EFFECT OF A FEDERAL LAW ON STATE POLICY PROCESS
AND ON LOCAL IMPLEMENTATION

by

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A SPECIAL DEDICATION

To my father and mother, and

, who taught me at an early age that perseverance and hard work will always be rewarded. And to my grand-
father, , who always believed that educa-
tion was one of the keys to the American dream.
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I am grateful to the members of the State Board of Education, the State Advisory Council, and the State Department of Education, Vocational Division. In particular I should like to acknowledge , , , and Mr. Dewey T. Oakley, Jr.

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after themselves and each other on more than one occasion. Without their support, this study would have been impossible.

Last, a vote of thanks must go to my superintendent, , my local school board members , , , , and for their outstanding cooperation.

A special note of acknowledgement also goes to my traveling companions, , , , and . Their support and encouragement was invaluable.
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Chapter 1

INTRODUCTION

During the past two decades, the governance of public elementary and secondary education in the United States has undergone significant change, shifting the locus of important policy decisions from local to higher levels of government. Documentation of the particular shifts that have taken place are readily apparent at the state level where state legislatures have become increasingly active in enacting a great range of law dealing with public education. There was a plethora of similar documentation at the federal level where the Congress had legislated in almost every conceivable area of education, initiating untold numbers of administrative guidelines and procedures.

Clearly it would have been far too ambitious to attempt to detail these governance arrangements for the whole public education arena. However, it was possible to view a small cross-section of the institutional impact brought about by the passage of a single piece of legislation. Such was the attempt of this study in analyzing the issues of Sex Stereotyping, Local Advisory Councils, Vocational Guidance, and Fiscal and Administrative Assurances as found in the 1976
Vocational Education Amendments to Public Law 94-482, which govern a large part of the federal involvement in public vocational education.

The purpose of Public Law 94-482 was to extend the Higher Education Act of 1965 and to extend and revise the Vocational Education Act of 1963. In addition to authorizing vocational funds, the law was designed (1) to extend and improve existing programs, (2) to develop new programs, (3) to overcome sex stereotyping, and (4) to provide part-time employment for youths, including those with special education handicaps. In October of 1977, the final regulations of the Vocational Amendments of 1976, Title II of Public Law 94-482, were published and promulgated as operational policy for participating states.

Changes, however, were still taking place even as the law was being implemented and changes were expected to continue. This was evident in the introductory paragraph of the law which stated:

The actual impact and consequences of the statutory provisions and problems which states and local education agencies may have in implementing these provisions are not known at the present time.  

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Statement of the Problem

The problem of this study was to describe the state of Virginia's policy-making process regarding the 1976 Federal Vocational Amendments. Further, the activities of the state level actors were investigated in order to examine, describe, and explain the process by which policy was developed to meet the mandates of the 1976 Amendments. Finally, the effect of the law on the implementation of Vocational Education was presented by first viewing the data in aggregation and then as perceived by type of respondent, as well as by size, type, and region of the school divisions.

Research Questions

Specifically, this study was designed to address the following research questions:

1. What policymaking processes were utilized at the state level by those persons most closely involved in developing a response to the 1976 Vocational Amendments?

2. What effects, if any, did the Vocational Amendments, as interpreted by the local actors, have at the local level?

3. What were the differences, if any, of perceptions of the impact of the Vocational Amendments by position of respondent and by size, type, and region of school divisions?
Purpose of Study

The purpose of this study of policy implementation was to inform those state and local policymakers most concerned with vocational education of the extent and type of influence of federal legislation on state policy process and local programs. This study was designed to demonstrate how the policy process currently operates as seen by the state actors, and the impact of federally originated and state mandated policy on the local school district. It was hoped that the results of this study would be helpful to state and local agencies as well as to regional planning districts and local advisory councils in their efforts to improve the policy and planning process for vocational education. The findings of this study could also add to the information available on the policy-making process in action and provide a basis for future studies on the development, implementation, and evaluation of policymaking for Vocational Education at the state and local level.

Need for the Study

With the 1976 Vocational Education Amendments a reality, the role of the Virginia (State) Board of Education (hereafter the Board, or Board of Education), acting as the State Board of Vocational Education, became extremely important. The relationship between the Board, acting for
the State, and both the federal government and the local jurisdictions was cited by Karlen as being in need of further study.

1. A study of the role of the State Board in relation to the federal government appears to be a fruitful area to investigate.

2. The State Board's relationship to the local school divisions appears to be an area which needs investigation.³

Although a review of the current literature revealed no studies on the possible impact of this type of Vocational Law, such a study was believed to be important to educators in Virginia and elsewhere for three reasons. First, it could provide an understanding of the impact of a federal law on policymaking at the state level; second, it could provide an understanding of the interplay among state actors and state agencies with regard to policy decisions; and finally, it could provide insight into the impact of a federal law upon a local school division.

Assumptions

This study was based on the following assumptions:

1. That the relevant and prevalent actors in

---
state policymaking regarding Vocational Education could be identified and their assistance obtained.

2. That actors interviewed in connection with their role in the policy-making process provided accurate information to the best of their knowledge.

3. That all school divisions in Virginia were offering vocational education classes partially under federal financing and were, therefore, subject to both federal and state mandates.

**Limitations of the Study**

The limitations of the study were those associated with the nature of ex-post facto research. One weakness of this type research is the increased risk of improper interpretations. The study was further limited by the impossibility of conducting interviews with all the identified actors. Although every attempt was made to interview the major actors involved some were not available due to conflicts and change of assignments.

Further, the scope of the study was narrowed to variables that affected the policies related to the Vocational Amendments of 1976, Public Law 94-482. Finally, the time period for this study was inclusive of the dates April, 1977 through August, 1979, and not expanded except for purposes of clarification.
## Definition of Terms

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<tr>
<td>Vocational Education</td>
<td>That part of the total program of education which dealt with preparation, including Vocational Guidance and Counseling and exploration and training for careers below the professional level.</td>
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<tr>
<td>Actor</td>
<td>Any individual or group participant in the policy-making process.</td>
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<tr>
<td>Power</td>
<td>The attempt to control others.</td>
</tr>
<tr>
<td>Policy Process</td>
<td>A pattern of events which led to a policy decision.</td>
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<td>State Actors</td>
<td>The State Vocational Advisory Council, and its Executive Director; the Board of Education, and its chairman; the Division of Vocational Education and its Director; the State Plan and Accountability Committee, and its Co-chairmen; and the Superintendent of Public Instruction, and his staff.</td>
</tr>
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<td>Local Actor as Respondent</td>
<td>The Superintendent, Vocational Director, and others responsible for Vocational Education at the school division level.</td>
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<tr>
<td>Policy</td>
<td>A rule of conduct or action prescribed or formally recognized as</td>
</tr>
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4Ibid., p. 10.


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<tr>
<th>Executive Guidelines</th>
<th>Regulations, statements or other memoranda that were used to explain Public Law 94-482.</th>
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<td>Policy Analysis</td>
<td>A purposive course of action followed by an actor or set of actors in dealing with a problem or matter of concern.</td>
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<td>Reputational Method</td>
<td>The reputational method rests on reputation rather than action. Therefore, the method does not assume that a person has power because of a certain class or station.</td>
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<tr>
<td>Issue Analysis Approach</td>
<td>In this approach the influential actors were assumed to be those &quot;who have their demands realized wholly or in part in the final enactment or who can block the efforts of other actors.&quot;</td>
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Summary

Chapter 1 provided an introduction to the study, a statement of the research problem, research questions, and a statement of the purpose for the study. Limitations and definition of terms were also stipulated.

The study contains four additional chapters. Chapter 2 provides a review of the related literature which was divided into four main parts: (1) Overviews of the policy process, (2) Public Law 94-482, (3) Legislative analysis, and (4) Virginia's Vocational Documents. The design of the research and procedures utilized in the study are described in Chapter 3. Chapter 4 is devoted to the findings and analysis of the study. Chapter 5 includes a summary, conclusions, implications, and recommendations for further research and for a review of the policy process.
Chapter 2

REVIEW OF THE RELATED LITERATURE
AND DOCUMENTS

The review of the related literature is divided into four sections: (1) Overview of the Policy Process, (2) Public Law 94-482, (3) The Legislative Analysis, and (4) Virginia's Vocational Documents. An Overview of the Policy Process is presented in the first section with the following parts: substance and method, specific features, definition, and system actors. Public Law 94-482 is reviewed in the second section. The main issues chosen from the law include Sex Stereotyping, State and Local Advisory Councils, Vocational Guidance and Counseling, Fiscal and Administrative Assurances. The Legislative Analysis is presented in the third section of the chapter. The analysis considers House Bill 12835 and Senate Bill 2657 and traces their merger into Public Law 94-482 with regard to the issues selected. In the fourth section, Virginia's Vocational Documents are reviewed in relation to the issues chosen. The policies covered in these documents outline the direction and tone that vocational education would take in order to meet the mandates prescribed by federal law.
Overview of the Public Policy Process

This section attempts to deal with some of the theory of policy making and how it applies to this study under the headings of substance and method and specific features. Reasons are given for the interview and survey questionnaire. A discussion on the definition of policy making is followed by a review of the system actors who were the participants in this study.

Substance and Method

The study of public policy is a complex endeavor in that it has both substantive and methodological implications. A small number of studies have addressed the question in terms of the substantive focus relative to the analysis of policy impacts. Regarding the substantive focus, Scioli stated: "Policy impact analysis attempts to identify and measure systematically the consequences, if any, that result from a given policy."¹

A variety of methodological alternatives are available to those who conduct policy research. It was imperative that a conceptual framework be developed to isolate the most important concepts. In attempting to explain a particular process or event, the analyst cannot simply describe all the

complexities of the environment leading up to the event. The logic of explanation requires that the determinants of the occurrence which are most relevant and important be chosen by the analyst.\textsuperscript{2} Further, many social scientists have succumbed to over-analysis of the data through the application of highly sophisticated statistical techniques, thus rendering the research incomprehensive to the public administrator or the public official who must make decisions of a more practical, and less academic nature.\textsuperscript{3} For this study, the face-to-face interview, which involved key individuals at the state level, was chosen as a research procedure. A survey questionnaire for the superintendent and those responsible for vocational education was used at the local level.

Specific Features

The policy process is conceived as both a circle and a ladder:

The chief executive officer is at the top of the ladder and the ordinary citizen at the bottom. Other participants ranged on the intermediate stages. Citizens sent out their opinions and preferences; but at each stage a more informed, active or responsible participant in policy making was sending some information, analysis, analysis,


\textsuperscript{3}Scioli, op. cit., p. 6.
and advice that helped a participant to clarify and amend his policy position. Eventually that reached the citizen to help him understand and better express his own wishes and needs.\textsuperscript{4}

It is important to recognize that policy formation extends well beyond the traditional concern for the intrinsic importance of issues. When actors focus on those strategic moves that direct an organization's critical resources toward perceived opportunities they are concerned with the:

1. intellectual activities of perception, analysis, and choice which are called decision making;
2. social process of implementing policies formulated by means of organizational structure, system of measurement and allocation, and systems for reward and punishment; and finally,
3. the dynamic process of revising policy as changes in organizational resources in the context of the original policy problem.\textsuperscript{5}

An interview with actors at the state level reveals a clearer picture of policy formulation at each stage of the process. Asking questions provides an opportunity for those interviewed to respond in terms of the moves that direct the state's organizational resources towards the perceived outcomes.


Definition

In trying to define policymaking, Polsby, Abert, and Lindblom list certain stages or processes that make up policy construction. A brief review reveals a striking similarity in their description.

Polsby described five stages that take place in policy formulation: (1) Initiation flows from two sources: a sudden demand upon government to spur people to ad-hoc problem solving, and a long range build up in society. Only on rare occasions do experts initiate a policy. (2) Incubation keeps the proposals alive while it picks up support, or waits for a better climate. (3) Formulation is the process of bargaining by including some features of the proposal and dropping others. (4) Modification focuses on who supports the proposal and who wants it to fail. Often it reveals interest groups and coalitions. (5) Appraisal occurs after a policy is passed by some one or group. Once policy goes into effect, by monitoring the tides of complaint and praise, those responsible can quickly judge the results of their accomplishments.6

Abert outlines a variation of the same process. In general, however, his five-part taxonomy is more appropriate

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for large policymaking staff operations. Lindblom, on the other hand, defines the process as a compromise among policymakers. Sometimes policies spring from new opportunities, not from problems, and sometimes they are not decided upon but nevertheless happen.

The methodology used in this study provided local actors an opportunity to assess the impact of the Vocational Amendments on their school divisions. At the same time, the interviews provided insight into initiation, incubation, formulation, modification, appraisal, and compromise processes at the state level.

System Actors

The framework of the political system represents "a set of interactions, abstracted from the totality of social behavior, through which values are authoritatively allocated for society." In the political system there are actors, or participants in the policy-making process. The actors at the state level in this study included the Superintendent of

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Public Instruction and his staff; The Division of Vocational Education, led by its director; the State Board of Education, led by its chairman; the State Advisory Council, led by its Executive Director; and the State Plan and Accountability Report Committee, led by the Director and the Assistant Director for Vocational Education.

In order to provide a basis for understanding the relationships and the authority which existed among the actors in this study, a brief description is provided. The Superintendent of Public Instruction, who is the chief state school officer, is also the chief executive officer of the Department of Education. He is appointed by the Governor, subject to confirmation by the General Assembly. He makes recommendations to the Board of Education and assists local authorities in carrying out Virginia school laws. He performs duties prescribed by the Board and administers public education according to state law and policies of the Board. He is also the Secretary of the Board.\(^1\)

The Division of Vocational Education is administered by the Director and his staff. The division is divided into two major services. The Administrative-Continuing Division consisting of Planning, Facilities, Appalachia, Comprehensive


The authorization of the Vocational Education Department is found in Virginia state law:

22-322. DEPARTMENT OF VOCATIONAL EDUCATION. The State Board of Education is authorized to establish out of such funds as are available, a department of vocational education for the State, the purpose of which department shall be the study of the problems of vocational education, the systematizing of the work in the state, and the promotion and supervision of the teaching of such subjects in the schools of the state as will lead to useful and productive employment in rural and urban communities.¹²


within the law so as to provide guidelines for the policy decision.

22-139. STATE BOARD OF VOCATIONAL EDUCATION. The State Board is delegated to act as the State Board of Vocational Education, to carry out the provisions of the federal act, to provide for the promotion of vocational education; for co-operation with the states for the promotion of such education in agriculture, and in the trades and industries; for co-operation with the states in the preparation of teachers of vocational subjects, and to appropriate money and regulate its expenditures, approved February twenty-third, nineteen hundred and seventeen, and to co-operate with the federal board for vocational education, as provided in this chapter.13

Virginia State Advisory Council flows from the federal level. The Council was created by Congress through the Vocational Education Amendments of 1968. Its members, drawn from a cross section of the public, are appointed by the Governor. The Council is charged by law to advise the State Board of Education concerning the operation of vocational education programs, to make recommendations for the improvement of vocational education programs, services and activities, and to submit annual reports.14

There are two distinct sets of expectations about advisory councils. First, many observers and policymakers expect that the councils performed the obvious function of

13Ibid.

advising with respect to the agencies’ policymaking. Second, advisory councils are expected to criticize.\textsuperscript{15} Often, administrators viewed advisory councils as devices for generating support for their policies and shields from external critics. This does not imply cynicism on the part of bureaucrats as much as it reflects the realities of the competitive struggle for administrative survival.\textsuperscript{16}

The State Plan and Accountability Report Committee was formed to meet the regulations and the spirit of the vocational acts. In Virginia it is led by the Director and Assistant Director of Vocational Education. The committee’s charge is the formulation of the five-year plan. The law requires that the active participation of representatives be selected from: (1) secondary vocational education programs, (2) post-secondary vocational programs, (3) community and junior colleges, (4) institutions of higher education, (5) local school boards, (6) vocational education teachers, (7) local school administrators, (8) State Manpower Services Council, (9) post-secondary planning, and (10) the State Advisory Council. The planning committee must meet at least


four times during the development of the five-year plan.\textsuperscript{17}

These meetings accomplish the following purposes:

(1) First meeting: Plan for the development of the first draft of the five-year State plan;

(2) Second meeting: Consider the first draft of the five-year State plan;

(3) Third meeting: Consider the draft of the five-year State plan after it is written to reflect the results of the second meeting of the planning group; and

(4) Fourth meeting: Recommend for adoption the final five-year State plan.\textsuperscript{18}

\textbf{Federal Public Law 94-482}

This section is designed to expand upon the four issues selected for the study. A detailed description is given with some comment on the questions that were raised concerning the purpose and intent of each issue as they appeared in the law.

\textbf{The Vocational Amendments of 1976}

The Vocational Amendments of 1976 cover the State administered programs and the Commissioner's discretionary programs. Generally the law was a complete revision of the Vocational Education Act of 1963 and subsequent amendments.

\textsuperscript{17} \textit{Vocational Education, State Programs and Commissioner's Discretionary Programs} (Federal Register, Vol. 42, No. 191--Monday, October 3, 1977), p. 53835.

\textsuperscript{18} Ibid.
It was designed to provide states improved planning in the use of all resources for vocational education and to overcome sex discrimination in vocational education.

The issues chosen for review from Public Law 94-482 were Sex Stereotyping, State and Local Advisory Councils, Vocational Guidance and Counseling, and Administrative Assurances. These four issues were selected as representative areas that involved major changes in the law or an expansion of previous legislation. In addition, they had a significant effect on every school division in the state by requiring school divisions to spend a significant amount of money, time, and other resources. The issues also involved the Standards of Quality of Virginia, and the lay public through advisory and planning committees.

Sex Stereotyping

The documentation was so extensive on sex discrimination and sex stereotyping that a complete listing of the references from the legislation appears in Appendix (E). "Sex bias" is defined in the law as behavior resulting from the assumption that one sex is superior to the other. "Sex stereotyping" means attributing behaviors, abilities, interest, values and roles to a person or group of persons on the basis of their sex. "Sex discrimination" is any action which limits or denies a person or a group of persons opportunities,
privileges, roles, or rewards on the basis of their sex.\textsuperscript{19}

The importance of the definitions are brought to bear in the rules and regulations under section 104.74 where the funds for full-time personnel are set aside.

Each State shall expend not less than $50,000 in each fiscal year from funds available under the basic grants (section 120 of the Act) to support the personnel working full-time to carry out the functions set forth in §104.75.\textsuperscript{20}

The functions of such full-time personnel as first listed in the original "Act" and later in §104.75 essentially changed the emphasis that was found in the traditional vocational program. Personnel designated under this section worked full-time: (1) to create awareness programs and activities including publicizing the public hearings on the State plan; (2) to gather, analyze and disseminate data on the status of men and women students and employees; (3) to correct problems brought to their attention including an awareness of the Title IX complaint process; (4) to review grants and contracts to assure that the interests and needs of women are addressed; (5) to review all vocational education programs in the state for sex bias; (6) to monitor the implementation of laws prohibiting sex discrimination in all hiring, firing, and promotion procedures within the

\textsuperscript{19}Ibid., p. 53831.

