THE CONGRESSIONAL INTENT, IMPLEMENTATION AND
UTILIZATION OF SECTION 202(d) LINKAGE FUNDS OF THE
COMPREHENSIVE
EMPLOYMENT AND TRAINING ACT AS AMENDED IN 1978

by

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CHAPTER I

The Problem

In 1978 Congress amended the Comprehensive Employment and Training Act (CETA) to include, among other things, Section 202(d) which provided funds to the governors to encourage coordination and establish linkages between CETA and educational agencies and institutions. The purposes of this study were to examine the Congressional intent behind Section 202(d) of the Comprehensive Employment and Training Act (CETA) of 1978, to trace the procedures used to implement Section 202(d) of CETA, to identify and codify Section 202(d) activities, and to make recommendations regarding the future of Section 202(d). This chapter of the study was designed to (a) introduce the problem, (b) provide background for the problem, (c) identify the research problem, (d) state the need for the study, (e) define the assumptions and limitations imposed on the study, (f) define appropriate terminology, and (g) provide an overview for the remainder of the study.
Introduction

Economists studied the investment in human capital approximately twenty years ago when they realized that higher earnings were associated with "higher levels of education, greater amounts of on-the-job-training, ... improved knowledge of the labor market, and greater training in vocational skills" (Borus, 1980, p. 26). Recognizing that training was a sound investment, a variety of delivery systems and forms of training emerged including vocational education and government-sponsored employment and training programs.

Vocational education, as part of the public education system, is headed by the United States Department of Education (DOE). Vocational education currently serves approximately 17.2 million Americans and encompasses preparation for more than 400 occupations. Federal, state, and local support for vocational education exceeded $0.5 billion in FY 1979, with almost $6 billion of the support coming from state and local sources (American Vocational Association (AVA) Fact Sheet, 1980).

Government-sponsored employment and training programs are headed by the United States Department of Labor (DOL) and are aimed toward the unemployed, underemployed, and economically disadvantaged. During FY 1979, the Comprehensive
Employment and Training Act (CETA) provided $9.4 billion in Federal funds to more than 4 million persons (U.S. Department of Labor, Employment and Training Report to the President, 1979, p. 19). No state or local funds were required for CETA operation.

The CETA legislation has provisions which encourage linkage between CETA and the public school system. However, a problem exists because the two superstructures have different administrations, statutory authorities, political constituencies, institutional histories, program objectives, and client groups. Thus, the various mandates for linkage have produced few results. Coleman and Wurzburg (1979) cited that there was a "... lack of mechanisms to facilitate the process of, or of incentives sufficient to overcome the obstacles to cooperate" (p. iii).

On a broader scope, the legislative process of mandating linkage between the two systems is often overlooked.

The federal and state administrators, who ultimately implement and administer the legislation, often do not fully understand the Congressional intent. Thus, the implementation process and the activities necessary to succeed in achieving goals fail. Too often programs adhere to the letter of the law but fail to identify and adhere to the spirit.
Background of the Problem

Training programs have been a part of American history during all of its existence. When one views the entire spectrum of training programs available through the several public, private, and proprietary institutions, one finds a rich variety of programs at all levels. This section will present the background of the various training programs legislated by the Federal government and emphasize the changing strategies policy makers have attempted to use over the years to coordinate these programs. Elements of this section include programs and strategies prior to the enactment of CETA, CETA as first enacted, and CETA since 1977.

Pre-CETA. Private and proprietary schools emerged in the early history of America as factories grew and industry realized the need for trained workers. Private apprenticeship training and trade schools flourished and even today are considered a significant component in the delivery system of occupational training. The categorization of such institutions include independent as well as the profit making, or proprietary, varieties (Gilli, 1976). The private and proprietary schools are conducted as business enterprises and are not directly affiliated with the public delivery systems of occupational training.
Public training programs, as part of the public schools, can appropriately be tied to the 1917 Smith-Hughes legislation which established vocational education as a part of public education. When the Smith-Hughes bill was introduced into Congress, the House report in February, 1916, deplored the drop-out rate in the schools. "Not only did students leave without an adequate general education, but they also had no special training to fit them for work" (American Vocational Journal, 1976, p. 56). Further it was noted that vocational education courses in the public schools could attract and hold students because students would be able to obtain suitable preparation for useful employment.

During World War II, industry and public training programs cooperated in war production training. Through the National Defense Training Program, vocational education was a medium through which millions of untrained workers were fitted for industries devoted to the war effort. Following the war, the nation began to experience new problems. While the economy flourished, changes in the economic structure made it difficult for unskilled workers and disadvantaged youth to secure employment. A solution to the problem emerged in the form of Federal job training programs.
Between 1961 and 1973 the majority of Federal job training funds were distributed under three major legislative statutes: (a) the Manpower Development and Training Act (MDTA) of 1962; (b) the Vocational Education Act (VEA) of 1963, with amendments; and (c) the Economic Opportunity Act (EOA) of 1964. All focused on the economically and socially disadvantaged; all stressed on-the-job training and work experience over classroom training; and all placed high priority on short duration enrollments (Wilken & Brown, 1981). From 1961 to 1970, Federal funds for job training programs and related services increased from an annual rate of less than $250 million to about $4 billion (Wilken & Brown, 1981).

Control over these programs was lead by three rival coalitions. One was the Department of Labor, who operated the Manpower Development and Training Act programs. Another, the Office of Economic Opportunity (OEO), worked primarily on behalf of local anti-poverty organizations and minority groups and operated the Economic Opportunity Act (EOA) of 1964. A third, the Department of Health, Education, and Welfare (HEW), focused on the concerns of vocational education and state and local public educational agencies.
Coordination among these agencies was frequently discussed but little was accomplished. As early as 1964 a President's Commission on Manpower, under the direction of Labor Secretary Willard Wirtz, attempted to explore problems and try to integrate local manpower efforts. Not surprisingly, the task force found coordination was needed but after some limited successes, efforts were curtailed (Davidson, 1972; Ruttenburg, 1970; Mangum, 1969).

Another attempt at coordination was the Concentrated Employment Program (CEP) of 1967. The purpose of CEP was to coordinate the delivery of manpower services from a singular administration structure. From the beginning CEP was plagued by jurisdictional conflicts. Subsequent legislation to mandate coordination only led to administrative complexities (Davidson, 1972, p. 6). Also in 1967 a hierarchy of local and state interagency committees, called CAMPS (Cooperative Area Manpower Planning System), was introduced to provide more consistent planning for manpower programs (Ruttenberg, 1970; Mangum, 1969). Because CAMPS only brought agencies together but had no authority over allocating funds, discussions were little more than academic exercises (Davidson, 1972).

The decade of the 60's ended with a variety of programs designed to serve the disadvantaged. Unemployment and pov-
erty remained despite the different programmatic solutions. Some 17 separate programs were authorized to offer manpower services; each program had a separate administration, rules and regulations, and each strived to serve essentially the same individuals (Drewes, 1980, Davidson, 1972). Duplication was rampant. Adult Basic Education (ABE) was available from eleven different grant programs; pre-vocational and skill training from ten, and on-the-job training from five (Davidson, 1972). As a result, there emerged a bureaucratic nightmare consisting of various reporting systems, a general inability to structure manpower programs to meet local needs, a lack of coordination of program operators, and an inability to assess the effectiveness of programs (Drewes, 1980, p. 35). Bringing order to the chaos would be difficult; however, this frustrating history of manpower legislation highlighted the inner workings of manpower policy-making and also illustrated the need to repair the administrative structure and diffuse the political pluralism which had been created.

CETA as First Enacted. The organization debate leading to CETA brought many divergent interests who had important roles in manpower services to the forefront. Of all the interests that had an important role, education was the only one that did not fully assert itself in the debates (Wilken
S. Brown, 1981). The U.S. Office of Education participated in the debate. However, the improvement of job training programs was a low priority (Davidson, 1972). While many vocational educators feared that the new legislation would foster a dual school system, the professional organization of vocational education, the American Vocational Association (AVA), did not oppose the passage of CETA (Davidson, 1972). HEW Secretary, Elliott Richardson, declared that the bill would "...assist the department to make vocational education more effective in meeting the manpower needs of our nation" (U.S. Congressional Record-House, November 17, 1970, p. 37664).

The underlying objective of CETA was to create a framework that could coordinate all manpower services including education. The structural revision passed in CETA provided the concept of allowing local areas to identify and solve their own employment and training needs through local agents called prime sponsors. A prime sponsor was defined as any state or city, county, or combination of local units with a 100,000 or more population base.

While CETA replaced the structure of Federal manpower programming, the basic forms of training were not altered (Ginzberg, 1980). Under CETA persons were provided with job search assistance, institutional skill training, on-the-job
training, and work experience. However, the providers of training were changed. Under MDTA, skill training was provided by local vocational education agencies, primarily vocational secondary schools (Ginzberg, 1980). While some CETA training was provided through the local schools, CETA allowed prime sponsors to organize training programs outside the regular school system. Institutional and political factors contributed to the extent and nature of vocational education's participation in CETA programs.

To qualify for CETA funding, state and local prime sponsors had to comply with a wide range of procedural checks and balances, many of which were aimed at the problem of education-manpower coordination. Some of the important procedures included:

A five percent set-aside of Title I funding to assist state vocational education agencies "to provide needed vocational education services in areas served by prime sponsors" (CETA, 1973, sec. 112(a))

A four percent set-aside of Title I funding to assist governors in developing comprehensive plans which "provide for the cooperation and participation of all state agencies providing manpower and manpower-related services" (CETA, 1973, sec. 106(b) (3))

A requirement holding all prime sponsor responsible for utilizing state vocational education agencies, local schools, and postsecondary educational institutions "after giving due consideration to the effectiveness of such services and facilities" (CETA, 1973, sec. 105(a) (3) (3))
A reciprocal exchange of representatives between the State Manpower Services Council (SMSC) and the State Advisory Council on Vocational Education (SACVE) (CETA, 1973, sec. 107)

Mutual review of annual state plans by the SMSC and the SACVE (CETA, 1973, sec. 107)

Inclusion of education interests in each prime sponsor's planning council (CETA, 1973, sec. 104). Thus, the only assured training role vocational education had was in the special five percent set-aside. While many educators saw this set-aside as "...proof of legislative commitment to utilization of state vocational education facilities and accumulated expertise in the design and delivery of CETA training services" (Manpower Demonstration Research Corporation, Inc., 1977, p. 53), other educators saw this as "...a direct threat to their authority as it denied them the right to control the use of funds . . . ." (Wilken & Brown, 1981, p. 7). Many CETA professionals viewed this set aside as a "... national political concession to the vocational education system . . . ." (Manpower Demonstration Research Corporation, Inc., 1977, p. 53).

This belief caused many prime sponsors to ignore vocational education training facility capabilities (Wilken & Brown, 1981). In addition, while CETA encouraged educational interests on planning councils, school officials frequently found they were ignored or excluded (American Institutes for Research, 1980, p. 35).
As part of the five percent set-aside, CETA and vocational education had to negotiate a non-financial agreement with the State Board of Vocational Education which specified both the type of services and the manner in which services could be provided. By 1977, these special monies continued to be a source of frequent conflict among CETA and vocational education administrators (Manpower Demonstration Research Corporation, Inc., 1977). The negotiation of non-financial agreements was difficult (Manpower Demonstration Research Corporation, Inc., 1977, p. 59).

CETA Since 1977. Congress recognized that cooperation between CETA and the educational communities was critical to the success of any effort to reduce youth unemployment (Wilken & Brown, 1981). New youth legislation in 1977, the Youth Employment and Demonstration Project's Act (YEDPA) contained requirements for closer programmatic relationships between CETA and vocational education. As part of YEDPA, the Youth Employment and Training Programs (YETP) subordinates the education linkage objective to a cooperative service agreement between CETA and the public schools. YETP serves unemployed youth between the ages of 14 and 21 and requires the local sponsors to use at least 22 percent of all revenues derived from YETP for in-school youth.
Under continuing pressure from the education community, Congress in the 1978 CETA reauthorization increased the vocational education set-aside from 5 percent to six percent (CETA, 1978, sec. 202(a)(1)(C)(d)). Additionally, a new set-aside which gave governor's one percent of Title II (Parts, A, B, C, and D) funding for "... encouraging coordination and establishing linkages between prime sponsors and appropriate educational agencies ...") (CETA, 1978, sec. 202(a)(1)(C)(d)).

The challenge as seen by Congress was to improve linkages at the local level among government and education. The increases in the education set-asides provided by YEDPA and CETA in 1977 and 1978 had increased the value of CETA's mandated educational set-asides from $94 to $269 million or almost 200 percent (Wilken & Brown, 1981, pp. 10-11). The MDTA skill training precedent coupled with the YEDPA set-aside requirements had not been sufficient linkage incentive to meet the challenge. Thus, the Section 202(d) approach was adopted.

The Research Problem

This research will use a systems approach to investigate the effects of Section 202(d). Specifically, this approach will seek to identify policy issues and resultant
practices prompted by Section 202(d). The outcome of this research will be a comprehensive statement of (a) the Congressional intent regarding the utilization of these funds; (b) the interpretation of the intent as evidenced in guideline issues regarding the utilization of the funds by the DOL and its ten Regional Administrators; (c) the actual implementation of the funds as evidenced in the public reports issued by the Governor and/or State Employment and Training Councils for each of the 50 states; and (d) conclusions and recommendations of the above findings.

The Congress of the United States wrote, passed, and funded legislation to encourage linkages between two primary deliverers of employment and training services. With Section 202(d), CETA and educational agencies were provided with incentives to coordinate and cooperate. The activities associated with these efforts have become known as linkage activities.

Section 202(d) authorized funding of $44,310,300 for FY 1979 and $35,562,019 for FY 1980. Section 202(d) explicitly required that CETA as administered through locally based prime sponsors plan and conduct activities designed to link CETA and educational agencies. Clearly a nationally based signal was given that linkage was important. To that end, four important research questions emerged.
1. What was the Congressional intent of Section 202(d)?

2. What process was used to transfer a nationally based intent for CETA linkage with educational agencies into practice?

3. What uses were made of the linkage funds?

4. Should the same or other legislative approaches be used to encourage linkage in the future?

Statement of Need

There are few who would argue for duplication of tax supported employment and training activities. Most everyone would agree that tax supported employment and training programs should be delivered in a manner that provides quality services to eligible clients. Further, most everyone supports efficiency and effectiveness of tax supported services. And lastly, everyone concerned would like to see maximum return for their tax investments. Section 202(d) align with these arguments. This study, both implicitly and explicitly, align with these same basic arguments.

The magnitude of funding, almost $80 million dollars, dictated that a serious review of the intent, process for implementation, and uses made of funds be conducted for accountability purposes. Moreover, investigations and anal-
ysis should be helpful in making wise decisions related to improvement or discontinuance of linkage legislation. No other major research effort has been undertaken in this regard.

This study also served to collect, for the first time, state based plans; state based reports; and state based examples of linkage activities. This data base, as it were, provided the most comprehensive record of CETA and education agency linkage heretofore available. The value of these data elements for local replication goes far beyond comprehension.

**Assumptions of the Study**

The study reflects that legislation is often a series of compromises and that the CETA legislation as legislated into law in 1973 represented a major compromise. Nevertheless, a major assumption of this study was that the final form of the legislation was the primary basis for interpreting Congressional intent.

In addition, this study did not attempt to identify or speculate upon the intent of the various individuals involved in the passage of the legislation or in the implementation process, but rather reviewed literature and documents available to the general public. The purpose was not
to uncover any obscure use or intentions of use of the monies.

**Limitations of the Study**

The legislative provisions of CETA allocated funds to the fifty states and the territories of American Samoa, Guam, Pacific Islands, and Northern Marianas, Puerto Rico, Virgin Islands, and the District of Columbia. This study deals with the issue of coordination between the two public systems of training—vocational education delivered by local public schools and the Federal employment and training system. As the educational system under the localities other than the fifty United States cannot be clearly defined, this study limited the survey portion to the fifty states.

Another limitation was based in the variety of quantity and quality of data provided by the states. No common format for reporting was available, and to that end state plans, state reports, and examples of linkage activities varied. Therefore, certain interpretations were subject to the inherent differences in the data documents.
**Definition of Terms**

This document will use various terms derived from various constituent sources germane to the study. In an effort to reduce confusion and to promote understanding, certain terms were chosen to form a list of defined terms. The definitions represent the interpretations placed by the most frequent users of the terms. Every effort was made to use these terms through the study in the same context as provided below.

**Department of Labor (DOL)**—the United States Department of Labor, specifically the Employment and Training Administration as an organizational unit of DOL.

**Employment and Training Programs**—programs funded by DOL after the 1978 CETA reauthorization "designed to enhance the employability and earnings of various disadvantaged groups in our society" (Mangum & Robson, 1973, p. 1). In 1978, the term "manpower" was changed to "employment and training."

**Governor**—the chief executive, or his/her designee of any state (Federal Register, 1979, p. 19998).

**Local Education Agency (LEA)**—a board of education or other legally constituted local school authority having administrative control and direction of public elementary or secondary schools in a city, county, township, school dis-
strict, or political subdivision in a state, or any other public educational institution or agency having administrative control and direction of a vocational education program (Federal Register, 1979, p. 19999).

Manpower Program—programs funded by the DOL prior to 1978 "designed to enhance the employability and earnings of various disadvantaged groups in the society" (Mangum & Rob- son, 1973, p. 1). The term is limited to human service pro- grams which have employability, employment, and earned income as their primary objective.

One Percent Funds—those specific funds allocated in the CETA amendments of 1978 under Subpart D, Title II, Special Grants to Governors, Section 202(d) to encourage coordination and establish linkages between prime sponsors and appropriate education agencies and institutions.

Prime Sponsor—"Cities and counties of 100,000 or more, and consortia, defined as any combination of government units in which one member of a population of 100,000 or more. A state may be a prime sponsor for areas not covered by local governments" (Mirengoff & Rindler, 1976, p. 3).

Regional Administrator—the network of regional offices of the Employment and Training Administration unit of DOL which transmits national policy, reviews and acts on prime sponsors' plans, interprets regulations, provides assist-
ance, assesses programs, and handles complaints (Mirengoff & Rindler, 1976, p. 89).

**State Employment and Training Council (SETC)** -- A council appointed by the governor which is composed of various representatives of the units of local government, labor, business, general public, and service delivers who perform such tasks as reviewing the operation of prime sponsor programs, making an annual report to the governor, and reviewing the Comprehensive Employment and Training Plan by prime sponsors.

**State Employment and Training Council Director** -- the appointed director of the State Employment and Training Council.

**Vocational Education Programs** -- those occupational training programs funded by the State Department of Education and/or U.S. Department of Health, Education and Welfare (now the U.S. Department of Education).

**Document Overview**

This chapter provided a general overview of the problem investigated. The balance of the dissertation will include four more chapters. Chapter two will highlight existing literature related to vocational education and its attendant characteristics, CETA and its attendant characteristics, the
concept of linkage with attention to facilitating and inhibiting characteristics, and the current impact of linkage. Chapter three describes the research approach and design, defines the systems approach and research questions, and describes the stages of data collection. Chapter four describes the results of the research into the history leading to Section 202(d), traces the implementation process, and summarized the results of the national survey of Section 202(d) activities. Chapter five provides conclusions based upon the findings summarized in Chapter four and a comment on the set-aside approach for encouraging linkage.
CHAPTER II

Review of Related Literature

Linkage of CETA with vocational education was the focus of this study. As a consequence of the focus, four primary bodies of literature related directly to the study. This chapter highlights the existing literature related to (a) vocational education and its attendant characteristics, (b) CETA and its attendant characteristics, (c) the concept of linkage with attention to facilitating and inhibiting characteristics, and (d) the current impact of linkage.

Vocational Education

The history, scope and depth of literature related to vocational education is almost overwhelming. As an example, the current Thesaurus of ERIC Descriptors (1980) reported 8,245 entries related to vocational education. While the total literature base may be of interest, this section will briefly describe selected characteristics that have bearing upon this study. The characteristics include (a) goals, (b) governing legislation, (c) administrative structure, (d) planning approach, (e) programmatic delivery system, (f) finance, and (g) coordination provisions.
Goals

Vocational education is that segment of education charged with preparing people for work. In its broadest sense vocational education has been defined as "...that part of education which makes an individual more employable in one group of occupations than in another" (Evans, 1971, p. 1; Evans & Herr, 1978, p. 3). The literature states three basic objectives of any public vocational education curriculum. These objectives are (a) meeting society's need for workers, (b) increasing the options available to each student, and (c) serving as a motivating force to enhance all types of learning (Evans & Herr, 1978).

The legislation states the definition of vocational education as "...organized educational programs which are directly related to the preparation of individuals for paid or unpaid employment, or for additional preparation for a career requiring other than a baccalaureate or advanced degree (Education Amendments of 1976, Sec. 195, 90 STAT. 2211)."

The legislation further states the purpose of vocational education is to provide programs

"...so that persons of all ages in all communities of the state, those in high school, those who have completed or discontinued their formal education and are preparing to enter the labor market, those who have already entered the labor market, but need to upgrade their skills or learn new ones, those with special educational handicaps, and
those in postsecondary schools, will have ready access to vocational training or retraining which is of high quality, which is realistic in the light of actual or anticipated opportunities for gainful employment, and which is suited to their needs, interests, and ability to benefit from such training" (Education Amendments of 1976, Sec. 101, 90 STAT. 2169-70)

Vocational education directly provides training for jobs. However, the literature points repeatedly to the fact that vocational education indirectly interprets general education for its students (Evans, 1971; Evans & Herr, 1978). Occupational success depends on the student learning such concepts as reading, writing, basic computation skills. Vocational education does this in two ways (Evans & Herr, 1978). First, it provides a reason for learning basic academic skills by letting the student know that these skills are important in life and in achieving occupational goals. Second, vocational education helps keep students in school.

