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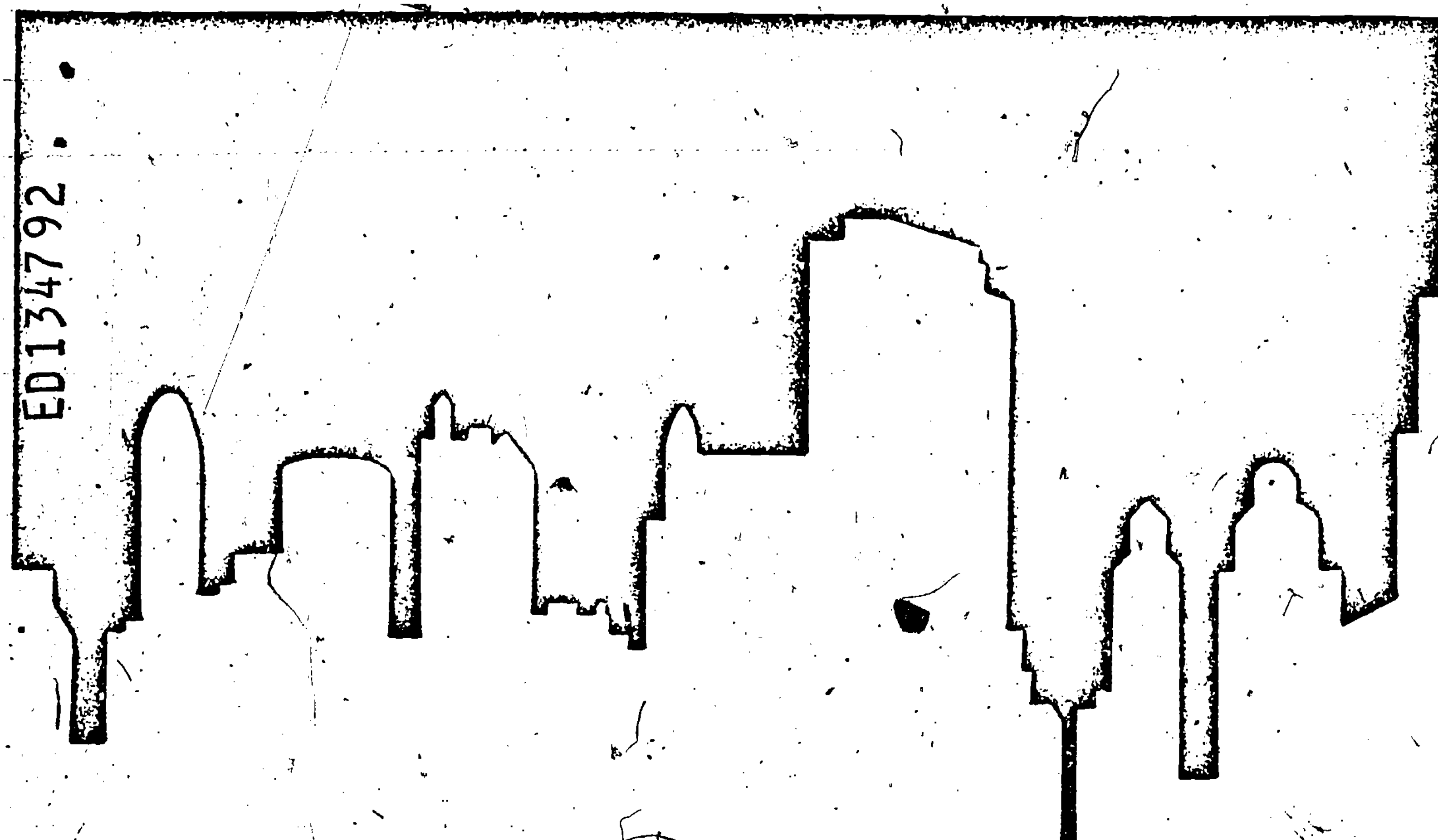
ABSTRACT