\textsuperscript{20}Ibid.
state; (7) to improve vocational education opportunities for women; and (8) to make available and disseminate information developed.21

Hearings were held in Washington, D.C. with such groups as the National Advisory Council on Women's Educational Programs and the National Coalition for Women and Girls in Education testifying. The final points on sex bias and sex stereotyping found their way into the law and eventually into the final regulations as a result of all of these concerns and the subsequent testimony.22

State and Local Advisory Councils

The idea of State advisory councils was included in the Vocational Education Amendments of 1968. However, the Amendments of 1976 spelled out that the memberships of such councils were to be appointed by the Governor or the State Board of Education where state board members were elected.23


Each State Advisory Council was required to have as a majority of its members, persons who were not educators or administrators in the field of education. Further, a required representation of the membership was specified to include one or more individuals who:

1) Represent, and are familiar with, the vocational needs and problems of management in the State;

2) Represent, and are familiar with, the vocational needs and problems of labor in the State;

3) Represent, and are familiar with, the vocational needs and problems of agriculture in the State;

4) Represent State industrial and economic development agencies;

5) Represent community and junior colleges;

6) Represent other institutions of higher education, area vocational schools, technical institutes, and post-secondary agencies or institutions which provide programs of vocational or technical education and training;

7) Have special knowledge, experience, or qualifications with respect to vocational education but are not involved in the administration of State or local vocational education programs;

8) Represent, and are familiar with, public programs of vocational education in comprehensive secondary schools;

9) Represent, and are familiar with, nonprofit private schools;

10) Represent, and are familiar with, vocational guidance and counseling services;

11) Represent State correctional institutions;

12) Are vocational education teachers presently teaching in local educational agencies;
13) Are currently serving as superintendents or other administrators of the local educational agencies;

14) are currently serving on local school boards;

15) Represent the State Manpower Services Council established pursuant to section 107 of the Comprehensive Employment and Training Act of 1973;

16) Represent school systems with large concentrations of persons who have special academic, social, economic, and cultural needs, and of persons who have limited English-speaking ability;

17) Are women with background and experiences in employment and training programs, and who are knowledgeable with respect to the special experiences and problems of sex discrimination in job training, and employment, and of sex stereotyping in vocational education, including women who were members of minority groups having special knowledge of the programs of discrimination in job training and employment against women in minority groups;

18) Have special knowledge, experience, or qualifications with respect to the special educational needs of physically or mentally handicapped persons;

19) Represent the general public, including at least one person representing and knowledgeable about the poor and disadvantaged; and

20) Are vocational education students who are not qualified for membership under any of the preceding clauses of this sentence.24

The main issue in the proposed rules was whether the regulations should delineate specifically the State Advisory

24Vocational Education, op. cit., p. 53832.
Council's role in the state evaluation or the relationship between the evaluations made by the Board and those made by the Council. In keeping with the position that the State Advisory Council would not duplicate studies made by the State Board, the regulations allowed the State Board and the Councils to develop the necessary working relationships in order to perform their respective mandates.25

The issue that was raised concerning the Local Advisory Council centered around the extent to which the Commissioner of the United States Office of Education should regulate the local council. The consensus was that the regulations should merely restate the law and should make no extra requirements of any kind.26

In the final Amendments, the establishment of the Local Advisory Councils was mandated as follows:

1) Each eligible recipient (that is, each local educational agency or post-secondary educational institution which receives Federal assistance under the Act) shall establish a Local Advisory Council on vocational education.

2) The Local Advisory Council could be established for:
   A) Program areas,
   B) Schools,
   C) The community, or
   D) The region in which the eligible recipient was located.


26Ibid.
3) The Local Advisory Council would be composed of representatives of the general public including at least a representative of:
   A) Business,
   B) Industry, and
   C) Labor

4) Each eligible recipient established a local Advisory Council which had an appropriate representation of both sexes and an appropriate representation of the racial and ethnic minorities found in the program areas, schools, community, or region which the local advisory council served.

5) An eligible recipient formed a Local Advisory Council composed of representatives from several craft committees, or representatives of several school councils, having had the prerequisite representation in paragraph (3) of this section.27

The duties of each local advisory council were to advise the eligible recipient on:

1) Current job needs,
2) The relevance of programs (courses) offered by the local educational agency or post-secondary educational agency in meeting current job needs, and
3) Its application to the State Board.28

Thus, with the establishment of the State and Local Advisory Councils, the direct involvement of the lay public in the policy-making process was reaffirmed.

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27Vocational Education, op. cit., p. 53833.
28Ibid.
Vocational Guidance and Counseling

The entire purpose of vocational guidance and counseling assistance was to improve the State's Vocational Education Programs by providing support for vocational development, guidance and counseling programs, services, and activities. Twenty percent of the Federal funds available under this section were to support:

1) Initiation, implementation, and improvement of high quality vocational guidance and counseling programs and activities;

2) Vocational counseling for children, youth, and adults, leading to a greater understanding of educational and vocational options;

3) Provisions of educational and job placement programs and follow-up services for students in vocational education and for individuals preparing for professional occupations or occupations requiring a baccalaureate or higher degree;

4) Vocational guidance and counseling training designed to acquaint guidance counselors with (1) the changing work patterns of women, (2) ways of effectively overcoming occupational sex stereotyping, and (3) ways of assisting girls and women in selecting careers solely on their occupational needs and interests, and to develop improved career counseling materials which are free;

5) Vocational and educational counseling for youth offenders and adults in correctional institutions;

6) Vocational guidance and counseling for persons of limited English-speaking ability;

7) Vocational resource centers to meet the special needs of out-of-school individuals, including individuals seeking second careers, individuals entering the job market late in life, handicapped individuals, individuals from economically depressed communities or areas, and early retirees; and
8) Leadership for vocational guidance and exploration programs at the local level.\textsuperscript{29}

As a special emphasis in the regulations, the following points were stressed concerning vocational guidance and counseling:

1) To bring individuals with experience in business and industry, the professions, and other occupational pursuits into schools as counselors or advisors for students;

2) To bring students into the work establishments of business and industry, the professions, and other work accomplished therein; and

3) To enable guidance counselors to obtain experience in business and industry, the professions, and other occupational pursuits which better enabled those counselors to carry out their guidance and counseling duties.\textsuperscript{30}

At the Hearings before the Subcommittee on Education and Labor in the House of Representatives, a number of individuals and groups spoke on the role of the counselor in career education and vocational guidance. The Association of Counselor Education and Supervision presented a position paper proposing seven recommendations for career guidance. Briefly, they included: (1) leadership, (2) self and value development, (3) theory and research, (4) counselor training, (5) guidance-based career education programs, (6) improved counselor preparation, and (7) research and

\textsuperscript{29}Ibid., p. t3849.

\textsuperscript{30}Ibid., p. 53850.
documentation for career program outcomes.\textsuperscript{31}

In summing up the intent of that portion of the law dealing with guidance and counseling, Chairman Carl D. Perkins, in his opening statement, illustrated its importance when he stated:

Hopefully, this bill will lay the groundwork for a comprehensive approach to education from the early elementary grades to adult years, providing people with an idea of what jobs are available and with the guidance and counseling to find the best jobs for them.\textsuperscript{32}

**Fiscal and Administrative Assurances**

Each state was required by section 106 of the Act to submit and maintain on permanent file a general application which contained ten assurances that the State Board was to abide by in carrying out programs of the Act. So strong was this part of the law that it carried a provision (under section 109) that prohibited the Commissioner from approving a state plan which did not provide adequate procedures for insuring that the assurances of the general application would be carried out.\textsuperscript{33}

The following statements are a summary of what each state was required to do under the Act. These same

\footnotesize{\textsuperscript{31}United States Congress, House of Representatives, Committee on Education and Labor, H.R. 7, op. cit., p. 414.}

\footnotesize{\textsuperscript{32}Ibid., p. 21.}

\footnotesize{\textsuperscript{33}Vocational Education, op. cit., p. 53834.}
assurances were then passed on to each locality in order to
insure compliance. Every state was required to provide:
(1) efficient administration of the Act; (2) Cooperation of
the State Board with the State Advisory Council; (3) reports
the Commissioner could reasonably request in order to carry
out his function under this act; (4) funds that were dis-
tributed to eligible recipients who had developed their plans
in consultation with training representatives in their area
and the local advisory council; (5) descriptions of the needs
of potential students in the area and to what extent the ap-
plication met such needs; (6) descriptions of activities
related to manpower programs conducted under the
Comprehensive Employment and Training Act; (7) descriptions
of the relationship between vocational education and other
programs in the community which were supported by state and
local funds; (8) priority to those applicants who were
economically depressed; (9) funds for uses specified in the
Act and which in no case supplanted state or local funds;
(10) fiscal control and accounting procedures as were neces-
sary to secure proper accounting for Federal funds paid to
the State; (11) funds that were to be used for programs of
vocational education as specified in the Act; (12) copies of
the state plan, accountability report and all procedures
issued by the state that were available to the public; and
(13) funds consistent with the state plan submitted pursuant to section 613(a) of the Education of the Handicapped Act.\textsuperscript{34}

In answer to these requirements the State Directors at their Vocational Education Conference stated through their Committee on Certifications and Assurances: "Insofar as the Act is intended to make State Plans actual planning, as opposed to compliance documents, the committee feels that the State Plan itself should assure compliance."\textsuperscript{35} Thus, it was left to the discretion of the states as to the method of actually meeting compliance requirements.

**Federal Legislative Analysis**

From their first introduction into the House of Representatives, and the Senate on May 14, 1976, House Bill 12835 and Senate Bill 2657 went through some major changes with regard to the issues selected before becoming Public Law 94-482. This section provides an analysis of the issues in the bills as they moved through Congress toward their final form in the law.

\textsuperscript{34}Ibid., pp. 18556-18557.

Advisory Councils

The bills continued the requirement in the existing law that, to participate in the Federal vocational education program, a State had to have a State Advisory Council. The bill clarified the membership mandated for this council, in order to assure the broadest possible public representation. In addition, some additional members were added. These included a representative of vocational needs and problems of agriculture, a representative of vocational guidance and counseling services, a representative of vocational education students. The agricultural representative was added to the State Advisory Council to add a balance to its other public membership, which included management and labor. The requirement for the guidance and counseling representative reflected the increased emphasis on vocational guidance and counseling which ran throughout the bill. The correctional representative was added to the advisory council following testimony before the committee that existing vocational education efforts in penal institutions were wholly inadequate. Finally, a student member of the advisory council was added.

The bills further provided that members of the State Advisory Council could not represent more than one of the mandated categories. This prevented members from wearing more than one hat, and made it easier to determine that all
required interests were represented. The bill also required that in making the appointments, the Governor or State Board of Education should insure that there was appropriate representation of both sexes, racial and ethnic minorities, and the various geographic regions of the State. This attempted to assure the widest possible representation of varying views concerning the proper direction a State's Vocational Education Program should take.  

This idea was carried to its logical conclusion when Senator Beall offered the amendment: "a majority of the members of the State Advisory Council shall be individuals who are not educators," thus preventing educators from advising themselves.

The role of the council was strictly advisory, and the council was not given a veto power over the planning commission or the State Board. It was intended, however, that their advice be given serious consideration. The General Accounting Office found that many State Councils were aware of and had reported significant problems in vocational education. Some of these council reports contained only a


litany of complaints that previous year's suggestions had been totally ignored. 38

Senator Beall, in his closing remarks, stressed that the advisory council was in place and with appropriate amendments could achieve the objectives desired without adding another layer of bureaucracy. This line of reasoning helped to pass Amendment No. 2904 and bring the law to its present form. 39

Vocational Guidance and Counseling

The bill authorized a new subpart of the Vocational Education Act to provide federal assistance to states. This enabled them to develop and conduct vocational guidance and counseling programs and improve existing programs. Witnesses documented in detail the need for increased federal attention to the often-slighted field of vocational guidance and counseling as an integral part of preparing the nation's students to make informed occupational and career choices.

States wishing to participate in vocational guidance and counseling programs under this subpart were to include in their annual program plan details concerning their proposed allotment of such funds among eligible recipients.

38 Ibid.

39 Ibid., p. S14663.
Services which could be supported with these monies included: (1) initiation, implementation, and improvement of vocational guidance and counseling programs of high quality; (2) vocational counseling for children, youth, and adults; (3) educational and job placement services; (4) vocational guidance and counseling training designed to acquaint counselors with changing work patterns of women; (5) vocational and educational counseling of youth offenders and adults in correctional institutions; (6) vocational guidance and counseling for persons of limited English-speaking ability; (7) establishment of vocational resource centers to meet the special needs of out-of-school individuals; and (8) leadership for vocational guidance and exploration programs at the local level.

The language of the bill specifically included educational and job placement services designed to prepare individuals for professional occupations requiring a baccalaureate or higher degree, including follow-up services. 40

Senator Pell spoke to the value of this part of the bill when he stated:

There is a need for improved guidance and counseling. The bill's provisions provide Federal funds to support existing efforts and to develop new guidance and counseling efforts. States desiring to participate under this program would include in their annual plan how they plan to allocate such funds among eligible recipients.

While I believe that schools and guidance counselors overall have done a good job, given the client-counselor ratio with which they work, with respect to college-bound students, I believe more and improved efforts are required for the now college-bound students. One use of such funds, which I have advocated, could be the naming of a community guidance and job placement officer whose responsibilities would be:

To work with guidance personnel in the county schools to make certain they are knowledgeable about job markets and that they pay attention to the needs of vocational students and become as involved in job placement for such students as they have traditionally done with college-bound students.

To serve as a liaison officer with the community; including industry, unions, State employment offices, manpower programs and the community colleges;

To understand the job needs of the community and region, and to encourage work-study slots in the community; and

To improve follow-up and placement activities.

This certainly would be a good use to which a school district could elect to use these funds.\textsuperscript{41}

Thus, the members of Congress amended the bill based on the testimony concerning the importance of guidance and counseling activities as an essential component of an educational program, the lack of coordination among guidance and counseling programs at the Federal, State, and local levels; and the need for improved and increased preparation of

\textsuperscript{41} United States Congress, \textit{Congressional Record}, op. cit., p. S14703.
education professionals in the field of guidance and counseling, with special emphasis on inservice training.

Sex Stereotyping

This area was of great concern during the discussions in both the House of Representatives and the Senate. The end result of funding special project grants and the designation of full-time personnel under the basic grants came mainly from a report submitted by the Secretary of Health, Education, and Welfare's Advisory Committee on the Rights and Responsibilities of Women which stated:

We have found that girls and women tend to be enrolled in vocational education programs which, like many home economics programs, either do not prepare them for gainful employment or which prepare them only for low-paying, dead-end jobs. For example, in 1972 (the last year in which the Office of Education collected vocational education enrollment data by sex), 49.5% of all female vocational education enrollments were in non-gainful home economics, and 30.5% were in office occupations--mostly in typing and filing courses. At the same time, only 4.8% of the female enrollments were in the trade and industrial programs which lead to higher paying jobs, and which accounted for 46.9% of the male enrollments.42

A complete reference to the rules and regulations relating to sex discrimination and sex bias in P.L. 94-482

in Appendix (E), illustrates how this issue permeated the discussions and finally the law itself.

Thus, after being introduced in the spring of 1976, Senate Bill 2057 and House Bill 12835 merged into one and became P.L. 94-482. A sequence of the major events leading to this passage appears in Appendix (F).

Virginia Vocational Documents

This section reviewed the vocational policies for the state of Virginia as they pertained to the selected issues. The policies were found in several documents, the most important of which was the Virginia State Plan for Vocational Education, 1978-82. This document was the State's contract with the Federal Government for the funds that support Vocational Education. The plan was more than a document of compliance, for in it was found the direction and tone that vocational education would take for the period (1978-82). This document was formulated by the State Plan and Accountability Report Committee and then approved by the State Board of Education. The importance of the adoption of this plan was stressed by Dr. Garner: "The major power delegated to State Boards by law is the power to establish or adopt policy. All policies are, therefore, necessarily based upon
law since boards cannot legally assume powers not delegated to them." \(^{43}\)

Other supporting documents had been published or sent to school divisions that provided further implementation or clarification of the State Vocational Plan. These were:

1. **Policies and Regulations for Vocational Education**, 
4. **Highlights of Employment Counseling and Placement Guidelines**, 
5. The format and forms that made up the local **Vocational Five-Year Plan**, and 
6. the **Standards of Quality and Objectives for Public Schools in Virginia, 1978-80**.

**Sex Stereotyping**

The State Plan opened with several important certification statements, one of which was a list of improvement objectives to reduce sex bias and sex stereotyping. \(^{44}\) In order to comply with the terms set forth under Sex Stereotyping and Sex Discrimination mandates, the State Plan contained:

\(^{43}\)Melvin H. Garner, "Policy-making as a Function of State Level Governance." (Speech read at the National Leadership Development Seminar for State Directors of Vocational Education, Orlando, Florida, September 26-30, 1977.)

1) A statement of compliance with Title IV prohibiting sex discrimination in facilities.

2) Provision for full-time personnel responsible for reducing sex bias by:

a) taking such action as may be necessary to create awareness of programs and activities in vocational education that were designed to reduce sex stereotyping in all vocational education programs;

b) gathering, analyzing, and disseminating data on the status of men and women, students and employees in the vocational education programs of the State;

c) developing and supporting actions to correct any problems brought to the attention of such personnel through activities under item (b);

d) reviewing the distribution of grants by the State Board to assure that the interests and needs of women were addressed in the projects assisted under this Act;

e) reviewing all vocational education programs in the State for sex bias;

f) monitoring the implementation of laws prohibiting sex discrimination in all hiring, firing, and promotion procedures within the State relating to vocational education;

g) reviewing and submitting recommendations with respect to the overcoming of sex stereotyping and sex bias in vocational education programs for the annual program plan and report;

h) assisting local educational agencies and other interested parties in the state and improving vocational opportunities for women; and

i) making readily available to the State Board, the State and National Advisory Councils on Vocational Education, the State Commission
of the Status of Women, the Commissioner and the general public information developed pursuant to this section. 45

3) Policies for eradicating sex bias and sex stereotyping with provisions that:

a) all vocational education programs offered in public secondary and postsecondary institutions be available equally to both sexes and that all classes be open to both sexes;

b) vocational education facilities be comparable for both sexes;

c) equal employment opportunities be available to all vocational education personnel at state and local levels;

d) curriculum guides, instructional materials, and other publications of the Board be reviewed to ensure sex fairness;

e) textbooks and other instructional materials be reviewed for sex bias and stereotyping and where such materials must be used, steps be taken to combat such discriminatory information;

f) vocational guidance and counseling activities and materials including orientation and exploratory courses, and sex stereotyping and sex bias;

g) aptitude and interest tests used to assist students in making career choices be non-sex oriented;

h) in-service education for vocational education administrative, supervisory, and instructional personnel included activities

(1) to develop an awareness and understanding of sex bias and sex stereotyping; (2) to develop a knowledge of the barriers to achieving sex fairness; (3) to develop a knowledge and understanding of provisions of Title IX and P.L. 94-482 that related to sex equity;

i) pre-service teacher education programs included a study of problems relating to sex bias and sex stereotyping in vocational education to encourage prospective teachers to prepare for teaching in non-traditional fields.

j) the Vocational Education Reporting System included identification by sex on all reports of students;

k) full-time personnel would be utilized to implement the Board's policies through technical assistance to State and local agencies having vocational education programs.  

4) Incentive monies to assist local recipients in overcoming sex bias and sex stereotyping through:

a) services provided through full-time State Personnel to provide assistance to local educational agencies (Objective 14, Strategy 14.1);

b) funded conferences for 150 vocational education leaders and guidance supervisors to assist participants in identifying stereotyping and sex bias in vocational education and develop suggestions for eliminating such discrimination (Objective 14, Strategy 14.3);

c) grants to at least 12 local educational agencies designed to improve vocational guidance and counseling with priority given to projects to reduce sex bias and stereotyping (Objective 14, Strategy 14.4);
model programs to reduce sex stereotyping in vocational education utilized resources from the various State agencies responsible for the delivery of vocational education (Objective 14, Strategy 14.2); e) action program to be developed in FY 1978 full-time State personnel which would include incentives to be provided in future years.47

5) Support services for women including:

a) counseling as to the nature of such programs and the difficulties which may be encountered by women in these programs;

b) job development;

c) job following services.48

6) Applications for support services for women developed as part of the annual and five-year local plan stating:

a) the need for the special services included in the local plan;

b) the special services for women in regard to counseling will be integrated into the regular program of vocational guidance;

c) the special services to be provided and how such services would assist women in overcoming difficulties normally encountered in pursuing a program of study or occupation traditionally limited to men;

d) the cost of providing these services.49

7) Outright grants for overcoming sex bias from both state and local agencies.

48Ibid., p. 66.
49Ibid.
Each of these points, as mandated, were carried to conclusion when local divisions were required to list activities to reduce sex stereotyping and sex bias in their evaluations of the Vocational Education Five-Year Plan.

The State Advisory Council made their position clear when they stated:

The State Advisory Council on Vocational Education views its responsibility in eliminating sex stereotyping and sex discrimination as being that of evaluating the State's efforts in implementing vocational education programs and services in keeping with both the spirit and requirement of the Law, and in reporting the results of its evaluations to the appropriate agencies, groups, and individuals. In discharging this responsibility, the Council will give special attention to: (1) the reports of full-time personnel on sex stereotyping and discrimination; (2) recruitment and admission practices and policies; (3) guidance and counseling services including the training of guidance counselors and type of materials used by counselors; (4) curricular materials and teaching practices; (5) the composition of faculties and administrators of vocational education programs with respect to sex; and (6) innovations and research development initiatives.

Based on its findings, appropriate recommendations will be made to the State Board of Education by the State Advisory Council on Vocational Education. 50

Advisory Councils

The responsibilities of the State Advisory Council in Virginia were found in the State Plan and followed the federal law almost word for word.

