

The district will use the following procedures to document comparability of services in its schools:

- The Title I Director will work with other LEA personnel to:
  - Collect and maintain the following data for each school:
    - student enrollment,
    - state and local funds allocated,
    - number and qualifications of teachers and instructional staff,
    - student-instructional staff ratio, and
    - instructional resources.
  - Compare the data for each Title I school with the average data for the non-Title I schools within the same grade span
  - Generate and retain a Comparability Report that shows the results of the comparison for each Title I school and the LEA as a whole.
  - Submit the Comparability Report to the Utah State Board of Education (USBE) by December 1 of each school year via the Desktop Monitoring Instrument.
  - Make the Comparability Report/calculations available to the public upon request.

The district will use the following procedures to address any instances of non-comparability in its schools:

- If the Comparability Report shows that any Title I school does not meet the comparability criteria, the district will identify the cause of the non-comparability and take corrective action to resolve it no later than November 15 of each school year.
- If the district is unable to meet comparability by November 15, the District will notify the Utah State Education Agency (SEA) of the non-comparability issue, submit a corrective action plan, and provide periodic updates on the progress and outcome of the plan.

- Once the district meets the comparability criteria, it will re-submit the Comparability Report demonstrating all Title I schools are comparable to non-Title I schools within the same grade span, or substantially comparable in each school in the case of an LEA that serves all of its schools with Title I funds.

**Legal References**

- [Section 1118\(c\) of the Elementary and Secondary Education Act of 1965 \(ESEA\), as amended by the Every Student Succeeds Act \(ESSA\)](#)

**Board Approved:**                      January 28, 2025