This 1974 report contains a summary and analysis of data collected from a survey of 100 city prime sponsors to determine the impact of the Comprehensive Employment and Training Act of 1973 (CETA) on the vocational education system based on CETA's first year in operation. Some of the basic conclusions presented (as derived from data received) are (1) CETA is not significantly impacting on institutional vocational education--at best the system is merely being maintained as it existed under the Manpower Development and Training Act and the Equal Opportunity Act, (2) there exists a great deal of confusion and lack of understanding among local prime sponsors due to the lack of direct involvement prior to CETA, (3) the communication between States and local prime sponsors needed for CETA to positively impact on vocational education is inadequate, (4) CETA title I money is not being used to any large extent to increase the training being provided at existing vocational education institutions, (5) the system of negotiating nonfinancial agreements with the State for the provision of vocational education training and services through the use of the 5% supplemental vocational education funds often does not afford local prime sponsors adequate flexibility, (6) the CETA rules and regulations are vague regarding allocation of the 5% supplemental vocational education funds within the States, and (7) the confusion, complexity, and restriction of local prime sponsor flexibility has resulted in frustration among many local prime sponsors and has made it difficult for the 5% supplemental vocational education funds to impact in local jurisdictions. The appendix includes city profile data for 100 cities selected for surveying, list of cities included in analysis, survey instrument, and signature sheet and instructions for completing the nonfinancial agreement. (HD)



THE IMPACT OF CETA ON INSTITUTIONAL VOCATIONAL EDUCATION

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UNITED STATES CONFERENCE OF MAYORS

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INTRODUCTION

This report contains a summary and analysis of data collected from the surveying of one-hundred city prime sponsors to determine the impact of the Comprehensive Employment and Training Act of 1973 (CETA) on the vocational education system throughout the country.

The following are basic conclusions derived from data received in our random sampling:

- CETA is not significantly impacting on institutional vocational education; at best the system is merely being maintained as it existed under MDTA and EOA.

- There exists a great deal of confusion and lack of understanding among local prime sponsors about the system of institutional vocational education due to the lack of direct involvement prior to CETA.

- The communication between States and local prime sponsors needed for CETA to positively impact on the provision of institutional vocational education is inadequate.

- CETA Title I money is not being used to any large extent to increase the training being provided at existing vocational education institutions.

- The system of negotiating non-financial agreements with the State for the provision of vocational education training and services through the use of the five-percent supplemental vocational education funds often does not afford local prime sponsors adequate flexibility.

- The CETA rules and regulations are vague regarding allocation of the five-percent supplemental vocational education funds within the States.

- The confusion, complexity, and restriction of local prime sponsor flexibility has resulted in frustration among many local prime sponsors and has made it difficult for the five-percent supplemental vocational education funds to impact in local jurisdictions.

LEGISLATIVE SUMMARY OF VOCATIONAL EDUCATION

In order to provide the proper context and perspective for this report, a brief review of legislation and legislative intent is included. Vocational education has traditionally operated as a Federal-State partnership. The first vocational education act, the Smith-Hughes Act of 1917 was the beginning of that partnership in that it authorized $7.2 million annually to provide for cooperation with the States to promote vocational education in agrioulture, home economics, and trade and industrial education.

The Vocational Education Act of 1946 (George-Barden Act) extended the 1917 legislation and increased Federal expenditures to $36 million. The Act was amended in 1956 to include practical nursing and fishery occupations as approved courses for vocational education.

In 1958 the National Defense Education Act authorized $15 million annually for four years to support vocational programs to train skilled technicians necessary to the national defense. Those occupations included electronics, data processing, computer programming, and mechanical, chemical, electrical, and aeronautical engineering.

With the 1960's came a growing awareness that existing vocational education programs were insufficient--more programs were needed to meet the technological growth of the country. In addition, vocational education programs were not equitably available within States and as such there was a discrepancy of offerings among States. Congress recognized the need to reorient vocational education to better serve those who needed skills rather than occupations that needed skilled employees and the Vocational Education Act of 1963 came into being. The 1963 Act was to serve the occupational needs of all people including those who because of educational or socioeconomic handicaps would not succeed in a regular vocational program. However, there was nothing in that legislation requiring that States spend their vocational education funds on students with special needs.