The State Advisory Council shall:

1) Advise the State Board in the development of the five-year State Plan, and the annual program plan and accountability report;

2) Advise the State Board on policy matters arising out of the administration of programs under the State Plan submitted pursuant to the Act;

3) Evaluate vocational education programs, services, and activities under the State Plan, and publish and distribute the results thereof;

4) Prepare and submit through the State Board to the Commissioner and to the National Advisory Council an annual evaluation report, accompanied by such additional comments of the State Board as the State deems appropriate, which (A) evaluates the effectiveness of vocational education programs, services, and activities carried out in the year under review in meeting the program objectives set forth in the five-year State plan and the annual program plan and accountability report including a consideration of the program evaluation reports developed by the State and of the distribution of Federal funds within the State, and (B) recommends such programs, services, and activities as may be deemed necessary;

5) (1) Identify, after consultation with the State Manpower Services Council, the vocational education and employment and training needs of the State and assess the extent to which vocational education, employment training, vocational rehabilitation, and other programs assisted under this and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs, and;

(2) Comment, at least once annually, on the reports of the State Manpower Services Council, which comments shall be included in the annual report submitted by the State Advisory Council pursuant to this Act and in the annual report submitted by the State Council pursuant to section 107 of the Comprehensive Employment and Training Act of 1973;
6) Provide technical assistance upon request to local advisory councils in the establishment and operation of such councils.\textsuperscript{51}

Likewise, the Local Advisory Council was defined from P.L. 94-482 as follows:

Each eligible recipient receiving assistance under this State Plan shall establish a local advisory council to provide advice on current job needs and on the relevancy of courses being offered in meeting such needs as required in section 105 (g). Such local advisory councils shall be composed of members of the general public, especially of representatives of business, industry, and labor; and such local advisory councils may be established for program areas, schools, communities, or regions, whichever the recipient determines best to meet the needs.\textsuperscript{52}

In carrying out its function in Virginia, the State Advisory Council in 1977 made seven recommendations for the State Board of Education: (1) improve communications between vocational education and the business and industrial community, (2) establish a state-wide coordinated program of vocational teacher education in cooperation with the institutions of higher education providing such programs, (3) develop a policy handbook related to the administration of vocational education which will identify policies for vocational education, (4) provide assistance to school divisions which had difficulty or had been unsuccessful in implementing a program of employment counseling and job placement for

\textsuperscript{51}\textit{State Board of Vocational Education, op. cit.}, pp. 30-31.

\textsuperscript{52}\textit{ibid.}
high school leaders and graduates, (5) develop guidelines and standards for the establishment and operation of local advisory councils on vocational education, (6) include relevant vocational education experiences in the certification requirements for school administrators, and (7) seek higher priority in the Governor’s Office and General Assembly for F.Y. 1978-80 vocational education fundings for the public schools and community colleges.\textsuperscript{53}

An evaluation of the extent to which former State Advisory Council recommendations received due consideration showed that the Council did not feel it had to again recommend any of its former recommendations from 1976-1977.\textsuperscript{54}

As stated earlier, the locality established an Advisory Council and assisted the school division in developing the local application to the State Board for vocational funds. In Virginia, the application for state funds was found in the local five-year plan under assurance statement number 6, which required the Local Advisory Council's chairperson's signature, thus assuring that the locality was in compliance with P.L. 94-482.\textsuperscript{55}

In order to provide further assistance, the state supervisors were assigned to assist localities in setting up

\textsuperscript{53}Virginia State Advisory Council on Vocational Education, op. cit., pp. 3-5.
\textsuperscript{54}Ibid., p. 33.
\textsuperscript{55}Local Vocational Education Five-Year Plan, 1979-83, Attachment Schedule 10, p. 8A.
the local Advisory Council. For this purpose, the Organization and Operation of Local Advisory Committees for Vocational Education was published by the Division of Vocational Education. 56

This guide provided an outline of local needs, provisions, concepts, and functions of the local vocational education advisory council. So complete was the guide that sample bylaws, appointment letters, charter activities and evaluations were included. 57

Vocational Guidance and Counseling

In order to carry out this part of P.L. 94-482, the State had effected a "marriage" between Guidance and Vocational services.

Guidance services in the public schools will be implemented in accordance with joint understandings and working relationships developed at the State level between the Guidance Service and the Division of Vocational Education in co-operation with local school divisions. 58

This working relationship was further spelled out in the duties to be performed:


58 State Board of Vocational Education, op. cit., p. 19.
(1) Coordinate vocational guidance activities of the school with guidance activities of the local vocational teachers and other professional school staff;

(2) Cooperate with school administrators, supervisors, coordinators, teachers, and parents in extending the services of the guidance program to in-school and out-of-school youth and adults;

(3) Assist in planning and conducting surveys of school and community facilities to assure the development of vocational guidance and occupational information program;

(4) Select, interpret, and disseminate educational and occupational information related to the vocational program in the school, and provide individual students with the information necessary for realistic vocational planning;

(5) Assist students through individual and group counseling to select and pursue their vocational plans;

(6) Counsel individuals regarding vocational education offerings so that they may choose to enroll in a vocational program;

(7) Select, administer, and interpret standardized tests needed to assist youth and adults in making intelligent occupational choices;

(8) Work with business, industry, armed forces, and other community agencies in placing students and finding work opportunities; and

(9) Assist in making follow-up studies to determine the effectiveness of the vocational guidance and counseling programs.\(^{59}\)

As required by the law, the State set aside funds for vocational development guidance and counseling programs and services which included:

\(^{59}\)Ibid.
1) initiation, implementation, and improvement of high quality vocational guidance and counseling programs and activities;

2) vocational counseling for children, youth and adults, leading to a greater understanding of educational and vocational options;

3) provision of educational and job placement services, including programs to prepare individuals for professional occupations or occupations requiring a baccalaureate or higher degree, including follow-up services;

4) vocational guidance and counseling training designed to acquaint guidance counselors with the changing work patterns of women, ways of effectively overcoming work patterns of women, ways of effectively overcoming occupational sex stereotyping, and ways of assisting females in selecting careers solely on their occupational needs and interests, including the development of free counseling materials;

5) vocational and educational counseling for youth offenders and adults in correctional institutions;

6) vocational guidance and counseling for persons of limited English-speaking ability;

7) establishment of vocational resource centers to meet the special needs of out-of-school individuals; and

8) leadership for vocational guidance and exploration programs at the local level.\(^60\)

Insofar as practicable, funds used for activities described in (1) and (2) of this section emphasized bringing individuals with experience in business and industry, the professions, and other occupational pursuits into schools as counselors or advisors for students, and sent students and counselors out into the work establishments. Such activities

\(^{60}\)Ibid., p. 82.
provided students with information about and exposure to the nature of work that was accomplished in the establishments and provided guidance counselors with opportunities to obtain experience which better enabled those counselors to carry out their guidance and counseling duties.

Vocational guidance and counseling services, programs and activities funded were identified in the annual program and five-year State plans and conducted cooperatively between the Guidance Service and the Division of Vocational Education, State Department of Education, and other appropriate State agencies.

Funds made available for the purposes of guidance to local educational agencies required that the local recipient include in the annual and five-year plans a full description of the uses to be made of these funds and such services, programs, and activities that received approval or disapproval in accordance with Section 1.7 of the State plan.61

In a further effort to assist the Vocational Education Department in meeting the requirements of the law, the Guidance Services Division of the State Department of Education published Highlights of Employment Counseling and Placement Guidelines.62 This document outlined the major objectives

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61 Ibid., p. 83.

for employment counseling and job placement.

Despite these efforts a research study conducted by the Virginia State Advisory Council through the research services of Dun & Bradstreet, Inc., indicated that two-thirds of all respondents felt that the counselors did not have sufficient knowledge and understanding to give career advice to students.63

Assurances on Administrative and Fiscal Matters

In order to comply with the assurances, the Vocational Division of the State Department of Education required that each district provide evidence of compliance with six standards. The standards for which data were required included:

(1) Evidence that consideration has been given to all education and training resources in the area including public, private, and parochial schools;

(2) A description of how and to what extent the programs proposed in the plan will meet the vocational education needs of students in the community served;

(3) A description of how the findings of any evaluations of programs operated by the applicant during previous years have been used to develop the program contained in this plan;

(4) A description of how the activities proposed in the plan related to manpower programs conducted in the area by a prime sponsor established under CETA, if any, to assure a coordinated approach to meeting the vocational education needs of the area of community.

(5) A description of the relationship between vocational education programs proposed to be conducted and other programs in the area or community which are supported by State and local funds, if any;

(6) The local advisory council shall assist the local school division in developing its application to the state board and advise on the relevance of programs (courses) being offered in meeting current job needs.

The last assurance was the only one that required the signature of a lay individual, who was the chairperson of the Local Advisory Council.64

A general guide for locating all State policies in the Vocational Department of Education concerning fiscal matters was produced in 1979. The Policies and Regulations for Vocational Education contained the areas concerning funding requirements a locality and the State would have to meet under P.L. 94-482.

64 Local Vocational Education Five-Year Plan, op. cit., pp. 48-9, schedule 10.

Summary

An overview of relevant literature was developed to provide a basis and guideline for collecting, organizing, and analyzing information for a study of the impact of a federal law on the policy process in Virginia. The overview provided described the meshing of substance and method, specific features, definition, and system actors.

A review of Public Law 94-482 and a legislative analysis through the issues of Sex Stereotyping, Advisory Councils, Guidance and Counseling, and Federal Assurances, revealed the detail incorporated through the legislative process of these parts of the law. A complete summary of the legislative analysis is found in Appendix (F). Finally, a review of the issues through the Virginia vocational documents outlined the mechanisms employed by the Commonwealth of Virginia to carry out the mandates of Public Law 94-482.
Chapter 3

RESEARCH METHODOLOGY

This chapter outlines and describes the methodology and procedures used in the conduct of this study. Included are the criteria used for selection of the issues to be studied in Public Law 94-482, the identification of the flow of state policy including data gathering and related techniques, and the methodology for assessment of local implementation. The latter also includes a review of techniques for data gathering and analysis.

Selection Criteria

The issues concerning the Vocational Education Amendments of 1976 were selected in terms of the following criteria:

1. They affected every school division in the state by:
   A. Providing an example of a federal law that impacted a significant segment of the decision-making process,
   B. Requiring school divisions to spend a significant amount of money, time and other resources,
C. Involving the Standards of Quality of the State of Virginia, and
D. Involving the lay public.

2. Each issue chosen from the Vocational Amendments involved major actors at the State and local levels in educational policymaking:

A. The state level actors were the Superintendent of Public Instruction and his staff, the Division of Vocational Education and the Director, the State Vocational Advisory Council and its Executive Secretary, the Board of Education, and the chairman and members of the State Plan and Accountability Report Committee.

B. The local level actors were comprised of all the Division Superintendents, and local Directors of Vocational Education (or other persons in the divisions responsible for vocational education as designated by the superintendent).

Description of the State Policy-making Process

The description of the policy-making process, and the relationship of the actors in that process at the state level in Virginia was developed in the following manner.
1. Documents of the State Board of Education between April, 1977 and June, 1978, concerning Vocational Education were reviewed.

2. Persons associated with policies in terms of incidents, words of authorization, directives, and funding support were identified from documents and reports including:
   A. reports, administrative memoranda, articles in the newspaper, and memoranda from the Superintendent of Public Instruction,
   B. records and testimony of other actors related to the designated policies and time period of study, and
   C. periodicals and other reports located during the course of the investigation related to the designated policies during the period of study.

3. Interviews were conducted with identified actors associated with the making of policies for Vocational Education. Areas of inquiry pursued in the oral interviews are included in Appendix (A).

4. The interviewees were chosen from those persons who had signed the Virginia State Plan for Vocational Education 1978-82. It was judged that these persons or groups were the most influential
in the policy process and therefore could identify all the important actors that needed to be interviewed. They consisted of the Superintendent of Public Instruction, or members of his staff; the State Board of Education; members of the State Advisory Council, the State Director of Vocational Education or members of his staff, and the members of the State Plan and Accountability Report Committee.

5. Those interviewed were the Executive Director of the State Advisory Council, one member of the State Superintendent's staff as recommended by the Superintendent, the chairman of the Board of Education, the Director of Vocational Education, and two members of the State Plan and Accountability Report Committee (one who was chosen for his experience in the area and the other because he was involved with educational planning). The interviews were not extended beyond these persons as the members interviewed did not suggest any other individual who might shed new light on the policy process under investigation.

6. Notes and observations of meetings of the State Board and the Division of Vocational Education were recorded.
Assessing Influence

The reputational and issue analysis methods were used as a guide for purposes of charting the organizational process. System actors were asked how much influence, importance, or leadership they attributed to a particular actor. An assumption was made that the actors had the knowledge to provide valid information and make general assessments which were of "value in tracing patterns of decision making."¹

"The reputational method rests on reputation rather than action."² Therefore, the method does not assume that a person has power because of a certain class or station. Rather, an influential person is simply perceived by others as having power. Others may have power and not exercise it, as others may be developing reputations for holding power to exercise later.³

The issue analysis approach was also used for assessing influence. First, it provided a way of cross checking among the interviews and other sources of information. Second, the outcomes of actual decisions could be studied

²Lutz and Iannaccone, loc. cit.
³Ibid.
and decided upon by examination of the facts as to which actors were the most influential. In this approach the influential actors were assumed to be those "who have their demands realized wholly or in part in the final enactment or who can block the efforts of other actors." 4

State actors were given the flow chart (Figure 1) as found in the Virginia State Plan for Vocational Education, 1977, which illustrated the chain of the policy process. They were then asked to define their roles and the roles of the other major state actors as they perceived them with regard to the four issues previously stated.

Conducting the Interview

The face-to-face interview was used with the actors involved, first for reasons of high yield of information and second, because all members of the chosen sample were located within the state of Virginia. A standard survey interview was utilized throughout with open-ended questions which were asked of all respondents in the same manner. 4 Notes were taken during or immediately after the interview. The strength of this type of information gathering lies in the thorough and complete discussion that took place during the interviews.

4Mazzoni and Campbell, loc. cit.

Figure 1
Organization of Virginia State Board Staff for Vocational Education
Reliability and Validity

Ex post facto research is:

...a systematic empirical inquiry in which the scientist does not have direct control of independent variables because their manifestations have already occurred or because they are inherently not maniputable.6

Therefore, the reliability of the research findings of this study were not possible to determine with experimental methods.

A check of validity was accomplished by (1) checking the actor's testimony with a verification of facts recorded in minutes of meetings, other documents, or supporting testimony of another actor; (2) attempting to seek all available information, thus avoiding the tendency to come to the premature closure on a topic studied; and (3) being aware of possible interviewer bias and the tendency of both parties to rationalize the past. An effort was made to avoid this tendency by concentrating on the interview questions as opposed to discussing only the justification for actions that took place.

Analysis of State Findings

A detailed record, reconstructed from interviews, observations and documents, provided a view of how the actors

interpreted their relationships in the state. Specifically, data were analyzed in terms of three dimensions: system actors, system functions, and influence. This analysis was accomplished in the following manner:

1. System Actors:
   A. An explanation was offered concerning the participation of given actors in the functional stages of decision making.
   B. A review of the participation by actors in the functional stages of the development of policies was presented.

2. System Function:
   The development of the policy was analyzed as reported by the system actors. The patterns of events leading to the policy decision were examined, described and explained.

3. Influence:
   A. The route the 1976 Amendments took and the development of the state Five-Year Plan of Vocational Education was described. A chart was used for illustration.
   B. The most influential actor in the policy process was determined.
Developing the Survey Instrument

A survey at the local level involving all the school divisions was administered to gather information on the impact of four major issues taken from the 1976 Vocational Amendments, to establish the relationships between certain specified school division's characteristics, and to establish relationships, if any, between those characteristics and impacts of the amendments. The characteristics of school divisions were classified according to each division's geographic region, type, and size.

This survey requested the respondents to answer each issue in relation to the impact of Public Law 94-482 in each participating school division. The instrument included 55 questions that had been identified which pertained to the new amendments. A five point rating scale was utilized for assessing each item listed in the instrument. Each item was rated on its importance, action taken, and its impact ranging from "low" to "high." The complete instrument appears in Appendix (C).

In order to assess the intent and purpose of the questionnaire, a panel of seven vocational administrators was asked to review the questions taken from vocational amendments. These administrators were active in the Middle Peninsula, Central, and Tidewater regions. One was a member of the state vocational staff. Two of the administrators were serving on the State Plan and Accountability Report Committee during the time they reviewed the questionnaire. All were working on the effects the 1976 Amendments would have in their area. They were asked to review the questionnaire using the following criteria. Did the questions substantively cover the four selected issues? Was each question clear in its intent? What questions could have been omitted and still have covered the four issues? Were there important questions left out? The panel reviewed the questionnaire and made no major changes in its content, but did suggest changes that improved the clarity of the document. For example, all the verb tenses were stated in action terms.

General Treatment

A category was placed in the questionnaire designed for this study in which respondents could mark "prior action taken" if indeed they had taken action in the areas under consideration prior to the 1976 amendments. Though little hard evidence was available, it appeared that few school
divisions had taken action to meet the problems identified prior to the formal adoption of the federal policy even though the survey was done two years after the passage of the law.

Respondents who indicated no action taken prior to 1976 were then asked to respond on a five point scale concerning how much action had been taken since the law was passed. The results were then compared with similarly categorized data regarding importance and impact.

It was to be expected that among those who had taken no prior action there would be considerable variation in the amount of action taken after the law had been enacted. Although it was true that all questions asked were directly mandated by federal law, there appeared to be some option as to which parts of the law would be acted upon and to what degree. Since action alone would not signify equal impact or effect (the main focus of this study), it was necessary to draw a relationship among all the dimensions. Thus correlations were calculated and statistical relationships examined between action taken and the perceived impact of that action on the division for each of the four issues.
To further investigate the perceived impact of federal law on local operations, the adjudged importance of an issue to a school division was related to both impact and action taken. That is, a summary of "importance" scores for each issue was correlated with a summary score for the level of action taken and for the perceived impact. The partial correlation provided a single measure of association describing the relationship between two variables: for example, importance and impact, while adjusting for the effects of the third variable, action taken. The partial correlation thus removed the effect of the control variable from the relationship between the other two variables. The intent was to ferret out the relationship, if any, that existed between how important the school division administration felt an issue was and how much action was taken and with what perceived impact. It was determined that on a scale of one to five a difference of at least one must be found between the means in order to warrant further investigation. This difference was established as the minimum that would be accepted as representing a practically important difference. These data provided a view of internal decision processes when some latitude of option was permitted in the implementation of federal law.
Specific Treatments

The total data were sorted by the following individual categories:

A. Respondent: Superintendent, Director of Vocational Education and others;

B. Region: seven regions as identified by the Virginia State Superintendent's Advisory Council.

C. School division type: (see Appendix G)
   a. Urban refers to areas of high intensity development and a high degree of specialized activities. An urban area is made up of a central city and suburban political jurisdictions.
   b. Suburban refers to an area of intermediate development characterized by residential development. A suburban area is normally in the vicinity of an urban center.
   c. Rural refers to areas of low intensity development and homogeneous activities which are usually agricultural.

D. School division size:
   a. 1000 or fewer students, grades eight through twelve;
b. 1001 to 3000 students, grades eight through twelve;
c. 3001 to 6000 students, grades eight through twelve;
d. More than 6000 students, grades eight through twelve.

The means for each issue were calculated for each of the four categories above to determine if any differences in perceptions of the issues existed. The impact scale was utilized to ultimately assess the effect of federal law on local divisions.

Summary

This chapter described the methodology used to conduct this study. The process for identifying issues to be studied in Public Law 94-482 were identified. The description of the policymaking process at the state level was developed. Using the reputational and issue analysis methods as a guide, the assessment of influence was reviewed in terms of how it would apply to the state actors. Reliability and validity procedures used to conduct the interview were explained. State findings were to be analyzed in terms of system actors, system functions, and influence.
The survey instrument was reviewed and explained. Included in the explanation was the treatment of prior action. The general and specific treatments chosen for the study were explained as was the procedure for analysis.
Chapter 4

PRESENTATION OF FINDINGS

Chapter four presents the route of the 1976 Amendments as interpreted through the interviewed actors involved with the state policy process. The chapter also describes both the relationship of the actors in the state policy process and the influence of those actors. The reputational approach, coupled with the issue analysis method, identifies the most influential actor in that process. This chapter also examines the survey instrument, designed for this study, in terms of its actual use and of the percentage of returns from local respondents. Finally, results from the survey are presented by type of respondent, school division size, type, and geographic region.

