



ORANGE SOUTHWEST SCHOOL DISTRICT

D4 Title One Comparability - Procedure

Comparability is an annual requirement for the Orange Southwest School District (OSSD) to be eligible to receive Title I Part A funds. To demonstrate comparability on an annual basis, the OSSD Office of the Superintendent oversees the computation of the ratio of students to instructional staff at each school within a grade span. To ensure accuracy of reporting, data will be collected on the same date within the school year.

The Office of the Superintendent will perform the comparability demonstration calculations using the Vermont Agency of Education comparability instructions and forms within the Grants Management System. The comparability demonstration will be completed by November 1st of each year so that any necessary adjustments in staffing can be in place by December 1st.

When a Title I school does not meet comparability, State and local resources that are provided to the school will be adjusted to bring the school into comparability with the other schools at the same grade-span. The OSSD Superintendent, Assistant Superintendent, and District Principals will participate in making staff adjustments. Adjustments will be made in a timely manner by no later than December 1st to get schools back into a comparable position to avoid Title I financial sanctions.

Annual Comparability Timeline

August - September

- Conduct meetings with appropriate LEA representatives to discuss and review the requirements for completing the annual comparability calculations.
- Review and establish (if needed) participants' roles and responsibilities.
- Review and update procedures, including the timeline for completion of the calculations.
- Obtain preliminary information from appropriate LEA staff.
- Be aware and look for notifications from the Vermont Agency of Education regarding updates on the Title I Comparability Report module.

October - November

- Determine the date and collection methodologies for gathering data needed to complete calculations.
- Complete Comparability Report
- Make adjustments if needed to get schools back into a comparable position.

December - July

- Periodically verify the data and check comparability throughout the second half of the school year.
- Continue to make adjustments as needed to get schools back into a comparable position.
- The LEA will keep the comparability requirement in mind as it plans for the allocation of instructional staff and resources to schools for the coming school year. This would enable the LEA to minimize the potential for disruption in the middle of a school year, should adjustments need to be made to ensure that Title I schools are comparable to non-Title I schools.
- Key stakeholders engage in LEA-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 comparability requirements for the upcoming school year.
- Identify LEA Title I schools and non-Title I schools.

Records:

- OSSD will keep a PDF copy of the completed comparability report(s) with the Business office for audit purposes.
- OSSD will maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I schools are comparable. Any report used for documentation will be signed and dated by the person issuing the report.

References:

- [Every Student Succeeds Act \(ESSA\)](#) – Section 1118(c)
- The U.S. Department of Education [Non-Regulatory Guidance: Title I Fiscal Issues](#)
- The Vermont Agency of Education Title I Part A Comparability Guidance Document