In 1972 the General Accounting Office (GAO) issued a report to Congress entitled <u>Training America's Labor</u>

Force: Potential, Progress, and Problems of Vocational Education. This report reviewed the successes and failures of the Vocational Education Act of 1963 and its 1968 amendments for fiscal years 1970 and 1971 in California, Michigan, Ohio, and Pennsylvania. Those States were selected for study because they were consistently among the top ten in terms of Federal dollars received. The report revealed that in those four States, funds earmarked for special programs and services to the disadvantaged were often not being used for that purpose. GAO found that there was a lack of understanding among State and local officials as to the intended use of the funds for disadvantaged and recommended to the Department of Health, Education, and Welfare a clarification of guidelines as well as a better system of enforcement.*

It was not until Congress passed the Vocational Education Amendments of 1968 that States were required to "set-aside" fifteen percent of their Federal vocational education dollars to serve the "disadvantaged," and ten percent for the "handicapped." However, it was later recognized in the form of the Education Amendments of 1972, that skill training for the disadvantaged was not enough; other special and supportive services were required to serve the special needs of the disadvantaged. The Education Amendments of 1972 came as a result of this recognition. The Amendments created a new program of grants to assist States in establishing and conducting post-secondary occupational education. The Amendments also authorized special vocational education programs for the disadvantaged. The definition of vocational education was amended to include training for volunteer firemen and to include industrial arts programs.

Vocational education programs authorized by the legislation cited above are currently administered by the Office of Education of the Department of Health, Education, and Welfare through matching grants to States in accordance with a formula based on the number of persons in each State of various age groups needing

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* The Comptroller General of the United States, Training America's Labor Force: Potential, Progress, and Problems of Vocational Education, October 18, 1972.

vocational education and the States' per capita income. The State Board of Education then provides funds to a city or county Board of Education to develop and conduct a vocational education program. Programs are primarily for students from fifteen to twenty years of age, either in high schools or having graduated from high schools lacking employable skills. Grants are also made to States for the support of basic educational programs for those sixteen years of age and over who wish to overcome difficulties with the English language and prepare for occupational training with emphasis on career education. Basically, vocational education programs are geared toward the young who are still in the public educational system.

Manpower programs are funded by the U. S. Department of Labor and are designed for adults who are no longer in the public education system and are either unemployed, underemployed, or disadvantaged and in need of training in a marketable skill. Those who have not completed a good vocational education program while in secondary school and who do not have a marketable skill are likely candidates for manpower training programs. Prior to CETA, grants were made by the U. S. Department of Labor to State departments of vocational education for the operation of Skills Centers or other State-operated training institutions. Funds for these grants were appropriated under the Manpower Development and Training Act of 1962 (MDTA) and the Economic Opportunity Act of 1964 (EOA). Local governments were excluded from the system unless they wanted to use some of their manpower grant monies to buy into the system. The Cooperative Area Manpower Planning System (CAMPS) was intended to be the link between vocational education and manpower. Under CAMPS, Regional Directors of cooperating Federal agencies were to provide information on State-controlled funds such as vocational education (ICI 73-1). However, a lack of cooperation often existed, which left some city manpower planners unable to get required information on funding levels and activities needed for comprehensive manpower planning. Numerous other problems existed such as a disproportionate number of enrollees in training slots coming from outlying areas rather than the inner city.

Currently, under the Comprehensive Employment and Training Act of 1973 (CETA), local prime sponsors have, for the first time, a legislatively mandated role to play in the vocational education system and it is that role that this report will examine.

Vocational training funds are now part of the block grant CETA package going to each prime sponsor. Each prime sponsor must determine whether or not to fund vocational education from CETA Title I allocations. Prime sponsors must also determine the level of funding, the types of occupational training and services to be provided, and the agencies to be contracted with to conduct such activities.