Route of the 1976 Amendments

When Congress passed Public Law 94-482 in its final form, each Chief State School Officer and State Advisory Council received a copy of the enactment. The law was conveyed to the recipients by way of the Federal Register and through direct correspondence. Figure 2 illustrates the steps of the amendments as they moved through the State Department of Education and the State Advisory Council.
I. FORMULATION STAGE

The Vocational Amendments of 1976

State Department of Education

State Advisory Council

(1) Chief State School Officer
Receives & Delivers Document

(2) Asst. Supt. for Curr.
and Instruction
Receives & Delivers Document

(3) Director of Vocational
Education
Receives Document & Organizes Response

(4A) Supervisor of State
Plan and Finance
Develops First Draft

(4B) Division of Vocational Ed.
Planning Council
Develops Recommendations

(5) State Plan and Accountability
Report Committee
Review, Recommends and Approves
1st Draft of Vocational Five-Year Plan

(6) State Board of Education
Review 1st Draft & Receives
Recommendations from State
Advisory Council

(7A) Supervisor of State
Plan and Finance and
The State Plan and Accountability
Report Committee
Develop 2nd Draft of the
Vocational Five-Year Plan

II. APPROVAL STAGE

(8A) State Plan and Accountability
Report Committee Develops
2nd Draft of Vocational
Five-Year Plan

(9) State Board of Education
Reviews & Approves Plan

(10) Governor Receives
and Comments on Five-Year Plan

(11) Chief State School Officer
Prepares Plan for the
U.S. Office of Education

(12) Final Five-Year Plan
for Vocational Education
Printed

(13) United States Office
of Education Receives
Plan for Approval

FIGURE 2. ROUTE OF THE 1976 AMENDMENTS AND THE DEVELOPMENT OF
THE STATE FIVE-YEAR PLAN OF VOCATIONAL EDUCATION.

Key:

--------------- Response to

--------------- Action to be taken

--------------- Provides Information
Discussion on the policy process then follows with each step explained in terms of its role in the process which led to the Five-Year Plan for Vocational Education.

The State Department of Education

In Virginia (1), Superintendent of Public Instruction, received the 1976 Amendments. They were then passed to (2), the Assistant Superintendent for Curriculum and Instruction, and (3), the Director of Vocational Education for Virginia.

was responsible for disseminating the Amendments to the state staff in the Department of Education, and organizing the response to the 1976 Amendments. The following interpretation of the events that took place comes from the interviewed state actors and represents their recollections of how the mandates of the 1976 Amendments were met.

In answer to the amendments, the state staff, consisting of the Supervisor of State Plan and Finance (4A) wrote the first draft of the state plan for the State Plan and Accountability Report Committee. In addition, the Division of Vocational Education Planning Council (4B) developed recommendations from within the vocational department. At the same time, the local plans sent by the Department for Vocational Education (4C) were developed and returned. Those plans provided further input into the formulation of the Five-Year Plan. The State Plan and Accountability Report
Committee (5) was assigned the responsibility for the formulation of the Vocational Five-Year Plan. Its membership consisted of key people in Vocational Education in the state of Virginia and its total membership was expanded beyond what was required in the law. Working with the State Advisory Council [A], the committee amended the first draft of the Vocational Five-Year Plan and sent it to the State Board of Education (6). The State Board received the draft and the recommendations of the State Advisory Council [C]. These documents were sent back to the State Plan and Accountability Report Committee (7A) for further development. The state staff (7B), from February to March of 1977, received comments from the lay public. These comments were returned to the Supervisor of State Plan and Finance and the State Plan and Accountability Report Committee for review. It was then the task of these actors to prepare the plan that would become the State Five-Year Plan for Vocational Education. This Plan, when adopted, would become the policy that would guide vocational education in Virginia. Upon agreement on the plan, the committee (8A) requested the Attorney General (8B) to determine whether the way the 1976 Amendments were to be carried out was in conflict with any section of Virginia state law. The Attorney General of Virginia reviewed the plan and found it did not conflict with state law. He then returned it to the Committee for submission to the State.
Board of Education for final approval. At a regular meeting, the State Board of Education (9) convened as the State Board of Vocational Education to approve the plan. After some discussion, no substantive changes were suggested and the State Plan for Vocational Education was passed by a unanimous vote on April 29, 1977. The last major step in Virginia was at the Governor's office. The Governor (10) had 45 days in which to review the plan and make comments while the Superintendent of Public Instruction (11) prepared the State Plan for its journey back to the United States Office of Education. The Governor's office had only editorial changes to offer and returned the plan to the Chief State School Officer who ordered the final printing (12) of the document. It was then sent to the State Advisory Council (13) and Washington (14).

The State Advisory Council

During the same time period, but on a different track, the State Advisory Council [A] prepared its annual report. This report contained both its findings and its recommendations to the State Board of Education. As did the state staff, the Council [B] held public hearings to receive input on vocational education in Virginia. This input would later be translated into seven recommendations [C], found in the Council's annual report for the Board of Education. The route of the 1976 Amendments through the State Advisory
Council climaxed with these recommendations. From this point the Board directed the state staff to respond to the recommendations and show how they were incorporated into the State Plan for Vocational Education.

Significantly, the state staff and the State Advisory Council had, in the process, chosen members who worked as liaisons with each of the other committees or official bodies. Therefore, information, concerns, and requests flowed smoothly between the steps of the policy process during the formulation stages.

Upon acceptance by the Office of Education, the federal funds flowed into Virginia through the office of the Director of Vocational Education. From that office they were matched with monies from the state according to the objectives in the State Plan for Vocational Education and sent on to the local school divisions.

Relationships of the Actors in the State Policy Process

To appreciate the roles of the actors in the policy process at the state level, it is important to review some of the relationships those actors had with each other or with their roles in the process itself. One such relationship was the one established, for the first time, between the Superintendent of Public Instruction and the Board. This relationship took into account the fact that when the State Board
considered vocational matters, it sat as the State Board of Vocational Education in order to meet the law as written in P.L. 94-482.¹ A State Advisory Council member commented that this relationship gave a great deal of importance to vocational education.²

Another important relationship was between the Vocational Department, led by its Director, and the State Plan and Accountability Report Committee. This committee was organized pursuant to the 1976 Vocational Amendments. Since the committee had the responsibility to formulate the State Plan for Vocational Education in Virginia, they had a great deal of influence in the policy process in matters of interpretation of law.³ This observation by Dr. Beamer, the Executive Director of the State Advisory Council, indicates how the committee, as seen from his position, could have been a powerful influence on the policy process.

The State Advisory Council was also an important actor in the policy process. Under federal law, the State Advisory Council advised on the development of a plan,

¹Statement by Virginia State Board of Education member, personal interview, November 1, 1978.
created a process for that development and then monitored the evaluation of local programs in terms of the resources allocated to those programs. Thus, in response to the federal regulations, the Advisory Council informed the State Board of Education as to how well the Board's policies were being carried out.4

The Governor and the General Assembly were also participants in the process. The Governor reviewed and signed the State Vocational Plan. The General Assembly, as the legislative and statutory body of the Commonwealth, had responsibility to meet the Constitutional and statutory requirements for funding which were found in the "Standards of Quality."5 Therefore, it was this body that provided the state finances necessary to meet the requirements outlined in the Vocational Amendments.

The Advisory Council was important since law required it to advise the Board of Education in the development of the Five-Year State Vocational Plan. The Board's relationship with the General Assembly and the Governor was significant in that the General Assembly had the authority to revise the standard in the Standards of Quality and set the level of

4Ibid.

funding for implementation, and in that the Governor was required to sign the State Plan into law.

Assessment of Influence

To determine the most influential actor and how influential that actor was in the policy process, both the reputational approach and the issue analysis method proved useful.

In the very beginning the state vocational staff felt it was their assignment to write the State Plan for Vocational Education, and they set out to make that assignment a reality. Their effort became apparent as the organization for the development of the Plan was created in order to construct the final document.

In the issue analysis method, the influential actors were assumed to be those "who have their demands realized wholly or in part in the final enactment or who blocked the efforts of other actors." Considering the only policy under investigation in this study, the Vocational Amendments of 1976, the State Plan and Accountability Report Committee was successful because the State Board of Education approved its draft of the Vocational Five-Year Plan. The State Board of

6Mazzoni and Campbell, loc. cit.
Education was successful in gaining the approval and enactment of the Five-Year Plan for Vocational Education in Virginia. This approval from the federal level had to take place in order for the State of Virginia to receive its federal allocation. The State Advisory Council was also successful in that without its approval the State Plan would not be accepted at the federal level. One other group, the community college supporters and the secondary education supporters abated when the community college forces saw they had no support from the federal officials.7

In the reputational approach, the interviewees name the actor they considered to be the most important in getting things done or the actor who took the leadership role in the decision making. The State Plan and Accountability Report Committee received five nominations when its influence was assessed by the reputational method and no blockages when assessed by the issue analysis method. The State Advisory Council received one nomination using the reputational method, but it had an automatic blockage contained in the law. The State Director of Vocational Education received one nomination using the reputational approach. However, he was also the chairman of the State Plan and Accountability Report Committee and therefore could influence the outcome of the

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Committee's State Plan. The State Superintendent also received one nomination.

State Plan and Accountability Report Committee

A review of the chain of events that took place presents a clearer picture of how the events unfolded. The State Plan and Accountability Report Committee formulated the State Plan and it was this plan that became the State of Virginia's response to Public Law 94-482. The committee reported to the Director of Vocational Education and through him to the State Superintendent of Public Instruction.

The Committee membership included representatives of different areas as required in order to meet the mandate found in the law. Membership consisted of:

1. Representation from the State agency having responsibility for secondary vocational education programs.
2. Representation from the State agency having responsibility for community colleges.
3. Representation from the State agency having responsibility for institutions of higher education and the Commission responsible for comprehensive postsecondary education planning.
4. Representation from a local school board.
5. Representation from vocational education teachers.
6. Representation from local administrators.
7. Representation from the State Manpower Services Council, appointed pursuant to Section 107(a) (2) (A) (i) of the Comprehensive Employment and Training Act of 1963.

8. Representation from the State Advisory Council on Vocational Education.

In addition, members were added to the committee representing the Division of Labor and Industry, Guidance, Vocational Research, Proprietary schools, Special Education, Virginia Employment Commission, Adult Education, Rehabilitative School Authority, Teacher Education, the Department of Education, Division of Planning in the Department of Education, and Industrial Development. The State Plan and Accountability Report Committee met together five times during the planning year in accordance with Section (107) (a) (I). 8

The meetings of the committee were spelled out in the law and required the committee to meet at least four times. The first meeting was to plan for the development of the first draft of the Five-Year State Plan. The second was to consider the first draft of the Five-Year State Plan. The third meeting was to consider the second draft after it was rewritten in order to reflect the recommended changes. Finally, a fourth meeting was held to recommend for adoption

8State Board of Vocational Education, op. cit., Introductory Pages.
the final Five-Year State Plan. In addition, members of the State Plan and Accountability Report Committee were required to certify in the State Plan that they had actively participated in the formulation of that plan.

The information in Figure 2, along with the membership of the State Plan and Accountability Report Committee, makes evident that the flow of information to and from the committee was controlled by people who also serve in other key areas of Vocational Education in Virginia. Thus, by design, the committee not only formulated the Five-Year Plan which reflected the policy of vocational education in Virginia, but its members, because of their position, could also help to carry out that plan.

**Summary**

According to the reputational approach, the State Plan and Accountability Report Committee, which was led by the state staff, was the most influential actor. The State Superintendent, State Director of Vocational Education, and the State Advisory Council tied for second place. In placing the actors in pyramidal order using the issue analysis approach, the State Plan and Accountability Report Committee was the most influential actor with the State Board of

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Education and State Advisory Council placing second. In neither approach was the Board of Education selected as the most influential actor in the process in which state level policy decisions were made concerning vocational education.

**Development of the Instrument**

A committee in the field reviewed and validated the issues chosen for the questionnaire. The process considered the issues in terms of their importance under the law, their relationship in terms of the Standards of Quality and their impact on school divisions. The committee consisted of five vocational directors or persons responsible for vocational education in their school divisions, one superintendent, and one person from the vocational area at the state level.

The committee was informed that the questions were extracted from the four issues of Public Law 94-482. Appendix (B) provides the exact source of the questions. The committee was asked to consider the following problems: Did the questions cover the four selected issues? Was each question clear in its intent? What questions could be omitted and still cover the four issues? Were there important questions left out?

In each case the committee agreed that the questions covered the four selected issues, that each question was clear, that no questions should be deleted, and that no
important questions had been left out. There were no objections or suggestions leading to the improvement of the questionnaire; thus, the instrument was used as developed from law.

**Respondents**

Of the 134 school divisions in Virginia surveyed, 98 participated in the study. Seventy superintendents and 87 vocational directors or other persons from those divisions responded to the request. The "other persons" category was merged with vocational directors as most of the returns indicated that they were functionally the local vocational directors even if they did not carry that title. Thus, a usable return representing 73.1 percent of the school divisions, 52.2 percent of the superintendents, and 66.4 percent of the vocational directors and others was obtained.

**Findings**

One of the major research problems was to explore the effect P.L. 94-482 had on the local school divisions. A major concern of this study was a consideration of what action had taken place prior to the passage of the law. In addition, the research was designed to examine the relationships which existed between perceived importance, action taken,
and impact that would assist in understanding the overall internal and external effect of the law.

Prior Action

A clear finding was the relatively small amount of prior action that had been taken regarding these four issues in the school divisions. For example, on the issue of Sex Stereotyping, 76.8 percent of the respondents reported no action taken prior to the passage of the amendments. Of these respondents, however, only 2.5 percent had taken no action two years after the effective date of the amendments. Eighteen percent had some action planned. Fifty-nine percent had taken some action; 17.5 percent were near completion; 2.5 percent had completed action to bring them into compliance.

On the issue of the Local Advisory Council, 83 percent of the respondents reported no prior action. The responses revealed that in terms of action since 1976, only 3.1 percent had taken no action, 3 percent had some action planned, 22 percent had taken some action, 58 percent were near completion, and 14 percent had completed action to bring them into compliance.

On the issue of Vocational Guidance and Counseling, 85.5 percent of the respondents reported no action prior to the amendments. In terms of action taken since 1976, the responses revealed that 1.6 percent had taken no action;
twenty-two percent had some action planned, and 55 percent had taken some action. Eighteen percent were near completion, and 3.2 percent had completed action to bring them into compliance.

Finally, on the issue of **Administrative and Fiscal Assurances**, 79.9 percent of the respondents reported no prior action. However, in terms of action taken since the amendments were passed, the respondents indicated that all had made some progress. Less than 1 percent had some action planned, 48 percent had taken some action, and an additional 43 percent were near completion. Only 9.0 percent had completed action which would bring them into compliance.

**Responses to the Issues**

In order to determine what effect the Vocational Amendments had at the local level, as interpreted by the local actors, a mean score was calculated for each of the issues: **Sex Stereotyping**, **Local Advisory Council**, **Vocational Guidance and Counseling**, and the Assurances with respect to perceived importance and impact. This tabulation was done to produce a scale of 1 to 5 with one representing a low score and five representing a high score for importance and impact. The scale values 1 to 5 were: low, moderately low, medium, moderately high, and high for importance and impact; and they represented no action taken, some action
planned, some action taken, action near completion, and action completed on the action taken scale. A difference of at least 1.0 among the means was established as the criterion for representing important differences.

Table 1 shows that under the variable of importance the means were: 3.3 for Sex Stereotyping, 3.9 for Local Advisory Council, 3.6 for Vocational Guidance, and 3.8 for the Assurances. Thus, the local respondents were placing medium to moderately high importance on each issue. The range of importance assigned was .6, with a low of 3.3 for Sex Stereotyping and a high of 3.9 for Advisory Council and Assurances. According to the criteria established, there was not sufficient evidence to warrant further attention.

The means for action taken were: 3.1 for Sex Stereotyping, 3.8 for Local Advisory Council, 2.9 for Vocational Guidance, and 3.6 for the Assurances. The respondents reported they had "some action taken" to "action near completion," an indication that much action may be needed on these issues before the divisions are in full compliance with the law. Again, however, the range of responses was less than 1.0.

The means for perceived impact were: 2.8 for Sex Stereotyping, 3.5 for Local Advisory Council, 3.1 for Vocational Guidance, and 3.6 for the Assurances. This impact on the school divisions tended to be in the medium range
Table 1
MEAN SCORES AND STANDARD DEVIATION ON EACH OF THE FOUR MAJOR ISSUES

<table>
<thead>
<tr>
<th>Issues</th>
<th>Importance</th>
<th></th>
<th>Action Taken</th>
<th></th>
<th>Impact</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>M</td>
<td>SD</td>
<td>M</td>
<td>SD</td>
<td>M</td>
<td>SD</td>
</tr>
<tr>
<td>Sex Stereotyping</td>
<td>3.3</td>
<td>0.87</td>
<td>3.1</td>
<td>0.68</td>
<td>2.8</td>
<td>0.82</td>
</tr>
<tr>
<td>Local Advisory Council</td>
<td>3.9</td>
<td>0.80</td>
<td>3.8</td>
<td>0.79</td>
<td>3.5</td>
<td>0.86</td>
</tr>
<tr>
<td>Vocational Guidance</td>
<td>3.6</td>
<td>0.74</td>
<td>2.9</td>
<td>0.69</td>
<td>3.1</td>
<td>0.77</td>
</tr>
<tr>
<td>The Assurances</td>
<td>3.8</td>
<td>0.69</td>
<td>3.6</td>
<td>0.63</td>
<td>3.6</td>
<td>0.65</td>
</tr>
</tbody>
</table>
according to the respondents. The low impact reported of 2.8 was only .8 of one point from the highest means reported of 3.6 for the Assurances.

Though the means were close together, the frequencies of response in Table 2 showed some interesting patterns. Under importance, each issue was given merit by most of the local divisions. However, under action taken, Sex Stereotyping had the most responses in the categories of some action taken to action near completion. The Local Advisory Council responses were, for the most part, in the some action taken and action completed category. At the same time the Vocational Guidance responses were evenly balanced between no action and some planned, versus action near completion and completed. The Assurances responses were between the some action taken and action completed scale.

The responses on the impact scale indicated that the issue of Sex Stereotyping had a low-to-medium impact for most of the local divisions. The impact of the Local Advisory Councils was reported mostly in the medium to moderately-high range. The same data also proved true of the Vocational Guidance issue. However, the responses of impact were a little higher with the Assurances. They ranged, for the most part, from medium to high impact.
<table>
<thead>
<tr>
<th>Issues</th>
<th>Importance</th>
<th>Action Taken</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Sex Stereotyping*</td>
<td>12</td>
<td>21</td>
<td>50</td>
</tr>
<tr>
<td>Local Advisory Council*</td>
<td>7</td>
<td>9</td>
<td>33</td>
</tr>
<tr>
<td>Vocational Guidance*</td>
<td>12</td>
<td>12</td>
<td>39</td>
</tr>
<tr>
<td>The Assurances*</td>
<td>9</td>
<td>9</td>
<td>32</td>
</tr>
</tbody>
</table>

*All numbers were rounded to the next highest number, valid cases = 159.
Results by Subcategories

The third and final question that this study posed was whether or not there were perceived differences among school divisions regarding the impact of the Amendments by position of respondent, size of division, type, and region. Using the means on each issue as reflected on the impact scale, a comparison was done to see if any differences existed.

The 159 respondents were categorized in Table 3 by population and demographic characteristics. They appear first by rural, suburban, and urban school divisions. Seventy-seven individuals responded from 50 rural school divisions, 59 responded from 36 suburban divisions, and 23 individuals responded from 12 urban school divisions. See Virginia Rural, Suburban and Urban School Divisions, Appendix (G). Sixty-one respondents ranked their division in the 0 to 1000 students range in grades eight through twelve, 59 in the 1001 to 3000 range, 20 in the 3001 to 6000 range, and 19 in the 6000+ range. As identified by the Virginia State Superintendent's Advisory Council, the responses from the local divisions were classified into the seven regions of Virginia.

