



Draft of FPA's Title IA Program and Comparability Policy

FPA Board Policy

1. Freedom Preparatory Academy (FPA) desires to provide a high-quality education that enables all students to meet challenging state academic standards. In schools with a large number or percentage of economically disadvantaged families, FPA shall use Title I funds to provide services that strengthen the academic program and provide support to students at risk of failing to achieve academic standards.
2. Title I funds shall be used to supplement, not supplant, funds available from state and local sources for the education of students participating in Title I programs. (20 USC [6314](#), [6321](#))
3. FPA will annually create a Schoolwide plan as specified in 20 USC [6312](#) and submit the required annual Title I application to USBE.
4. School-level strategies shall be aligned with FPA's Schoolwide plan and be tailored to the specific needs of the students at the school.
5. In addition, FPA shall develop a written parent/guardian and family engagement policy in accordance with 20 USC [6318](#).
6. Comparability of Services In schools receiving Title I funds, state and local funds shall be used to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving Title I funds or, if all FPA schools are receiving Title I funds, that are substantially comparable in each school. Comparability may be determined on a school-by-school basis or by grade span. (20 USC [6321](#)) To demonstrate comparability of services among FPA schools, FPA shall:
 - a. Implement an agency-wide salary schedule.
 - b. Ensure equivalence in teachers, administrators, and other staff, as measured by either or both of the following:
 - i. The ratio of students to instructional staff at each Title I school within a grade span, which shall not exceed 110 percent of the average ratio for all non-Title I District schools within that grade span.
 - ii. Salary expenditures for instructional staff at each Title I school shall be no less than 90 percent of the average salary expenditure across non-Title I FPA schools.
 - c. Ensure equivalence in the provision of curriculum materials and instructional supplies, by determining whether the per-student expenditure of state and local funds for curriculum materials and instructional supplies in Title I schools is between 90 and 110 percent of FPA's systemwide average.

- d. Determine whether the amount of state and local funds allocated per student for each grade span is between 90 and 110 percent of the per student average for each grade span in non-Title I schools.
7. In determining comparability, FPA shall not include staff salary differentials for years of employment. FPA also may exclude unpredictable changes in student enrollment of personnel assignments that occur after the beginning of the school year, state and local funds expended for language instruction educational programs, state and local funds expended for the excess costs of providing services to students with disabilities, and supplemental state or local funds expended in any school attendance area or school for programs that specifically meet the intent and purposes of Title I. (20 USC [6321](#)) The Director of Finance or designee shall annually assess comparability in accordance with the above criteria and maintain records documenting FPA's compliance. If any instances of noncomparability are identified, the Director of Finance or designee shall promptly implement adjustments as needed to ensure comparability.
8. **Program Evaluation** FPA's Governing Board shall regularly monitor the progress of economically disadvantaged and low-achieving students in Title I schools. During the annual evaluation of the FPA's progress toward achieving each goal identified in the Schoolwide Plan, FPA's Governing Board shall review disaggregated data on academic achievement, school attendance, and other outcomes for such students and shall ensure that strategies are revised as necessary to support continuous improvement.