Governing Legislation

The Smith-Hughes Act of 1917 authorized funding for vocational education in agriculture, trades and industry, home economics, and the training of teachers for these programs. Since the Smith-Hughes Act, a series of Federal legislative enactments provided further financial assistance and direction for vocational education programs. In 1961, President John F. Kennedy initiated a major study on voca-
tional education. The final report, entitled *Education for a Changing World of Work*, contained recommendations that the local-state-federal partnership increase support for (a) high school students preparing to enter the labor market or become homemakers, (b) youths with special needs who have academic, socioeconomic, or other handicaps that prevent them from succeeding in a regular high school vocational program, (c) youths or adults who have completed or left high school and are full-time students preparing to enter the labor market, (d) youths or adults who need training or retraining to achieve employment stability, and (e) adequate services and facilities to assure quality in all vocational education programs (U.S. Department of Health, Education and Welfare, 1963).

Congress incorporated many of these major recommendations in the Vocational Education Act of 1963, Public Law 88-210. Criticism of vocational education at that time was directed toward the alleged failure of vocational education programs to change from the older occupational emphasis on agriculture, home economics, and trades to meet the increasingly more sophisticated economy of the 1960's. Thus, for the first time, vocational education funds were authorized for the construction of new vocational education schools. Demonstration and research projects were also authorized to
help improve the quality of vocational training. The 1963 Act provided for the establishment of a National Advisory Council on Vocational Education and charged it to review and evaluate programs. In 1968 the Council's first report was published (Advisory Council on Vocational Education, 1963), with major shortcomings listed regarding the implementation of two major objectives mandated in the 1963 Act. The shortcomings related to preparation for work and attention to students with special needs. The Council also identified several social problems that would have an important bearing on the need for training.

In 1968, the Congress enacted major amendments to the Vocational Education Act of 1963 which revised and expanded the Federal vocational education program in an attempt to rectify the problems identified by the Advisory Council in the early 1960s. These amendments established a permanent authorization for the basic state grant programs in vocational education and specifically identified students with special educational needs into two select groups including (a) disadvantaged vocational students and, (b) physically and mentally handicapped vocational students. In addition, various percentages of the vocational education basic grant funds were earmarked to be used for these two select groups.
The current vocational education legislation is included as Title II of the Education Amendments of 1976 (Public Law 94-482). This legislation extended many vocational education programs and revised the Vocational Education Act of 1963.

Included in this legislation is the requirement that each state establish a state board or agency solely responsible for the administration of vocational education (Education Amendments of 1976, Sec. 104, 90 STAT. 2172). In addition, state and local advisory councils must be established. National priority programs in the legislation include programs for handicapped persons, disadvantaged persons, and persons who have limited English-speaking ability.

Federal funding may be used to award grants to local systems for work study programs, cooperative vocational education programs, energy education, and residential vocational schools. Funds may also be used for program improvement and supportive services including research, exemplary and innovative programs, curriculum development, guidance and counseling, and activities to overcome sex bias.

Administrative Structure

Vocational education is headed by the United States Department of Education at the Federal level. At the state
level, vocational education is under the jurisdiction of the State Board of Vocational Education. This board or agency coordinates the development of policy, a five year plan, annual program plan, and accountability report. In addition, the board certifies any delegation of responsibility for administration, supervision, and operation, and assigns full-time personnel to rectify sex biasing and stereotyping in vocational education programs. Also at the state level, the governor appoints a State Advisory Council whose responsibilities include advising the State Board on policy matters, in the development of the five-year state plan, the annual plan, and the accountability report. The State Advisory Council also prepares, publishes, and distributes an annual report and a report on the effectiveness of vocational education programs, services, and activities in meeting the program goals identified in the five year plan.

Finance

Vocational education represents a federal/state/local partnership. Although state and local expenditures for vocational education outpace Federal expenditures by almost $9 for every $1 (AVA Fact Sheet), the U.S. Congress continues to appropriate to vocational education. In effect, there are two somewhat autonomous systems of vocational edu-
cation, federal-state and state-local (Attebury & Stevens, 1980).

The Federal vocational education legislation provides funds for the purpose of stimulating the states to organize programs of vocational education and to assist them in the further development of these programs (Roberts, 1971, p. 147). Over time, however, states have become less dependent upon the Federal funds, and as a result have established their own state-local systems (Attebury & Stevens, 1980, p. 6).

For every Federal dollar expended for vocational education programs, services and activities, at least one dollar of state and/or local funds must be expended. Federal set-aside funds must also be matched dollar for dollar, but constitute a separate match. In addition, the financial effort of the state and local agency for vocational education on a per student or aggregate basis must not be less than the fiscal effort in the previous fiscal year or in the second preceding fiscal year (Trapnell, McGough, Wortman, 1979, pp. 54-55).

Planning Approach

In order to receive Federal vocational education funds, each state must submit through the State Board to the Com-
missioner of Education general assurances and a five year State Plan for Vocational Education. The State Board must provide for active participation of state agencies in the development and revision of the plan. This plan must assess current and future needs for job skills, identify goals to be achieved by the state, courses and other training opportunities to be offered, and projected enrollments of those courses and training opportunities.

At the local level, the local education agency must also develop an annual program plan which includes 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. The plan must align with goals of vocational education as adopted by the state. The local plans are submitted to the state for approval, funding, and evaluation.

**Programmatic Delivery System**

Delivery of vocational programs and services at the local level vary with more than 16,000 institutions (National Institute of Education, 1980) across the country offering some type of vocational program in the eight primary types of institutions (AVA Fact Sheet). The types include (a) general high school, (b) comprehensive high
school, (c) vocational high school, (d) area vocational center, (e) community college, (f) technical institute, (g) area vocational school, and (h) specialized vocational school. The general and comprehensive high schools offer vocational programs as part of the regular general offerings. While a portion of the student's time is spent in vocational courses, the remaining portion is spent in meeting the requirements for graduation. The vocational high schools and area vocational centers offer programs to students as part of the education curriculum. Post-secondary institutions include the community college, technical institute, and certain area vocational and technical schools. The eighth institution offering vocational training is the specialized vocational school which offers training in only one or two occupational areas.

Traditionally, secondary vocational education has been divided into eight broad vocational fields which include agriculture, distributive, health-related, occupational home economics, business and office, technical, and trade and industrial and consumer and homemaking education (National Institute of Education, 1980). In addition to occupationally specific programs vocational education enrollments also show programs designed to help students acquire introductory occupational knowledge and general information about a vari-
ety of work settings (AVA Fact Sheet, 1980). Others provide help in overcoming educational deficiencies by teaching functional and occupational literacy skills.

The vocational curriculum combines classroom instruction with laboratory work, participation in student organizations, and on-the-job training. Practical application of classroom learning through on-the-job training is provided through cooperative programs under the supervision of a coordinator. Other on-the-job training programs offered through vocational education include direct contracting with local businesses, apprenticeships, clinical experience especially in the health-related service area and after-hours work site training in local industry (AVA Fact Sheet).

There are more than 54,000 chapters of vocational student organizations at the secondary and postsecondary levels. These organizations reinforce other aspects of the curriculum.

Coordination Provisions

Coordination between CETA and vocational education is mandated in the 1976 Education Amendments. States receiving funds under the Act must provide assurance that a coordinated approach is being followed to meet the vocational education and training needs of the area or community served.
(Sec. 100(A)(4)(C), 90 STAT. 21770); that a representative from the State Manpower Services Council (now the State Employment and Training Council) participate in the preparation of the five year state plan (Section 107(A)(1)(H), 90 STAT. 2179); that the five year State plan contain criteria for coordinating Manpower Training programs sponsored by CETA with vocational education programs sponsored by Federal assistance (Section 107(b)(5), 90 STAT. 2181); that the annual accountability reports show the results achieved by coordination of vocational education programs supported by Federal funds with CETA (Section 108(b)(1)(C)(i), 90 STAT. 2182); and that a representative from the State Manpower Services Council serve on the State Advisory Council on Vocational Education (Section 105(a)(15), 90 STAT. 2174).

CETA

The Comprehensive Employment and Training Act (CETA) absorbed two previous pieces of legislation, the Manpower Development and Training Act and the Economic Opportunity Act. The essence of CETA was decentralization, decategorization, and consolidation. Indeed, CETA changed the distribution of power and authority by altering the relationships and roles relative to the delivery of manpower services. This section will describe CETA according to its
(a) goals, (b) governing legislation, (c) administrative structure, (d) planning approach, (e) programmatic delivery system, (f) finance, and (g) coordination provisions.

Goals

The major objective of CETA is to provide training to improve the employment opportunities for the economically disadvantaged and for the unemployed and underemployed (Mirengoff & Rindler, 1978). CETA confines itself principally to the training of those out of school and in trouble in the labor market. In addition, CETA provides supportive services and subsidized employment opportunities for the unemployed and disadvantaged.

There are a number of subsidiary objectives that Congress sought to achieve through employment and training legislation reform. First, CETA was intended to move manpower activity from a categorical mode, administered by the Federal government, to locally based comprehensive program models (Snedeker & Snedeker, 1978; Mirengoff & Rindler, 1976; Mirengoff & Rindler, 1978). Second, Congress also sought to improve the system for allocating resources (Mirengoff & Rindler, 1978); provide for wider consultation in planning for manpower services (Mirengoff & Rindler, 1978); and eliminate the duplication and fragmentation in the delivery of manpower services (Mirengoff & Rindler, 1978).
Governing Legislation

The original CETA legislation was passed in December, 1973. The reauthorization of the Act occurred in 1978 and incorporated the Youth Employment and Demonstration Projects Act (YEDPA) of 1977 into the CETA legislation. The current CETA is the 1978 Amendments which renumbered the titles of the original legislation and consolidated the youth portion of the original legislation and YEDPA into one title.

Title I, Administrative Provisions, includes the organizational and general provisions which set forth conditions applicable to all programs. Title II, Comprehensive Employment and Training Services, includes four parts. Part A outlines the allocation formulas. Part B outlines services for the economically disadvantaged which include job search assistance, outreach, education and institutional skill training, on-the-job training, work experience, and supportive services. Part C provides financial assistance to public and private employers for costs of upgrading and retraining. Part D provides transitional employment opportunities for economically disadvantaged who are unemployed for 15 or more weeks or on welfare.

Title III, Special Federal Responsibilities, identifies special national programs and activities which administer additional employment and training services to target groups in need of services including handicapped individuals,
women, single parents, displaced homemakers, youth, older workers, individuals who lack educational credentials, public assistance recipients, etc. In addition, Title III established a comprehensive program of employment and training research that may include studies relating to easing the transition from school to work, labor market information, and job bank program at national levels.

Title IV, Youth Programs, is divided into three parts. Part A is the Youth Employment Demonstration Programs which is further divided into four subparts. Subpart 1 is the Youth Incentive Entitlement Pilot Projects (YIEPP) which includes experimental programs for disadvantaged youth attending secondary schools or high school equivalency programs. Subpart 2 is the Youth Community Conservation and Improvement Projects (YCCIP) which provides unemployed youth participation in community involvement projects. Subpart 3 is the Youth Employment and Training Programs (YETP) which are designed to make a significant long-term impact on the structural unemployment of youth, to enhance job prospects and career opportunities through programs of employment, community service, training, and supportive services. It is under this subpart that 22 percent of funds are set-aside for programs for in-school youth. Subpart 4 contains the general provisions and distribution of funds under Part A.
Part 5 retained the Job Corps as a Federal program for low-income disadvantaged youth. Part C established the Summer Youth Programs.

**Title V** established the National Commission for Employment Policy which was formerly the National Commission for Manpower Policy. **Title VI** provides for countercyclical Public Service Employment Programs to vary with the rate of unemployment. **Title VII** was added to include the Private Sector in employment and training and to increase opportunities for unemployed or underemployed persons who are economically disadvantaged. **Title VIII** established the Young Adult Conservation Corps (YACC) administered through interagency agreements with the Secretary of the Interior and the Secretary of Agriculture. Work projects under this title are residential or nonresidential and operate to improve public lands.

**Administrative Structure**

Basic decision-making authority over CETA expenditures is lodged primarily with cities and counties with more than 100,000 people, or with consortia of cities and counties, designated as CETA prime sponsors. States are responsible for operating a balance-of-state program for the remaining small towns and rural areas that are geographically isolated from operating consortia or choose not to join a consortium.
The governor of each state and territory receives some discretionary funds for use in providing special statewide services; funds for operating a state employment and training council; funds that are passed through to the state vocational education board to provide supplementary vocational education services; and funds to establish linkages and relationships between CETA prime sponsors and education agencies and institutions.

The ten regional offices of the Department of Labor are given responsibility within the CETA network. Their responsibility includes transmitting national policy, reviewing and acting on prime sponsors' plans, interpreting regulations, providing assistance, assessing programs, and processing complaints (Mirengoff & Rindler, 1978).

The Department of Labor in Washington, D.C. has an impact on the prime sponsors in four significant ways (Franklin, 1979). First, the DOL translates legislative intent into policy by writing the Federal regulations for CETA published in the Federal Register. Second, the DOL established an evaluation and reporting criteria from which prime sponsors operating programs are evaluated and their performance reported. Third, the DOL operates Title III, Special National Programs and Activities, specifically aimed at particular segments of
the population. And finally, the DOL administers a special set-aside for special national demonstration projects and for research and evaluation of those and other YEDPA projects.

Planning Approach

Planning is an essential element of CETA. Prime sponsors are required to prepare plans in order to receive financial assistance. Each sponsor must submit a comprehensive employment and training plan consisting of a master plan and an annual plan. A planning council is established to participate in the development of the comprehensive plan. The planning council consists of members of the community including at least one member representing public vocational education.

The master plan serves as a long-term charter and as a guide that each annual program is designed and implemented in the best manner suited to local conditions (CETA, 1978, Sec. 103, 92 STAT. 1918). Included in the plan is a statement of the methods and institutional arrangements by which educational agencies are involved in the planning process, a description of the procedures used to select deliverers of services, and a description of appropriate arrangements with educational agencies including the methods that will be uti-
lized to ensure participation of public vocational education in the achievement of identified employment and training goals and objectives.

In addition, any state seeking CETA funding is required to prepare a Governor's Coordination and Special Services Plan. This plan is designed to coordinate all related services provided by the state, by prime sponsors, by state education agencies and other institutions of vocational and higher education. This function is typically carried out by the State Employment and Training Council (SETC). The SETC membership must include at least one representative each from the State Board of Vocational Education and the State Advisory Council on Vocational Education. The SETC must also comment at least once annually on the reports of the State Advisory Council on Vocational Education and must review all comprehensive plans of prime sponsors. The governor of each state is also required to document through a Special Grant Annual Plan the special grant allocation activities proposed for the vocational education services program, state employment and training council program, state coordination and establishment of linkges program, and the state grant program (U.S. Department of Labor, Federal Register, April 3, 1979, pp. 20041).
Programmatic Delivery System

Structuring the delivery system and selecting the service deliverers are the two principal tasks of CETA prime sponsors (Mirengoff & Rindler, 1978). There are no "presumptive deliverers," however, Congress did stipulate that existing institutions of demonstrated effectiveness should be used to the extent deemed feasible.

CETA provides for basically three program approaches. The first approach is education and/or training through classroom and on-the-job training which assumes that the problem of employability is at a deficient level of skill or capability of an individual. The second approach is subsidized employment in the public or private nonprofit sector such as work experience and public services employment. The final approach is through support services including counseling, job referral, child care, etc. (Perry, et al., 1975).

Mirengoff & Rindler (1978) report that there has been greater emphasis on work experience and public services employment and a shift away from classroom training and on-the-job training.

The CETA delivery system did not have a model to work from. A delivery system has been defined as the interrelationships of agencies and organizations that carry out the activities at entry, exit, and transfer points through which
individuals flow as they receive manpower services (Mirengoff & Rindler, 1978, p. 136). Basically there are three systems a CETA prime sponsor may adopt in the delivery of services to participants which include a categorical, comprehensive, or mixed system (Mirengoff & Rindler, 1978). A categorical system is where a prime sponsor offers subcontracted program operators specific services. Comprehensive service delivery implies that all activities and services offered in one area would be unified and accountability for program outcome would be centralized. A mixed approach is an approach which combines both a categorical and comprehensive system. Mirengoff & Rindler (1978) reported that approximately one third of the local sponsors had adopted a comprehensive delivery system in 1976; one quarter had a mixed system, and the remaining 40 percent had retained categorical delivery arrangements (p. 156). A striking result noted by Mirengoff & Rindler (1978) was the expanded role of the prime sponsor in direct program operation. More than half of all sponsors reported delivering intake and/or placement services and many were directly operating some aspect of the program (p. 156).
Finance

The basic objectives of CETA were to combine separate MDTA, EOA, and EEA funding sources into block grants and transfer control and accountability to local officials (Mir-engoff & Rindier, 1978, p. 19). Almost all CETA funds are distributed on the basis of formulas specified to the local level. This assured each area a share of funds in proportion to need and eliminated grantsmanship and partiality in fund distribution. In addition to fund applicants by formula, a share of the appropriation is reserved by law for use at the discretion of the Secretary of Labor. These discretionary funds include the governor's grant which includes the six percent supplemental vocational education supplement, the four percent coordination and special services grant, and the one percent coordination and linkage funds.

Coordination Provisions

The coordination of CETA with vocational education was recognized as a priority by Congress in 1973 and even greater priority in 1978 when CETA was amended. The following include those provisions in the 1978 amendments which require coordination with vocational education:

-Prime sponsors must submit a comprehensive employment and training agreement including a description of involvement of educational agencies, among other things, the arrangement made to
provide participants with job-search assistance and counseling (Sec. 103, 92 STAT. 1918).

-Prime sponsors must submit an annual plan which allows 30 days of review and comment on the plans by, among others, educational agencies and institutions, prior to submission (Sec. 104, 92 STAT. 1922).

-one percent set-aside authorized to governor to encourage coordination and establishment of linkages between prime sponsors and educational agencies and institutions (Sec. 202(d), 92 STAT. 1951).

-State Supplemental Vocational Education Grants of six percent of Title II, Parts A, B, and C. 85 percent of those funds to be used for vocational education training and services. The remainder, among other things to provide technical assistance to vocational education institutions and local education agencies in making cooperative arrangements with prime sponsors, and in developing curriculum materials and prime sponsor staff development (Sec. 204, 92 STAT. 1953).

-22 percent set-aside for programs for in-school youth, requiring prime sponsor-local education agreement. Programs may include services for eligible participants who are enrolled or agree to enroll in junior or community colleges, or a technical or trade school as well as participants enrolled in secondary schools (Sec. 431, 432, and 433, 92 STAT. 1982-3).

-The Secretary of the DOL is authorized to provide State Vocational Education Board with up to 50 percent of costs to establish demonstration community vocational resource centers to provide guidance and counseling to CETA participants (Sec. 311(f), 92 STAT. 1969).
Concept of Linkage

Linkage can serve many objectives. Congress passed legislation requiring linkage in order to more effectively and efficiently attack the problem of unemployment, while leaving political institutions intact (Wilken & Brown, 1981). The Department of Labor anticipates that linkage will ensure the quality of programs delivered to clients. Both vocational education and CETA are concerned with providing job related training, and retraining. The following section addresses the critical factors that (a) facilitate linkage, and (b) inhibit linkage between CETA and vocational education.

Critical Factors that Facilitate Linkage

The literature identifies both opportunities and incentives for linkage available to both CETA and educational communities. Opportunities are evidenced in (a) the legislative planning requirements, (b) the common defined purposes of each agency, and (c) the overlapping target groups served. The incentive for linkage is financial. This subsection will detail these facilitating factors.

Legislated planning requirements. Both CETA and educational institutions must plan for program activities. By the mandated requirement that the plan of both agencies must
be reviewed by the other facilitates identification of target groups with joint concerns. Points of commonality or interest can serve as the basis for cooperation. In addition, both CETA and vocational education are required to provide data identifying the local needs to be served by their programs. Assessing demographic and economic information to identify the universe of employment and economic problems and thus, the extent of need for services is a task performed by CETA planners. Vocational education historically has placed reliance on personal contacts with employers. These contacts provide estimates of the demand for jobs and give direction for the program planning efforts. While CETA and vocational education have different approaches to planning, sharing of the information can provide valuable information for both.

**Common purposes.** Both CETA and vocational education have a common concern for meeting the employment and employability needs of youth and adults. Problems in serving this common group within the constraints of the existing organizational arrangements are mutual. Joint solutions to problems can result in improved accessibility, continuity and efficiency in program delivery. Administratively, gaps in the delivery system can be identified and the client's needs met by a system that allows planning, budgeting, and evaluating the broad range of options to meet their needs.
Overlapping target groups served. CETA specializes in serving the disadvantaged. Vocational education is mandated to serve the disadvantaged. Both serve adults and youth who are unemployed, underemployed, or economically disadvantaged. Thus, vocational education includes disadvantaged clients while CETA clientele must be disadvantaged.