Superintendents/Vocational Directors

The impact as judged by the Superintendents and Vocational Directors in Table 4 reveals a very close pattern of
Table 3
RESPONDENTS BY STUDENT POPULATION, GEOGRAPHIC AND DEMOGRAPHIC CHARACTERISTICS

<table>
<thead>
<tr>
<th>Characteristics</th>
<th>Respondents</th>
<th>Number of Divisions or Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural</td>
<td>77</td>
<td>50</td>
</tr>
<tr>
<td>Suburban</td>
<td>59</td>
<td>36</td>
</tr>
<tr>
<td>Urban</td>
<td>23</td>
<td>12</td>
</tr>
<tr>
<td>Total</td>
<td>159</td>
<td>98</td>
</tr>
</tbody>
</table>

Students Grades 8-12

<table>
<thead>
<tr>
<th></th>
<th>Respondents</th>
<th>Number of Divisions or Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 - 1000</td>
<td>61</td>
<td>31</td>
</tr>
<tr>
<td>1001 - 3000</td>
<td>59</td>
<td>38</td>
</tr>
<tr>
<td>3001 - 6000</td>
<td>20</td>
<td>17</td>
</tr>
<tr>
<td>6000 +</td>
<td>19</td>
<td>12</td>
</tr>
<tr>
<td>Total</td>
<td>159</td>
<td>98</td>
</tr>
</tbody>
</table>

Region

<table>
<thead>
<tr>
<th>Region</th>
<th>Respondents</th>
<th>Number of Divisions or Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>I Central</td>
<td>30</td>
<td>17</td>
</tr>
<tr>
<td>II Tidewater</td>
<td>18</td>
<td>11</td>
</tr>
<tr>
<td>III Middle Peninsula</td>
<td>21</td>
<td>14</td>
</tr>
<tr>
<td>Northern Neck</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IV Northern Virginia</td>
<td>22</td>
<td>14</td>
</tr>
<tr>
<td>V Central Virginia West</td>
<td>29</td>
<td>17</td>
</tr>
<tr>
<td>VI Near Southwest</td>
<td>19</td>
<td>12</td>
</tr>
<tr>
<td>VII Far Southwest</td>
<td>20</td>
<td>13</td>
</tr>
<tr>
<td>Total</td>
<td>159</td>
<td>98</td>
</tr>
</tbody>
</table>
Table 4
IMPACT AS JUDGED BY THE SUPERINTENDENTS AND THE VOCATIONAL DIRECTORS

<table>
<thead>
<tr>
<th>Issues</th>
<th>Respondents</th>
<th>Means</th>
<th>Std. Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sex Stereotyping</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Superintendents</td>
<td>2.8</td>
<td>0.87</td>
<td></td>
</tr>
<tr>
<td>Vocational Directors</td>
<td>2.8</td>
<td>0.79</td>
<td></td>
</tr>
<tr>
<td>Local Advisory Councils</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Superintendents</td>
<td>3.3</td>
<td>0.86</td>
<td></td>
</tr>
<tr>
<td>Vocational Directors</td>
<td>3.5</td>
<td>0.86</td>
<td></td>
</tr>
<tr>
<td>Vocational Guidance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Superintendents</td>
<td>3.1</td>
<td>0.73</td>
<td></td>
</tr>
<tr>
<td>Vocational Directors</td>
<td>3.0</td>
<td>0.80</td>
<td></td>
</tr>
<tr>
<td>Administrative &amp; Fiscal Assurances</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Superintendents</td>
<td>3.4</td>
<td>0.64</td>
<td></td>
</tr>
<tr>
<td>Vocational Directors</td>
<td>3.6</td>
<td>0.64</td>
<td></td>
</tr>
</tbody>
</table>
responses across the four issues. Under Sex Stereotyping, the means of both groups of respondents were 2.8. Under Local Advisory Councils, the Superintendents and Vocational Directors' mean responses were nearly the same, (3.3 and 3.5, respectively), each with a standard deviation of 0.86. In the area of Vocational Guidance, the Superintendents at 3.1 had a slightly higher mean score than the Vocational Directors at 3.0 with a standard deviation of 0.80 and 0.73, respectively. On the issue of Administrative and Fiscal Assurances, the Vocational Directors showed a slightly higher impact mean of 3.6 versus a mean of 3.4 for the Superintendents with precisely the same standard deviation of .64. Thus, there appeared to be little difference between the two types of respondents on the issues based upon calculated means and standard deviations of the responses.

Size

Table 5 reflects the impact as judged by the respondents according to the size of their school divisions. Under Sex Stereotyping, the means were almost the same from the smaller to the larger divisions (2.7 to 2.8, respectively), though there was greater variance regarding the impact in the third-largest category of school divisions (3001-6000) with a standard deviation of 1.02. This statistic stands in juxtaposition to a standard deviation of .70 in the second largest category of division (1001-3000). Under the issue of
Table 5
IMPACT AS JUDGED BY THE RESPONDENTS ACCORDING TO SCHOOL DIVISION SIZE

<table>
<thead>
<tr>
<th>Issues</th>
<th>Size</th>
<th>Means</th>
<th>Std. Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sex Stereotyping</td>
<td>0 - 1000</td>
<td>2.8</td>
<td>0.87</td>
</tr>
<tr>
<td></td>
<td>1001 - 3000</td>
<td>2.8</td>
<td>0.70</td>
</tr>
<tr>
<td></td>
<td>3001 - 6000</td>
<td>2.7</td>
<td>1.02</td>
</tr>
<tr>
<td></td>
<td>6001 - →</td>
<td>2.8</td>
<td>0.83</td>
</tr>
<tr>
<td>Local Advisory Councils</td>
<td>0 - 1000</td>
<td>3.4</td>
<td>0.85</td>
</tr>
<tr>
<td></td>
<td>1001 - 3000</td>
<td>3.6</td>
<td>0.83</td>
</tr>
<tr>
<td></td>
<td>3001 - 6000</td>
<td>3.2</td>
<td>0.88</td>
</tr>
<tr>
<td></td>
<td>6001 - →</td>
<td>3.4</td>
<td>0.98</td>
</tr>
<tr>
<td>Vocational Guidance</td>
<td>0 - 1000</td>
<td>3.1</td>
<td>0.70</td>
</tr>
<tr>
<td></td>
<td>1001 - 3000</td>
<td>3.1</td>
<td>0.64</td>
</tr>
<tr>
<td></td>
<td>3001 - 6000</td>
<td>3.1</td>
<td>0.94</td>
</tr>
<tr>
<td></td>
<td>6001 - →</td>
<td>2.8</td>
<td>1.10</td>
</tr>
<tr>
<td>Administrative and Fiscal Assurances</td>
<td>0 - 1000</td>
<td>3.6</td>
<td>0.61</td>
</tr>
<tr>
<td></td>
<td>1001 - 3000</td>
<td>3.6</td>
<td>0.58</td>
</tr>
<tr>
<td></td>
<td>3001 - 6000</td>
<td>3.5</td>
<td>0.79</td>
</tr>
<tr>
<td></td>
<td>6001 - →</td>
<td>3.2</td>
<td>0.76</td>
</tr>
</tbody>
</table>
Local Advisory Councils, the means were relatively close (3.2 to 3.6) among size of division. The highest standard deviation existed in those school divisions larger than 6000 students, the lowest (.83) again in the 1001-3000 student divisions.

Under the issue of Vocational Guidance, the means showed a difference of .3 (2.8 to 3.1), with the highest standard deviation again found in the over 6000 student divisions and the lowest found in the 1001-3000 student divisions.

Under the issues of Assurances, the means ranged from 3.2 to 3.6. The largest standard deviation existed in the 3001 to 6000 size school divisions with the smallest reported in the 1001 to 3000 size division. The standard deviations of 1.02 under Sex Stereotyping and 1.10 under Vocational Guidance indicate a wide range of responses on the impact these issues have had on the local school divisions.

Table 6 shows the responses according to the adjudged impact by school division type. The means under the issue Sex Stereotyping ranged from 2.7 for rural to 2.9 for urban divisions while the standard deviations ranged from .81 to .89 for urban school divisions. Under Local Advisory Councils, the means ranged from 3.3 for rural to 3.9 for urban divisions. The suburban divisions experienced the greatest
Table 6

IMPACT AS JUDGED BY THE RESPONDENTS ACCORDING TO SCHOOL DIVISION TYPE

<table>
<thead>
<tr>
<th>Issues</th>
<th>Type</th>
<th>Means</th>
<th>Std. Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sex Stereotyping</td>
<td>Rural</td>
<td>2.7</td>
<td>0.82</td>
</tr>
<tr>
<td></td>
<td>Urban</td>
<td>2.9</td>
<td>0.89</td>
</tr>
<tr>
<td></td>
<td>Suburban</td>
<td>2.8</td>
<td>0.81</td>
</tr>
<tr>
<td>Local Advisory Councils</td>
<td>Rural</td>
<td>3.3</td>
<td>0.83</td>
</tr>
<tr>
<td></td>
<td>Urban</td>
<td>3.9</td>
<td>0.79</td>
</tr>
<tr>
<td></td>
<td>Suburban</td>
<td>3.4</td>
<td>0.88</td>
</tr>
<tr>
<td>Vocational Guidance</td>
<td>Rural</td>
<td>3.1</td>
<td>0.65</td>
</tr>
<tr>
<td></td>
<td>Urban</td>
<td>3.0</td>
<td>0.76</td>
</tr>
<tr>
<td></td>
<td>Suburban</td>
<td>3.1</td>
<td>0.91</td>
</tr>
<tr>
<td>Administrative &amp; Fiscal Assurance</td>
<td>Rural</td>
<td>3.5</td>
<td>0.57</td>
</tr>
<tr>
<td></td>
<td>Urban</td>
<td>3.5</td>
<td>0.60</td>
</tr>
<tr>
<td></td>
<td>Suburban</td>
<td>3.5</td>
<td>0.76</td>
</tr>
</tbody>
</table>
standard deviation (.88) while the lowest was the urban divisions (.79).

On the issue of Vocational Guidance, the means were within 0.1 of a point, 3.0 for urban to 3.1 for rural and suburban school divisions, with standard deviations of .91 for suburban divisions and .65 for rural divisions. With the issue of the Assurances, the means were exactly the same among school division types. However, the standard deviations ranged from .76 for the suburban divisions to .57 for the rural divisions.

Region

In Table 7, the impact as reported by geographical regions of the state showed a wider range of mean scores. Under Sex Stereotyping the means ranged from a high of 3.9 in the Central Virginia West region to a low of 2.3 in the Far Southwest with the other five regions clustering around a mean of 2.6 to 3.0 on the impact of Sex Stereotyping on their school divisions. From this response, the difference of 1.6 in the means between the highest and lowest region indicated that the respondents vary on the impact of this issue on their school divisions.

Under Local Advisory Councils the means among regions varied by only .5 of a point. The highest was the Middle Peninsula, Northern Neck at 3.7, and the lowest was the Far
Table 7
IMPACT AS JUDGED BY THE RESPONDENTS
ACCORDING TO REGIONS

<table>
<thead>
<tr>
<th>Issues</th>
<th>Regions</th>
<th>Means</th>
<th>Std. Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sex Stereotyping</td>
<td>1. Central</td>
<td>2.9</td>
<td>0.97</td>
</tr>
<tr>
<td></td>
<td>2. Tidewater</td>
<td>3.0</td>
<td>0.90</td>
</tr>
<tr>
<td></td>
<td>3. Middle Peninsula</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Northern Neck</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. Northern Virginia</td>
<td>3.0</td>
<td>0.69</td>
</tr>
<tr>
<td></td>
<td>5. Central Virginia West</td>
<td>3.9</td>
<td>0.86</td>
</tr>
<tr>
<td></td>
<td>6. Near Southwest</td>
<td>2.6</td>
<td>0.58</td>
</tr>
<tr>
<td></td>
<td>7. Far Southwest</td>
<td>2.3</td>
<td>0.74</td>
</tr>
<tr>
<td>Local Advisory Councils</td>
<td>1. Central</td>
<td>3.4</td>
<td>1.14</td>
</tr>
<tr>
<td></td>
<td>2. Tidewater</td>
<td>3.6</td>
<td>0.73</td>
</tr>
<tr>
<td></td>
<td>3. Middle Peninsula</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Northern Neck</td>
<td>3.7</td>
<td>0.56</td>
</tr>
<tr>
<td></td>
<td>4. Northern Virginia</td>
<td>3.5</td>
<td>1.02</td>
</tr>
<tr>
<td></td>
<td>5. Central Virginia West</td>
<td>3.3</td>
<td>0.85</td>
</tr>
<tr>
<td></td>
<td>6. Near Southwest</td>
<td>3.6</td>
<td>0.78</td>
</tr>
<tr>
<td></td>
<td>7. Far Southwest</td>
<td>3.2</td>
<td>0.62</td>
</tr>
<tr>
<td>Vocational Guidance</td>
<td>1. Central</td>
<td>3.1</td>
<td>0.82</td>
</tr>
<tr>
<td></td>
<td>2. Tidewater</td>
<td>3.0</td>
<td>1.03</td>
</tr>
<tr>
<td></td>
<td>3. Middle Peninsula</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Northern Neck</td>
<td>3.2</td>
<td>0.52</td>
</tr>
<tr>
<td></td>
<td>4. Northern Virginia</td>
<td>3.0</td>
<td>0.90</td>
</tr>
<tr>
<td></td>
<td>5. Central Virginia West</td>
<td>3.0</td>
<td>0.59</td>
</tr>
<tr>
<td></td>
<td>6. Near Southwest</td>
<td>3.1</td>
<td>0.73</td>
</tr>
<tr>
<td></td>
<td>7. Far Southwest</td>
<td>3.0</td>
<td>0.83</td>
</tr>
<tr>
<td>Administrative and Fiscal Assurances</td>
<td>1. Central</td>
<td>3.6</td>
<td>0.61</td>
</tr>
<tr>
<td></td>
<td>2. Tidewater</td>
<td>3.4</td>
<td>0.84</td>
</tr>
<tr>
<td></td>
<td>3. Middle Peninsula</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Northern Neck</td>
<td>3.8</td>
<td>0.58</td>
</tr>
<tr>
<td></td>
<td>4. Northern Virginia</td>
<td>3.6</td>
<td>0.74</td>
</tr>
<tr>
<td></td>
<td>5. Central Virginia West</td>
<td>3.4</td>
<td>0.54</td>
</tr>
<tr>
<td></td>
<td>6. Near Southwest</td>
<td>3.5</td>
<td>0.50</td>
</tr>
<tr>
<td></td>
<td>7. Far Southwest</td>
<td>3.5</td>
<td>0.75</td>
</tr>
</tbody>
</table>
Southwest at 3.2 with all other regions ranging the full scale in between. Though the means were close between the Central and Northern Virginia regions, the standard deviations varied much more than the other regions.

On the issue of **Vocational Guidance**, the means ranged from 3.0 to 3.2 with the highest mean reported once again by the Middle Peninsula, Northern Neck at 3.2; the lowest (3.0) was reported by four regions: Tidewater, Northern Virginia, Near Southwest, and the Far Southwestern regions.

Finally, on the issue of **Administrative and Fiscal Assurances**, the means were comparable to the means in the other regions as they were in the medium impact category with a range of 3.4 in Tidewater, Central Virginia West region to 3.8 from the Middle Peninsula Northern Neck.

The standard deviation in each of the four issues demonstrated no unusual fluctuations among the regions, though the greatest disagreement occurred over the **Local Advisory Councils** with two divisions showing standard deviations of 1.02 (Northern Virginia) and 1.14 (Central). Only in one other case, that of **Vocational Guidance**, was there a deviation as great (1.03), this time in Tidewater.

**Correlations Among Constructs**

In order to determine what relationships existed among the four major issues, a correlation was calculated
between two of the three constructs of importance, action taken, and impact while the effect of the third construct was held out of the relationship. Interpretation of the partial correlation recognizes and controls the constructs involved in this study. They do not account for other unidentified factors which were not involved in this study. Since the return rate was moderately low, the calculations were only interpreted to the respective population mentioned in the study.

Table 8 gives a complete list of these relationships. The table is constructed for viewing vertically under each issue and then horizontally by constructs. Reading vertically by issues, Sex Stereotyping had an importance: impact correlation of .56. The correlation of importance to action taken was .34. Under the same issue, action taken to impact showed a correlation of .15.

The correlation of importance to impact regarding Local Advisory Councils was .51. There was a weaker relationship of .19 between importance and the action taken; however, in the action taken: impact relationship, the correlation went back up to .45.

Vocational Guidance correlations followed a pattern similar to the Local Advisory Councils in that importance: impact correlations were .47; the importance: action taken
Table 8
PARTIAL CORRELATION COEFFICIENTS

<table>
<thead>
<tr>
<th>Variables</th>
<th>Sex Stereotyping</th>
<th>Local Advisory Councils</th>
<th>Vocational Guidance</th>
<th>The Assurances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship of Importance to Impact Controlling for Action Taken</td>
<td>.56 .31</td>
<td>.51 .26</td>
<td>.47 .22</td>
<td>.49 .24</td>
</tr>
<tr>
<td>Relationship of Importance to Action Taken Controlling for Impact</td>
<td>.34 .12</td>
<td>.19 .04</td>
<td>.06 .00</td>
<td>.28 .08</td>
</tr>
<tr>
<td>Relationship of Action Taken to Impact Controlling for Importance</td>
<td>.15 .02</td>
<td>.45 .20</td>
<td>.59 .35</td>
<td>.37 .14</td>
</tr>
</tbody>
</table>
correlation fell to a low of .06; and the action taken: impact correlation rose back up to .59.

The Assurances correlation for importance: impact was .49, the importance: action taken .28, and the action taken: impact correlation stood at .37.

Viewing Table 8 horizontally, by constructs, the importance: impact correlations were .56, .51, .47, and .49 for each of the four issues, respectively. The importance: action taken correlations were .34, .19, .06, and .28 for Sex Stereotyping, Local Advisory Councils, Vocational Guidance and the Assurances. The action taken: impact correlations were .15, .45, .59, and .37.

A squaring of the coefficient (r²) produced the amount of variance that the factors had in common. This computation produced the percent that each factor shared and, therefore, the rate at which a prediction was drawn concerning the relationship.

Overall, each issue had a moderate relationship between importance and impact. The relationship of importance to action taken was very low. Hence, there was little predictability that if an issue was important that action would be taken on that issue by the respondents. The correlations comparing action taken and impact were mixed. The Sex Stereotyping issue had a very low correlation in this area
while the Local Advisory Councils and Assurances were slightly higher. A moderate relationship existed under the issue of Vocational Guidance.

Overall there was a tendency to view the issues as moderately important and as having moderate impact. There was no way to predict the importance of the issue in terms of the action taken on that issue. Only on the issue of Vocational Guidance was there a reasonable estimate that if action was taken, the resulting impact would take place.

Discussion of Findings

The State Policy Process

With the arrival of the 1976 Amendments, the Virginia State Department of Education faced the task of organizing a response. Preparation of the Five-Year State Plan, Virginia's response to the 1976 Amendments, set in motion both a chain of events and information flow that was similar to the previous planning process for Vocational Education. However, there were two exceptions. First, a dollar amount had to be attached to the goals and objectives of the Five-Year State Plan. Second, the State Plan and Accountability Report Committee was established.

The Supervisor of State Plan and Finance assumed the task of collecting the data and organizing the recommendations. Working with him was the Division of Vocational
Educational Planning Council. It was their responsibility to assemble, process, and prepare the information that flowed to the next step of the policy process. Second, the State Plan and Accountability Report Committee was to synthesize this information flowing from the state staff and Planning Council into a manageable report. They had to decide how they would meet the needs of Vocational Education in Virginia and the requirements of the 1976 Amendments. Third, as it was this committee's charge to formulate the final State Plan, they became the most important link in the policy chain on the way to the plan's adoption by the Board of Education. The final report emerged from all the information that had been sent to this important committee.

Fourth, the State Advisory Council, which was also to make recommendations to the Board of Education, worked very closely with the State Plan and Accountability Report Committee. Information flowed between the two groups through their mutual members. Although their missions were different, the information processed by both groups did lead to recommendations that were of a similar nature. For example, the Advisory Council was to tell the Board how well vocational education was meeting the needs of industry, the law, and the public in Virginia. The State Plan of Vocational Education was to show how these needs were to be met and programs, personnel, and resources needed to make them a reality.
The plan, then, once adopted by the State Board of Education, became the document that guided vocational education policy in Virginia for the next five years.

Figure 2, when placed beside the State Plan and Accountability Report Committee, illustrates that the flow of information in and out of the committee was controlled by the same key people who also served in other key areas of Vocational Education in Virginia. Thus, by design, the committee met not only to form the five-year plan which reflected the policy of vocational education in Virginia, but to help carry out that plan by virtue of and through its key members who were in decision-making roles throughout the state.