In addition, each prime sponsor receives a share of a five-percent supplemental vocational education appropriation that is part of a special grant to Governors to provide vocational education training and services to prime sponsors in each State. Upon notification of the funds available to a State, the Governor is required to inform the State Vocational Education Board and each prime sponsor of the amount of funds to be spent in each prime sponsor's planning area. (In this report we will examine the various methods used by States in determining prime sponsors' share of the five-percent funds.) Each prime sponsor must then plan for the expenditure of his share of the supplemental vocational education funds and negotiate a non-financial agreement with the State for the delivery of training and services. The final agreement is termed non-financial because prime sponsors do not physically receive their share of the funds; the State itself contracts for the training and services negotiated in the agreement.

There are various options open to prime sponsors in determining how their share of the five-percent monies can be spent, providing that the State has not imposed restrictions or requirements on prime sponsors in their negotiations. The five-percent monies should be included as part of an overall CETA plan and not as an isolated section. The following represent some of the options most often selected by prime sponsors in allocating their supplemental funds.

1) Use of all or part of the monies to continue the previous system as funded through MDTA or EOA (slots and/or individual referrals at skills centers or public vocational schools where they exist);

2) Use of all or part of the monies on slots and/or individual referrals at other training sites (e.g. proprietary schools);

3) Use of all or part of the monies for the payment of wages and allowances to enrollees in vocational education programs;

4) Use of all or part of the monies to provide other services such as job counseling, English language training, etc.;

5) Use of all or part of the five-percent monies to increase the number of training slots above the level that existed prior to CETA.

Prime sponsors may decide to use a sizeable portion of CETA Title I funds for vocational education and use their five-percent monies as an add-on to expand the existing levels of training and services.

RATIONALE FOR SURVEY

The survey designed was intended as a measuring device to determine if CETA is maintaining the level, increasing the level, or decreasing the level of vocational education in comparison to previously funded vocational education programs as funded under MDTA and EOA. (See Appendix for copy of survey with cumulative totals or averages.)

The scope of the survey and its findings are limited. Such limitations are based upon the time period in which the survey was conducted. The goal was to determine what was occurring early in the CETA implementation process. This study, therefore, represents a first look at CETA's impact on one of the most important institutions involved in enhancing the employability of those who lack the necessary skills required for full participation in the world of work. Data cited in this report was extracted directly from surveys returned to us in late September and early October of 1974. It is clear, however, that since that time, changes may have occurred in some local jurisdictions. The analysis of data obtained and the conclusions drawn from such analysis raised more questions than are answered. This is to be expected for a new and difficult path has been taken which will hopefully lead to new participatory relationships among all levels of government and their institutions.

Section I of the survey asked prime sponsors for general CETA information. The survey asked prime sponsors if they were members of consortia in order to determine if consortia incentive funds would be used for vocational education. The survey also sought to determine if there was greater representation of the institutional vocational education community on the manpower advisory councils of consortia, and determine if this factor had any significant effect on the planning and allocation of resources for vocational education.

Asking prime sponsors for their Title I allocations was intended to determine if there was any correlation between Title I allocations and the amount prime sponsors received under the five-percent funds. In addition, if a prime sponsor planned to use Title I funds for vocational education, we wanted to determine what percentage of Title I monies would be spent in that area as a measure of the relative priority of vocational education among local prime sponsors.

Asking prime sponsors for the methods used by the States to allocate the five-percent supplemental monies was intended to determine if there was a great disparity among States in their methodologies.

Section I, question number 7 asked prime sponsors if the training and services negotiated in their non-financial agreements were being incorporated into their FY 1975 manpower plans. The rationale for this question was to determine how far in advance prime sponsors had planned for their vocational education activities.

Section II of the survey asked prime sponsors who served on their manpower advisory councils and how they were selected. The responses to those questions indicated whether or not CETA had impacted on the representation of vocational education institutions on manpower advisory councils.

Section III was designed as a measure of the effect of CETA on numbers of persons being trained, as opposed to location and kinds of training being offered. Question number 2 of Section III asks Prime Sponsors if CETA will maintain, increase, or decrease the level of institutional vocational education in comparison with previously funded vocational education programs (MDTA and EOA funded). That question together with question number 4, Section III, which asked for a total number of enrollees in vocational education institutions for FY 1974 compared to the anticipated number for FY 1975, allowed us to measure the effects of CETA on the number of persons being served by vocational education programs.