Financial incentive. CETA provides mandated educational set-asides in two of its eight titles. Title II of the CETA legislation provides two education mandated set-asides, the six percent supplemental vocational education grant and the one percent linkage funds. Title IV, Youth Programs, provides the 22 percent education mandated set-aside for YETP programs. As an indication of the total amount of funds mandated for linkage by the CETA legislation, Title II had a budget appropriation of $2,054 million in FY 1980. The six percent vocational education grant equaled $123 million and the one percent linkage grant equaled $35 million. This represented less than 2 percent of the total funds available under Title II. Title IV had a budget authority of $826 million. The 22 percent set-aside equaled $114 million which represented 14 percent of the total funds available for the Title IV (Wilken & Brown, 1981). Preventing program overlap while CETA supports the financial needs of the target groups should be a real incen-
tive for coordination (Drewes, 1980; Wilken & Brown, 1981). In addition, consolidated operations can reduce duplication and facilitate efficiency (IMPACT, 1978, p. 6). If protecting the public investment is a measure of efficiency, the incentive for linkage should be made stronger.

Critical Factors That Inhibit Linkage

The literature points to three causes of weak linkages (Wilken & Brown, 1981). These three include (a) the short amount of time that CETA and educational agencies had to implement legislative mandates for coordination; (b) deficiencies in the mandates themselves; and (c) characteristics of the CETA and educational systems which cannot be changed by coordination alone.

Short implementation time. Developmental difficulties are a product of change. Experience indicates that almost any policy initiative is likely to face predictable initial problems. There is often a lack of information and understanding about CETA's complicated rules and regulations (Snedeker & Snedeker, 1978, p. 65). This lack of clarity regarding the rules and regulations caused considerable tension (Youthwork National Policy Study, 1978).

The lack of understanding by both CETA and vocational educators of each other's operational process was evidenced
when the linkage mandates were implemented. It was reported that local prime sponsor directors were confused and lacked understanding about the institutional vocational education programs (Anderson & Rozansky, 1974). In addition, personnel in many school systems and manpower agencies were not aware of the problems to be encountered in operating a cooperative training system until it was operational. In the words of one analyst, "Local expertise in employment and training affairs is (often) more political and managerial because grantsmanship and outguessing Congress and the Department of Labor are prerequisites for survival" (Wurzburg, 1979, p. 9).

The newness of the mandate also is cited as the cause of inadequate program design and service agreements. As an example, during 1978, YEDPA mandated knowledge development with virtually no direction. Most prime sponsors attempted to do something and the result was commonly chaotic (National Commission for Manpower Policy, March, 1978, p. vii). Review of prime sponsor and education agencies non-financial agreements were often "...vague with regard to roles, responsibilities, goals, target populations" (American Institute for Research, 1980, p. 13). There was also disagreement over what activities were allowable (Snedeker & Snedeker, 1978, p. 66), and differences in opinion on who
had the authority to make key decisions affecting the jointly run programs (Manpower Demonstration Research Corporation, Inc., 1977).

Problems of this type usually pass with time. The longer the rules are in effect, the more individuals will understand the associated rules and procedures and gain the expertise needed to implement them. Time, however, cannot provide for defects in the mandates.

Deficiencies in mandates. The literature points to several deficiencies in the coordination mandates. Most often cited was the mismatch of the CETA and public school's planning cycles. CETA's budget cycle runs from October to September, while the schools operated on a July to June cycle. As a result, schools must make commitments to training programs for CETA without assurances that the CETA system will be able to provide the funds for the entire fiscal cycle. Education administrators must also make decisions about CETA programs only a few days before school opens in the fall.

The legislation itself has also built doubt into the future funding of CETA programs. In addition, as prime sponsor receive funds annually, school systems must compete from year to year and project to project (Mirengoff & Rindler, 1976). In addition, when Congress enacted the YEDPA
statute in 1977, it decided to treat youth programs under YETP as demonstration programs with only annual budget authority. This system disrupted the orderly management of vocational training programs and lead school officials to question the investment in manpower training programs.

While CETA was perceived to be a block grant program, it was, in fact, a series of separate programs fragmented around a central theme (Wilken & Brown, 1981). As school systems attempted to work with CETA, they commonly found themselves working with many different contracting procedures, liaison persons, and eligibility practices. These legislative requirements were viewed by many as counterproductive (Wurzburg, 1979, p. 236).

The most heated CETA/education controversy has been over the awarding of academic credit for work experience or employability development training (Wurzburg, 1979, p. 10). Credit is most generally determined on the basis of time spent, with one unit of elective credit generally given for a specified number of hours of classroom and/or job experience. Yet, credit for CETA-funded programs was seldom, if ever, awarded to clients upon completion (Drewes, 1980, p. 65). There was also the question of whether local educators could make policy regarding the awarding of credit without specific state mandates on the subject (Wurzburg, 1979).
Finally, there is no truly authoritative coordination mechanism (Wilken & Brown, 1981). Both CETA and the education institutions remained basically sovereign entities. The incentives for cooperation would not be adequate as long as CETA goals were not in line with those of the educational community (Wilken & Brown, 1981).

**Conflicting characteristics.** There are several important realities which must be considered when discussing state and local policymaking. CETA and vocational education constitute two different systems for improving employment prospects for their clients. These differences are evident in the philosophical and organizational structures of the two systems.

Vocational education programs address educational disadvantage, which includes economic disadvantage (Stevens, 1979). The term disadvantaged is defined in the legislation for vocational education as "...persons (other than handicapped persons) who have academic or economic handicaps and who require special services and assistance in order to enable them to succeed in vocational education programs" (Education Amendments of 1976, Sec. 195, 90 STAT. 2213). The determination of disadvantaged from a vocational education perspective is program specific and not a characteristic of the individual. This differs from the CETA def-
inition of disadvantaged, which is solely in terms of financial eligibility. In addition, vocational education regulations defined economic disadvantage in terms of the poverty level which is a census concept. In contrast, CETA standards are based on the lower living standard income level which is determined by the Bureau of Labor Statistics (Drewes, 1980, p. 59).

In addition, differences in perception of what constitutes effective training have been noted in the literature (Mirengoff & Rindier, 1978, p. 128). CETA programs are commonly directed at narrow, short-term objectives and stress the minimum amount of training necessary to secure the person employment. In contrast, vocational educators prefer a more generalized, and more enriching training curriculum. Finally, turf protection has been cited as the largest coordination problem that exists at the local level (Anderson & Rozansky, 1976, p. 3).

The vocational education system has existing buildings, equipment, and certified staff members. MDTA funds to vocational education expanded both physical and faculty resources (Stevens, 1979). These resources are currently operating. However, the CETA system has no presumptive service agents, although the CETA amendments stress the prime sponsor's responsibility to use existing organizations
of demonstrated effectiveness. In addition, CETA philosophy calls for training programs to be flexible, open-entry/open-exit in order to produce large numbers of job-ready clients. The instructors are not required to be certified teachers. This conflicts with vocational education's traditional program operation and organization.

The conflicting characteristics, however, go beyond these philosophical and organizational differences. The public school system today is facing a multitude of problems including enormous pressure to comply with more compelling Federal mandates (Wilken & Brown, 1981). Special education, desegregation, and the like, must be included in the realm of activities public schools deal with daily. Participation with CETA, unfortunately, is optional and in most cases schools are free to accept or reject clients. Budget restraints, weak internal administrative stability, and priorities from state and local political groups are all problems that public schools face (Wilken & Brown, 1981). As a consequence, the mandate for coordination with CETA is often "...treated as little more than incidental appendages for most education institutions" (Wilken & Brown, 1981, p. 41).
Current Impact of Linkage

Since the Federal government became active in training programs for disadvantaged Americans, the Federal policy makers have attempted to promote coordination between the education and manpower programs. Prior to CETA, this was attempted through a series of "top-down" mandates which gave state education agencies a major role in operating training for the Federal programs. The 1973 CETA has changed this strategy and attempted to allow employment and training agencies the right to operate educational programs from the "bottom-up." Consequently, state and local education agencies regarded this as a "...major assault on their established authority" (Wilken & Brown, 1981). Congress responded by amending CETA in 1977 and 1978 with a series of compromise measures which allowed manpower agencies to retain full authority over their programs while giving state and local education agencies an assured role in providing educational services to manpower clients.

It is not surprising that the studies conducted to assess the impact of coordination between CETA and education agencies show little linkage efforts. The National League of Cities U.S. Conference of Mayors has conducted studies since CETA was enacted in 1973 to track the development of coordination. Their first study in 1974 (Anderson & Rozan-
sky, 1974) gave some preliminary indications that CETA was not significantly impacting on institutional vocational education. This study indicated the difficulty and frustration among localities in negotiating non-financial agreements and attributed part of the problem to the vague CETA rules and regulations. After this negative assessment of CETA's first year of operation, a second study was contracted to examine the issues following a second year of operation. For FY 1976, it was concluded that over 50 percent of the prime sponsors reported a more effective working relationship with their respective vocational education communities (Anderson & Rozansky, 1976), but generally cited continuing problems.

Manpower Demonstration Research Corporation, Inc. (1977) conducted on-site studies in nine states during 1976 to investigate the Special Grants to Governors. This study analyzed the planning procedures, program activities, and results associated with state administration of CETA's five percent grants for vocational education services. They identified that the single significant accomplishment of this set-aside was the success in bringing CETA prime sponsors and vocational education administrators face-to-face (p. 65). Overall, however, the study indicated that CETA's special grant set-aside had few apparent pluses (p. 66). It further stated that while some states were successful in
working out the technical problems, most of the states found that it required extraordinary efforts just to keep the special grants to vocational education from having a negative impact (p. 66).

Following the enactment of YEDPA and the 22 percent earmark of funds for school-to-work efforts aimed at youth still in school, the Office of Youth Programs of the DOL found the collaboration between schools and CETA program sponsors was improving. From evidence collected in case studies by the National Council on Employment Policy on the implementation of the 22 percent set-aside, it was stated "...that the 22 percent set-aside for CETA-LEA agreements is a useful starting point for improving relationships between local CETA sponsors and Schools, and for developing institutional complementarity" (Wurzburg, 1979, p. 1).

The CETA Amendments of 1977 and 1978 had been in operation for such a short time that few studies have been conducted to assess the efforts of Congress. However, there is mounting evidence that supports the CETA and educational institutions are moving toward a form of "administrative detente" (Wilken & Brown, 1981). There has been an increasing involvement of state and local education officials in the CETA planning (U.S. Conference of Mayors, 1979), increasing interchange of statistical data between education
and manpower programs (Wilken & Brown, 1981), expanding collaboration on coordination issues between the Departments of Education and Labor (Wurzburg, 1979), and increased fiscal linkages between CETA agencies and educational institutions (Wilken & Brown, 1981). In 1973 economic ties between CETA and educational institutions totaled less than $400 millions (Wilken & Brown, 1981). In 1980, economic transactions between CETA agencies and institutions providing educational services "...totaled between $1.1 and $1.5 million" (Wilken & Brown, 1981, p. 16).

Fragmented data from different sources indicted that most CETA agencies rely on educational institutions for essentially the purchase of classroom training (U.S. Conference of Mayors, 1979). However, in a survey of 40 prime sponsors, it was found that almost 95 percent of the prime sponsors purchased basic education, pre-employment training, skill training, counseling, job placement/development, and administration from educational agencies (U.S. Conference of Mayors, 1979, p. 23). This same document reported that 73.7 percent of the five percent supplemental funds for vocational education were used for that portion of the skill training which included "...tuition, instructors' salaries, equipment, books, supplies, etc. (p. 24). Wilken and Brown (1981) noted that the U.S. Conference of Mayors' study pre-
dated the implementation of YETP, with the 22 percent set-aside requiring all in-school service agreements to supplement any classroom training with what is called "transition services" including non-instructional assistance such as counseling, transportation, outreach, and child care (p. 19). Thus, the economic ties may, in fact, be much greater in dollars spent.

While manpower agencies and educational institutions have expanded their administrative and financial relationships, little progress has been made toward actual integration of service activities (Wilken & Brown, 1981). This is evidenced in three ways. First, there has been limited progress toward mutual funding of CETA-school activities; second, CETA depends upon school for basic skills instruction; and third, schools are not awarding academic credit for CETA-funded programs.

It appears that most local education agencies operate CETA training programs exclusively with CETA dollars (Wilken & Brown, 1981). Pooled financial support for CETA youth programs is estimated at only one programs out of five (Wilken & Brown, 1981). In addition, CETA has not drawn on the schools' educational services and most of the resources involved are used for participant stipends (Wilken & Brown, 1981). The DOL, Employment and Training Administration (in
Wilken & Brown, 1981) reported during fiscal 1979, for example, that 63 percent of services under YEIP went for participation wages and benefits and only 30 percent was spent on teaching, training, or support services. The balance went to program administration (pp. 30-31). And finally, the number of youth program participants receiving academic credit was very small. In 1979, youth programs reported that only about 39,000 enrollees earned scholastic credit for work experience or on-the-job training. This represented about three percent of all enrollees in such programs (Wilken & Brown, 1981).

Summary

This chapter has highlighted the literature related to vocational education, CETA, the concept of linkage, and the current impact of CETA/Education linkage. These components are summarized below.

Vocational education is an integral part of the public educational system and represents a joint Federal, state, and local partnership effort. Programs are designed to provide occupationallly specific training and also to help students acquire general education knowledge and information about a variety of work settings. The vocational curriculum incorporates classroom instruction, laboratory work, partic-
ipation in student organization, and on-the-job training. 
Training through vocational education is offered primarily 
within institutional settings which include comprehensive 
high schools, vocational high schools, area vocational cen-
ters, technical institutes, and community and junior col-
leges and specialized vocational schools. Legislation 
requires that the state administrate vocational education 
using a five year and a one year plan approach.

CETA provides training to improve the employment oppor-
tunities for the economically disadvantaged who are unem-
ployed or underemployed. Basic decision-making authority 
over CETA expenditures is lodged primarily with cities and 
counties with more than 100,000 people, or with consortia of 
cities and counties, designated as CETA prime sponsors. 
CETA contracts for classroom, laboratory, and on-the-job 
training. Subsidized employment in the public or private 
nonprofit sector is used to provide employment. In addi-
tion, CETA provides counseling, job referral, child care, 
transportation, and other support services.

The literature identifies opportunities and incentives 
for linkages available to both CETA and the educational com-

munities. Opportunities are evidenced in the legislative 
planning requirements, the common defined purposes of each 
agency, and the overlapping target groups served. The
incentive for linkage is financial with CETA providing mandated set-asides. The literature also points to three causes of weak linkages. These include the short amount of time CETA and the educational agencies had to implement legislative mandates for coordination, deficiencies in the mandates themselves, and characteristics of the CETA and educational systems which cannot be changed by coordination alone.

Over the last several years, working relationships between CETA agencies and educational institutions have improved in several respects. There is greater interagency communication, planning, and increased sharing of financial resources. However, few educational institutions matched CETA dollars with resources of their own and few awarded CETA clients academic credit for work experience. While the dollars spent may seem impressive, a closer look revealed that the majority of the funds were used to pay participant stipends and supportive services and the amount used for instructional services was relatively small.

The importance for this study was emphasized through this comprehensive review of coordination between CETA agencies and educational institutions. No study mentioned the impact of the one percent funds or intent of Congress. To date, time and money have not eliminated the inhibitors to
coordination. To date, time and money have not eliminated the mismatch of funding cycles, nor changed the political environment in which CETA must operate. Yet, Congress added in 1978 the one percent educational linkage set-aside.
CHAPTER III

Design & Method

The purposes of this study were to examine the Congressional intent behind Section 202(d) of the Comprehensive Employment and Training Act Amendments of 1978, to trace the procedures used to implement Section 202(d) of CETA, to identify and codify Section 202(d) activities and to make recommendations regarding the future of Section 202(d).

This chapter of the study was designed to (a) provide an analytical framework for the study; (b) outline related research models; (c) specify the research questions; (d) present a conceptual framework; and (e) outline procedural stages and tasks.

Analytical Framework

No matter what the policy, there will be an authority who formulates and enacts the policy; agent who refine, interpret, and enforce the policy; and certain individuals whose actions the policy is intended to modify (Coombs, 1981). A policy analysis study may focus upon several aspects of this process. The most common aspect studied has
been policy output. Policy output studies typically address the dollar expenditures for various services. A second focus of a policy analysis study might be policy implementation. Scioli & Cooke (1975), defined this as the link between policy goals, objectives, outputs, and the nature and amount of service delivered. Policy implementation studies pivot upon the concepts of compliance and noncompliance. A third focus of a policy analysis study might be policy impact. Policy impact studies systematically identify the consequences that result from a given policy action. A policy impact study identifies the consequences from a policy and addresses the factors in the policy making process, the content of the policy or the manner it was implemented as related to the actual consequences of the policy (Grumm & Wasby, 1961).

This study addressed the policy of the linkage set-asides included in the 1978 CETA Amendments. The set-aside was to be used by the governors of each state to encourage coordination and establish linkages between CETA and appropriate educational agencies and institutions. The authority who formulated and enacted this policy was the U.S. Congress. The agents who refined and interpreted the policy was the Department of Labor, Employment and Training Administration. The enforcers of the policy were the governors
of each state. The individuals whose action the policy was intended to modify was the local administrators of CETA and appropriate educational agencies.

This study was not a policy output study as no attempt was made to address the dollar expenditures. Nor was this study a policy implementation study as it was not the intent of this study to identify compliance and/or noncompliance with Section 202(d). This study was, however, a policy impact study. It sought to clarify the content of the policy, to investigate the causal factors in the policy-making process, and to identify and codify the consequences of this policy. Finally, it sought to identify recommendations.

Research Models

The research model used for this study was a systems approach (Brock, et al, 1973; Copa, 1980; Kaufman, 1976). A common definition of a systems approach implies that there are separate components to a policy that are directly related to one another (Copa, 1980). Brock, et al. (1973) listed four characteristics to a system which are essential for inquiry. First, the objectives must be interdependent upon one another. Second, a system must contain an ordered sequence of events. Third, the objects within the system must be connected. Fourth, a system must possess both a structure and a set of processes.
A fundamental concept of policy analysis or policy evaluation is decision making. The decision-maker should use a theoretical evaluation approach. The literature offers several systematic models for evaluating and analyzing policy. Three particular models contributed to the design of this study and are herein presented. All three models emphasize interdependence of objectives within the system, order the sequence of events, connect the objectives, and possess both a structure and process. These three models are (a) Brock's Systems Model (Brock, et al., 1973); (b) Tri-C Evaluation Framework (Manasse, 1981); and (c) the CIPP Model (Stufflebeam, et al., 1971) with adaptations by Wentling and Lawson (1975) and Copa (1980). The following discussion provides the connection between the traditional policy study models (Brock, et al., 1973; Manasse, 1981) and the CIPP model (Stufflebeam, et al., 1971) with adaptations by Wentling and Lawson (1975) and Copa (1980), which have been applied to vocational education evaluation.

**Brock's Systems Model**

According to Brock (1973) four terms are the major feature of any system. These four terms are components, relationships, goals, and effects. Figure 1 identifies and
defines these terms. This model serves two functions and allows the decision-maker to make two types of assessments. First, a descriptive analysis is made of the system. The components and relationships provide the foundation for the descriptive statements regarding the function or operation of a system. The decision-maker examines the system to identify the components within the system which would lead to the discovery of relationships within the system. Having identified the components in a system, the decision-maker may decide to examine only commonly recognized relationships or might identify relationships that are less obvious.

Second, the model allows an evaluative assessment of the system. Goals and effects are generally the basis to an evaluation of this system. The concept of an effect is an interpretative assessment based upon a comparison of the relationships within a system and the stated or operational goals of a system. From this perspective, the decision-maker asks if the quantitative or qualitative interaction of certain components (relationships) are achieving desired goals or to what extent the relationships are consistent with desired goals.
<table>
<thead>
<tr>
<th>Function</th>
<th>Terms</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Components</td>
<td>The discrete, unique, or constituent parts that compose a system.</td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>Relationships</td>
<td>The identity that exists between two or more components; the action of a system, that is, the nature or characteristics of the activity that exists between two or more things taken together.</td>
</tr>
<tr>
<td>Goals</td>
<td>The state or operational objectives, designs, aims, or intentions of the men interacting with their environment; the critical decision-making process is designed to maximize or achieve these goals.</td>
<td></td>
</tr>
<tr>
<td>Evaluation</td>
<td>Effects</td>
<td>The assessment, fulfillment, accomplishment, impression, or outcome of a system as a result of certain components interacting in relationships toward certain goals; an evaluation of the elements of the system as measured against the goals of the system.</td>
</tr>
</tbody>
</table>

Figure 1: A Systems Model

Tri-C Evaluation Framework

Manasse (1981) describes a framework developed as an integral part of the Los Angeles Unified School District's Community-Centered Classroom program (Tri-C). This framework was designed to overcome many of the common problems of policy evaluation and impact analysis and produces appropriate and timely data for both decision makers and program managers (p. 161). Figure 2 outlines the approach, primary activities, and output of this framework. The framework includes four components including contextual analysis, organizational analysis, dramaturgic analysis, and self-evaluation.

A contextual analysis of the external and internal factors influencing the initial policy decision identifies areas of conflict and ambiguity. In this analysis underlying values and assumptions related to the policy, and relevant actors, and basic policy goals are identified.