The State Advisory Council, which placed second in influence, had as its policy function to give advice to the State Board in the development of the Five-Year State Plan. It was from this Council that the Board sought advice on policy matters concerning the administration of local programs, the process of the annual state plan, and the evaluation of local programs as found in the accountability report. The State Board had to consider the report of this Council as it constituted not only a mandate of the law but the expressions of lay citizens as well. The Council, therefore,
brought a different but important perspective to the policy process through association with the Manpower Services Council, employment needs, local advisory councils, and the lay public. Thus, in the state policy process on Vocational Education, it became apparent that the State Plan and Accountability Report Committee and the State Advisory Council provided the most input to the Five-Year State Plan for Vocational Education.

The Local Involvement

A review of the data at the local level showed that there was considerable variation regarding the effect of P.L. 94-482. Three key points emerged. First, concerning prior action, only the issue of Sex Stereotyping had more than 20 percent of the reporting school divisions taking any action before the 1976 Amendments became law. Second, as reported in Table 1, there was relatively little difference on the four issues with respect to the perceived importance, action taken, and impact. Third, the data reviewed for perceived differences among the school divisions on impact by position of respondent, size of school divisions, type, and region indicated that the Superintendents and Vocational Directors showed little difference on all four issues. However, as the impact was less than the established criteria, it was evident that both groups viewed the impact as the same on their respective divisions. This similarity
was most likely due to the generally close working relationship between the two positions as well as the leadership and philosophy of the division superintendent toward the selected issues.

Under the school division size and type, the impact was almost the same under each issue. However, by regions the Far Southwest placed consistently low on all four issues. Since prior action taken produced such a low response statewide it is reasonable to assume that this region may not have fully understood the impact of the law. The report by regions did not indicate a clear pattern of impact among the issues, using the established criteria, except on the issue of Sex Stereotyping. This perceived impact may have implied that the law had not been fully carried out.

Finally, when the partial correlations were determined by correlating responses on two of the constructs while withholding the third, the correlations ranged from .06 to .59. There was almost no relationship when comparing importance to action taken under each issue $r^2 = .12, .04, .00, \text{ and } .08$. A moderate relationship occurred when comparing importance to impact, $=.31, .26, .22, \text{ and } .24$. These varied responses indicated that if an issue were important and expected to have even a moderate impact, it would not necessarily follow that action would be taken
based on the importance of that issue. In addition, only on the issue of Vocational Guidance was action taken which brought about a moderate amount of impact.

An interesting note under Vocational Guidance was the importance: action taken correlation of .00. A review of the data showed that the respondents tended to mark opposite choices. The Superintendents rated the items less important and marked more action had taken place than did the Vocational Directors. Thus, it appeared that even though the issues were important to the school divisions, little to no action was planned based on that importance. This reaction may have been due to cost, facilities, or a host of other reasons. There had been little action taken prior to the passage of the law. Therefore, it is unlikely that the respondents had planned any new action between the passage of the law and the time this study was done. In terms of impact that the action had, the relationships across the issues were varied. Sex Stereotyping was very low, probably because the respondents felt they were meeting the mandates of the law. The moderate correlation of action taken to Impact under Vocational Guidance was due most likely to a comparison of student placement and training to prior years before the passage of P.L. 94-482.
Chapter 5

SUMMARY, CONCLUSIONS, IMPLICATIONS, AND RECOMMENDATIONS

This chapter summarizes the results of the research related to the process by which state actors implemented the 1976 Vocational Amendments. In addition, the effect of the Vocational Amendments, as interpreted by the local actors, and the differences of the perceived impact by respondents, size of school division, type, and region are summarized. Conclusions are written as they relate to the state policy process and impact on the local school division. Finally, implications concerning the effect of the federal law are discussed and recommendations for further research are suggested.

Summary

The problem of this study was to describe and explain how a federal law, as interpreted through the executive guidelines, affects state policymaking and local implementation. Further, the activities of the state level actors were investigated and reported in order to determine the process by which policy was developed to meet the mandates of the 1976 Amendments. Finally, the effect of the law on the implementation of vocational education in local school
divisions was assessed. The investigation was important to educators and policy makers for three reasons. First, it provided an understanding of the impact of a federal law on policymaking at the state level. Second, it provided an understanding of the interplay among state actors and state agencies with regard to policy making. Third, it provided insight into the impact of a federal law upon local school divisions.

Specifically, this study investigated the following questions:

1. What policy making processes were utilized at the state level by those persons most closely involved in developing a response to the 1976 Vocational Amendments?

2. What effects, if any, did the Vocational Amendments, as interpreted by the local actors, have at the local level?

3. What were the differences, if any, of perceptions of the impact of the Vocational Amendments by position of respondent and by size, type, and region of school divisions?

A detailed record, reconstructed from interviews and documents, provided a view of the policymaking processes at the state level. In addition, the most influential actor was identified using the reputational and issue analysis methods as a guide.
The effect on the local level was assessed through a questionnaire in terms of prior action, importance, action taken and impact on each of the issues of Sex Stereotyping, Local Advisory Councils, Vocational Guidance, and the Assurances. Further sorting by organizational position of respondents, geographical region, and division type and size, was conducted in order to detect any perceived differences. A comparison of the mean impact scores on each issue served to illuminate differences if they existed. Partial correlations assessed relationships among the variables of importance, action taken, and impact regarding the four selected issues.

Findings of the research may be characterized under the heading of state, local, and differences within and among school divisions and correlations among variables.

State

1. The policy-making process at the state level was a complex array of assignments among committees, state officers, and staff.

2. The state process involved the State Advisory Council which operated relatively autonomously of the process involving state or state appointed officials.

3. Using the reputational approach, the State Plan and Accountability Report Committee was the most influential actor. The State Superintendent, State Director of Vocational Education, and the State Advisory Council tied for second place.
4. In using the issue analysis approach, the State Plan and Accountability Report Committee was the most influential actor, with the State Board of Education and the State Advisory Council placing second.

Local

At the local level the findings as associated with the research questions were:

1. In terms of prior action, it was evident that the localities had done little on the selected issues before the 1976 Amendments.

2. In terms of what impact the Vocational Amendments had at the local level, the means ranged from 2.8 to 3.6 on a five point scale.

Differences

1. There were only slight differences of impact perceived among the school divisions concerning Superintendents or Vocational Directors, size, and type of school division.

2. As reported by geographical region, there was a difference on the issue of Sex Stereotyping among the respondents, particularly between the Central Virginia West and the Far Southwest region.

Correlations

1. Overall, the relationships between importance and impact on the local school divisions were recorded as
moderate relationships across the four issues of Sex Stereotyping, Local Advisory Councils, Vocational Guidance, and the Assurances.

2. There was a weak relationship between the importance of an issue and action taken on that issue.

3. The same weak relationships existed between action taken and impact except for the issue of Vocational Guidance.

Conclusions

Conclusions of this study are divided into four separate categories in response to the research questions. The first category of conclusions relates to the policy-making process at the state level. The second category related to the impact the amendments had at the local level. The third category concerns the differences among the respondents, and among geographic regions, types, and sizes of local school divisions. The fourth category draws conclusions regarding the correlations among the constructs.

Conclusions Related to the State Policy Process

1. The policy-making process at the state level involved a complex array of interlocking assignments among the appointed committees, state offices, and staff at the State Department of Education.
The State Advisory Council which, though it operated with knowledge of the activities of the above groups through liaison persons, formally functioned virtually autonomously and independently. Even though there was not the overlapping of membership between the State Department staff and committees, and the Advisory Council, the members were, however, kept informed by attending each others functions. Thus, as each group was aware of what the other was doing, the organizing, developing, reviewing, and recommending activities involving the plan were carried out without surprises.

2. The State Plan and Accountability Report Committee was chosen in both the reputational approach and the issue analysis method as the most influential actor in the policy process. It could be reasonably argued that their selection as having the most influence in the process may have been due to the very few changes made during the formulation of the Five-Year Plan for Vocational Education.

3. As the State Plan for Vocational Education had to include recommendations from the State Advisory Council before the plan was accepted at the federal level, it is therefore logical to conclude that this is why the Council was chosen as the second most influential actor in the policy process.
Conclusions Related to the Impact on the Local School Division

Relatively little prior action had taken place on the issues of Sex Stereotyping, Local Advisory Councils, Vocational Guidance and Counseling, and the Assurances before the 1976 Vocational Amendments became law. During the post-1976 period, almost every school division in the study had some activity taking place. Therefore, in the absence of any other known explanation, it can be concluded that the passage of the 1976 Amendments required the local divisions to focus attention and resources on the selected issues.

Conclusions Related to Differences from Within and Among the Local School Divisions

1. The Superintendents and Vocational Directors, though operating from different perspectives in the organization, view the impact of mandated legislation quite similarly with little variation among the four issues studied.

2. The size of the school division makes no difference on the impact at the local level. That is, the degree of impact is not differentiated by differences in terms of the average daily membership of the organization.

3. There was no major difference detected in reviewing the impact by school type. It seems to matter little whether a division is rural, urban, or suburban.

4. The differences among the regions under Sex Stereotyping show that the law may not have been carried out
to its fullest intent or that the issue is not fully understood by the respondents from the local school divisions.

Conclusion Related to the Relationships

As the correlations revealed that each issue had a moderate relationship between importance and perceived impact, and a low relationship between importance and action taken, and a mixed relationship between action taken and perceived impact, it is logical to conclude that as the issues were important to the school divisions, all the action that needs to be taken in order to make the issues commensurate with their importance, has not been carried out.

Implications

Implications of this investigation include several facets related to the study which could not be stated as formal conclusions but were of interest.

1. The structure and small number of meetings indicated that the State Plan and Accountability Report Committee probably delegated the writing of the State Five-Year Plan to the State Department of Vocational Education. In this manner, they would be able to recommend and make changes that would then be finalized by a professional staff.

2. Despite the mandate of the law, the State
Advisory Council did not play as large a role as it should have in the state policy process with regard to Vocational Education. It appeared that once its recommendations were given to the State Board of Education and the state staff, not a great deal of follow up occurred, except for a response by the state staff.

3. In no instance was the State Board selected as the most influential actor. This omission is possibly because the Board functioned as a non-salaried, part-time governmental body, with most members investing from two to three days per month on a formal basis in State Board of Education affairs. Furthermore, the Board did not have a staff other than that made available through the Department of Education.

4. In contrast to the State Board of Education, the State Plan and Accountability Report Committee, led by the State Vocational Director, devoted its full time to the State Plan. It had professional stature, a large staff at its disposal, and proximity to the core of the information bases. These major factors placed it at the center of the state policy process on vocational education.

5. At the local level, the respondents were very much aware of the existence of the 1976 Amendments, but they showed little indication that they had carried the specific requirements of the four selected issues in this study to
completion. This mediocre effect may have been due to a lack of resources, a lack of commitment, or a lack of understanding of just what is required under the law.

Recommendations

The recommendations for further research that emerged from this study covered three major points.

Recommendations for Further Research

1. As this study investigated only one policy issue, the 1976 Vocational Amendments, a follow-up investigation with a similar study related to other issues in Vocational Education is highly desirable.

2. From a policy perspective a study of the impact of federal legislation on other areas which pertain to education would be desirable. In this way, policymakers, educators, and others might better understand and thus influence or be responsive to subsequent legislation.

3. A study that would involve the local school board and their understanding of how the policy process works in relationship to the federal laws affecting their localities would also be desirable.
BIBLIOGRAPHY

Single-Volume Works


122
Periodicals


Publications of the Government, Learned Societies, and Other Organizations


Unpublished Sources


APPENDICES
APPENDIX A

LEAD INTERVIEW QUESTIONS
The lead questions were asked as a means of inviting a response in relation to the research questions under investigation. These responses concerned policies centered around the four major issues of Sex Stereotyping, Local Advisory Councils, Vocational Guidance, and the Fiscal and Administrative Assurances. A copy of the questions was given to each interviewer and the time period under investigation was identified.

**Lead Questions**

1. Who initiates policy for Vocational Education in Virginia? How do they perceive a need for such policy? What individuals or groups within the state-local governance system were involved? Who initiated involvement?

2. Were individuals, interest groups or agencies outside the state-local educational governance system contributing to the development of vocational policies?

3. How were you involved in the development of vocational policy and to what extent was the involvement? Were there others involved and to what extent was their involvement?

4. How did you obtain the information needed to contribute to the development of policy in response to
the 1976 Vocational Amendments? What source of information was the most helpful? What source was the least helpful?

5. Did conflicts arise in the development of vocational policies? How were they resolved?

6. Who approved the stated policies and what form did the approval take? How many groups approved the policy?

7. Was the approval of the policy based on previously established procedures, programs, or law?

8. What participant in the development of vocational policy would you attribute the most influence or leadership? Who influences your board most? Why does this actor have more influence?
APPENDIX B

LETTER OF REQUEST
Dear

The federal government is playing an increasingly greater role in the day-to-day operation of vocational education, most recently evidenced by the 1976 Amendments. These require the local divisions to address themselves to the mandates found in Public Law 94-482. While the requirements of law and guidelines are clear, the impact that they have on local programs is as yet only generally known. It is the purpose of this questionnaire and subsequent study, therefore, to measure the impact of the 1976 Vocational Amendments on your school division with regard to the four questions of sex stereotyping, local advisory councils, vocational guidance, and the assurances on administrative and fiscal matters. The data collected will be reported by (1) respondent-superintendents, Director of Vocational Education and others, (2) by regions, as identified by the Virginia State Superintendent's Advisory Council, (3) school division type--urban, suburban, rural, and (4) by school division size.

I know you have many requests for information and may be inclined to pass this off as just one more request. But I would hope that you would not do so lightly as we need to let our State Board and State Department of Education, as well as those in Washington, know the problems and opportunities afforded by this law.

Sincerely,

Ralph W. Johnson
Assistant Superintendent for Instruction
Gloucester County Public Schools
(Candidate for Degree of Doctor of Education at V.P.I. & S.U.)
APPENDIX C

SOURCE OF THE SURVEY QUESTIONS

Question Number: 1, 2, 3, 4, 5, 6, 7, 13, 14, 15, 16, 17, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 41, 42, 57.

II. Questions that must be addressed in the local Vocational Education Five-Year Plan by Objective and Strategies.

Question Number: 8, 7, 9, 10, 11, 18, 20, 21, 24, 38, 39, 40, 41, 42, 45, 46, 47, 48, 49, 57.


Question Number: 12, 50, 51, 52, 53, 54, 55, 56, 57.


V. Questions taken from Public Law 94-482, October 12, 1976.

Question Number: 1, 2, 3, 4, 5, 6, 7, 13, 14, 15, 16, 17, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 57.
APPENDIX D

SURVEY INSTRUMENT
A SURVEY OF THE IMPACT OF THE 1976 VOCATIONAL AMENDMENTS ON THE LOCAL SCHOOL DIVISION IN VIRGINIA

INSTRUCTIONS:

This survey is intended to gather information on importance, action, and impact for vocational education at the local level. Four major issues have been selected to represent conditions associated with the recent legislation. Please rate how important your school district feels each statement is and then if action has been taken, or is planned, rate the impact or potential of the action. The items taken from the 1976 Vocational Amendments to consider are:

1. Sex Stereotyping § 104.72
2. Local Advisory Council § 104.111
3. Vocational Guidance and Counseling § 104.73
4. The General Assurance on Administrative and Fiscal Matters § 104.141

All information will be treated as confidential. No school division or individual will be in any way identified in the study. Please return all forms by November 10, 1978.

School Division: ____________________________________________________________

Approximate total number of students in grades eight through twelve: _______________________________________

Person completing this form _____ Superintendent _____ Vocational Director
_____ Other Persons responsible for vocational education.
_____ Please send me a composite of the completed study.

Thank you for your time and your assistance in completing this survey.
THE SURVEY DESCRIPTORS

The respondents are asked to keep the following guidelines in mind when responding to the questions.

For the Importance Scale the question is; If this question is a first order of priority, must be resolved, or has a direct bearing on the issue, enter a 5. If, on the other hand, the question has no priority, relevance, measurable effect, or should be dropped as an item to consider, enter a 1.

For the Impact Scale the question is; If this event must occur or has already occurred what impact did it have, or will have on your school division. If a significant impact enter a 4 or 5. If, on the other hand, little or no impact would result, enter a 1 or 2.

For the Action Taken Scale the question is; If this event occurred before the 1976 Amendments mark 0. If not rate the action taken or planned by your school division. If that action is nearing completion or completed enter a 4 or 5. If no action has been taken or some is planned, enter 1 or 2.

CIRCLE THE NUMBER ON THE SCALES TO INDICATE YOUR ESTIMATE.

<table>
<thead>
<tr>
<th>SEX STEREOTYPING</th>
<th>IMPORTANCE</th>
<th>ACTION TAKEN</th>
<th>IMPACT</th>
</tr>
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<tbody>
<tr>
<td></td>
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<td>Medium</td>
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<td>1. Creating an understanding of the term “sex bias” by local personnel.</td>
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<td>2. Creating an understanding of the term “sex stereotyping” by local personnel.</td>
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<tr>
<td>3. Creating an understanding of the term “sex discrimination” by local personnel.</td>
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<tr>
<td>4. Creating programs and activities designed to reduce sex bias and sex stereotyping.</td>
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<td>5. Creating an awareness of the Title IX complaint process.</td>
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<td>6. Reviewing local vocational education programs for sex bias.</td>
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<tr>
<td>7. Improving vocational education opportunities for women.</td>
<td>1 2 3 4 5</td>
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<td>1 2 3 4 5</td>
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<tr>
<td>8. The implementing of goals to avoid sex stereotyping at the local level.</td>
<td>1 2 3 4 5</td>
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<tr>
<td>9. Translating local programs related to sex stereotyping to measurable product objectives.</td>
<td>1 2 3 4 5</td>
<td>0 1 2 3 4 5</td>
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<td>10. Translating local sex stereotyping programs to observable process objectives.</td>
<td>1 2 3 4 5</td>
<td>0 1 2 3 4 5</td>
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<td>11. Meeting the needs of the target populations relative to sex stereotyping.</td>
<td>1 2 3 4 5</td>
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<td>12. Gathering information about the needs of sex stereotyping target populations.</td>
<td>1 2 3 4 5</td>
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</tr>
<tr>
<td>13. Construction of facilities so that either sex can participate in any program.</td>
<td>1 2 3 4 5</td>
<td>0 1 2 3 4 5</td>
<td>1 2 3 4 5</td>
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</tbody>
</table>

15. Selecting representatives required for the Local Advisory Council from business, industry, and labor.

16. Selecting representatives required for the Local Advisory Council that make up an appropriate sample of both sexes and racial and ethnic minority groups.

17. Processing advice given by the Local Advisory Council on current job needs.

18. Processing advice given by the Local Advisory Council on the relevance of programs being offered by the school division in meeting current needs.

