

1 To improve the academic achievement of educationally and economically disadvantaged
2 children, the Transylvania County Board of Education (the “board”) will participate in the
3 federal Title I program.

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5 **A. TITLE I MAINTENANCE OF EFFORT**

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7 The school system will maintain fiscal effort with state and local funds as required to be
8 eligible for the receipt of funds through Title I, Part A of the Elementary and Secondary
9 Education Act, **as amended**.

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11 **B. USE AND ALLOCATION OF TITLE I FUNDS**

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13 Title I funds will be used to supplement, and not to supplant, non-federal funds that
14 would otherwise be used for the education of students participating in the Title I program.
15 Accordingly, state and local funds will be allocated to each school receiving Title I funds
16 in a manner that ensures that each such school receives all of the state and local funds it
17 would otherwise receive in the absence of Title I funding.

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19 **C. COMPARABILITY OF SERVICES**

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21 State and local funds will be used in schools receiving Title I funds to provide services
22 that, taken as a whole, are at least comparable to services in schools that are not receiving
23 Title I funds, or, if all schools receive Title I funds, to provide services that are
24 substantially comparable in each school. The board will ensure equivalence among
25 schools in the allocation of state and local resources for (1) teachers, administrators, and
26 other staff, and (2) curriculum materials and instructional supplies. In addition, the board
27 will establish and implement system-wide salary scales that are applicable to all staff
28 whether assigned to Title I or non-Title I schools.

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30 **D. COMPARABILITY TESTING**

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32 The superintendent shall direct the Title I **director** ~~coordinator~~, in conjunction with the
33 finance officer, to conduct comparability testing before November 1 of each school year
34 to assess the equivalent distribution of state and local resources among schools.; **The**
35 **Title I director will determine annually whether to compare student enrollment to**
36 **instructional staff or to instructional staff salary and also whether schools will be**
37 **examined on a grade-span basis or on a school-by-school basis. The following will be**
38 **excluded when determining comparability: (1) any resources paid with federal or private**
39 **funds; (2) supplemental state or local funds expended for programs that meet the intent**
40 **and purpose of Title I; (3) staff salary differentials for years of employment; (4)**
41 **unpredictable changes in student enrollment or personnel assignments that occur after the**
42 **beginning of a school year; (5) state and local funds expended for language instruction**
43 **programs; and (6) excess costs of providing services to students with disabilities.**
44 **Comparability testing will be completed using the forms, measures, methodologies, and**

45 following the ~~other guidance as specified~~ **created** by the North Carolina Department of
46 Public Instruction (NCDPI) for the calculation of comparability. ~~Schools may be~~
47 ~~examined on either a grade span or school by school basis.~~ The superintendent or
48 designee shall submit the comparability testing report annually to NCDPI by the deadline
49 established by that agency.
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51 E. CORRECTION OF NONCOMPLIANCE

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53 If comparability testing identifies any instances of variance greater than ten percent
54 (10%), the Title I ~~director coordinator~~ shall notify the superintendent or designee without
55 delay. The superintendent or designee shall promptly make adjustments as needed to
56 ensure comparability. These adjustments may include, but need not be limited to,
57 reallocation of materials or supplies, or reassignment of personnel.
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59 F. DOCUMENTATION OF COMPLIANCE WITH TITLE I FISCAL REQUIREMENTS

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61 The superintendent or designee shall provide in a timely manner **any** ~~all~~ assurances,
62 additional documentation, or other information required by the State Board of
63 Education/NCDPI to demonstrate the school system's compliance with Title I fiscal
64 requirements.
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66 G. RECORDS MAINTENANCE

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68 The superintendent or designee shall maintain reports and other documentation
69 demonstrating compliance with the requirements of this policy, including documentation
70 to demonstrate that any needed adjustments to staff assignments were made annually, for
71 review by the North Carolina Department of Public Instruction or auditors upon request.
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73 The superintendent shall ensure that all other requirements for receiving Title I funds are fulfilled
74 in an accurate and timely manner and shall develop, or cause to be developed, any additional
75 procedures necessary to implement this policy.
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77 Legal References: Elementary and Secondary Education Act, 20 U.S.C. 6301 *et seq.*, 34 C.F.R.
78 pt. 200
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80 Cross References:
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82 Other Resources: *Non-Regulatory Guidance, Title I Fiscal Issues*, U.S. Department of Education
83 (February 2008), available at <http://www2.ed.gov/programs/titleiparta/fiscalguid.pdf>
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85 Adopted: December 19, 2016
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87 **Revised: [DATE]**