An organizational analysis describes the characteristics of the policy in action. The organizational analysis has utility for identifying resources and constraints and for providing a framework for identifying, analyzing, and resolving problems. A comparison of decision-maker goals
<table>
<thead>
<tr>
<th>APPROACH</th>
<th>PRIMARY ACTIVITIES</th>
<th>OUTPUT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contextual</td>
<td>Historical research.</td>
<td>Definition of basic boundaries, resources, constraints.</td>
</tr>
<tr>
<td>analysis</td>
<td>Narrative description of decision process.</td>
<td>Identification of internal and external influence, potential consequences, potential spillovers of program.</td>
</tr>
<tr>
<td></td>
<td>Identification of relevant systems, groups, individuals.</td>
<td>Explication of values, underlying assumptions systems and decision makers.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Identification of data needs.</td>
</tr>
<tr>
<td>Dramaturgic</td>
<td>Recording and documenting of major meetings, problems, decisions, etc.</td>
<td>Listing of major issues, conflicts, problems to emerge.</td>
</tr>
<tr>
<td>analysis</td>
<td>Preparation of narrative descriptive analysis using dramaturgic approach</td>
<td>Identification of primary and secondary actors, their values, prospective, self-interested motivations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Description of policy in action.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Comparison of values of decision makers, administrators, teachers.</td>
</tr>
<tr>
<td>Organizational</td>
<td>Development of organizational chart showing all relationships of program to other</td>
<td>Identification of values, perspectives, expectations of various system</td>
</tr>
<tr>
<td>analysis</td>
<td>system elements.</td>
<td>components with regard to program.</td>
</tr>
<tr>
<td></td>
<td>Recording and analyzing activities in terms of conflicting system demands.</td>
<td>Identification of areas of conflict.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Specification of program priorities.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Specification of data needs from program to other components of system.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Framework for assessing impact of policy on system.</td>
</tr>
<tr>
<td>Self-evaluation</td>
<td>Compiling client demographic data.</td>
<td>Data to decision makers on number of target population served.</td>
</tr>
<tr>
<td></td>
<td>Interviewing students, parents, staff.</td>
<td>Preliminary data on impact of program on target population.</td>
</tr>
<tr>
<td></td>
<td>Recording site activities.</td>
<td>Demographic characteristics of population served.</td>
</tr>
<tr>
<td></td>
<td>Recording pupil attendance.</td>
<td>Impact data on staff.</td>
</tr>
<tr>
<td></td>
<td>Recording anecdotal comments on student behavior, attitudes.</td>
<td>Identification of variables; development of projective models for future testing.</td>
</tr>
<tr>
<td></td>
<td>Recording student academic activities.</td>
<td>Descriptive data on program inputs.</td>
</tr>
<tr>
<td></td>
<td>Preparing weekly reports.</td>
<td>Recommendations for modification in policy or program.</td>
</tr>
<tr>
<td></td>
<td>Logging all referrals, agency contacts.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Preparing pupil progress reports.</td>
<td></td>
</tr>
</tbody>
</table>

Figure 2: Tri-C Evaluation Framework

with program personnel goals reveals conflicts or ambiguities.

Dramaturgic analysis organizes data relating to specific issues, showing the evolution of a situation, the relevant actors and actions, and the resolution. This analysis includes a comparison between stated policy and the policy in operation, identification of major problems and issues, and a description of the actors and processes. This provides a format for organizing information during the course of program implementation and operation to identify an emerging pattern.

The self-evaluation describes the program as a whole based upon the data. The data generated from this evaluation provides information regarding the day-to-day details of the policy in action, describes subsystems and program operation.

CIPP Evaluation Model

The most common models for research are variations of what has been labeled the problem solving approach. One traditional problem solving approach for decision-making has been offered by a group of educational evaluators and has been labeled the CIPP model (Stufflebeam et al., 1971; Kemtling & Lawson, 1975; Kaufman, 1976; Copa, 1980). The CIPP
model describes four types of evaluation which include context, input, process, and product evaluations (Stufflebeam, et al., 1971). Figure three summarizes the objective, method, and relation to decision making in the change process for each type. Context evaluation facilitates planning decisions to determine objectives; input evaluation facilitates structuring decisions to determine designs; process evaluation facilitates implementing decisions to control operations; and product evaluation facilitates recycling decisions to judge and react to attainments.

Context evaluation is basic and provides a rationale for determination of objectives. Specifically it defines the relevant environment, describes the desired and actual conditions pertaining to that environment, identifies unmet needs, and diagnoses the problem. Input evaluation provides information for determining how to utilize resources to meet program goals. Input evaluation identifies and assesses capabilities, strategies, and implementation designs. Process evaluation provides periodic feedback to persons responsible for implementing plans and procedures. Process evaluation detects or predicts defects in the design or its implementation during the implementation stage, provides information for programmed decisions, and maintains a record of the procedure as it occurs. Product evaluation measures and interprets attainments not only at the end of a cycle,
<table>
<thead>
<tr>
<th>OBJECTIVE</th>
<th>CONTEXT EVALUATION</th>
<th>INPUT EVALUATION</th>
<th>PROCESS EVALUATION</th>
<th>PRODUCT EVALUATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>To define the operating context, to identify and assess needs and opportunities in the context, and to diagnose problems underlying the needs and opportunities</td>
<td>To identify and assess system capabilities, available input strategies, and designs for implementing the strategies</td>
<td>To identify or predict, in process defects in the procedural design or its implementation, to provide information for the preprogrammed decisions, and to maintain a record of procedural events and activities</td>
<td>To relate outcome information to context, input, and process information</td>
<td></td>
</tr>
<tr>
<td>METHOD</td>
<td>By describing the context, by comparing actual and intended inputs and outputs, by comparing probable and possible system performance, and by analyzing possible causes of discrepancies between actualities and intentions</td>
<td>By describing and analyzing available human and material resources, solution strategies, and procedural designs for relevance, feasibility and economy in the course of action to be taken</td>
<td>By monitoring the activity's potential and measuring criteria associated with the objectives, by comparing these measurements with predetermined standards or comparative basis, and by interpreting the outcomes in terms of recorded context, input, and process information</td>
<td></td>
</tr>
<tr>
<td>RELATION TO DECISION-MAKING IN THE CHANGE PROCESS</td>
<td>For deciding upon the setting to be served, the goals associated with meeting needs or using opportunities, and the objectives associated with solving problems, i.e., for planning needed changes</td>
<td>For selecting sources of support, solution strategies, and procedural designs, i.e., for structuring change activities</td>
<td>For implementing and refining the program design and procedure, i.e., for effecting process control</td>
<td>For deciding to terminate, modify, or reverse a change activity, and for linking the activity to other major phases of the change process, i.e., for regulating change activities</td>
</tr>
</tbody>
</table>

Figure 3: Four Types of Evaluation

but as often as necessary during the term of the project. In addition, product evaluation makes rational interpretations of the outcomes using the recorded context, input, and process information.

Wentling and Lawson (1975) and Copa (1980) have adapted Stufflebeam's model for use in evaluating occupational training programs. They stress that the use of this model provides decision makers with needed types of rational information necessary to make sound decisions regarding available alternatives.

The important concept provided in the CIPP model, and its adaptations by Copa and Wentling and Lawson, is that the most important decisions require the combining of information about more than one component. Any agency, organization, or policy must be viewed as a system with interrelated components. Decisions regarding these agencies, organizations, or policies can be placed in categories which reflect particular general information needs.

A combination of the CIPP model and Copa system was used to form the model for this research. The model is presented in Figure 4. Justification for the use of the CIPP model and Copa system was supported by the policy models of Brock, et al. (1973) and Manasse (1981). The structure has four categories of decisions developed by consider-
ing two characteristics or dimensions of a decision. The first dimension encompasses what is to be done (ends) or how it is to be done (means). The second dimension reflects the time of the decision, that is, either before (intended) or after (actual) the decision is implemented.

In summary, all three models possessed components which are interdependent upon one another, connect the objects within the system, and possess a structure and process. Thus, each model meets the criteria for being a systems approach to policy analysis. The Brock, et al. (1973) and the Manasse (1981) policy impact studies were used to verify the use of the CIFF model and Copa system for use in assessing the impact of the policy. The structure of the model formed the process for the four specific research questions of the study.

Research Questions

The focus of this study was impact analysis. Traditionally, analysis refers to the process of breaking something down into its constituent parts (Brock, et al., 1973, p. 3). In order to formalize the study, the purposes were broken into specific research questions. The questions addressed prompted specific phases and connected the conceptual and analytical frameworks. Thus, the research pro-
<table>
<thead>
<tr>
<th></th>
<th>Intended</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ends</td>
<td>Planning (Context)</td>
<td>Recycling (Product)</td>
</tr>
<tr>
<td>Means</td>
<td>Structuring (Input)</td>
<td>Implementing (Process)</td>
</tr>
</tbody>
</table>

Figure 4: Adapted Model by Stufflebeam and Copa
ceeded in identifiable stages and produced outcomes for each stage. The research questions addressed were:

1. What was the Congressional intent of Section 202(d)?

2. What process was used to transfer a nationally based intent for CETA linkage with education agencies into practice?

3. What uses were made of the linkage funds?

4. Should the same or other legislative approaches be used to encourage linkage in the future?

Conceptual Framework

The conceptual framework of this study included four distinct stages, each separate from but related to the other stages. Within a given stage, data were gathered, methodologies applied and outcomes reported. The overall study was conducted with the assumption that the outcomes of each stage were complementary to the next stage. The four stages of the study, were:

1. The identification of the context and inputs leading to the enactment of Section 202(d) into CETA amendments of 1978.

2. The process through the bureaucratic structure to transform Section 202(d) from a legislative amendment to an administrative guideline.
3. The collection and interpretation of product data provided by the states with respect to the activities of Section 202(d) as implemented.

4. The specification of impact of set-aside funding as a means of encouraging coordination and establishing linkage.

The conceptual framework for this study is depicted in Figure 5. The following paragraphs outline the specific aspects of executing each stage.

Stage One

Stage one addressed the research question dealing with the Congressional intent of Section 202(d) in the CETA Amendments of 1978. Historical methodologies were used and focused upon source documents and a personal interview with a key member of the legislative team at the time of its enactment. The analysis of this stage was designed to identify internal and external influences of this policy, the relevant actors, and basic policy goals as determined by Congressional action.

The procedures used to identify the historical events began with research at the legislated statement of intent; source documents including the U.S. Senate reports; testimony of hearings before the Subcommittee on Employment, Pou-
<table>
<thead>
<tr>
<th>Stage of Study</th>
<th>Research Questions</th>
<th>Methodology</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage One</td>
<td>What was the Congressional intent of Section 202(d) of CETA 1978?</td>
<td>Historical (Primary)</td>
<td>Statement of Congressional intent</td>
</tr>
<tr>
<td>Stage Two</td>
<td>What processes were used to transfer a nationally based intent for CETA linkage with educational agencies into practice?</td>
<td>Historical (Primary)</td>
<td>Factors in the policy-making process, in the content of the policy, or in the manner it was implemented responsible for the actual consequences of the policy</td>
</tr>
<tr>
<td>Stage Three</td>
<td>What uses were made of linkage funds?</td>
<td>Survey</td>
<td>Consequences of the policy</td>
</tr>
<tr>
<td>Stage Four</td>
<td>Should the same or other legislative approaches be used to encourage linkage in the future?</td>
<td>Analysis</td>
<td>Recommendations/Conclusions</td>
</tr>
</tbody>
</table>

Figure 5: Research Design and Methods
erty, and Migratory Labor of the Senate Committee on Human Resources; and the legislative history as provided in the U.S. Code and Administrative Review and Congressional Record. A second procedure included an interview with a leader in the enactment of this amendment. This leader was Dr. James O'Connel, a staff professional under Senator Jacob Javits at the time the amendment was offered to the committee. Dr. O'Connel provided the key to the historical events and contributed to understanding the overall intent of Section 202(d) as seen by those who authored the amendment.

Stage Two

Stage two addressed the research question dealing with the process used to transfer the national intent of Section 202(d) for CETA linkage with educational agencies into an administrative guideline. The sequence of decision-interpretation-implementation process following the original legislation through the planning cycle for FY 1980 was assessed. The primary function of this analysis was to organize data to show the evolution of the situation, and the relevant interpreters, enforcers, and implementors of the policy.
The procedures for conducting this section included identification of the Department of Labor as an organization, the DOL's relationship to the Regional Administrators, and the State Employment and Training Council's as an enforcer of the policy. Guidelines, memorandum, and related documents, including the rules and regulations published in the Federal Register were examined.

Stage Three

Stage three addressed the research question dealing with the uses made of the linkage funds by the states as evidenced in the reports required of the states by the DOL. A survey of the fifty State Employment and Training Council directors was made to identify these activities. Two public documents were requested. These two documents were the 1979 Annual Report and the 1980 Governor's Special Grant Annual Plan. The reviewing process produced a categorization of the linkage activities consistent with the Federal Register, Section 677.38.

Stage Four

Stage four resulted in recommendations and comment concerning the final research question regarding the set-aside legislative approach. This stage provided data for decision making related to future linkage efforts.
Research Procedures

The research procedures are summarized on the Gantt Chart, Figure 6, shown on the following page. The study progressed through four identifiable stages with defined tasks. The chart depicts the tasks completed during the study and spans a nine month time frame.

Stage One Tasks

The tasks addressed the research question dealing with the historical events that contributed to the development of Section 202(d) in the CETA Amendments of 1978. The tasks needed to complete this stage included (a) extensive research into source documents and (b) interviews with key contact people.

The first source document studied was the legislative history provided in the U.S. Code and Administrative Review (95th Congress, 2nd session, Vol 4, 1978). This history provided the complete text of Senate Report 95-891 (p. 4480) and House Conference Report (p. 4581) 95-1765. In addition, this report identified other reports and Congressional Record information. Following this initial history, the testimony of Hearings before the Subcommittee on Employment, Poverty, and Migratory Labor of the Senate Committee on Human Resources on S.2570 were reviewed.
<table>
<thead>
<tr>
<th>Tasks By Stages</th>
<th>Month</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(1)</td>
</tr>
<tr>
<td></td>
<td>(2)</td>
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<tr>
<td><strong>STAGE ONE</strong></td>
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<tr>
<td>Conduct computerized literature search</td>
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<tr>
<td>Research relevant documents including government publications</td>
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<tr>
<td>Contact Washington, D.C. offices to secure names of key actors</td>
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<tr>
<td>Interview Dr. James O'Connell</td>
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<tr>
<td>Extend research beyond CETA to include YEDPA's 22% set-aside</td>
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<td>Finalize Congressional intent of Section 202(d)</td>
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<td><strong>STAGE TWO</strong></td>
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<tr>
<td>Identify relevant document(s) containing guidelines, legislative processes,</td>
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<td>historical background</td>
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<tr>
<td>Verify Office of Comprehensive Employment Development of DOL as authors of</td>
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<td>rules and regulations</td>
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<tr>
<td>Following interview, Stage One, with Dr. O'Connell, correlate information</td>
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<td>regarding Congressional input into rules and regulations</td>
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<tr>
<td>Contact ten Regional Administrators of DOL to verify extent of additional</td>
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<td>guidelines issued to states</td>
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<tr>
<td>Summarize implementation process of Section 202(d)</td>
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<td><strong>STAGE THREE</strong></td>
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<tr>
<td>Conduct survey of State Employment and Training Council directors</td>
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<td>Identify codification categories</td>
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<td>Study data provided by states</td>
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<tr>
<td>Summarize by category activities of Section 202(d)</td>
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<td><strong>STAGE FOUR</strong></td>
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<td>Determine findings</td>
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<td>Identify conclusions and unresolved issues relating to findings</td>
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<td>Offer recommendations</td>
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Figure 6: Gantt Chart - Research Activities by Stages
Telephone conversations with the Senate Committee on Human Resources provided the name of Dr. James O'Connell as a key legislative professional actively involved with the reauthorization of CETA in 1978. A subsequent conversation with Dr. O'Connell indicated he was instrumental in the initiation of this section into CETA and would be willing to provide an interview. A complete transcript of this interview may be found in Appendix A.

Following the interview with Dr. O'Connell, it became evident that the intent behind Section 202(d) went back to the Youth Employment and Demonstration Projects Act of 1977. Consequently, the source documents relative to YEDPA were investigated and included the hearing before the Subcommittee on Employment, Poverty, and Migratory Labor of the Committee on Human Resources on S.1242 and the Congressional Record. Both documents were reviewed for documentation on the education-work linkage emphasized in YEDPA through the 22 percent set-aside.

Stage Two Tasks

Stage two addressed the research question dealing with the process used to transfer the national intent of Section 202(d) for CETA linkage with education agencies into an administrative guideline. A careful review of the Federal
Register, (April 3, 1979, Vol. 44, no. 65, Rules and Regulations) provided the name of Mr. Robert Anderson, Administrator, Office of Comprehensive Employment Development, Employment and Training Administration, U.S. Department of Labor. Through contact with his office, it was determined that this office authored the legislative rules and regulations. The process used to write these rules and regulations was identified by both this office and Dr. O'Connell in his interview.

Following the identification of writers of the rules and regulations, the process was traced through the bureaucratic system to the ten Regional Administrators of the DOL. Telephone conversations with these ten individuals provided the information relative to guidelines the states received to assist them in implementing this policy. A complete list of these individuals may be found in Appendix B.

Stage Three Tasks

Stage three addressed the research question dealing with the uses made of the linkage funds by the states as evidenced in the reports required of the states by the DOL. It was determined that the State Employment and Training Council directors would be the logical contact from each state because of his/her political position with the state.
governor's office and his/her responsibility over the discretionary funds. A complete list was obtained from the Virginia Governor's Employment and Training Council director, Mr. George Scherer, which subsequently provided the basis for the mailing list. A complete list may be found in Appendix C.

A review of the Federal Register (April 3, 1979, Vol. 44, No. 65) indicated that each state was required to submit two reports relative to the special discretionary funds. The first report, a public Annual Report to the Governor must be submitted by the State Employment and Training Council (Federal Register, ssb77.36) no later than February each year. The Annual Report "...shall analyze the coordination of employment and training programs during the previous fiscal year, and recommend improvement. It shall also describe any special programs or linkages" (p. 20042). The second document, a Special Grant Annual Plan to the Regional Administrator must be submitted from the governor upon notification by the Secretary of Labor of the amount of funds available for a special grant. This plan must contain among other things a section entitled, "State Coordination and Establishment of Linkages Between Prime Sponsors and Education Agencies and Institutions Program Narrative" (p. 20041). Logically, the Annual Report would provide linkage
activities for FY 1979 and the Annual Plan activities proposed for FY 1980. It was determined that these two documents would be requested from each state.

A subsequent task was to prepare a letter requesting the information from the names provided by the Virginia Governor's Employment and Training Council director. A copy of the original letter may be found in Appendix D. A follow-up letter was sent three months after the initial letter to those states who had not responded. A copy of the follow-up letter may be found in Appendix E.

After receipt of the data, it was necessary to determine a method to codify the data provided by the states. Again, the Federal Register (April 3, 1979, ss677.38 p. 20043) provided the appropriate categories. In addition, the format requested by the Regional Administrators in the Special Grant Annual Plan was provided in the Forms Preparation Handbook (U.S. Department of Labor, 1979). This categorized the activities of Section 202(d) into two general categories with one of these categories containing seven subcategories. The data was then summarized by activity for the responding states.
Stage Four Tasks

Stage four produced recommendations and comment upon the final research question regarding the legislative approach used to encourage linkage. This stage reflected upon all of the previous stages.
CHAPTER IV

Findings

In 1978 Congress amended the Comprehensive Employment and Training Act (CETA) to include, among other things, Section 202(d). Funds were provided to governors to encourage coordination and establish linkages between CETA and educational agencies and institutions. The purposes of this study were to examine the Congressional intent behind Section 202(d) of CETA of 1978, to trace the procedures used to implement Section 202(d) of CETA, to identify and codify Section 202(d) activities and to make recommendations regarding the future of Section 202(d). This chapter presents the results obtained in achieving the goals and purposes of the study. The data are presented in three sections. Section one reports the results of research into the legislative and historical background leading to the enactment of Section 202(d) into CETA in 1978. Section two traces the implementation process of Section 202(d). Section three summarizes the results of the national survey of Section 202(d) activities.
Legislative and Historical Background of Section 202(d)

The key to making the legislative process work is the individual citizen (Lewak, 1977). The public must be alert, informed, and watchful of the power delegated to the legislators. In addition, the public, and more particularly the administrators charged with implementing the legislation passed by Congress, must be educated as to the legislative process and historical background of the legislation. This section was divided into two sections (a) an overview of the legislative process in general, as it related to CETA in 1978, and as it specifically related to Section 202(d), and (b) a description of the historical background leading to Section 202(d)’s enactment into CETA in 1978.

Legislative Process

The legislative process at the Federal level impacts the legislative intent. Controversial subjects can be disruptive to the process and yet conflicts are vital to the process as they provide the stimulus for needed changes. An understanding of this process is necessary and thus this section contains two components: (a) an overview of the legislative process in general, and (b) an overview of the legislative process relating to the CETA amendments of 1978.
Legislative process in general. Major bills are drafted by various agencies and introduced as legislation by members of Congress. After a bill is introduced, it is assigned to a committee. Committees are the work locale of Congress and the source of leadership and research on most legislation (Olson, 1976). If the chairman or a majority of the committee members feel that a piece of legislation deserves consideration, a subcommittee will deliberate.

The subcommittee holds public hearings on the proposed legislation, enabling the legislators to obtain information and varied opinions on the bill. At the conclusion of the hearings the subcommittee carefully considers the bill. Amendments may be added and sections deleted by committee members through the process known as the "mark-up" of the bill. This usually takes place in executive session. If the subcommittee votes in favor of the proposed legislation, the bill is then referred to the full committee for consideration.

If the proposed legislation passes the entire committee, it is ready for floor action. More than 80 percent of the bills voted out of committees are eventually passed when they come to the floor for a vote (Lewak, 1977). However, the bills may face three additional hurdles before they are voted upon by Congress. These are the Rules Committee in
the House, the filibuster in the Senate, and floor tactics that can be used in both chambers (Lewak, 1977).