19. Signing procedure required in the local vocational plan.

20. Establish goals of your Local Advisory Council.

21. Translating programs suggested by the Local Advisory Council to measurable product objectives.

22. Translating of Local Advisory Council suggestions to observable process objectives.

23. Identifying the role of the Local Advisory Council in your Vocational Education Program.

24. Using advisory councils in your program areas.

25. Establishing the goals of your local program of Vocational Guidance and Counseling.

26. Supporting Vocational Guidance and Counseling programs, services, and activities.

27. Initiating, implementing or improving vocational guidance and counseling programs and activities.

28. Counseling for youth and adults, leading to a greater understanding of educational and vocational options.

29. Providing educational and job placement programs.

30. Providing of follow-up services for students.

31. Training designed to acquaint guidance counselors with the changing work patterns of women.

32. Training designed to acquaint guidance counselors with ways of overcoming occupational sex stereotyping.

33. Training designed to acquaint guidance counselors with ways of assisting girls and women in selecting careers solely on their occupational needs and interest.
<table>
<thead>
<tr>
<th></th>
<th>IMPORTANCE</th>
<th>ACTION TAKEN</th>
<th>IMPACT</th>
</tr>
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<td></td>
<td>Low</td>
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<tr>
<td>34.</td>
<td>Counseling for persons of limited English speaking ability.</td>
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<td>35.</td>
<td>Establishing vocational resource centers to meet the needs of out-of-school individuals.</td>
<td>1</td>
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<td>36.</td>
<td>Providing leadership for vocational guidance and exploration programs.</td>
<td>1</td>
<td>2</td>
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<td>37.</td>
<td>Translating of programs in Guidance Counseling to measurable.</td>
<td>1</td>
<td>2</td>
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<td>38.</td>
<td>Translating of Local Counseling Programs to observable process objectives.</td>
<td>1</td>
<td>2</td>
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<tr>
<td>39.</td>
<td>Meeting the needs of the identified target populations for Vocational Guidance and Counseling.</td>
<td>1</td>
<td>2</td>
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<td>40.</td>
<td>Estimating the procedures of future employment needs.</td>
<td>1</td>
<td>2</td>
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<tr>
<td>41.</td>
<td>Coordinating vocational guidance activities with the guidance activities of the local vocational teachers and other professional school staff.</td>
<td>1</td>
<td>2</td>
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<tr>
<td>42.</td>
<td>Developing a vocational guidance and occupational information program.</td>
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**THE ASSURANCES ON ADMINISTRATIVE AND FISCAL MATTERS**

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<td>43.</td>
<td>Demonstrating that consideration has been given to all education and training resources in the area including public, private, and parochial schools.</td>
<td>1</td>
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<tr>
<td>44.</td>
<td>Describing how and to what extent the programs proposed in the local plan will meet the vocational education needs of students in the community served</td>
<td>1</td>
<td>2</td>
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<tr>
<td>45.</td>
<td>Evaluating programs operated during the previous years that have been used to develop the program contained in the local plan.</td>
<td>1</td>
<td>2</td>
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<tr>
<td>46.</td>
<td>Proposing of activities in the local plan related to manpower programs established under C.E.T.A., to assure a coordinated approach to meeting the vocational education needs of the area or community</td>
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<td>2</td>
</tr>
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<td>47.</td>
<td>Relating between vocational education programs proposed and other programs in the area or community which are supported by state and local funds, if any.</td>
<td>1</td>
<td>2</td>
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<tr>
<td>48.</td>
<td>Financing assistance provided on approved regular programs of vocational education.</td>
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<td>2</td>
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<td>49.</td>
<td>Financing assistance provided on categorical activities for approved vocational education programs.</td>
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<td>50.</td>
<td>Financing assistance on Vocational Adult programs and courses.</td>
<td>1</td>
<td>2</td>
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<tr>
<td>51.</td>
<td>Financing assistance on adult supplements for vocational teachers.</td>
<td>1</td>
<td>2</td>
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### THE ASSURANCES ON ADMINISTRATIVE AND FISCAL MATTERS

#### 52. Financing assistance on equipment for vocational education programs.

#### 53. Financing assistance on construction of area vocational schools.

#### 54. Financing assistance on approved services and vocational education programs for disadvantaged and handicapped students.

#### 55. Accounting procedures to monitor federal funds paid to a local school division under the Vocational Amendments of 1976.

<table>
<thead>
<tr>
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<tr>
<td>Low</td>
<td>Action taken prior to 1976 Amendments</td>
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<td>0 1 1 2 3 4 5</td>
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<td>1 2 3 4 5</td>
<td>High</td>
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APPENDIX E

DOCUMENTATION ON SEX DISCRIMINATION/
SEX BIAS/SEX STEREOTYPING,
PROVISIONS, P.L. 94-482
RULES AND REGULATIONS RELATING TO SEX DISCRIMINATION/
SEX BIAS/SEX STEREOTYPING PROVISIONS
P.L. 94-482
EDUCATION AMENDMENTS OF 1976
TITLE II--VOCATIONAL EDUCATION
PART A--STATE VOCATIONAL EDUCATION PROGRAMS
PART 104--STATE VOCATIONAL EDUCATION PROGRAMS
Subpart 1--State Administration

SEC. 104.1 Scope

Part 104 contains regulations interpreting or implement-ning Part A of Title I of the Vocational Education Act of 1963, as amended by Title II of the Education Amend-ments of 1976, Pub. L. 94-482 (referred to as "the Act").

(Secs. 101 through 150, 195; 20 U.S.C. 2301.)

STATE BOARD
FULL-TIME PERSONNEL AND FUNCTIONS TO ELIMINATE SEX
DISCRIMINATION AND SEX STEREOTYPING

SEC. 104.71 Scope

Sections 104.72 through 104.76 apply only to the fifty States and the District of Columbia. (These sections do not apply to the Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, Northern Mariana Islands, or the Trust Territory of the Pacific Islands.)

(Sec. 104 (b) (3); 20 U.S.C. 2304.)

SEC. 104.72 Selection of full-time personnel to eliminate sex discrimination and sex stereotyping

(a) A State desiring to participate in the programs authorized by the Act shall select personnel to work full time to assist the State board in fulfilling the purposes of the act concerned with:

(1) Furnishing equal educational opportunities in vocational education programs to persons of both sexes; and
(2) Eliminating sex discrimination and sex stereotyping from all vocational education programs.

(Secs. 101 (3), 104 (b) (1); 20 U.S.C. 2301, 2304.)

(b) In selecting the full-time professional personnel, the State shall match the qualifications of the applicants with the responsibilities of the job.

(Implements Sec. 104 (b) (1); 20 U.S.C. 2304.)

SEC. 104.73 Definitions

The following definitions apply for the purposes of Sections 104.72 through 104.76 and throughout the Act and regulations.

(a) "Sex bias" means behaviors resulting from the assumption that one sex is superior to the other.

(b) "Sex stereotyping" means attributing behaviors, abilities, interests, values, and roles to a person or group of persons on the basis of their sex.

(c) "Sex discrimination" means any action which limits or denies a person or a group of persons opportunities, privileges, roles, or rewards on the basis of their sex.

(Implements Sec. 104 (b); 20 U.S.C. 2304.)

SEC. 104.74 Funds for full-time personnel and functions

(a) Each State shall expend not less than $50,000 in each fiscal year from funds available under basic grants (section 120 of the Act) to support the personnel working full time to carry out the functions set forth in Section 104.75.

(Secs. 104 (b) (2), 120 (b) (1) (F); 20 U.S.C. 2304, 2330.)

(b) Funds set aside under paragraph (a) of this section shall be used for:

(1) Salaries for full-time professional staff;

(2) Salaries for support staff; and

(3) Travel and other expenses directly related to the support of personnel in carrying out the functions set forth in Section 104.75.

(Implements Sec. 104 (b); 20 U.S.C. 2304.)
SEC. 104.75 Functions of full-time personnel

Personnel designated under Section 104.72 shall work full time to:
(a) Take action necessary to create awareness of programs and activities in vocational education designed to reduce sex bias and sex stereotyping in all vocational education programs, including assisting the State board in publicizing the public hearings on the State plan in accordance with Section 104.165 (a);
(b) Gather, analyze, and disseminate data on the status of men and women students and employees in vocational education programs of the State;
(c) Develop and support actions to correct problems brought to the attention of this personnel through activities carried out under paragraph (b) and Section 104.76, including creating awareness of Title IX complaint process;
(d) Review the distribution of grants and contracts by the State board to assure that the interests and needs of women are addressed in all projects assisted under this Act;
(e) Review all vocational education programs (including work-study programs, cooperative vocational education programs, apprenticeship programs, and the placement of students who have successfully completed vocational education programs) in the State for sex bias;
(f) Monitor the implementation of laws prohibiting sex discrimination in all hiring, firing, and promotion procedures within the State relating to vocational education;
(g) Assist local educational agencies and other interested parties in the State in improving vocational education opportunities for women; and
(h) Make available to the State board, the State advisory council, the National Advisory Council on Vocational Education, the State Commission on the Status of Women, the Commissioner, and the general public, including individuals and organizations in the State concerned about sex bias in vocational education, information developed under this section.

(Sec. 104 (b) (1); 20 U.S.C. 2304.)

(i) Review the self-evaluations required by Title IX; and

(Implements Sec. 104 (b) (1); 20 U.S.C. 2304.)
(j) Review and submit recommendations with respect to overcoming sex bias and sex stereotyping in vocational education programs for the five-year State plan and its annual program plan prior to their submission to the Commissioner for approval.

(Secs. 104 (b) (1), 109 (a) (3) (B); 20 U.S.C. 2304, 2309.)

SEC. 104.76 Studies to carry out functions.

A State may use funds available under section 130 of the Act to support studies necessary to carry out the functions set forth in Section 104.75.

(Implements Sec. 104 (b) (1); 20 U.S.C. 2304.)

STATE ADVISORY COUNCIL

SEC. 104.92 Membership

(a) Required representation. The membership of the State advisory council shall include one or more individuals who:

(17) Are women with backgrounds and experiences in employment and training programs, and who are knowledgeable with respect to the special experiences and problems of sex discrimination in job training, and employment, and of sex stereotyping in vocational education, including women who are members of minority groups having special knowledge of the problems of discrimination in job training and employment against women in minority groups;

(Sec. 105 (a); 20 U.S.C. 2305.)

(b) Special considerations. The appointing authority, pursuant to paragraph (a) of this section, shall insure that:

(3) There is appropriate representation of both sexes, racial and ethnic minorities, and the various geographic regions of the state. The Commissioner considers the term "appropriate representation" to be representation which generally reflects the percentage of women or minorities in the population of the State or the percentage of women or minorities in the work force of the State.

(Implements Sec. 105 (a); 20 U.S.C. 2305.)
SEC. 104.93 Functions and responsibilities

The State advisory council shall:
(c) Evaluate vocational education programs (including programs to overcome sex bias), services, and activities under the annual program plan, and publish and distribute the results thereof;

(Sec. 105 (d) (2); 20 U.S.C. 2305.)

LOCAL ADVISORY COUNCILS

SEC. 104.111 Establishment of local advisory councils

(d) Each eligible recipient shall establish a local advisory council which has an appropriate representation of both sexes and an appropriate representation of the racial and ethnic minorities found in the program areas, schools, community, or region which the local advisory council serves.

(Implements Sec. 105 (g) (1); 20 U.S.C. 2305.)

DEVELOPMENT OF FIVE-YEAR STATE PLAN

SEC. 104.171 Certification of plans

As used in this section, the term "plans" refers to the five-year State plan and the annual program plan and accountability report. The plans submitted shall include, as attachments, the following certifications:
(g) Certification by full-time personnel of opportunity to review the plans
The personnel assigned full time to review programs within the State to assure equal access to vocational education by both men and women shall certify that the opportunity to review the plan has been afforded.

(Implements Sec. 109 (a) (3) (B); 20 U.S.C. 2309.)

SEC. 104.187 Policies for eradicating sex discrimination

(a) The five-year State plan shall set forth a detailed description of policies and procedures which the State will follow to assure equal access to vocational education programs by both women and men.
This description shall include:
(1) Actions to be taken to overcome sex discrimination and sex stereotyping in all State and local vocational education programs;
(2) Incentive adopted by the State for eligible recipients to:
   (i) Encourage the enrollment of both women and men in nontraditional courses of study; and
   (ii) Develop model programs to reduce sex bias and sex stereotyping in training for and placement in all occupations.

(b) The five-year State plan shall set forth a program to assess and meet the needs of persons described in Section 104.621.
   This program shall include:
   (1) Special courses for these persons to learn how to seek employment; and
   (2) Placement services for these persons once they complete the vocational education program.

(Sec. 107 (b) (4); 20 U.S.C. 2307.)

DEVELOPMENT OF ANNUAL PROGRAM PLAN
AND ACCOUNTABILITY REPORT

SEC. 104.222 Content of annual program plans for the fiscal years following 1978

The plan shall contain:
(f) The results of the:
   (2) Compliance of the State plan with the provisions contained in Section 104.187 concerning providing equal access to programs by both men and women

(Implements Sec. 108 (b) (1); 20 U.S.C. 2308.)

APPROVAL OF FIVE-YEAR STATE PLAN AND ANNUAL PROGRAM PLAN AND ACCOUNTABILITY REPORT

SEC. 104.261 Conditions for approval of five-year State plan.

The Commissioner will not approve a five-year State plan until the Commissioner:
(d) Has received assurances that the full-time personnel assigned to review programs within the State to assure equal access by both men and women have been afforded the opportunity to review the five-year State plan;

(Sec. 109 (a) (3) (B); 20 U.S.C. 2309.)

SEC. 104.262 Conditions for approval of annual program plan and accountability report.

The Commissioner will not approve an annual program plan and accountability report until the Commissioner:
(e) Has received assurances that the full-time personnel assigned to review programs within the State to assure equal access by both men and women have been afforded the opportunity to review the annual program plan and accountability report

(Sec. 109 (a) (3) (B); 20 U.S.C. 2309.)

STATE EVALUATION

SEC. 104.402 Evaluation by State board

The State board shall, during the five-year period of the State plan, evaluate the quantitative terms the effectiveness of each formally organized program or project supported by Federal, State, and local funds. These evaluations shall be in terms of:
(d) The results of additional services, as measured by the suggested criteria under paragraphs (a) planning and operational process, (b) results of student achievement, and (c) results of student employment success of this section, that the State provides under the Act to these special populations:
(1) Women;
(2) Members of minority groups;
(3) Handicapped persons;
(4) Disadvantaged persons; and
(5) Persons of limited English-speaking ability.

(Implements Sec. 112 (b) (1); 20 U.S.C. 2312.)
Subpart 2--Basic Grant

GENERAL PURPOSES

SEC. 104.502 Use of funds under the basic grant.

(a) The State shall expend not less than $50,000 for each fiscal year from the funds available under the basic grant (section 120 of the Act) for the support of full-time personnel to perform the functions set forth in Sections 104.71 through 104.76.

(Sec. 104 (b), 120 (b) (1) (F); 20 U.S.C. 2304, 2330.)

(b) The State shall expend not less than an amount of funds it deems necessary for each fiscal year from the funds available under the basic grant (section 120 of the Act) for the special programs and placement services which are tailored to meet the needs of the group identified in Section 104.621 (Displaced Homemakers and Other Special Groups). The scope of these vocational education programs is described in Section 104.622.

(Sec. 107 (b) (4) (B); 20 U.S.C. 2307.)

(c) The State may use the balance of the funds available under the basic grant (section 120 of the Act), in accordance with the approved five-year State plan and annual program plan, for any of the following purposes:

(8) Industrial arts programs, described in Section 104.591.

(Sec. 120 (b); 20 U.S.C. 2330.)

VOCATIONAL EDUCATION PROGRAMS

SEC. 104.515 Apprenticeship programs

The five-year State plan may provide for related instruction for apprentices who are employed to learn skilled trades. If such programs of instruction are offered, the plan must set forth the following assurances:

(4) It provides equal access to both sexes.

(29 U.S.C. 50.)
INDUSTRIAL ARTS

SEC. 104.592 Industrial arts programs

Industrial arts education programs which may be funded under Section 104.591 are those industrial arts programs which are designed to meet the purposes of this Act (including the elimination of sex stereotyping)

(Sec. 195 (15); 20 U.S.C. 2461.)

SUPPORT SERVICES FOR WOMEN

SEC. 104.601 Use of funds

A State may use funds under its basic grant (section 120 of the Act), when included in its approved five-year State plan and annual program plan, for support services for women who enter vocational education programs designed to prepare individuals for employment in jobs which have been traditionally limited to men.

(Sec. 120 (b) (1) (J); 20 U.S.C. 2330.)

SEC. 104.602 Types of support services

Support services to be provided under Section 104.601 include:

(a) Counseling. Counseling women entering and enrolled in non-traditional programs on the nature of these programs and on the ways of overcoming the difficulties which may be encountered by women in these programs. Counselors may furnish supportive services to assist students in adjusting to the new employment requirements.

(Implements Sec. 120 (b) (1) (J); 20 U.S.C. 2330.)

(b) Job development. Programs and activities in the area of job development include the provision of materials and information concerning the world of work which present women students entering, enrolled in, or interested in nontraditional programs the options, opportunities, and range of jobs available in these nontraditional fields. Job development support services may also be carried out
through bringing persons employed in these nontraditional fields into the schools, as well as providing opportunities for women students to visit the work place of business and industry so as to afford them a clear understanding of the nature of the work, including an understanding of the work setting in which these jobs are performed.

(Implements Sec. 120 (b) (1) (J): 20 U.S.C. 2330; H.R. Rept. No. 94-1085, pp. 23-25.)

(c) Job follow-up support. Support services may be provided to assist women students in finding employment relevant to their training and interests. Follow-up services may be provided to assist students in the work force, and dealing with barriers which women face in working in these nontraditional areas.

(Implements Sec. 120 (b) (1) (J); 20 U.S.C. 2330.)

SEC. 104.603 Support to increase number of women instructors

In funding programs and activities of support services for women, funds may be used to increase the number of women instructors involved in the training of individuals in programs which have traditionally enrolled mostly males, so as to provide supportive examples for these women who are preparing for jobs in these nontraditional areas of employment.

(Implements Sec. 120 (b) (1) (J); 20 U.S.C. 2330; H.R. Rept. No. 1085, p. 24.)

VOCATIONAL EDUCATION PROGRAMS FOR DISPLACED HOMEMAKERS AND OTHER SPECIAL GROUPS

SEC. 104.621 Use of funds

A State shall use funds under its basic grant (section 120 of the Act) in accordance with its approved five-year State plan and annual program plan to provide vocational education programs for the following special groups:

(a) Persons who had been homemakers but who now, because of dissolution of marriage, must seek employment;
(b) Persons who are single heads of household and who lack adequate job skills;  
(c) Persons who are currently homemakers and part-time workers but who wish to secure a full-time job; and  
(d) Women who are now in jobs which have been traditionally considered jobs for females and who wish to seek employment in job areas which have not been traditionally considered as job areas for females, and men who are now in jobs which have been traditionally considered jobs for males and who wish to seek employment in job areas which have not been traditionally considered as job areas for males.

(Secs. 107 (b) (4) (B), 120 (b) (1) (L); 20 U.S.C. 2307, 2330.)

SEC. 104.622 Scope of programs

The State shall fund programs, in accordance with the policies and procedures described in its approved five-year State plan pursuant to Section 104.187 (b), to assess and meet the needs of the groups described in Section 104.621. These programs shall include:

(a) Organized educational programs necessary to prepare these special groups for employment, including the acquisition, maintenance and repair of instructional equipment;

(b) Special courses preparing these individuals in how to seek employment; and

(c) Provision of placement service for the graduate of these programs.

(Implements Sec. 120 (b) (1) (L); 20 U.S.C. 2330.)

Subpart 3--Program Improvement and Supportive Services

SEC. 104.701 Authorization of grants

A State shall use 20 percent of the funds allotted pursuant to section 102 (a) of the Act for any of the following purposes, except as provided in Section 104.762 (a):

(d) Grants to overcome sex bias and sex stereotyping described in Section 104.791

(Secs. 103 (e), 130; 20 U.S.C. 2303, 2350.)
SEC. 104.705 Use of funds for research programs

A research coordinating unit may use funds available under section 130 of the Act directly or by contract for:
(b) Experimental, developmental, and pilot programs and projects designed to test the effectiveness of research findings, including programs and projects to overcome problems of sex bias and sex stereotyping;
(c) Improved curriculum materials for presently funded programs in vocational education and new curriculum materials for new and emerging job fields, including a review and revision of any curricula developed under this section to insure that such curricula do not reflect stereotypes based on sex, race, or national origin

(Sec. 131 (a); 20 U.S.C. 2351.)

SEC. 104.706 Use of funds for exemplary and innovative programs

(b) Every contract made by a research coordinating unit for the purpose of funding exemplary and innovative projects shall:
(1) Give priority to programs and projects designed to reduce sex bias and sex stereotyping in vocational education

(Sec. 132 (b); 20 U.S.C. 2352.)

VOCATIONAL GUIDANCE AND COUNSELING

SEC. 104.763 Kinds of programs, services, and activities

Funds made available to a State under the vocational guidance and counseling program (section 134 of the Act) shall be used to support one or more of the following activities:
Guidance and counseling.
(d) Vocational guidance and counseling training designed to acquaint guidance counselors with (1) the changing work patterns of women, (2) ways of effectively
overcoming occupational sex stereotyping, and (3) ways of assisting girls and women in selecting careers solely on their occupational needs and interests, and to develop improved career counseling materials which are free

(Implements Sec. 134 (a); 20 U.S.C. 2354; Sen. Rept. No. 95-142.)

VOCATIONAL EDUCATION PERSONNEL TRAINING

SEC. 104.774 Types of training

Funds available to the State under section 130 of the Act may be used to support programs and projects designed to improve the qualifications of persons who are eligible under Section 104.773, including (but not limited to) the following:

(b) In-service training for vocational education teachers and other staff members, to improve the quality of instruction, supervision, and administration of vocational education programs, and to overcome sex bias and sex stereotyping in vocational education programs

(Sec. 135 (a); 20 U.S.C. 2355.)

GRANTS TO OVERCOME SEX BIAS AND SEX STEREOTYPING

SEX. 104.791 Purpose

The purpose of grants under Section 104.792 is to support activities which show promise of overcoming sex bias and sex stereotyping in vocational education.