Section IV of the survey is designed to determine what prime sponsors actually negotiated in their non-financial agreements with the State. Question number 2, which asks for the starting date for the delivery of training and services (as negotiated in the non-financial agreement) is intended to show if there is any consistency in starting dates. It was our expectation to find staggered starting dates with many non-financial agreements not yet in effect. Questions 3 and 4 (Section IV) were designed to determine if prime sponsors were creating any new slots with their share of the five-percent monies. By new slots it was meant a slot level above the number that previously existed under MDTA and EOA funding. In questions 5 and 6 of the same section we wanted to determine if prime sponsors were channeling their five-percent funds into individual referrals. Question number 7 of Section IV asks for the total number of enrollees in

CETA funded vocational education programs. That question was intended simply as a cross check to a previous question in Section III. In question number 8 (Section IV) we sought information on the types of vocational education training being provided and the number of slots in each occupational area, while question number 10 tells us where occupational training is taking place under CETA. In question number 11 we asked prime sponsors for the method they used in determining how their share of the five-percent vocational education monies would be used. That question was intended to ascertain influencing factors and what methodology impacted on prime sponsors in deciding what use would be made of their share of the supplemental vocational education funds. In addition, question number 12 of the same section sought to determine if prime sponsors were satisfied with the non-financial agreements negotiated with the State and if not, why not. The rationale for that question seems rather obvious in terms of determining if States were cooperative and if not what kinds of obstacles restrained prime sponsors from negotiating the type of non-financial agreement they desired.

Questions 13, 14 and 15 (Section IV) are informational questions requesting prime sponsors to tell us which office or agency would determine occupational needs, provide recruitment and placement services and do the actual contracting for training and services for enrollees. Those three questions give us an indication of whether or not mayors' manpower offices are playing active roles in vocational education and if not what offices or agencies are influential.

Questions 16 and 19 are both informational questions asking if job counseling and wages and allowances are services negotiated into non-financial agreements.

Questions 17 and 18 ask at what time of the day will vocational education training be provided. It was thought that we might be able to get an indication from the responses to that question as to whether enrollees were unemployed or employed seeking upgrading of skills or a change in occupational training.

The issue of administrative costs is addressed in questions 20 and 21. There is a twenty percent ceiling on the five-percent monies for administrative costs and we sought to determine if the State took out administrative monies from the Governor's special grant, and if so, how much.

Question number 22 asked prime sponsors if additional equipment needed to be purchased and if so, on what basis the decision was made. It also asked for the procedures used for purchasing additional equipment. The purpose for this questions was to determine if the additional equipment was necessary because prime sponsors were providing training in new occupational areas, or if there was insufficient equipment to provide adequate training in a given area.

Section V of the survey sought information on the number of applications received to date from individuals interested in CETA funded vocational education programs, and the types of applications used to determine an applicant's career development interests. The rationale for that section was to measure client response, as well as to determine the degree of flexibility given potential enrollees in determining the type of training they might wish to pursue.

Section VI deals with additional funding for vocational education through Title I CETA funds and consortia incentive funds. The purpose of this section was to determine whether prime sponsors were going to spend CETA Title I and potential consortia incentive funds on vocational education, how much they would spend, where they would spend it, and what types of training and services would be provided. The response to those questions indicated the relative priority of vocational education to prime sponsors, and whether the level of vocational education under CETA has been maintained or whether it has increased or decreased.

Section VIII, entitled Miscellaneous, contained two questions. The first asked prime sponsors to elaborate on any unusual circumstances that took place while negotiating their non-financial agreements. That question was merely intended to allow prime sponsors to discuss any items of concern, interest, etc. not previously mentioned in the survey. The second question asked prime sponsors to identify the kinds of information or technical assistance they might need to enable them to provide more effective vocational education training.