The House Rules Committee places bills on a legislative calendar so they can be considered in an orderly manner. The Rules Committee can place restrictions to proposed legislation including the length of floor debate time allowed. Indeed it can prevent bills from reaching the floor. While these conditions may appear to be mere technicalities, the Rules Committee can doom a bill by not putting it on the calendar and thus preventing a vote (Lewak, 1977).

The Senate does not have a Rules Committee yet the Senators have the right to use the filibuster or unlimited debate (Lewak, 1977) to kill bills through continuous talking. The only way to stop a filibuster is through cloture of it by two-thirds of the Senators present on the floor voting to cut off debate. At that point, debate must end and a vote taken.

Even after a bill clears the potential obstacles of the Rules Committee and the filibuster, tactics on the floor of either chamber can lead to its demise. One method used is to attach amendments of substance to the bill or attach extraneous amendments. As the President must sign an entire bill, including the rider, this sometimes is used to allow a bill that probably cannot pass on its own to "ride" through to passage on the strength of a more popular measure, or it
can be used to cause a veto by adding provisions that the 
President cannot support.

Once a piece of legislation reaches the floor for a 
vote, lawmakers can vote one of three ways, "aye," "nay," or 
"present." The last choice indicates that the legislator 
was in attendance but decided not to vote on the issue. 
Even after legislation is passed by the House and Senate, 
two problems remain. Legislation must be passed in identi-
cal form by both houses before it can reach the President's 
desk. If differences exist between similar bills, a confer-
ence committee is established to work out a compromise 
between the House and Senate versions. It is then returned 
to both houses for approval.

The second problem is that once the bill has been 
approved by the Congress and signed into law by the Presi-
dent it still is only an authorization. Real meaning is 
given by the House and Senate Appropriations Committee which 
appropriate funds for the law. An appropriation, like any 
other legislation, must be approved by the House and Senate 
and signed by the President.

The legislative process of CETA 1978. On February 23, 
1978, Senators Nelson, Williams, Javits, Hathaway, Rieglie, 
Kennedy, and Cranston introduced S.2570, the administra-
tion's proposal to revise and reauthorize the Comprehensive
Employment and Training Act of 1973. It was referred to the Senate Committee on Human Resources, which referred it to the Subcommittee on Employment, Poverty, and Migratory Labor. The legislative history indicates that a total of eleven days of hearings were held on S.2570 and other legislation pertaining to the CETA amendments. Eight days of hearings specifically relating to S.2570 were held in Washington on February 23 and March 1, 2, 6, and 10, 1978; one day was held in Grand Rapids, Michigan, on February 16, 1978; one day was held in Detroit, Michigan, on February 17, 1978; and one day of hearings was held in Madison, Wisconsin, on February 25, 1978. The subcommittee received testimony from congressional and administration witnesses; from public and private interest groups including representatives of counties, governors, labor unions, community-based organizations' client groups; vocational education organizations, as well as from the Chairman of the U.S. Civil Rights Commission; and the National Commission for Manpower Policy. In addition, witnesses from the Chamber of Commerce, the Business Roundtable, the Committee for Economic Development, and the Chrysler Institute testified before the subcommittee concerning their views on the role of the private sector in CETA (Congressional Record--Senate, August 22, 1978, p. 13952).
The Subcommittee on Employment, Poverty, and Migratory Labor held two days of mark-up on S. 2570 on April 25 and 26, 1978. At this time the subcommittee recommended that the Senate Human Resources Committee report the bill, as amended by the subcommittee, to the Senate. On May 11, 1978, the Senate Human Resources Committee made several changes in the legislation reauthorizing the Comprehensive Employment and Training Act and reported the bill out for upcoming floor vote. It was during this session that the one percent amendment was sponsored by Senator Jacob Javits earmarking one percent of Title II money for linkages between schools and prime sponsors.

The bill was considered in the House on August 9 and considered in the Senate August 22 and 25. The two chambers reconciled their differences in a conference committee. On October 13, the Senate agreed to the conference report, and October 15 the House agreed to the conference report. On October 27 President Carter signed the CETA amendments into law.

Historical Background of Section 202(d)

On May 11, 1978, the Senate Human Resources Committee passed an amendment earmarking one percent of Title II funds be available to encourage coordination and establish linkage
between CETA and appropriate educational agencies and institutions. In order to determine the intent of the Committee in recommending this amendment and of Congress in subsequently passing this amendment, it became clear that the benchmark provision of the one percent set-aside "...goes back to the 22 percent set-aside that was enacted as part of P.L. 95-93, the Youth Employment and Demonstration Projects Act" (O'Connell, J., personal communication, March 19, 1981). Therefore, this section will address two subjects (a) the education-work linkage provided in the YEDPA 22 percent set-aside, and (b) describe the unique characteristics of this set-aside approach.

**YEDPA 22 percent set-aside.** In 1977 Senator Hubert Humphrey and Senator Jacob Javits drafted the Youth Employment and Demonstrations Projects Act (YEDPA) of 1977, which ultimately became P.L. 95-93 to initiate a new partnership between prime sponsors and local education agencies in improving the transition of youth from school to work. The motivation for the passage of YEDPA was summarized in the *Congressional Record* (July 21, 1977) when the conference committee submitted H.R. 6138 and asked for its consideration. Senator Hubert Humphrey summarized:

> The plague of unemployment continues to strike hardest at our youth... The unemployment rate now stands at 38.7 percent for black teenagers and it approaches an appalling 60 percent in some of our central cities. Almost half of all unemployed Americans are under the age of 25... It is clear
that the most direct and rapid way of alleviating youth unemployment is through specifically targeted youth employment programs. Economic recovery alone will not provide enough jobs opportunities to satisfy the nearly 3.2 million youths who want jobs. (Congressional Record--Senate, July 21, 1977, p. 24292).

The primary motivation for the passage of YEDPA was a desire to find a solution to the youth unemployment situation. When the supporters of this youth employment legislation commented, broader problems were seen to be central.

Senator Jacob Javits identified the following four basic principles that he felt the Congress should consider in drafting youth employment legislation:

One: that youth employment programs need to be targeted at low income youths and at high unemployment areas of our country.

Two: that linkages need to be established between education and work, in order to improve the transition of youths from school to employment.

Three: that work experience programs must include a significant component of training, counseling, guidance, and so forth in order to upgrade the long run employability of youth.

Four: that innovative and experimental programs and projects must be tested in order to demonstrate which employment and training program offers the best hope for removing the competitive disadvantages that often characterize the labor market experience of young people (Congressional Record--Senate, July 21, 1977, p. 24279).

Thus, the transition from school to work, linkages between education and employment and training, were goals of YEDPA. Through the Sub-part 3, Youth Employment and Train-
ing Programs (YETP), 22 percent of the funds available must be set aside for programs administered by the local schools for in-school youth.

Following the enactment of YEDPA, studies surfaced that indicated that a new spirit of collaboration had been initiated between prime sponsors and local educational agencies (U.S. Department of Labor, *Youth Initiatives*, 1978; Coleman & Wurzburg, 1979). Wurzburg, (1980) reported that after one year, in virtually all prime sponsorships, there was some progress toward joint planning and coordinated programming (p. 21). The report further stated that more frequently, positive steps in the right direction were spurred but indicated that the road is a very long one.

It was clear to Senator Javits and the other members of the Human Resources Committee that the 22 percent set-aside could accomplish much in alleviating the problems of unemployment and underemployment. However, increased collaboration between CETA and the educational community was needed (U.S. Congressional Record—Senate, August 22, 1978, p. 13968). In addition, it became clear to these members of the Committee that linkages were forming and that programs were being designed and administered to strengthen the linkage between the classroom and the workplace. However, the committee was concerned about the adequacy of the 22 percent
This concern was a result of several important factors. First, the members of the subcommittee felt that prime sponsors and local educational agencies using the 22 percent set-aside "...lacked the technical assistance that was required to bring these agreements about in a way other than just signing on the dotted line" (O'Connell, J. Personal communication, March 19, 1981). In addition, the two institutions needed to work out administrative differences and be provided substantive guidance and models in the form of collaboration (Wurzburg, 1980). Further, Coleman & Wurzburg (1979) cautioned that education leaders met on the YEDPA agenda, issued a statement of support for closer relationships, and adopted a conciliatory stance toward youth employment and training programs. But, these actions "...do not necessarily reflect the sentiments of their constituencies and certainly cannot deliver the support of those constituencies" (p. 29). To the Committee on Human Resources, and more specifically to Senator Javits, a new element was needed to promote negotiation and development of the 22 percent set-aside funding requirements (O'Connell, J., personal interview, March 19, 1981). The additional encouragement came in the form of Section 202(d) in 1978.
The set-aside approach. CETA, since its inception, has placed increasing and repeated emphasis on linking local CETA prime sponsor employment and training programs with other local agencies. The various mandates for collaboration have produced few results (Coleman & Wurzburg, 1979). YEDPA included the usual mandates and verbiage to encourage linkage but also included a specific mechanism to spur it. This mechanism was a provision that 22 percent of the Youth Employment and Training Program (YETP) prime sponsor’s formula allocation be administered under the terms of an agreement between the sponsor and the local education agency.

Coleman & Wurzburg (1979) stressed that the 22 percent "...set-aside set in motion the forces necessary for genuine collaboration" (p. 111). The point of getting educators involved in employment and training programs for youth was more than acquiring the expertise of the schools in providing services to youth. It was anticipated that these funds would stimulate two important institutional changes (Wurzburg, 1980). First, it was anticipated that the schools would gear more of the educational process to meeting the employability needs of youth. Second, it was anticipated that the potential dropouts and underachievers, typically served by CETA, would be better served by education and employability services. The set-aside approach struck a
compromise between the notion of serving Federal priorities through the CETA system and granting local decision makers a degree of discretion in developing programs and policies. Not only did the set-aside force prime-sponsors to take a hard look at the ability of educational institutions to provide the kind of training and employability development needed by the local labor market, it also forced the educators to review their curricula and training.

It was obvious that the governor's responsibilities outlined in the 1973 legislation was inadequate when the one percent linkage allocation was added to the discretionary budget. Therefore, new provisions were added to the amendment which expanded the role of the governor in coordinating employment, training, and education programs. First section 105 (b) (1) provided that coordination of these programs shall be a new function of the governors in CETA programs, and shall be described in the Governor's Coordination and Special Services Plan.

The set-aside provision of Section 202(d) of CETA to encourage coordination and establish linkage was given to the governor of each state. Javits felt (Congressional Record--Senate, August 22, 1978, p. 13968) that the governor was in the best position to "nudge" the systems together. As an incentive grant for joint programs, in-service pro-
grams, conferences, and technical assistance, it was felt that the governor could be the catalyst for initiating a new partnership between prime sponsors and educational institutions. These grants were provided over and above the 22 percent mandated formula allocation.

In summary, the legislative and historical background of Section 202(d) to encourage coordination and establish linkage between CETA and educational agencies provided the statement of Congressional intent regarding the utilization of funds for activities. The governors, through incentive grants for joint programs, in-service programs, conferences, and technical assistance were to act as catalyst for initiating a new partnership between prime sponsors and educational institutions. In addition, the educational agencies would not have a presumptive role in the delivery of services. Rather the prime sponsors and educational agencies would initiate joint efforts to prepare people for work through programs relevant to current labor market conditions.

**Implementation Process Trace**

The impact of regulations is a function of how they are implemented. In like manner, a function of the implementation process is the characteristics of the agency assigned
the task of implementation. Once CETA was signed into law, the implementation process began. This section will (a) identify the national, regional, and state roles in implementing and interpreting CETA 1973; (b) identify the process of interpreting and implementing CETA in 1978; and (c) summarize the interpretation of Section 202(d) of CETA 1978.

Interpreting and Implementing CETA 1973

One of the stated purposes of CETA was to move decision-making and management of employment and training programs to the local level. In the process, CETA had to change existing interorganizational relationships and modify the roles of the Federal, state, and local officials (Mirengoff & Rindler, 1978, p. 85). The act became law in December, 1973, with the intention that it would be operational by July 1, 1974. This left only six months for transition from the existing program authorized by the Manpower Development and Training Act and the Economic Opportunity Act. Their legislation was to expire July 1, 1974. This section will (a) identify the national role in implementing CETA, (b) the regional office role in implementing CETA, and the (c) state role in implementing the Governor's Grant.

The national role. The Department of Labor outlined several major functions for itself. The first function was
to designate prime sponsors and allocate funds. In addition, its key responsibility was to review plans for conformity with the legislation, interpret and implement national policy through regulations and guidelines, provide technical assistance, assess prime sponsor performance, and establish a mechanism for hearings and appeals (Mirengoff & Rindler, 1978, p. 87).

The CETA legislative history reflects ambivalence regarding Federal control. For example, prime sponsors must give assurances that statutory provisions are being met. However, a House Committee Report, 93-659, indicated that the Secretary of Labor was not to rely on prime sponsor certification alone, but to exercise judgment to ensure that the requirements of the act were fulfilled (Mirengoff & Rindler, 1978, p. 86). Yet the same report indicated that the Secretary of Labor is not to second guess the good faith judgment of the prime sponsor. Apparently the intent was to permit some degree of freedom within the broad limits imposed by the statute.

Since the enactment of CETA, there has been a gradual erosion of the freedom and flexibility of the local authorities, primarily because of Congressional affect in dealing with new programs (Mirengoff & Rindler, 1978, p. 86). Obviously the Federal government was concerned that the act was
administered properly. What is unclear, however, is the extent to which Federal officials should participate in decisions on such matters as the type of programs to be offered, the delivery system for those programs, the selection of agencies to deliver the services and clientele to be served.

The regional office role. The Federal office is linked to the local prime sponsor through a network of regional offices of the Employment and Training Administration. According to Mirengoff & Rindler (1978), these offices transcribe national policy, review and act on prime sponsors' plans, interpret regulations, provide assistance, assess programs, and handle complaints.

The Regional Office Handbook indicates that the program staff should not impose their judgment on a prime sponsor's plans or operations unless it is clear that the sponsor's actions are not in compliance with the purposes and provisions of the Act (Snedeker & Snedeker, 1978, p. 44). The line between advice and assistance and direct intervention was sometimes crossed (Snedeker & Snedeker, 1978) as regional staffs had been accustomed to a role in program decision making. It is understandable that regional offices and prime sponsor conflicts were frequent (Snedeker & Snedeker, 1978).
The state role. CETA assigned state government two roles. The state became prime sponsor for those areas within the state ineligible, or not electing to become individual prime sponsors. These areas of the state were designated balance-of-state areas. States were also made responsible for coordinating all manpower-related activities on a statewide basis. A percentage of funds were allocated to governors for statewide purposes. These funds were separate and apart from the Section 202(d) funds.

The state administrators were frustrated by the dual role and the lack of clarity in the legislation and regulations (Snedeker & Snedeker, 1978). Governors were given oversight and coordination responsibilities over prime sponsor localities, but they were not given specific power to intervene in local prime sponsor systems or to enforce coordination with non-CETA program sponsors (Mirengoff & Rindler, 1978).

Interpreting and Implementing CETA 1978

President Carter signed the CETA Amendments into law on October 27, 1978. The Employment and Training Administration of the Department of Labor began to analyze the CETA reauthorization immediately to prepare new regulations. The total effort of writing the regulations was coordinated by
Robert Anderson, Office of Comprehensive Employment Development, U.S. Department of Labor. He monitored schedules and served as the central point for submittal and distribution of comments.

The process summarized below was adapted from two issues of the Bureau of National Affairs (BNA), Employment and Training Reporter (ETR). The regulation writing process was lengthy and extensive. Within the Employment and Training Administration, three committees were formed to develop the regulations (BNA, ETR, November, 1978). The first committee was a coordinating committee which described the issues needing higher level decisions. Committee members included representatives from the Office of Comprehensive Employment Development, the Office of National Programs, the Office of Youth Programs, the Office of Policy, Evaluation and Research, the Office of Administration and Management, the U.S. Employment Service, Unemployment Insurance, the Office of Investigation and Compliance, and the Office of Field Operations. A second executive committee was chaired by Assistant Secretary Green and consisted of the deputy assistant secretary, the administrators of the above mentioned offices, and representatives of the ten regional administrators. The decisions of the executive committee were reported to the coordinating committee and the Employ-
ment and Training Administration and Department of Labor. The third group was the Secretary's Departmental Committee which met with representatives of the executive committee to discuss the issues and progress of the regulations.

Procedurally, the first draft of the regulations was circulated to regional offices and Employment and Training Administration executive staff November 6, 1978, but was not available to anyone outside the Labor Department. Comments on the draft were returned by November 20 and members of the regional offices discussed the comments. A second draft was available for review on December 4. It was the responsibility of the regional administrators to inform prime sponsors and the principal public groups about the draft regulations at this time and to organize work groups to analyze and comment on the regulations. Specific instructions to the governors regarding the preparation of the Master and Annual Plans required a section entitled "State Coordination and Establishment of Linkages Between Prime Sponsor and Educational Agencies and Institutions Program Narrative." The Forms Preparation Handbook (U.S. Department of Labor, May 14, 1979, pp. VIII-20-VIII-21) provided directions for the proper format to be followed by staffs in preparing the narrative. The directions were:

i) A description of arrangements made to provide assistance to prime sponsors or education insti-
v) A description of technical assistance to be provided to prime sponsors and educational agencies in the extent of educational offerings to prime sponsor jurisdictions which lack access to various educational opportunities.

vi) A description of provisions made for providing assistance in the development of systems for assessment and testing of educational attainment of participants in prime sponsor programs.

vii) A description of provisions made for providing assistance to eliminate barriers in the educational system which hamper employment and training activities including open-entry/open-exit courses and academic credit for CETA training.

viii) A description of arrangements to increase coordination and establish linkages between prime sponsor and institutions providing training programs approved by the Secretary, such as State apprenticeship councils.

The third draft was published in the Federal Register on January 19, 1979. The regions again gathered prime sponsor and public comment with the final regulations published on March 20, and became effective April 1.
Summary of Section 202(d) of CETA 1978

In addition to the committees involved in the writing of the rules and regulations, the professional staff of the legislative committees were also involved. Dr. O'Connell, (personal communication, March 19, 1981) indicated that there were informal sessions in which the Employment and Training Administration discussed the proposed regulations with the members of the legislative committee in order to insure intent and correct interpretation of the regulations. His personal experience with the Department of Labor has been that the process is consistent with every effort made to ensure correct interpretation.

Section 202(d) may be found in the Federal Register, April 3, 1979, under the heading Rules and Regulations relating to Section 202(d) ss677.38 (p. 20043). Specifically, the Federal Register lists activities that the funds may be used which include:

(a) Funds provided under ss677.32 (c) shall be available for encouraging coordination and establishing linkages between prime sponsors and appropriate educational agencies and institutions, providing training programs approved by the Secretary such as apprenticeship programs. Funds may be used for activities such as:

(1) Providing assistance to prime sponsors or education institutions in the development of agreements between prime sponsors and State Boards of Vocational Education and State or local educational agencies or institutions of higher education (sec 203(c), sec. 433(d)(2), and sec 430(c));
(2) Establishing mechanisms to increase information exchange between prime sponsors and educational agencies and institutions;

(3) Developing and disseminating models of linkages which can be shared with all prime sponsors in the State;

(4) Providing technical assistance to prime sponsors and educational agencies the extension of educational offerings to prime sponsor jurisdictions which lack access to various education opportunities;

(5) Providing information, curriculum materials and technical assistance in curriculum development and staff development to prime sponsors;

(6) Providing assistance in development of systems for assessment and testing of the educational attainment of participants in prime sponsor programs;

(7) Providing assistance to eliminate barriers in the educational system which hamper employment and training activities, such as development of open-entry/open-exit courses and academic credit for CETA training.

(b) Funds for services to eligible participants shall be used for the purposes of encouraging and supporting training activities which are jointly delivered by employment and training agencies and appropriate educational agencies and institutions, including apprenticeship programs or hometown plans. Funds may be used for:

(1) Expand the size of jointly delivered programs;

(2) Enhance training and services available to participants in jointly delivered programs;

(3) Assist in the planning, development and evaluation of jointly delivered programs. Telephone conversations with each of the ten regional offices validated that no additional guidelines were issued
to the states regarding the use of the linkage funds. A listing of the ten individuals contacted may be found in Appendix B.

In summary, the implementation of CETA required a transition from categorical to decentralized programming. Key decisions, actions, and developing roles during the transition period shaped relationships which exist today. State and local administrators struggled with Federal regulations and numerous guidelines. Regional Labor Department staffs attempted to provide assistance in interpreting regulations. The Federal staff was overwhelmed with the amount of coordination and administrative procedures necessary to change the system.

The interpretation of legislation was the key to its implementation. Clearly the 1978 amendments were interpreted into rules and regulations and the process was carefully planned and orchestrated. While the Federal level provided input into the writing of the regulations, assistance was also sought from the regional offices; the local administrators, the public, and most importantly from the legislative staff who authored the legislation. The process implies that the rules and regulations reflected the legislative intent of the Congress.
National Survey of Linkage Activities

Section 202(a) makes funds available to the governor of each state as part of the Special Grant to Governors allocating one percent of the amount available for Title II, Parts A, B, C, and D. The stated purposes of these funds are to (a) encouraging coordination and establishing linkages between prime sponsors and appropriate educational agencies and institutions, and (b) for services for eligible participants delivered jointly by employment and training agencies and appropriate educational agencies and institutions. This section will provide (a) a general summary of the collected data; and (b) a narrative summary of the linkage activities by category as required in the Forms Preparation Handbook of the Department of Labor in reporting state planning.