(Sec. 130 (b) (6), 136; 20 U.S.C. 2350, 2356.)

SEC. 104.792 Conformity with five-year State plan

(a) A State may use funds available under section 130 of the Act to support grants to overcome sex bias and sex stereotyping in vocational education programs.

(Sec. 136; 20 U.S.C. 2356.)
(b) The expenditure of funds for this purpose shall be in accordance with the approved five-year State plan and annual program plan. The plans shall describe the types of projects to be funded.

(Sec. 130 (b); 20 U.S.C. 2350.)

SEC. 104.793 Types of projects

Funds may be used for projects such as:
(a) Research projects on ways to overcome sex bias and sex stereotyping in vocational educational programs;
(b) Development of curriculum materials free of sex stereotyping;
(c) Development of criteria for use in determining whether curriculum materials are free from sex stereotyping;
(d) Examination of current curriculum materials to assure that they are free of sex stereotyping; and
(e) Training to acquaint guidance counselors, administrators, and teachers with ways of effectively overcoming sex bias and sex stereotyping, especially in assisting persons in selecting careers according to their interests and occupational needs rather than according to stereotypes.

(Implements Sec. 136; 20 U.S.C. 2356.)

Subpart 5--Consumer and Homemaking Education

SEC. 104.904 Purpose of programs in consumer and homemaking education

A State shall set forth in the five-year State plan and annual program plan the programs in consumer and homemaking education which it intends to support. Funds available under section 150 of the Act shall only be provided to support ed-programs in consumer and homemaking education which:

(a) Encourage participation of both males and females to prepare for combining the roles of homemakers and wage earners;
(b) Encourage elimination of sex stereotyping by promoting the development of curriculum materials which deal with:
(1) Increased numbers of women working outside the home;
(2) Increased numbers of men assuming homemaking responsibilities;
(3) Changing career patterns of men and women; and
(4) Appropriate Federal and State laws relating to equal opportunity in education and employment

(Sec. 150 (b); 20 U.S.C. 2380.)

PART B--NATIONAL PROGRAMS

PART 105--COMMISSIONER'S DISCRETIONARY PROGRAMS OF VOCATIONAL EDUCATION

GENERAL

SEC. 105.1 Scope

Part 105 contains regulations interpreting or implementing Part B (entitled "National Programs") of Title I of the Vocational Education Act of 1963, as amended by section 202 of Title II of the Education Amendments of 1976, Pub. L. 94-482 (referred to as "the Act"). Part 105 also contains regulations interpreting or implementing the Commissioner's discretionary program of contracts with Indian tribes contained in section 103 (a) (1) (B) of the Act.

(Sec. 103 (a) (1) (B); Secs. 171 through 195; 20 U.S.C. 2303, 2401 et seq.)

Subpart 1--Program Improvement

SEC. 105.104 Authorized activities

(a) The Commissioner will support projects of national significance for improvement of vocational education. The projects include the following activities as authorized in sections 131 through 136 of the Act:
(6) Grants to assist in overcoming sex bias and sex stereotyping (section 136 of the Act)

(Secs. 131 through 136, 171 (a) (1): 20 U.S.C. 2351-56, 2401.)
SEC. 105.110 Technical review criteria

The following criteria will be used in reviewing applications. These criteria are consistent with 45 CFR 100a.26, Review of Applications, in the General Provisions for Office of Education Programs . . .

(h) Staff competencies and experience.
(4) Use of professional staff members from minorities or women;
(k) Sex bias and stereotyping. The application provides appropriate plans to eliminate sex bias and stereotyping in the proposed results, end products, and outcomes, and the proposed dissemination plans.

(Implements Sec. 171; 20 U.S.C. 2401.)

Subpart 33--Training and Development Programs for Vocational Education Personnel

VOCATIONAL EDUCATION CERTIFICATION FELLOWSHIP PROGRAM

SEC. 105.443 Technical review criteria

The Commissioner will use the following criteria in reviewing formally transmitted applications.
(e) National need. The applicant describes in writing his or her goals, objectives, and aspirations in vocational education and their relationship to national needs in vocational education with particular reference to the elimination of sex stereotyping and working with the following populations: (1) Disadvantaged persons; (2) Members of minority groups; and (3) Handicapped persons.

(H.R. Rept. No. 94-1085, p. 55.)

Subpart 4--Emergency Assistance for Remodeling and Renovating of Vocational Education Facilities

SEC. 105.502 Content of applications

An application for a grant or assistance contract shall set forth:
(c) A description of the extent to which the modernization or conversion of facilities and equipment will be consistent with, and further the goals of, the five-year State plan, including the elimination of sex and racial bias and sex stereotyping in vocational education programs.

(Implements Sec. 193 (a) (1)-(4); 20 U.S.C. 2443.)
MAJOR SEX DISCRIMINATION/SEX BIAS/SEX STEREOTYPING PROVISIONS
P.L. 94-482

EDUCATION AMENDMENTS OF 1976
TITLE II--VOCATIONAL EDUCATION

(References Verbatim from Legislation)

PART A--STATE VOCATIONAL EDUCATION PROGRAMS

DECLARATION OF PURPOSE

1. SEC. 101 (3); (20 USC 2301.), 90 STAT. 2169.

SEC. 101. It is the purpose of this part to assist States in improving planning in the use of all resources available to them for vocational education and manpower training by involving a wide range of agencies and individuals concerned with education and training within the State in the development of the vocational education plans. It is also the purpose of this part to authorize Federal grants to States to assist them--

(3) to develop and carry out such programs of vocational education within each State so as to overcome sex discrimination and sex stereotyping in vocational education programs (including programs of homemaking), and thereby furnish equal educational opportunities in vocational education to persons of both sexes.

Subpart 1--General Provisions

STATE ADMINISTRATION

2. SEC. 104 (b) (1), (A) through (I), and (2); (20 USC 2304.), 90 STAT. 2173
SEC. 104 (b) (1) Any State desiring to participate in the programs authorized by this Act shall also assign such full-time personnel as may be necessary to assist the State board in fulfilling the purposes of this Act by--

(A) taking such action as may be necessary to create awareness of programs and activities in vocational education that are designed to reduce sex stereotyping in all vocational education programs;

(B) gathering, analyzing, and disseminating data on the status of men and women, students and employees in the vocational education programs of that State;

(C) developing and supporting actions to correct any problems brought to the attention of such personnel through activities carried out under clause (b) of this sentence;

(D) reviewing the distribution of grants by the State board to assure that the interests and needs of women are addressed in the projects assisted under this Act;

(E) reviewing all vocational education programs in the State for sex bias;

(F) monitoring the implementation of laws prohibiting sex discrimination in all hiring, firing, and promotion procedures within the State relating to vocational education;

(G) reviewing and submitting recommendations with respect to the overcoming of sex stereotyping and sex bias in vocational education programs for the annual program plan and report;

(H) assisting local educational agencies and other interested parties in the State in improving vocational education opportunities for women; and

(I) making readily available to the State board, the State and National Advisory Councils on Vocational Education, the State Commission on the Status of Women, the Commissioner and the general public, information, developed pursuant to this subsection.

SEC. 104 (b) (2); (20 USC 2304.), 90 STAT. 2173.

(2) From the funds appropriated to carry out subpart 2, each State shall reserve $50,000 in each fiscal year to carry out this subsection.
STATE AND LOCAL ADVISORY COUNCILS

3. SEC. 105 (a) (17); (20 USC 2305, 29 USC 817.), 90 STAT. 2174-2175.

SEC. 105 (a) Any State which desires to participate in programs under this Act for any fiscal year shall establish a State advisory council, which shall be appointed by the Governor or, in the case of States in which the members of the State board of education are elected (including election by the State legislature), by such board. Members of each State advisory council shall be appointed for terms of three years except that (1) in the case of the members appointed for fiscal year 1978, one-third of the membership shall be appointed for terms of one year each and one-third shall be appointed for terms of two years each, and (2) appointments to fill vacancies shall be for such terms as remain unexpired. Each State advisory council shall have as a majority of its members persons who are not educators or administrators in the field of education and shall include as members one or more individuals who--

(17) are women with backgrounds and experiences in employment and training programs, and who are knowledgeable with respect to the special experiences and problems of sex discrimination in job training and employment and of sex stereotyping in vocational education, including women who are members of minority groups and who have, in addition to such backgrounds and experiences, special knowledge of the problems of discrimination in job training and employment against women who are members of such groups.

4. SEC. 107 (b) (4) (A) i, ii, iii, I & II, and (b); (20 USC 2307.), 90STAT. 2180-2181.

SEC. 107 (b) The five-year State plans shall be submitted to the Commissioner by the July 1st preceding the beginning of the first fiscal year for which such plan is to take effect and shall--

(4) (A) set forth policies and procedures which the State will follow so as to assure equal access to vocational education programs by both women and men including--

(i) a detailed description of such policies and procedures,
(ii) actions to be taken to overcome sex discrimination and sex stereotyping in all State and local vocational education programs, and

(iii) incentives, to be provided to eligible recipients so that such recipients will--
(I) encourage the enrollment of both women and men in nontraditional courses of study; and
(II) develop model programs to reduce sex stereotyping in all occupations.

(B) set forth a program to assess and meet the needs of persons described in section 120 (b) (1) (L) which shall provide for (i) special courses for such persons in learning how to seek employment and (ii) guidance placement services for such graduates of vocational education programs and courses.

ANNUAL PROGRAM PLANS AND ACCOUNTABILITY REPORTS

5. SEC. 108 (b) (1) (C) ii; (20 USC 2308.), 90 STAT. 2182.

SEC. 108 (b) The annual program plan and accountability report shall be submitted to the Commissioner by the July 1st preceding the beginning of the fiscal year for which the plan is to be effective. This plan and report shall contain:

(1) planning provisions which
(C) show the results of the--
(ii) compliance of the State plan with the provision contained in section 107 (b)
(4) (A) concerning providing equal access to programs by both men and women.

SUBMISSION OF PLANS; WITHHOLDING AND JUDICIAL REVIEW

6. SEC. 109 (B); (20 USC 2309.), 90 STAT. 2183.

SEC. 109 (b) In carrying out the provisions of this subsection, the Commissioner shall not approve a State plan or annual program plan and report until
he has received assurances that the personnel assigned to review programs within the State to assure equal access by both men and women under the provisions of section 104 (b) have been afforded the opportunity to review the plan or program plan and report.

PART A

Subpart 2--Basic Grant

AUTHORIZATION OF GRANTS AND USES OF FUNDS

7. SEC. 120 (b) (1) (J), (L) i, ii, iii, iv; (20 USC 2330.), 90 STAT. 2187-2188.

SEC. 120 (b) (1) Grants to States under this subpart may be used, in accordance with five-year State plans and annual program plans approved pursuant to section 109, for the following purposes:

(J) support services for women who enter programs designed to prepare individuals for employment in jobs which have been traditionally limited to men, including counseling as to the nature of such programs and the difficulties which may be encountered by women in such programs, and job development and job followup services.

(L) vocational education for--

(i) persons who had solely been homemakers but who now, because of dissolution of marriage, must seek employment;

(ii) persons who are single heads of households and who lack adequate job skills;

(iii) persons who are currently homemakers and part-time workers but who wish to secure a full-time job; and

(iv) women who are now in jobs which have been traditionally considered jobs for females and who wish to seek employment in job areas which have not been traditionally considered job areas for females, and men who are now in jobs which have been traditionally considered jobs for males and who wish to seek employment in job areas which have not been traditionally considered job areas for males.
PART A

Subpart 3--Program Improvement and Supportive Services

AUTHORIZATION OF GRANTS AND USES OF FUNDS

8. SEC. 130 (b) (6); (20 USC 2350.), 90 STAT. 2191.
   (b) Grants to States under this subpart may be used, in accordance with five-year State plans, and annual program plans approved pursuant to section 109, for the following purposes:
   (6) grants to overcome sex bias as described in section 136.

RESEARCH

SEC. 131 (a) (2) (3); (20 USC 2351.), 90 STAT. 2191-2192.

SEC. 131 (a) Funds available to the States under section 130 (a) may be used for support of State research coordination units and for contracts by those units pursuant to comprehensive plans of program improvement involving--
   (2) experimental, developmental, and pilot programs and projects designed to test the effectiveness of research findings, including programs and projects to overcome problems of sex bias and sex stereotyping;
   (3) improved curriculum materials for presently funded programs in vocational education and new curriculum materials for new and emerging job fields, including a review and revision of any curricula developed under this section to insure that such curricula do not reflect stereotypes based on sex, race, or national origin.
EXEMPLARY AND INNOVATIVE PROGRAMS

9. SEC. 132 (b); (20 USC 2352.), 90 STAT. 2193.

(b) Every contract made by a State for the purpose of funding exemplary and innovative projects shall give priority to programs and projects designed to reduce sex stereotyping in vocational education and shall, to the extent consistent with the number of students enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which the program or project involved is to meet, provide for the participation of such students; and such contract shall also provide that the Federal funds will not be commingled with State or local funds.

CURRICULUM DEVELOPMENT

10. SEC. 133 (a) (2); (20 USC 2353.), 90 STAT. 2193.

SEC. 133 (a) Funds available to the States under section 130 (a) may be used for contracts for the support of curriculum development projects, including--

(2) the development of curriculum and guidance and testing materials designed to overcome sex bias in vocational education programs, and support services designed to enable teachers to meet the needs of individuals enrolled in vocational education programs traditionally limited to members of the opposite sex.

VOCATIONAL GUIDANCE AND COUNSELING

11. SEC. 134 (a) (4); (20 USC 2354.), 90 STAT. 2193-2194.

SEC. 134 (a) Not less than 20 per centum of the funds available to the States under section 130 (a) shall be used to support programs for vocational development guidance and counseling programs and services which, subject to the provisions of subsection (b), shall include--
(4) vocational guidance and counseling training designed to acquaint guidance counselors with (A) the changing work patterns of women, (B) ways of effectively overcoming occupational sex stereotyping, and (C) ways of assisting girls and women in selecting careers solely on their occupational needs and interests, and to develop improved career counseling materials which are free.

VOCATIONAL EDUCATION PERSONNEL TRAINING

12. SEC. 135 (a) (2); (20 USC 2355.), 90 STAT. 2194.

SEC. 135 (a) Funds available to the States under section 130 (a) may be used to support programs or projects designed to improve the qualifications of persons serving or preparing to serve in vocational education programs, including teachers, administrators, supervisors, and vocational guidance and counseling personnel, including programs or projects—

(2) which provide in-service training for vocational education teachers and other staff members, to improve the quality of instruction, supervision, and administration of vocational education programs, and to overcome sex bias in vocational education programs.

GRANTS TO ASSIST IN OVERCOMING SEX BIAS

13. SEC. 136; (20 USC 2356.), 90 STAT. 2195.

SEC. 136. Funds available to the States under section 130 (a) may be used to support activities which show promise of overcoming sex stereotyping and bias in vocational education.
PART A

Subpart 5--Consumer and Homemaking Education

CONSUMER AND HOMEMAKING EDUCATION

14. SEC. 150 (b) (B), (E); (20 USC 2380.), 90 STAT. 2196.

(b) Grants to States under this subpart may be used, in accordance with five-year State plans and annual program plans approved pursuant to section 109, solely for (1) educational programs in consumer and homemaking education consisting of instructional programs, services, and activities at all educational levels for the occupations of homemaking including but not limited to, consumer education, food and nutrition, family living and home management (including resource management), and clothing and textiles which encourage elimination of sex stereotyping in consumer and homemaking education by promoting the development of curriculum materials which deal (i) with increased numbers of women working outside the home, and increased numbers of men assuming homemaking responsibilities and the changing career patterns for women and men and (ii) with appropriate Federal and State laws relating to equal opportunity in education and employment.

(E) prepare males and females who have entered or are preparing to enter the work of the home.

PART B--NATIONAL PROGRAMS

Subpart 1--General Provisions

NATIONAL ADVISORY COUNCIL ON VOCATIONAL EDUCATION

15. SEC. 162 (a) (6); (20 USC 2392, 951.), 90 STAT. 2199.

SEC. 162 (a) The National Advisory Council on Vocational Education, established pursuant to section
104 (a) of the Vocational Education Act of 1963, in effect prior to the enactment of the Education Amendments of 1976, shall continue to exist during the period for which appropriations are authorized under this Act. Individuals who are members of the Council on the date of the enactment of this Act may continue to serve for the terms for which they were appointed. Members appointed to succeed such individuals shall be appointed by the President for terms of three years. The Council shall consist of twenty-one members, each of whom shall be designated as representing one of the categories set forth in the following sentence. The National Advisory Council shall include individuals--

(6) who are women with backgrounds and experiences in employment and training programs, who are knowledgeable with respect to problems of sex discrimination in job training and in employment, including women who are members of minority groups and who have, in addition to such backgrounds and experiences, special knowledge of the problems of discrimination in job training and employment against women who are members of such groups.
APPENDIX F

LEGISLATIVE ANALYSIS
May 14, 1976  S. 2657--Introduced by Mr. Pell; referred to Committee on Labor and Public Welfare. Reported (S. Rep. 882)

May 17, 1976  Cosponsors added

Aug. 25-27, 1976  Debated

Aug. 27, 1976  Amended and passed Senate

Aug. 31, 1976  Passed House amended

Aug. 31, 1976  House insisted on its amendment and asked for a conference; conferees appointed

Sept. 15, 1976  Senate disagreed to House amendments and agreed to a conference; conferees appointed


Sept. 28, 1976  Conference report filed in Senate and agreed to

Sept. 29, 1976  House agreed to conference report

Oct. 1, 1976  Examined and signed

Oct. 1, 1976  Presented to the President

Oct. 12, 1976  Approved (Pub. L. No. 482)

H.R. 12835, 94th Cong., 2d Sess. (S. 2657 passed in lieu)

Mar. 29, 1976  H.R. 12835--Introduced by Mr. Perkins et al., referred to Committee on Education and Labor

May 4, 1976  Reported with amendment (H.R. Rep. 1085)

May 6, 1976  Made special order (H.R. Res. 1179)

May 11, 1976  Debated
### H.R. 12835, 94th Cong., 2d Sess. (Continued)

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**H.R. 12851, 94th Cong., 2d Sess.**
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**H.R. 14070, 94th Cong., 2d Sess.**
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**Hearings:**


KF26.L343 1976

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APPENDIX G

VIRGINIA RURAL, SUBURBAN, AND URBAN SCHOOL DIVISIONS
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The two page vita has been removed from the scanned document. Page 2 of 2
EFFECT OF A FEDERAL LAW ON STATE POLICY PROCESS AND ON LOCAL IMPLEMENTATION

by

Ralph W. Johnson

(ABSTRACT)

This study described the state policy-making process as it was affected by the impact of the 1976 Federal Vocational Amendments.

The roles of the state level actors were investigated in order to explain the process by which policy was developed. The impact on the local division was analyzed in terms of importance, action taken, and impact as these related to the issues of Sex Stereotyping, Local Advisory Council, Vocational Guidance, and the Assurances on Administrative and Fiscal Matters. The data were first viewed in aggregation and then as perceived by type of respondent, as well as by size, type, and geographical region of the school division.

The major findings of the study were:

1. That the policy-making process at the state level was a complex array of assignments, committees, state officers, and staff.
2. The State Plan and Accountability Report Committee was the most influential actor in the policy process with the State Advisory Council placing second in importance.

3. In terms of prior action before the 1976 Vocational Amendments, little had taken place at the local level.

4. In terms of impact, the 1976 Vocational Amendments had only a moderately low to moderate effect on school organizations as reported by Superintendents and Vocational Directors.

5. As reported by respondents, school division size, type, and geographic region, only the issue of Sex Stereotyping produced an adjudged difference in impact.

6. Partial correlations across the relationships of importance to impact, importance to action taken, and action taken to impact revealed moderate to low relationships.

7. The conclusions of this investigation were, at the state level, that the development of the Five-Year Plan for Vocational Education was carried out with very few changes from the draft that was formulated by the State Plan and Accountability Report Committee. and that the State Plan and Accountability Report Committee played a unique and important role in the policy process. At the lowest
level, the 1976 Vocational Amendments required the local divisions to focus attention and resources on the selected issues. Although the Amendments required the school divisions to take action, only a moderate effect had been reported by the localities on their school division organization.

At the local level, the 1976 Vocational Amendments required the local divisions to focus attention and resources on the selected issues. Although the Amendments required the school divisions to take action, only a moderate effect had been reported by the localities on their school division organization.