ANALYSIS

A. Introduction

CETA, as it relates to human needs, is an important and historic example of legislative compromise. It could be the guidepost to a new era of "accomodation." Prime sponsors are presently identifying and adopting those administrative and managerial tools necessary for the successful implementation of the CETA concept. Provision of vocational education, a key and vital aspect of the total concept, has been, to some extent, provided for legislatively. The gap between local, State, and Federal systems, however, remains a problem. Some of those problems are identified in this report. The education of local prime sponsors in how the State vocational education system operates is as important as the education of State operators in how the local system operates. The mutual identification of goals and capabilities should lead to a more productive and meaningful relationship whose result will be a better served clientele.

The collection of data found in this report was accomplished through surveying. Surveys were forwarded to one hundred cities to develop a meaningful random sampling of responses to assist us in our efforts to determine how the Comprehensive Employment and Training Act of 1973 (CETA) is impacting on vocational education. Forty cities failed to return our survey, and of the sixty cities who did respond, eight stated that their non-financial agreements had either not yet been negotiated or not yet finalized (see Appendix II for survey and responses). As a result some cities did not return the survey at all and others were only able to provide us with skeleton information on what their vocational education intentions are. As an example, the City of Charleston, West Virginia was one of sixty who returned the survey, however they are no longer a prime sponsor. The City is now part of a statewide consortium. Therefore, Charleston was unable to complete the survey and is excluded in our analysis. Follow-up telephone calls were made to all cities who returned the survey. Through these follow-up telephone conversations, many prime sponsors expressed their dissatisfaction and frustration with the system of negotiating non-financial agreements with the State.

The selection of cities was based on total population, population mix, type of government, percent of population under eighteen years of age, school enrollment, median years of school completed, and major industries in those localities (see Appendix I). In Section 112(c) of CETA, the Congressional intent for the Supplemental Vocational Education funds is explained as follows:

> Funds available under this section shall be used only for providing vocational education and services to participants in programs under this title in accordance with an agreement between the State vocational education board and the prime sponsor.

CETA was intended to provide prime sponsors with the capability to plan and operate manpower programs in a manner that would best serve the various client groups within their planning area. The fact that prime sponsors are compelled to negotiate with the State for vocational education training and services without always possessing adequate knowledge of the system, threatens the effectiveness of CETA in the area of vocational education.

Since vocational education has traditionally been State operated, there is a serious lack of knowledge on the part of local government in this area. The special grant to Governors leaves the State in control of many CETA dollars specifically earmarked for vocational education. States can also retain up to twenty percent of those funds for their administrative costs. The State must also approve non-financial agreements and provide the actual training and services negotiated in the non-financial agreements. The lack of knowledge on the part of local government, coupled with the fact that the State controls the allocation of supplemental funds makes feasible the possibility that States could wield inordinate influence in determining the contents of non-financial agreements.

B. State Methodologies for Distribution of the Five-Percent Supplemental Vocational Education Funds

The survey asked prime sponsors to cite the amount of their Title I allocation under CETA and the amount of their five-percent vocational education allocation. New York City received the largest amount of Title I dollars and the highest five-percent allocation. Charlotte, North Carolina received the lowest five-percent allocation, while Columbia, South Carolina received the smallest amount of Title I funds of the sixty responding cities. The method used by some States in determining a prime sponsor's share of the five-percent monies is directly related to the amount of Title I funds received by each prime sponsor.

In response to the survey question asking what method States used to distribute the five-percent monies among prime sponsors, nine prime sponsors (15% of total responses) indicated that they do not know what method was used by the State to allocate the supplemental vocational education funds. They merely accepted the dollar figure given to them by the State, regardless of whether or not it was perceived as an equitable distribution. This becomes even more significant when tied to two other questions asked of prime sponsors: 1) were they satisfied with the non-financial agreement negotiated with the State and; 2) whether or not the State took any administrative costs out of the five-percent monies. If prime sponsors do not even know if they had received an equitable share of the five-percent monies, how can they say with any real certainty if their non-financial agreements are satisfactory. In addition, if prime sponsors do not know the distribution formula, it is also likely that they would not know whether the State did or did not take any administrative costs from the five-percent monies.