General Summary of Data

Data collected for this research were in response to a letter and/or follow-up letter sent to the fifty state Employment and Training Council directors requesting copies of the 1979 Annual Report and 1980 Special Grant Annual Plan. Eighty-six percent (86 percent) of the states responded to the request. New Hampshire, North Carolina, Oklahoma, Rhode Island, South Carolina, West Virginia, and Wyoming did not respond.
The Annual Reports and Annual Plans provided a wide variety of formats, detail, and information. The 1979 Annual Reports to the governors provided little usable information. Because funds were not released until April 1, 1979, leaving only six months for program operation, many states did not have time to implement programs. Thus several states carried their FY 1979 monies over to FY 1980. Due to the lack of information reported in the Annual Reports and the variability in the reporting of information, it was determined that the Annual Reports were not usable for this study.

The FY 1980 Annual Plans, however, were more informative and provided the research data pool for this document. The section of the Annual Plans specifically requested from each State Employment and Training Council director was the part entitled, "State Coordination and Establishment of Linkages Between Prime Sponsors and Federal Educational Agencies and Institutions Program Narrative" (Federal Register, April 3, 1979, Rules and Regulations, p. 20041). This section contained a summary of the states' activities regarding the use of Section 202(d) funding. The Forms Preparation Handbook provided instructions for this Special Grant Annual Plan.
Several observations were made concerning the Annual Plans in general. While some states provided extensive information about funded activities to encourage coordination and establish linkages, other states provided a paragraph format which detailed little activity. Other states provided information about a funded activity but, the activity funded did not relate to the category. The sections that provided no activity or unrelated activity were coded "NA", not addressed.

There were other states that did not provide a comprehensive narrative. For example, Connecticut sent only the first category and obviously omitted the remaining sections when responding to this study. Indiana and Maine elected to place priorities on specific categories and only responded to those categories which addressed those priorities. Vermont funded two projects which did not meet all category requirements. Washington listed the projects funded and provided a table indicating which category the projects addressed. New Jersey funded several projects and provided a narrative summary but the data were not categorized in any manner. Therefore, for many of these states the researcher coded a "NP", not provided, which indicated that the state had not attempted to provide this information.
Generalizations from the survey portion of this research revealed that there was variability in the activities reported by the states. Most of the states indicated plans to fund a variety of projects to meet the specific categories offered in the *Forms Preparation Handbook*. Many of these same states had formed steering or advisory committees to assist in the appropriate utilization of the funds. Often priorities were identified and projects funded according to priority. For example, Virginia's technical steering committee consisting of a cross-section of personnel with expertise in education and representatives of selected prime sponsors set priorities for linkage funds. Indiana's committee developed a three-year planning process and addressed specific priorities. Ohio's State Employment and Training Council voted to distribute the one percent funds according to a formal allocation. Sixty percent went to the prime sponsors; twenty percent to vocational education; and twenty percent to the Governor's Employment and Training Council with the intent for each to implement new and innovative type programs.

Other states identified one or two projects for which linkage funds could be used. For example, New Mexico funded a Placement Officer's Project which provided public and post-secondary training institutions with placement offi-
cers. These placement officers coordinated training, developed jobs, provided follow-up services, and provided CETA participants with information on job placement and employer linkages. Arkansas placed linkage funds into the Media Implementation System funded by the State Board of Vocational Education. Minnesota funded the Youth Employment Education Unit of the Minnesota Department of Education.

Finally, the documents were indeed planning documents. While many of the states had obviously already completed a Request for Proposal (RFP) process and selected specific projects to fund for FY 1980 regarding the use of one percent linkage funds, other states indicated an intent to provide programs that addressed specific categories. Additionally, many states were literally responding in generalities regarding the entire governor's grant activities.

**Narrative Summary of Linkage Activities by State**

The *Forms Preparation Handbook* (1979) provided specific information regarding the narrative requested from each state regarding the Annual Plan to the Regional Administrator. Specifically, the Annual Plan narrative regarding the one percent linkage funds contained eight descriptions of activities. These eight categories provided the codification breakdown of the activities. This section summarizes
the activities by category and is divided into (a) arrangements made to provide assistance in the development of agreements; (b) mechanisms to increase information exchange; (c) description for developing and disseminating models of linkages; (d) technical assistance in the extension of educational offerings; (e) provisions for providing information, curriculum materials, and technical assistance in curriculum and staff development; (f) provisions for assistance in the development of assessment systems and educational attainment testing; (g) provisions for providing assistance to eliminate barriers in the educational system which hamper employment and training activities; and (h) jointly delivered training programs.

A summary of the activities is provided in Table 1.
Table 1: Summary of Section 202(d) Activities

<table>
<thead>
<tr>
<th>STATE</th>
<th>Arrangements Made to Provide Assistance</th>
<th>Mechanisms Established to Facilitate Exchange</th>
<th>Arrangements Made for Disseminating Models of Programs</th>
<th>Technical Assistance Provided in the Field</th>
<th>Provisions Made for Information, Research, Educational, &amp; Technical Assistance in Curriculum &amp; Staff Development</th>
<th>Development of Systems for Assessment and Assurance</th>
<th>Eliminate Barriers in the Educational System &amp; Workforce Development</th>
<th>Arrangements to Increase80% Participation in 300 &amp; 100 Institutions</th>
<th>NP = Not Provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>conduct workshops publish</td>
<td>conduct workshops serve as clearing-house</td>
<td>develop model projects disseminate written information</td>
<td>conduct research; develop curriculum</td>
<td>conduct research; develop model project</td>
<td>conduct research</td>
<td>conduct model project</td>
<td>conduct research</td>
<td></td>
</tr>
<tr>
<td>Alaska</td>
<td>develop models publish service</td>
<td>provide coordination</td>
<td>develop model provide research; support</td>
<td>provide technical assistance</td>
<td>provide technical assistance</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Arizona</td>
<td>purchase service</td>
<td>provide coordination</td>
<td>develop model provide research; support</td>
<td>provide technical assistance</td>
<td>provide technical assistance</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Arkansas</td>
<td>develop models provide coordination;</td>
<td>disseminate written information; conduct workshop</td>
<td>develop curriculum</td>
<td>develop model project</td>
<td>NA</td>
<td>initiate communication</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>California</td>
<td>conduct workshop develop data system publish</td>
<td>conduct workshop provide research; support</td>
<td>develop research; provide technical assistance</td>
<td>NA</td>
<td>develop model project provide staff support</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Colorado</td>
<td>Eliminated due to inappropriate information</td>
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</tr>
<tr>
<td>Connecticut</td>
<td>purchase service</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>NP</td>
</tr>
<tr>
<td>Delaware</td>
<td>NP</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>NP</td>
</tr>
<tr>
<td>Florida</td>
<td>conduct workshop</td>
<td></td>
<td>develop model project</td>
<td>conduct research; develop model project</td>
<td>conduct research; develop curriculum</td>
<td>develop model project</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Georgia</td>
<td>purchase service</td>
<td>conduct workshops disseminate written information</td>
<td>conduct research; provide technical assistance</td>
<td>develop model project</td>
<td>disseminate written information</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>STATE</td>
<td>Arrangements made to develop agreements</td>
<td>Mechanisms established to increase information exchange</td>
<td>Arrangements made for disseminating models</td>
<td>Technical Assistance provided in the form of workshops, seminars, etc.</td>
<td>Provisions made for coordination, development of systems and curriculum materials, etc.</td>
<td>Development of systems testing of educational assistance</td>
<td>Arrangements made to increase coordination and establish coordination mechanisms</td>
<td>Arrangements made to increase coordination and establish coordination mechanisms, and training and technical assistance provided, if any, by the Secretary.</td>
<td></td>
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</tr>
<tr>
<td>Hawaii</td>
<td>NA</td>
<td>conduct workshop, publish, serve as clearinghouse</td>
<td>develop model project</td>
<td>NF</td>
<td>NF</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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</tr>
<tr>
<td>Idaho</td>
<td>publish</td>
<td>serve as clearinghouse</td>
<td>develop model project</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Illinois</td>
<td>purchase service</td>
<td>conduct workshop, provide coordination, develop data system</td>
<td>NA</td>
<td>disseminate written information</td>
<td>conduct research</td>
<td>develop model project</td>
<td>develop model project</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Indiana</td>
<td>NP</td>
<td>serve as clearinghouse</td>
<td>conduct workshop</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td>develop model project</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Iowa</td>
<td>other funds provide</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td>purchase material</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Kansas</td>
<td>NP</td>
<td>publish</td>
<td>develop model project</td>
<td>provide technical assistance</td>
<td>NA</td>
<td>develop model project</td>
<td>develop model project</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Kentucky</td>
<td>NP</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td>NA</td>
<td>develop model project</td>
<td>develop model project</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Louisiana</td>
<td>purchase service</td>
<td>conduct workshop, provide coordination, develop data system</td>
<td>NA</td>
<td>disseminate written information</td>
<td>conduct research</td>
<td>develop model project</td>
<td>develop model project</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Maine</td>
<td>develop models</td>
<td>publish, conduct workshop</td>
<td>NA</td>
<td>develop model project</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td></td>
</tr>
<tr>
<td>Maryland</td>
<td>NP</td>
<td>provide coordination</td>
<td>NA</td>
<td>develop model project</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td></td>
</tr>
</tbody>
</table>
Table 1: Summary of Section 202(d) Activities (continued)

<table>
<thead>
<tr>
<th>STATE</th>
<th>Arrangements made to increase offerings</th>
<th>Arrangements made for dissemination of &amp; improve resources</th>
<th>Coordination, publication; develop model projects</th>
<th>Development of systems for assessment and monitoring of educational effects</th>
<th>Eliminate barriers in the educational system that may hinder the effective use of educational materials and resources</th>
<th>Arrangements to increase the dissemination of information, technical assistance in curriculum &amp; staff development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Massachusetts</td>
<td>publish; purchase service, conduct workshop</td>
<td>provide coordination, develop data system, publish</td>
<td>disseminate written information</td>
<td>develop curriculum; provide staff development</td>
<td>develop model project</td>
<td>initiate communication</td>
</tr>
<tr>
<td>Michigan</td>
<td>purchase service, conduct workshop</td>
<td>provide coordination</td>
<td>disseminate written information</td>
<td>conduct research, conduct workshop</td>
<td>develop model project</td>
<td>develop model project</td>
</tr>
<tr>
<td>Minnesota</td>
<td>purchase service</td>
<td>serve as clearinghouse</td>
<td>NA</td>
<td>provide staff support</td>
<td>provide staff support</td>
<td>develop model project</td>
</tr>
<tr>
<td>Mississippi</td>
<td>NA</td>
<td>serve as clearinghouse</td>
<td>disseminate written information</td>
<td>conduct research</td>
<td>NA</td>
<td>develop model project</td>
</tr>
<tr>
<td>Missouri</td>
<td>purchase service,</td>
<td>NA</td>
<td>NA</td>
<td>conduct research</td>
<td>NA</td>
<td>develop model project</td>
</tr>
<tr>
<td>Montana</td>
<td>NA</td>
<td>publish</td>
<td>develop model project</td>
<td>conduct research</td>
<td>purchase material</td>
<td>conduct research</td>
</tr>
<tr>
<td>Nebraska</td>
<td>NP</td>
<td>NP</td>
<td>NP</td>
<td>provide staff development</td>
<td>NP</td>
<td>develop model project</td>
</tr>
<tr>
<td>Nevada</td>
<td>conduct workshop</td>
<td>publish</td>
<td>disseminate written information</td>
<td>conduct research</td>
<td>provide technical assistance</td>
<td>NA</td>
</tr>
<tr>
<td>New Hampshire</td>
<td>Did not respond</td>
<td></td>
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</tr>
<tr>
<td>New Jersey</td>
<td>purchase service</td>
<td>provide coordination</td>
<td>develop model project</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
</tr>
<tr>
<td>New Mexico</td>
<td>NA</td>
<td>provide coordination</td>
<td>conduct workshop</td>
<td>develop model project</td>
<td>provide staff development</td>
<td>NP</td>
</tr>
</tbody>
</table>
Table 1: Summary of Section 202(d) Activities  
(continued)

<table>
<thead>
<tr>
<th>STATE</th>
<th>Arrangements made to provide assistance to develop agreements</th>
<th>Mechanisms established to increase information exchange</th>
<th>Arrangements made for dissemination of models</th>
<th>Technical Assistance provided in the development of educational offerings</th>
<th>Elaboration of systems for assessment and development of educational programs</th>
<th>Arrangements to increase linkage between programs</th>
<th>Arrangements to increase linkage between institutions providing written information</th>
<th>NA</th>
<th>Provide staff support</th>
<th>develop model project</th>
</tr>
</thead>
<tbody>
<tr>
<td>New York</td>
<td>other funds provide</td>
<td>conduct workshop</td>
<td>conduct workshop</td>
<td>NA</td>
<td>NP</td>
<td>provide staff support</td>
<td>develop model project</td>
<td>NA</td>
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<tr>
<td>North Carolina</td>
<td>Did not respond</td>
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<tr>
<td>North Dakota</td>
<td>Did not respond</td>
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<tr>
<td>Ohio</td>
<td>other funds provide</td>
<td>serve as clearinghouse</td>
<td>disseminate written information</td>
<td>provide staff support</td>
<td>NA</td>
<td>NA</td>
<td>initiate communication</td>
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<tr>
<td>Oklahoma</td>
<td>Did not respond</td>
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<tr>
<td>Oregon</td>
<td>Eliminated for inappropriate information</td>
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<tr>
<td>Pennsylvania</td>
<td>purchase service; conduct workshop</td>
<td>develop data system</td>
<td>conduct workshop</td>
<td>develop model project</td>
<td>conduct research</td>
<td>conduct research</td>
<td>conduct research</td>
<td></td>
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<tr>
<td>Rhode Island</td>
<td>Did not respond</td>
<td></td>
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<tr>
<td>South Carolina</td>
<td>NA</td>
<td></td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td>NA</td>
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<tr>
<td>South Dakota</td>
<td>NA</td>
<td></td>
<td>develop model project</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td>NA</td>
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<tr>
<td>Tennessee</td>
<td>purchase service; conduct workshop</td>
<td>disseminate written information</td>
<td>conduct research</td>
<td>develop model project</td>
<td>disseminate written information</td>
<td>develop model project</td>
<td>develop model project</td>
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<tr>
<td>Texas</td>
<td>other funds provide</td>
<td></td>
<td>develop model project</td>
<td>NA</td>
<td>NA</td>
<td>develop model project</td>
<td>conduct research</td>
<td></td>
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<tr>
<td>Utah</td>
<td>NA</td>
<td>serve as clearinghouse</td>
<td>develop model project</td>
<td>provide technical assistance</td>
<td>NA</td>
<td>develop model project</td>
<td>NA</td>
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</tr>
<tr>
<td>STATE</td>
<td>Developed assistance to develop agreements</td>
<td>Provide research, develop model, conduct project</td>
<td>Disseminate written information</td>
<td>Staff development: conduct workshop, provide technical assistance</td>
<td>Conduct research</td>
<td>Eliminate barriers in obtaining financial assistance</td>
<td>Arrangements to increase coordination &amp; establish linkages between agencies متاح</td>
<td>Did not respond</td>
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<tr>
<td>Vermont</td>
<td>NA</td>
<td>NP</td>
<td>NP</td>
<td>NP</td>
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<td>NA</td>
<td>NA</td>
<td>NA</td>
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</tr>
<tr>
<td>Virginia</td>
<td>Other funds provide</td>
<td>Publish, conduct written information</td>
<td>Develop model project</td>
<td>Conduct research, provide technical assistance</td>
<td>Conduct research</td>
<td>Develop model project</td>
<td>NA</td>
<td>Did not respond</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington</td>
<td>Purchase service</td>
<td>Serve as clearinghouse</td>
<td>Conduct research</td>
<td>Conduct research</td>
<td>Conduct research</td>
<td>Provide staff support</td>
<td>NA</td>
<td>Did not respond</td>
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<tr>
<td>West Virginia</td>
<td>Did not respond</td>
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</tr>
<tr>
<td>Wisconsin</td>
<td>NA</td>
<td>Conduct research project</td>
<td>Develop communications</td>
<td>Conduct research, develop model project</td>
<td>Develop model project</td>
<td></td>
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<tr>
<td>Wyoming</td>
<td>Did not respond</td>
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</tbody>
</table>
Two states, Colorado and Oregon, were eliminated from this study due to inappropriate information. Colorado reported a narrative other than the one percent narrative. Oregon at the time of the writing of the Annual Plan had not developed programs and thus the specific responses to the required narrative were too general to be usable for this study. All other states provided usable information.

Every attempt was made to report the activities in the context that the states reported. However, while the Forms Preparation Handbook (1979) provided instructions for reporting this section of the Annual Plans, many states did not follow these instructions. The variability in format reporting was evidenced in several ways. For example, Iowa and Oregon reported in the requested format but only provided general information with no specific mention of funded activities. Washington, Pennsylvania, Kansas, and Kentucky provided a listing of funded activities with no narrative, categorical classification, or summary. Wisconsin developed a different listing of priorities and responded to that list rather than the ones identified in the Forms Preparation Handbook (1979). Nebraska reported activities in the form of a letter to the Regional Administrator generalizing the entire special grant program.
Arrangements made to provide assistance in the development of agreements. The states outlined a variety of administrative techniques to provide assistance in the development of agreements between prime sponsors and educational agencies and institutions. Seven states (Hawaii, Mississippi, New Mexico, South Dakota, Utah, Vermont, and Wisconsin) did not address the category; five states (Indiana, Kansas, Kentucky, Maryland, and Nebraska) did not provide the requested information; five other states (Iowa, New York, Ohio, Texas, and Virginia) indicated they were already conducting this activity using the governor's grant funding.

The remaining states reported arrangements to provide assistance in developing agreements between CETA and the educational agencies through (a) disseminating information through some type of publication, written models, conferences, workshops, and/or meetings; or (b) purchasing the services to provide technical assistance from some agency.

Alabama and Massachusetts proposed the development of handbooks on the development of agreements. Massachusetts is reviewing and analyzing the range of state-supported educational services which describe their potential linkages to prime sponsor activities. Idaho is producing a Youth Employment and Training Projects (YETP) Operations Manual on financial and non-financial agreements policies and procedures to be distributed to schools within the state.
Three states (Alaska, Arkansas, and Maine) are developing model agreements as guides in the development of agreements. The Arkansas models will assure that agreements are standardized and that all necessary information is included.

Seven states (Alabama, California, Florida, Illinois, Massachusetts, Michigan, and Nevada) will provide assistance in negotiating non-financial agreements in the utilization of workshops, meetings, and symposiums. California and Florida are conducting symposiums and workshops. Illinois is holding joint meetings, and Massachusetts and Illinois chose regional conferences. Michigan is utilizing a statewide conference while Nevada uses quarterly meetings.

Thirteen states (Arizona, Connecticut, Georgia, Louisiana, Massachusetts, Michigan, Minnesota, Missouri, Montana, New Jersey, Pennsylvania, Tennessee, and Washington) are providing technical assistance as a functioning mechanism through their own office or through a contract with another agency. A variety of names are applied to these groups including the Technical Advisory Group (Arizona), Manpower Analyst (Louisiana), Youth Employment Education Unit (Minnesota), Interagency Coordinators (Massachusetts), sub-state or regional coordinators (New Jersey), and the Linkage and Coordination staff (Tennessee). Five states (Georgia, Michigan, Minnesota, Missouri, and Tennessee) specifically men-
tion that their State Department of Education either receives the subcontract to provide these services or are involved in a team that provides technical assistance. Two states (Connecticut and Washington) are developing a process and providing technical assistance from their offices.

Mechanisms to increase information exchange. The techniques identified by the states included (a) information processing and dissemination through publications or workshops, conferences, etc. and (b) development of a centralized system of exchange through agency personnel, a clearinghouse of information, or a data system. Four states (Florida, Iowa, Missouri, and South Dakota) did not address the category and seven states (Connecticut, Delaware, Kentucky, Nebraska, Texas, Vermont, and Wisconsin) did not provide information addressing this category.

Publications are used to increase information exchange and take the form of either a newsletter or some other form of media. Seven states (Alaska, California, Hawaii, Kansas, Maine, Nevada, and Virginia) publish a newsletter. The newsletters provide information sharing on a statewide basis and are published either bi-monthly or quarterly. Other media include brochures, handbooks, and slide series. Montana is developing a brochure on the CETA Youth Employment and Training Program and Experience Based Career Education
Curriculum. Slide series are developed by Montana on the above project and by Virginia on strategies relevant to the development of CETA/Education linkages. A monograph series is also being developed by Virginia to create an awareness of the need for effective linkages. Massachusetts created a handbook which provided conceptual information and a catalog of training materials.

Nine states reported workshops and/or meetings to facilitate information exchange (Alabama, Arkansas, Georgia, Hawaii, Louisiana, Maine, New York, Tennessee, and Virginia). Alabama, Georgia, and Tennessee hold a series of meetings and Arkansas and Louisiana report regular meetings. Virginia conducts a statewide technical conference for key administrators and Maine holds a statewide youth conference.

Eight states (Arizona, Arkansas, Illinois, Louisiana, Maryland, Massachusetts, Michigan, New Jersey, and New Mexico) assign staff specifically responsible for information exchange. Arkansas funds the Arkansas Advisory Council for a Vocational-Technical Education coordinator who devotes full-time to establishing operational and communicative linkages between vocational education and CETA. Louisiana linkage funds create the Supervisor of Evaluation and Analysis position responsible for extracting information from computer terminals and compiling reports relative to occupa-
tional data. Illinois funds regional linkage consultants through the state to promote joint planning and program development. Maryland's State Department of Education, which has a subcontract with the Employment and Training Council, provides coordinators through their central office staff to provide services to CETA eligible youth. Michigan's Interagency Collaborative Bodies provides policy and direction in the application of employment, training and education in the local areas. The bodies have responsibility for joint planning and decision making which involves the utilization of all agency resources and information. Arizona's Technical Advisory Group and New Jersey's regional or sub-state coordinating group serves as the mechanism for information exchange in their respective states. Massachusetts's Systems Development Unit and field staff have daily informational exchanges.

