

**ENFIELD BOARD OF EDUCATION  
ENFIELD, CONNECTICUT**

**Instruction**

**6161.3**

**Comparability of Services**

The Superintendent or his/her designee shall pursue funding under Title I of the Academic Achievement of the Disadvantaged, as amended by the Every Student Succeeds Act (ESSA) to supplement instructional services and activities in order to improve the educational opportunities of educationally disadvantaged or deprived children.

*Alternate language:* To improve the academic achievement of educationally and economically disadvantaged children, the Board of Education (Board) will participate in the federal Title I program.

All District schools, regardless of whether they receive Title I funds, shall provide services that, taken as a whole, are substantially comparable. Teachers, administrators and other staff shall be assigned to schools in a manner that ensures equivalency among the District's schools. Curriculum materials and instructional supplies shall be provided in a manner that ensures equivalency among the District's schools.

Comparability is defined, for purposes of this policy, that the District uses state and local funds to provide services to Title I schools that are comparable to those offered in non-Title I schools in order to get federal funding under ESSA.

The Board of Education believes that at all times its schools should be equally as well equipped and maintained as may be possible within existing financial limitations.

It shall be the policy of the Board of Education to insure comparability of services funded by state and local sources in both Title I project schools and non-project schools. The Board of Education will therefore:

1. Establish and maintain a district-wide salary schedule that is applicable to all staff whether assigned to Title I or non-Title I schools.
2. Provide services with federal, state and local funds in schools serving Title I project areas that are at least comparable to services in non-project areas.
3. Use federal, state and local funds to provide for an equivalence among all schools in all schools with the same grade levels in teachers, administrators, auxiliary personnel.
4. Use federal, state and local funds to provide for an equivalence among all schools with the same grade levels in the provision of curriculum and instructional materials, books and supplies.

The District shall maintain records that are updated biannually documenting its compliance with this ESSA requirement.

**Comparability of Services**

**Note:** The district will be considered to have met the comparability requirements of Title I, Part A if it has filed with the State Board of Education a written assurance that it has established and implemented (1) a district-wide salary schedule and (2) policies to ensure equivalence in resources. (U.S.C. 6321(c)(2))

For the purposes of determining comparability in compliance with 20 U.S.C. 6321(c), the District, may exclude

1. State and local funds expended for English Learners language instruction education programs.
2. Excess costs associated with providing services to students with disabilities.
3. Unexpected changes in enrollment or personnel assignments occurring after the beginning of the school year.
4. Staff salary differentials for years of employment.
5. Other expenditures from supplemental state or local funds consistent with the intent of Title I (serving only children who are failing, or most at risk of failing, to meet the State's standards)

The Superintendent or his/her designee shall provide in a timely manner all assurances, documentation, or other information required by the State Department of Education to demonstrate the District's compliance with Title I fiscal requirements.

The Superintendent or his/her designee shall maintain reports and other documentation demonstrating compliance with the requirements of this policy.

Nothing in this policy will prohibit the administration from addressing identified problems at individual schools.

**Note:** The comparability requirements of 20 U.S.C. Section 6321(c) shall not apply to a district that does not have more than one building from each grade span. (20 U.S.C. Section 6321(c)(4))

Legal Reference: Title I Improving Basic Programs Operated by State and Local Educational Agencies, Improving Every Student Succeeds Act, P.L. 114-95, Section 1118c of Title I, ESEA/ESSA  
20 U.S.C. Section 6321(c)  
*Agostini v. Felton* 521 U.S. 103 (1997)

**Policy Adopted: May 11, 2021**