Another technique used by ten states (Alabama, Alaska, Hawaii, Idaho, Indiana, Minnesota, Mississippi, Ohio, Tennessee, and Utah) is the implementation of a clearinghouse agent. Alaska's linkage staff person, Tennessee's Linkage and Coordination Specialist, Idaho's Information Development Specialist, and Mississippi's proposed Independent Monitoring Unit provide a coordination of existing data on such topics as training offerings, curriculum aids, labor market
information, and educational opportunities. Ohio provides a newsclipping service and both Ohio and Utah coordinate a mailing list for all materials flowing through the government printing office for distribution to prime sponsor and vocational education staffs. Hawaii is establishing and maintaining a library of employment and training related educational publications for use by all agencies. Indiana provides career resource materials to educators and CETA counselors from business, labor, professional, and other private sector organizations. Minnesota maintains a listing of youth employment education. Alabama is in the process for establishment of a Displaced Homemaker Resource Center to gather and organize printed and non-printed materials helpful to displaced homemakers seeking new career direction.

Four states (California, Louisiana, Massachusetts, and Pennsylvania) are developing a centralized data system to address specific needs. California's data source addresses local labor market supply and demand information and linkage funds are made available to localities to buy access to the system. Louisiana has a computerized vocational information system and Massachusetts's Systems Development Unit disseminates labor market supply and demand information and other planning data to CETA and local education agencies. Penn-
Sylvania has a contract to integrate all computer facilities in Pennsylvania's educational system into one commonly supported network. This network is used both as an administrative and classroom aid.

Description for developing and disseminating models of linkages. The survey of the states reported three basic methods for disseminating models of linkages. The states either (a) disseminate information through printed media, workshops, conferences, or meetings; (b) conduct research; or (c) conduct a programmatic activity. Four states (Iowa, Missouri, Louisiana, Minnesota) did not address the category and six states (Connecticut, Kentucky, Maine, Nebraska, Texas, and Vermont) did not provide information for the category.

Ten states (Alabama, Arkansas, Georgia, Massachusetts, Michigan, Mississippi, Nevada, Ohio, Tennessee, Virginia) fund the development of some type of printed model and disseminate it through appropriate channels. Arkansas, through its Media Implementation Center, prints packages for dissemination to their prime sponsors. Georgia, Michigan, Mississippi, Alabama, Ohio, Nevada, and Virginia publish and disseminate reports, copies of contracts, performance reviews, and/or evaluations of linkage efforts. Massachusetts and Tennessee publish a handbook and procedures manual.
respectively, which identifies educational agencies and institutions and assesses capabilities for involvement in prime sponsor activities. Seven states (Arkansas, California, Georgia, Indiana, New Mexico, New York, and Pennsylvania) conduct some type of workshop, meeting or conference to disseminate and discuss model linkages.

Alaska, Washington, and Wisconsin conduct research regarding national or state model programs. The results of the research will be disseminated throughout their respective states. Wisconsin is specifically focusing research upon potential dropouts and funded projects to review prevention programs.

Linkage funds in twelve states (Alabama, Arizona, Florida, Hawaii, Idaho, Illinois, Kansas, Maryland, Montana, New Jersey, South Dakota, and Utah) are used to provide programmatic linkages and disseminate results throughout their respective states. Arizona proposes the funding of three model programs, a Skill Center Curriculum Expansion Program, a Bilingual/Vocational Training Program, and an Apprenticeship Linkage Program. These programs will be shared with all prime sponsors in the state. Florida is developing a Computer Assisted Placement Services model program between CETA operators, private employers, and the Florida Educational System. Idaho's Career Information System gathers automated career/educational information to be disseminated
throughout the state. Kansas has in process a statewide Career Development Project by the Shawnee Mission Public School which will provide information, curriculum materials, and technical assistance in curriculum and staff development to prime sponsors in the area of career guidance. Maryland provides funds to implement the Counselors Acting in Transition (CAT) program designed to work with disadvantaged and potentially disadvantaged senior high school students. Montana's Field Learning Program model will be disseminated to all prime sponsors. New Jersey funds two model programs in order to identify criteria for jointly delivered services to in-school youth. South Dakota's linkage funds assist in the training of hard core unemployed persons. Alabama's program will develop a model curriculum to assist students in becoming proficient in survival and conversational English. Hawaii's program involves the planning and implementation of the occupational information system. Utah and Illinois are developing model programs to be disseminated or replicated throughout their states.

**Technical assistance in the extension of educational offerings.** States either (a) conduct research, (b) provide agency personnel support to provide technical assistance, (c) disseminate information through workshops or other media, or (d) conduct either programmatic or administrative
projects to meet this category. Indiana, Connecticut, Hawaii, Maine, Maryland, Michigan, Nebraska, New Jersey, and Virginia did not provide information on this category.

Georgia, Illinois, Mississippi, Nevada, Tennessee, and Washington are assessing the utilization of programs, facilities, and/or equipment for the purpose of providing prime sponsor information on possible programs and services. Alabama requests status papers to be submitted by each of the areas of specialization in the State Department of Education for review and compilation. Missouri is analyzing research data, program feedback and experience of prime sponsors and subcontractors for possible funding opportunities. Montana provides technical assistance in evaluating programs as a means of extending educational offerings.

Alaska, Arizona, California, Idaho, Minnesota, and Ohio are funding agency personnel support to extend educational offerings. Minnesota proposed the hiring of professional staff for this purpose, while Ohio, Alaska, Arizona, and California indicate this is a responsibility of contractual obligations already in existence. Idaho proposes to fund internships in vocational counseling and educational administration for college and university undergraduates at advanced levels in related study or graduate students in vocational counseling, teacher education, or a related field.
Florida, Kentucky, Pennsylvania, and Wisconsin fund projects which provide direct service to clients. Iowa, Kansas, Massachusetts, New Mexico, Texas, Utah, and Vermont are funding projects which relate to the category but indirectly provide services to clients. Florida funds a project to train unemployed persons in the field of solar energy. Kentucky makes available expanded youth in-school programs plus summer youth funds to offer vocational exposure programs to high school youth who have not made an occupational choice or attended a vocational school. Pennsylvania established a career education program for youth with a remedial skill training project for remedial reading and mathematical skills. Wisconsin proposes the funding of a joint interdistrict post-secondary vocational service to rural residents. Iowa indicates a need to develop programs where voids in specific target populations have been evidenced. Kansas plans to extend the career development project and Massachusetts supports the expansion of Adult High school diploma programs. New Mexico provides technical assistance in developing alternative programs, solving transportation and residential programs, and institutional training to address identified needs whenever they are where access is limited. Texas is purchasing equipment for a newly constructed, jointly funded training center. Utah's center system pro-
vides manpower delivery throughout the state and includes intake, assessment, counseling, skill training, job development, placement, and follow-up. Vermont is developing a career guidance institute to bring representatives from education and industry together in a cooperative education effort and to provide a more comprehensive approach to career exploration.

Arkansas's Medical Implementation System produces recruitment films for isolated rural areas or impacted urban areas. New York conducts workshops, regional conferences which reveals an additional source for technical assistance. Louisiana's coordination analyst offers technical assistance to establish written agreements to extend offerings to outlying areas within their jurisdiction and Iowa assists in the development of agreements between prime sponsors and local educational agencies for identification of voids in populations not being served.

Provisions for providing information, curriculum materials, and technical assistance in curriculum and staff development. States addressed this category with a variety of techniques. The provisions included (a) research, (b) conferences, (c) curriculum development, (d) staff development, or (e) technical assistance. Idaho, Mississippi, New Jersey, and New York did not address this category. Con-
necticut, Hawaii, Indiana, Kentucky, Maine, Maryland, and Vermont did not provide the information for this category.

Six states (Alabama, California, Florida, Louisiana, Michigan, and Washington) conduct research into a variety of areas to meet the needs of their state. Alabama catalogues curriculum development and management centers within the state. California's regional coordinators provide information on current industrial needs, apprenticeship programs, labor organizations, and other information necessary for prime sponsors to develop curricula related to the job market. Florida researches barriers due to language difficulties for Hispanic's developed programs and will disseminate information packets. Louisiana is developing a Needs Assessment Model transportable among all geographical areas and prime sponsors to provide a plan for continuous informational feedback. Michigan's Interagency Collaborative Bodies funds an extensive resource inventory and needs assessment conducted in local areas to determine specific informational and curriculum needs. Washington's data collection project ensured that occupational information was collected in usable formats and met planning needs of prime sponsors.

Three states (Georgia, Tennessee, and Michigan) hold some form of workshops or seminars to provide information and disseminate research on needs assessment and resource
inventories. Montana is purchasing career education resource materials that compliment the strength of the Experience-Based Career Education curriculum provided to school districts.

Alabama, Arizona, Arkansas, Florida, Massachusetts, Oregon, Pennsylvania, Texas, and Wisconsin are developing some form of curriculum. Texas and Wisconsin specifically indicated that the curriculum they are developing is competency-based instruction. Iowa and Montana are purchasing curriculum materials through linkage funds.

Nine states (Illinois, Massachusetts, Minnesota, Nebraska, New Mexico, Ohio, Pennsylvania, Tennessee, and Virginia) provide some form of staff development. Illinois conducts workshops on various management topics for prime sponsor staff, while Ohio provides one-day informational programs on topics that would enhance the performance of the day-to-day operations of prime sponsors. New Mexico offers pre-service and in-service training for project personnel, and Nebraska is purchasing staff training and participant material from a community college to utilize the equipment and programs of an existing learning center. Virginia offers staff development workshops conducted for administrators and supervisors of CETA training programs. Minnesota conducts an innovative reciprocal and employee transfer pro-
gram which employees of CETA and education temporarily switched working environments for a limited time. Pennsylvania is developing a staff training model which could be shared with all prime sponsors. Massachusetts uses linkage funds to expand the availability of competency-based staff training opportunities in the areas where such training is needed.

Finally, ten states (Alaska, California, Georgia, Kansas, Missouri, Nevada, Pennsylvania, Tennessee, Utah, and Virginia) provide technical assistance to extend curriculum and staff development. Alaska provides a talent bank of individuals willing and able to provide technical assistance upon request. California provides curriculum development services by short-term consultant contracts with educational specialists. Georgia provides instructional coordinators stationed at area vocational schools to work closely with sponsors on a regular or need basis. Nevada and Missouri, through contracts with their State Departments of Education, provide technical assistance on curriculum development. Virginia, also through a contract with their State Department of Education, provides a week-long in-service training program for teachers and educational counselors. Kansas and Utah provide technical assistance in curriculum and staff development as needed. Pennsylvania provides technical
assistance to the counseling staff in preparation of more comprehensive Employability Development Plan for clients.

Provisions for assistance in the development of assessment systems and educational attainment testing. The category was the one least addressed by the states. Nine states did not address this issue and included the states of California, Idaho, Iowa, Missouri, Nevada, New Jersey, Ohio, South Dakota, and Washington. Twelve states (Alaska, Connecticut, Hawaii, Indiana, Kansas, Maine, Maryland, Nebraska, New Mexico, New York, and Utah) did not provide information relating to this category. Those states that did select to address the issue either (a) conduct research or (b) develop model programs. Three states (Minnesota, Arizona, and New York) did provide additional activities as discussed in the following paragraph. Minnesota funds a counseling specialist position located at the Office of Statewide CETA Coordination to provide inter-system counseling linkages. Arizona and New York provide technical assistance in the development of systems for assessment and testing.

The states that provide for research included Alabama, Florida, Illinois, Montana, Virginia, and Wisconsin. Montana tests and evaluates their model experience based career education model while Alabama and Virginia determine the
various systems used to provide recommendations and methods for the incorporation of assessment systems into presently used testing activities or prime sponsors. Illinois is compiling a collection of tests, scales, questionnaires, and schedules that could be used to evaluate the effectiveness of model training programs. Wisconsin researches the factors related to obtaining and maintaining employment. Florida provides linkage funds to research and develop a model that identifies alternatives for preparing entry into non-conventional jobs and training.

The remaining states (Alabama, Arkansas, Florida, Georgia, Illinois, Kentucky, Louisiana, Massachusetts, Michigan, Mississippi, Pennsylvania, Tennessee, Vermont, and Wisconsin) develop some type of model program in the area of assessment and/or educational attainment testing. Alabama funds a project to provide a model in development of a system for assessment and testing for 11th and 12th grade high school students. Arkansas’s Media Implementation Center is developing procedures and materials for testing attainment of prime sponsor participants. In addition, linkage money in Arkansas is used to supplement the assessment program operated by the Balance of State. Kentucky, Michigan, and Louisiana are developing an assessment and testing mechanism to determine the educational attainment level of partici-
pants. Tennessee and Vermont are developing model program designs adaptable to all prime sponsors for joint testing and assessment. Wisconsin is developing an innovative mobile assessment laboratory to serve individuals in rural areas that would have a difficult time getting to another assessment center. Georgia is investigating the feasibility of funding pilot demonstration projects to determine participant deficiencies and attempt to provide relative academic and vocational training. Massachusetts promotes the establishment of regional assessment center for special needs youth whether in-school or out-of-school. Pennsylvania's Northwest Regional Assessment Center provides assessment and counseling services to unsuccessful eligible CETA participants as well as those referred individuals who have the most significant barrier to employment. Mississippi's Career Development program will provide additional testing to be offered to CETA participants. Illinois is developing a project to compile a collection of scales, tests, questionnaires and schedules that may be used to evaluate the effectiveness of model training and employment programs.

Provisions for providing assistance to eliminate barriers in educational systems which hamper employment and training activities. The Federal Register reported that examples of these barriers included open-entry/open-exit
courses and the awarding of academic credit for CETA training. Only seven states (Connecticut, Hawaii, Indiana, Kansas, Nebraska, New Mexico, Texas, and Vermont) did not provide information on this category. Idaho, Iowa, and Mississippi indicated that they were currently providing for these barriers, and Illinois and Arizona emphasized that their contracts were required to address these barriers. Ohio provided support for this category, Arkansas places an emphasis on this category and Utah placed top priority on it; however, not one of the three indicated how they were meeting the needs necessary to eliminate these barriers.

The methods other states are using included (a) research, (b) staff support, (c) program development, and (d) information dissemination.

Alabama, Delaware, Maine, Missouri, Pennsylvania, Virginia, Washington, and Wisconsin are conducting research into specific barriers and intend to report the findings to appropriate agencies. Maine and Virginia are specifically investigating the issue of academic credit while the other states are investigating the general area of barriers to identify possible solutions.

Alaska, Indiana, Nevada, New York, and Washington provides agency personnel through linkage monies to eliminate these barriers. Alaska's staff person works with educa-
tional institutions to allow credit be given for required courses. Indiana funds a Vocational Career Information specialist who is trained in the operation of both programs and policies. Liaison officers in Washington are provided in a number of institutions. Staff support through technical assistance is provided in Nevada and New York.

Georgia and Tennessee disseminate information to eliminate barriers. Georgia disseminates successful projects or programs in regards to barrier removal and academic credit. Tennessee through training conferences, council meetings, and other linkage and coordination network channels disseminates successful approaches in dealing with barriers.

Finally, Alabama, California, Florida, Indiana, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Montana, New Jersey, South Dakota, and Wisconsin are developing programs to assist in the elimination of barriers. Alabama, Florida, Indiana, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Montana, New Jersey, and South Dakota are developing demonstration projects with either open-entry/open-exit curriculum or award academic credit. California Worksite Education Training Act Program is implemented to provide entry level course and are conducted open-entry/open-exit and grant academic credit to participants. Wisconsin is funding a two year project to
research, pilot, revise, and adopt a policy governing the granting of advanced standing in courses.

**Jointly delivered training programs.** The category was addressed through the section in the Annual Plan which provided for increased coordination and establishment of linkages between prime sponsor and institutions providing training programs approved by the Secretary such as state apprenticeship programs. Ten states (Arizona, Connecticut, Hawaii, Indiana, Kansas, Kentucky, Maine, Maryland, Mississippi, and New Jersey) did not provide this information. Idaho, South Dakota, Vermont, and Washington did not address this category. The states that did address the category either (a) conduct research, (b) disseminate information, (c) use their state office to set up initial communications with such agencies, or (d) develop jointly administered programs.

Alabama, Illinois, Pennsylvania, and Texas are studying areas to determine appropriate direction and policies for future program development by identifying agencies involved, reviewing model programs, and reporting significant findings. Alaska and Nevada disseminate information on relevant training programs. Alaska also provides a meeting guide for the year on pertinent educational meetings.
Five states (Arkansas, Georgia, Massachusetts, New Mexico, and Ohio) through the Employment and Training Council are set by mechanism for information flow by establishing communication with such agencies as the Bureau of Apprenticeship and Training and AFL-CIO to possible link training. The mechanism will be forwarded to the prime sponsors for follow through and program development.

Seven states (Louisiana, Missouri, New Mexico, Tennessee, Utah, and Virginia) either had a pre-apprenticeship program operating or planned to operate one. Florida funds a small scale technology in the energy field to promote energy conservation through the sponsorship of one or more Energy Conservation Corps. Iowa subcontracts with such agencies and the Commission on the Status of Women for programs. Nebraska funds and ABE/ESL program for Southeast Asian Refugees transported to Nebraska by the U.S. Government. Wisconsin funds a re-entry program for offenders. Other states which fund cooperative programs include Michigan, Montana, and New York.

In summary, this section provided a summary of the survey portion of this research into Section 202(d) activity. Data was provided from the FY 1980 Special Grant to Governors Annual Plan to the Regional Administrators of the Labor Department. Specifically, the Annual Plan contained a sec-
tion entitled, "State Coordination and Establishment of Linkages Between Prime Sponsors and Educational Agencies and Institutions Program Narrative." The Forms Preparation Handbook (1979) itemized eight categories each state was to address in reporting this narrative. This summary provided the codified activities reported by states.

A variety of administrative techniques were used to provide assistance in the development of agreements between prime sponsors and educational agencies and institutions. These techniques included disseminating information through some type of publications, written model, conferences, workshops, and/or meetings, or purchasing the service to provide technical assistance from an outside agency.

The techniques identified by the states to increase information exchange included information processing and dissemination through publications or workshops, conferences, and meetings to the development of a centralized system of exchange. This centralized system included agency personnel, a clearinghouse of information, or the development of a data system.

The survey of the states codified three basic means for disseminating models of linkages. The states disseminated information through printed media, workshops, conferences, or meetings, conducted research and conducted a programmatic
activity. This programmatic activity often included direct services to clients with project results disseminated throughout the state for possible replication.

Technical assistance to extend educational offerings was codified into four areas. Many states conducted research into the current utilization of programs, facilities, and equipment. Other states provided agency personnel support through technical assistance or disseminated information through workshops or printed media. Finally, several states conducted with programmatic or administrative projects to extend educational offerings.

Information, curriculum materials, and technical assistance in curriculum and staff development was provided through research, conferences, curriculum development projects, staff development, projects, or through technical assistance. Research was often conducted into the programs currently offered throughout the state or into barriers existing in the present systems. In-service or staff development projects were also used to assist CETA and educational personnel in effectively delivering services to clients.

The codification of the assistance in the development of assessment systems and educational attainment testing was the category least addressed by the states. While several
states had developed model projects or regional assessment centers, other states conducted research into acceptable systems throughout the state and/or nation.

The methods used by the states to eliminate barriers in the educational system which hamper employment and training activities included research, staff support, program development, and information dissemination. Research was conducted into the issue of awarding academic credit and the concept of open-entry/open-exit curriculum systems. Many states indicated that such barriers had been eliminated.

The final category of jointly delivered programs included the codified activities of research, dissemination of information, initial communications with agencies, and jointly administered programs. It was pointed out that the governor's offices were often used to act as a liaison between the prime sponsors and the state apprenticeship programs.
CHAPTER V

Summary, Conclusions, and Recommendations

In 1978 Congress amended the Comprehensive Employment and Training Act (CETA) to include, among other things, Section 202(d). Funds were provided through this section to governors to encourage coordination and establish linkages between CETA and educational agencies and institutions. The purposes of this study were to examine the Congressional intent behind Section 202(d) of CETA of 1978, to trace the procedures used to implement Section 202(d) of CETA, to identify and codify Section 202(d) activities and to make recommendations regarding the future of Section 202(d).

The focus of this study was policy impact analysis. Traditionally, analysis refers to the process of breaking something down into its constituent parts. In order to formalize the study, the purposes were broken into specific research questions. The questions addressed framed the specific stages of research and connected the conceptual and analytical frameworks. The research questions addressed were:

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1. What was the Congressional intent of Section 202(d) of CETA?

2. What process was used to transfer a nationally based intent for CETA linkage with educational agencies into practice?

3. What uses were made of the linkage funds?

4. Should the same or other legislative approaches be used to encourage linkage in the future?

The remainder of this chapter, using the first three research questions as a backdrop, includes summary findings from Chapter four. Each finding subsequently was used to draw specific conclusions and underlying issues. The underlying issues served to temper the respective findings and conclusions. In addition, research question four was used to aggregate the interdependent findings, conclusions, and underlying issues to form overall recommendations. The first seven recommendations evolved from independent analysis of the respective seven findings, conclusions, and underlying issues. Recommendations eight through ten evolved from the aggregation of interdependent aspects of the aforementioned factors.
Research Question One

The first research question addressed was the identification of Congressional intent relating to Section 202(d) of CETA of 1978. Historical methodologies into the legislative and historical background of Section 202(d) produced the following:

Finding One
Section 202(d) was intended to be used to assist in the implementation of CETA's 22 percent Youth Employment and Training Program (YETP) set-aside. This 22 percent set-aside was reserved from each prime sponsor's formula allocation to be administered under the terms of an agreement between the prime sponsor and the local education agency.

Conclusion. Section 202(d) provided a new financial incentive to promote the negotiation and development of the 22 percent set-aside funding requirement.

Underlying Issue. There were already funds available through the six percent supplemental vocational education funding and the four percent coordination and special services grant in the governor's office to promote the negotiation of the development of the 22 percent funding requirements. If the 22 percent set-aside was not sufficient for collaboration, and if the discretionary funds already avail-
able to the governor were not effective; then, how could the amount of funding that the one percent grant provided adequately impact the inhibiting barriers for cooperation between CETA and the educational community?

**Finding Two**
The intent was for the governor to act as a catalyst to initiate a new partnership between prime sponsors and educational institutions through an incentive grant for joint programs, in-service programs, conferences, and technical assistance.

**Conclusion.** The role of the governor in coordination of employment and training programs was expanded.

**Underlying Issue.** The Governor's Employment and Training Councils, a delegate of the governor, were required to coordinate linkage activities among state agencies, but were not given authority to cause or enforce linkage. Further, local schools were not accountable to the Department of Labor nor to the State Employment and Training Council. Therefore, the balance between responsibility and authority remains unchecked.
Research Question Two

Historical methodologies addressed the implementation process of Section 202(d) by the Department of Labor through the Governor's Employment and Training Councils offices. The research provided data which clearly indicated a carefully planned national level process was used to transform the Congressional intent into written policy. A series of committees in the Labor Department were formed with several draft copies of the regulations submitted through a checks and balance process. These draft regulations were available for comment and modification by prime sponsors and the public. In turn, the materials were adopted through publication in the Federal Register.

Finding Three

Administrators from the Department of Labor, prime sponsors, interested citizens, and members of the legislative committees who authored the section were involved in the writing of the national level rules and regulations.

Conclusion. The rules and regulations written to implement Section 202(d) reflected the legislative intent of Congress.

Underlying Issue. The 22 percent set-aside of Youth Employment and Training Program was added to the youth leg-
islation in 1977. Subsequently, the educational community criticized that this set-aside ignored the question of whether education should take a role in CETA and focused upon how education should be involved. Without educator involvement in the process of authoring the rules and regulations and monitoring its implementation, can education support be expected?

**Finding Four**

CETA was signed into law October 27, 1978; however, the final rules and regulations were not completed until April 1, 1979. With CETA's fiscal year ending September 30, 1979, only six months remained for the start-up of linkage activities during FY 1979.

**Conclusion.** The difficulties of startup resulted in delay in program buildup through the first year of Section 202(d) implementation.

**Underlying Issue.** The State Employment and Training Councils had not formalized standard operational procedures prior to April 1, 1979, when the regulations and dollar allocation were released. Some confusion and delay at the state level in establishing procedures caused postponement of Section 202(d) activities until FY 1980. Could the delay be attributed to the lack of legislative guidelines or regional direction?
**Research Question Three**

The third question was addressed through survey methodology and resulted in a table and narrative summary of Section 202(d) planned activities. Data were provided from the FY 1980 *Special Grant Annual Plan* to the Regional Administrators of the Labor Department. The *Forms Preparation Handbook* (1979) provided the eight categories for codifying the Section 202(d) activities.

**Finding Five**

The *Annual Reports* for FY 1979 and the *Annual Plans* for FY 1980 provided a variety of formats, detail, and information. The Annual Report provided little usable information. The *Annual Plans* provided extensive information about potential funded activities but great variation among plans were discovered.

**Conclusion.** The reporting requirements of the State Employment and Training Councils were either not uniformly explicit or not enforced.

**Underlying Issue.** The *Annual Report* and the *Annual Plan* are public documents designed to communicate projected and accomplished activities from the Section 202(d) funds. Why then was the variance among states so great?
Finding Six

The codification of the activities reported by the states included conducting workshops, conferences, and meetings; developing model projects and programs; developing curriculum, initiating staff development; developing comprehensive data systems/disseminating published information which included handbooks, newsletters, and other media; serving as a clearinghouse of information; purchasing technical assistance activities; acting as a liaison between prime sponsors and local agencies; providing staff support and/or positions; and conducting research.

Conclusion. The proposed activities of employment and training projects and research did not reveal a systematic or consistent approach to linkage.

Underlying Issue. With a variety of both training and research projects being funded, what should be the most appropriate approach to linkage?

Finding Seven

A host of activities were planned by states to promote linkage.

Conclusion. The activities did not routinely permit codification by the categories specified for linkage reporting and planning.
Underlying Issue. While states developed a myriad of individual linkage activities, the common characteristics of successful linkages were not evident.

Research Question Four

The fourth question sought to identify the legislative approach which should be used to encourage linkage in the future. This section will present seven major recommendations that evolved from the aggregation of the independent findings, conclusions, and underlying issues of the three preceding research questions.

1. The educational community must contain a shared interest in their involvement in CETA. Both CETA and the Vocational Education Act are up for reauthorization in 1982. The opportunity for joint legislative process involving both education and the employment and training communities at the Federal, state, and local levels must be undertaken.

2. Procedures are needed which would clearly delineate the responsibility and authority of the governor, or his agent, with respect to linkages. Care should be taken to insure that the limits are commensurate with the funds allocated and that the strengths of agency independence are not jeopardized.
3. It is recommended that the careful process of regulation writing at the national level be continued; however, when coordination between education and the employment and training communities is involved, involvement from both communities is essential.

4. Implementation assistance and lead time should be provided at the regional, state, and local levels prior to initiation of activities. It appears that six months planning is required between authorization and release of contracts.

5. Standard reporting requirements should be provided and reporting should be monitored. The reporting requirements should be provided prior to or concurrent with the planning process.

6. A prioritized and standardized core of linkage activities should be identified and incorporated by all states.

7. Research into the exemplary linkages is needed to extract common elements of success for possible replication.

8. Congress should reconsider its current linkage strategy.

9. Incentive grants for linkage should be provided at the local level.
10. Systematic models for linkage should be developed for the purpose of replication.

Summary

The experience of the past CETA years suggests that the set-aside grant funding is not adequate to bring about the organizational changes necessary for collaboration of the two systems. In addition, while the governor is in an advantageous position to accomplish some coordination and provide supportive services to all prime sponsors and educational agencies, the need for incentive grants is at the local level. And finally, the states need a systematic approach or model to begin coordinating services. Haphazard projects and programs may have short-term benefits; however, the overall, long-term problem still exists.

Finally, there is a clear need for further study into the policy issues surrounding CETA and its collaboration with educational agencies. The growth and complexity of CETA makes it increasingly important for legislators and administrators to have information regarding the impact of their policies.
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INTERVIEW--DR. JAMES O'CONNELL

March 19, 1981

Question: Why did Congress legislate the one percent monies to encourage coordination and establish linkage between CETA and educational agencies?

I can speak to the issue of why it's in there, and the reason why it is in there goes back a year before, the provision for that set aside goes back to the 22 percent set-aside that was enacted as part of P.L. 95-953, which was the Youth Employment and Demonstration Projects Act, which set aside 22 percent for prime sponsor to use in cooperation with local education agencies for the development of jointly administered education and work programs. Now this was a very, very special interest of Senator Javits who was the ranking minority member of the Subcommittee (Subcommittee on Employment, Poverty, and Migratory Labor) at that time because he felt that CETA programs in and of themselves could be criticized for being excessively work oriented. There was a very high percentage of work experience even in the training programs to say nothing of Public Service

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Employment which was exclusively work but even in the training programs, there tended to be an undue emphasis on work experience. Now at the same time there was criticism of education programs (and he had been in the previous Congress the ranking minority member of the subcommittee on education), there had been a great deal of criticism of Title I programs for the disadvantaged (Title I, ESEA) that there was not an adequate world of work orientation, that young people were graduating from school or leaving school (mostly leaving school) lacking a sense of the world of work and what was involved, and a certain naivete about what was going to be expected of them, what they could be likely to earn, what skills they would need, and that seemed to be, I'm not saying a general problem, but a difficulty that was being experienced. So he felt that what we ought to do is try to marry or bridge the education experience and the work experience for young people. That is why he offered with Senator Hubert Humphry the 22 percent education/work set-aside which is in law today, and is probably $130 million or so of jointly funded programs. Indeed, the Carter administration in their youth incentive of early 1980 made the combined employment and education initiative the centerpiece of their youth effort and that really was an outgrowth of the 22 percent set-aside. Senator Javits, and I think many mem-
bers of the Senate Labor and Human Resources Committee, always felt that the basis of the Carter initiative had been the experience of the 22 percent set-aside, so it rather legitimized what the thinking had been. However, following in 1977 and the implementation of the 22 percent set-aside, it became a concern to the members of the Subcommittee that prime sponsors and local education agencies using the 22 percent set-aside lacked the technical assistance that was required to bring these agreements about in a way other than just signing on a dotted line. The CETA prime sponsors could not commit funds unless he had a non-financial agreement with the local education agency and sometimes that agreement was pro forma and that became a concern of the members of the committee. So they began to look for ways in which the prime sponsors and the local education agencies, but particularly the local education agency, because under most state laws the local education agency is responsible to the state education department that sets overall policy and that tends to be a problem for some local education agencies as to what the could commit to do and what was consistent with state education policy. And for some reason we felt there was a need to provide some capability at the state level to assist in the negotiation and development of the 22 percent set-aside funding. Now, you might say, well what
about the funds that were existing under the governor's 4 percent monies? The feeling of the members was that if they were going to be providing for a new responsibility, not new in the sense that it was not gotten at in the description of the governor's responsibility, that it generally implied, but we had much more specific intent with respect to the 22 percent set-asides and that to get the governor's offices, good offices, involved would require some additional assistance. And that's why the one percent set-aside was offered. There was discussion on the mark-up on the CETA amendments, I don't know if you could get a transcript but there is one available in the clerk's office of the Committee. There was discussion that it would be helpful to have one percent set-aside for the governor's to allow the governors complete flexibility to adopt whatever system that they saw fit for the purpose of helping with the development of these education/work programs.

I suppose one could say that Senator Javits, specifically wished that this would be on a more accelerated track than it was taking place left to its own device. Now, I might just give you some background, if I may, for just a second on the 22 percent set-asides. There was a lot of pressure in the committee and from the Carter administration to try either in the Act or report or in the implementing
regulations to force the 22 percent set-aside money to go for certain specific activities. They wanted to categorize that. They didn't like the idea that the 22 percent would be put out for educational agencies and CETA prime sponsors to use whatever way they saw fit and their inclination was to constrain the use and we resisted that. The minority of the committee did not go for that because they felt that with 475 prime sponsorships around the country and 13,000 local education agencies that if any effort were made to manipulate the purpose of the set-asides would only inhibit what could be very successful initiatives at the local level. So we really held pretty fast to the original intent.

But, nevertheless, it was very slow in coming about and we felt that perhaps we ought to provide a little bit more encouragement, a little bit more lift to this initiative. So that's why we went with the one percent set-aside to the governors. That we felt that maybe the governor could help out in that regard without having federal intervention. That's what we were concerned about, and ultimately went with the one percent set-asides. So the intent clearly was that the one percent would be related to the 22 percent to bring the state officials into the nurturing process for education work set-asides. But I don't think in either the
report or the legislative history that we got quite that specific because we felt that for many states they might not have the capability to do this but we did want a general encouragement of education/work linkages. I think, if you read the report language, there was discussion of education/work with the one percent while there may not be discussion specifically of the 22 percent set-asides. Now what the DOL ultimately did, I don't know. It is true that some states turned the money over to state manpower officials rather than to some joint education activity, but that was the intention that it would be left to the governor. If the governor decided to do manpower related activities, then that would be fine. My understanding was, at least in late 1978 or early 1979, that there was an effort on the part of some states to bring this into the education/work vicinity anyway if not specifically on the 22 percent matter.

**Question:** Was the bill altered in any way before it was passed?

There was a one percent set-aside for the governors.

**Question:** What is the process once the bill leaves Congress?

I was involved a little in the development of those regs and I believe came out in April, 1979. I don't recall thinking that the regs were that radically inconsistent.
You can't get an understanding of the one percent without an understanding of the 22 percent and also the comparison between the 1973 Act, governor's responsibility with the '78 Act, governor's responsibilities. Because I remember clearly that the feeling of the 1973 statute was not adequate if we were going to give the governors this new responsibility. Now your activity is not important and that's how it has been implemented as a matter of fact and what guidance has the Department given to states. Now if they have just lumped the money with the 4 percent, that would not be a new activity for the governors and would not really have been the thrust of what governors did.

And see that was really the thrust that gets you back into the crystal ball at what the Committee will do next year and if they felt that these various set-asides are just doing what was done before, then you are going to get away from this completely and you are going to get a block grant to do whatever you want, but it is a lot less money.

**Question:** Describe the process used in writing the regs.

There are numerous staff meetings.

**Question:** Are there records of those meetings?
Not really, informal sessions in which the Department will set down, the reg writers will set down with the staff, and they will say these are the kinds of we have been thinking about and we want to be sure we are at least going in the same direction. In some instances, the regulation writers are really not familiar with the intent and they misinterpret and I don't feel as prime sponsors seem to feel that this is an epidemic. I think that this is an exception. My experience has been, at least at the DOL, the reg writers get guidance from their administrators so that they are consistent with the Congressional intent. Every once in a while that's not the case and I remember when the 22 percent was first enacted and the Department had resisted that. They tried with the regulations to implement what they were not able to get through the statute and there were exchanges of letters and numerous phone calls, which ultimately led the Department to back off and I think that is a problem in government generally, but where you have bureaucracy (with) very clear ideas of how they think the law should be implemented, they tend to become somewhat independent in their judgment. It is interesting to note that in years gone by, in the 50's especially, statutes were much shorter and wide latitude was given to agencies to actually implement and one of the common complaints these days is that our statutes are
too long, too detailed and look like regulations. You could read the CETA statutes in many instances, and it doesn't look that different from the regulations and it looks like they wrote the regulations in the statutes. The reason is that there has been some dissatisfaction on the part of members with the ways these things have been implemented and for that reason they spelled our chapter and verse, exactly what it is they want. Sometimes they go a little too far in that, and they get too complicated, but sometimes it is not the fault of the reg writers necessarily. Sometimes it's the fault of the programs themselves.

**Question:** Was there any testimony that you recall that really made the need clear to Senator Javits?

Yes, the hearings on YEDPA (Youth Employment Demonstration Project Act) contained numerous amounts of testimony on not necessarily a set-aside, but on the need to bridge education and work. I can't recall off hand whose testimony would be most enlightening, but I can tell you the idea for such a program came to me from a book written by Garth Mangum, the manpower administrator from Utah, and the book was called *Employability, Employment and Income* published by Olympia, which is a great book. It's an excellent book. And in that book, at least it was the first time I had seen
 referenced, Mangum talked about the need for jointly administered programs and as I though and began to develop the idea a little bit more, and in conversation with others, it really struck Javits as the way to go for the future and so went for it and it was done on that YEDPA statute. So I always credit Mangum with the idea, but the actual way it was done—as a set-aside to prime sponsors—that's something that is a product of the legislative process. I don't think you had to do set-asides, necessarily, you could have had language requiring prime sponsors to do this and not hold their money hostage to an agreement but given the time frame in retrospect, I'm glad that it was done that way. My understanding is the experience under that set-aside have been good, that there have been a lot of joint programs and in fact, the National Council on Employment Policy, Wurtzburg, has done a lot of work on this and have been very positive on the 22 percent. So we feel rather vindicated in taking that approach. As I said at the outset, I think Carter's administration decision to go with $1 billion for education agencies and $1 billion for prime sponsors for youth programs indicates that the consensus came to be a good idea for education/work.

Feel free to call me, I will be glad to talk about it. I was glad to be involved in that and even though the Reagan
Administration has proposed the elimination of funding for Title IV, I think that the things that were begun under that program will be continued with the prime sponsors on their own initiative. There may not be any set-asides, but working relationships have been established between primes and local education agencies that did not exist before. I went around the country in many conferences and got exposed to many prime sponsor people and the first blush of that statute there was tremendous criticism as prime sponsors felt that Congress had mandated to give away 22 percent of their money, and they didn't like it at all. I must say that in the ensuing years those same prime sponsors came to realize that there was a lot of benefit associated with reviewing their own programs to the extent that they linked them up with local school systems. I love to talk about it, as you can see.
Appendix B

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Appendix D

SURVEY LETTER TO STATE EMPLOYMENT AND TRAINING COUNCIL DIRECTORS

Dear

We are conducting a national survey to assess the scope and nature of activities funded by the Governor's linkage allocation from CETA. This is the allocation representing 1% of the annual appropriation for CETA Title II funds (Section 202(d) of the 1978 CETA Amendments). These funds are specifically targeted toward coordination and linkages of CETA with educational agencies and institutions. The results will be reported at the American Vocational Association (AVA) conference in December, 1980, and through other appropriate professional channels. For participating in this study you will receive a summary of our findings.

The Department of Labor reported to us that your state received in 1979 $-------- in 1% linkage funds and in 1980 $--------. In order that we might have an optimal base from which to describe the uses of these linkage funds in your state, we are requesting several things from each state. As Director of the State Employment and Training Council, you are our preferred contact for your state. Specifically, we are requesting:

1. A copy of that section in your 1980 Special Grant Annual Plan to the Regional Administrator of the Department of Labor; specifically, that section entitled, "State Coordination and Establishment of Linkages Between Prime Sponsors and Educational Agencies and Institutions Program Narrative." This is the description of the arrangements for carrying out each of the activities provided for in the CETA Rules and Regulations relating to Section 677.38.

2. A copy of that portion of your Annual Report to the Governor regarding the use of these 1% funds for fiscal 1979.
3. If other than yourself, the name, address, and telephone number of the administrator in your state most knowledgeable of the utilization of these 1% funds.

4. Please forward, under separate cover, a sample of the products developed through the use of these funds. These materials will be used for display and review at an AVA workshop.

We appreciate your help. We look forward to learning of your state’s work and of sharing our findings at the American Vocational Association Conference. Should you have any questions, please do not hesitate to contact us. Our address is on the letterhead and our telephone number is (703) 961-5805.

Sincerely,

Katherine Manley
Research Associate

Dr. Daniel E. Vogler
Associate Professor
Appendix E

FOLLOW-UP LETTER TO STATE EMPLOYMENT AND TRAINING COUNCIL DIRECTORS

Dear : 

This letter is a follow-up to our letter of August 15, 1980, in which we requested information regarding your State's use of Section 202(d) funds of the CETA Amendments of 1978. Specifically, regarding the use of these 1% linkage funds, we requested:

a) A copy of that section of your 1980 Special Grant Annual Plan to the Regional Administrator of the DOL; specifically, that section entitled, "State Coordination and Establishment of Linkages Between Prime Sponsors and Educational Agencies and Institutions Program Narrative."

b) A copy of that portion of your Annual Report to the Governor regarding the actual use of the funds for fiscal 1979.

c) If other than yourself, the name, address, and telephone number of the administrator most knowledgeable of the utilization of these funds.

d) Sample products developed through the use of these funds.

We would like to remind you that if you participate in our study, you will receive the following:

1. A copy of our findings on linkage activities throughout the United States.

2. National visibility at the American Vocational Association National Conference in December during a presentation on the use of these funds.

You are very important to our study. Please respond immediately to have your state included in this important survey.
Sincerely,

Katherine Manley  
Research Associate  

Dr. Daniel E. Vogler  
Associate Professor
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In 1978 Congress amended the Comprehensive Employment and Training Act (CETA) to include, among other things, Section 202(d) which provided funds to state governors to encourage coordination and establish linkages between CETA and educational agencies and institutions. The purposes of this study were to examine the Congressional intent behind Section 202(d), to trace the procedures used to implement Section 202(d) activities, to identify and codify Section 202(d) activities, and to make recommendations regarding the future of Section 202(d).

The research was a policy impact study. In order to formalize the study, the purposes were broken into specific research questions. The questions framed specific stages of research and thereby connected the conceptual and analytical frameworks.

The conceptual framework included four distinct stages, each separate from but related to the other stages. Within a given stage data were collected, methodologies applied and outcomes reported. Stage one identified the context and inputs leading to the enactment of Section 202(d) into CETA...
amendments of 1978. Historical methodologies were used and focused upon source documents and personal interview. Stage two traced the process through the bureaucratic structure to transform Section 202(d) from a legislative amendment to an administrative guideline. Guidelines, memorandum, and related documents including the published rules and regulations were examined. Stage three collected and interpreted product data provided by the State Employment and Training Council directors. Stage four produced recommendations and comment concerning the final research conclusions.

It was concluded that the set-aside grant funding is not adequate to bring about the organizational changes necessary for collaboration of the two systems. Haphazard projects and programs may have short-term benefits; however, the overall, long-term problem still exists.

Recommendations include that Congress should reconsider its current coordination strategy. In addition, while the governor is in an advantageous position to accomplish some coordination and provide supportive services to all prime sponsors and educational agencies, the need for incentive grants is at the local level. And finally, the states need a systematic approach or model to begin coordinating services.