Of those prime sponsors who knew what method the State used in distributing the supplemental monies, twenty-one (21) stated that the formula was based on unemployment rates and 1970 census data. Two (2) prime sponsors indicated that unemployment and census data were a part of the distribution formula, but that other factors such as prior year's funding level under MDTA and EOA were included. Another fifteen (15) prime sponsors responded that the State based their formulas on the proportion of the State's total Title I CETA money each prime sponsor had been allocated by the U. S. Department of Labor. Five (5) prime sponsors responded that they were allocated a straight five-percent of their Title I grant by the State for supplemental vocational education.

Two other methodologies were also mentioned. Four (4) prime sponsors indicated that their share of the five-percent funds was in proportion to how much Title I money they were going to spend on vocational education, and two(2) prime sponsors said their States had based their formula only on the previous year's MDTA funding level. One (1) prime sponsor said that the formula was based on prior year's funding and unemployment data.

DISTRIBUTION METHODOLOGIES USED BY STATES IN ALLOCATING THE FIVE-PERCENT VOCATIONAL EDUCATION FUNDS

(N = 49 Prime Sponsors)*

Basis for Allocation Formula Used By States	Number of Prime Sponsors
Unemployment and Census Data	21
Proportion of Title I Funds each Prime Sponsor had within the State	15
Straight Five Percent of each Prime Sponsor's Share of Title I Money	5
Amount of Title I Money to be Used by each Prime Sponsor for Vocational Education	4
Previous Year's MDTA Funding Level	2
Combination of Methodologies	2

* Nine (9) Prime Sponsors indicated that they did not know the distribution formula used by their State.

One (1) Prime Sponsor did not respond.

It is obvious that there exists a great disparity among States in their methods for distributing the supplemental monies. With each method there will be satisfied and dissatisfied prime sponsors.

C. Incorporation of Non-Financial Agreements Into FY 1975 Manpower Plans

Prime sponsors were asked if they had incorporated training and services for vocational education from their non-financial agreement into their FY 1975 manpower plans. We hoped to get from this question an indication of how far in advance prime sponsors planned for the supplemental vocational education funds. Out of the sixty surveys returned to us, thirty-eight (38) prime sponsors indicated that training and services negotiated into their non-financial agreements were included in their FY 1975 manpower plans. Twenty-one (21) indicated that such arrangements were not included in their original plans, therefore their FY 1975 manpower plans would have to be modified. One (1) prime sponsor did not respond to this question. The responses to this question are not extremely significant due to two factors. First, it was found that many prime sponsors had not been able to plan for their share of the five-percent monies because the State had not notified them of the amount of their share in time for them to incorporate it into their FY 1975 plans. The second factor is that many prime sponsors were in the midst of negotiating with the State and approval of the agreement had not yet taken place at the time FY 1975 manpower plans were being finalized. Therefore, it was not possible to definitely conclude how far in advance prime sponsors were planning for use of their supplemental funds. However, there is the possibility that some laxity exists on the part of States in notifying prime sponsors of the negotiating and allocation processes to be employed under this new arrangement. This can be partially attributed to the fact that the CETA rules and regulations do not adequately address the issue.

In the survey, prime sponsors were also asked for the starting date of the delivery of training and services negotiated in their non-financial agreements. According to the responses we received, the earliest start-up date was July 1, 1974, the beginning of the fiscal year, as well as the implementation date for CETA. The latest start-up date indicated by prime sponsors was January 1, 1975. However, we found October 1, 1974 to be the most common start-up date. Three major reasons for the staggering start-up dates are as follows: 1) States would not begin providing the training and services to prime sponsors until all MDTA "carry-over" funds were used up at vocational institutions; 2) in some cases States were late in informing prime sponsors of the amount of their share of the five-percent monies, which in turn caused a delay in prime sponsors' ability to plan for those funds, and; 3) difficulties in the actual negotiating process.

An interesting situation exists in San Francisco. They responded that their start-up date would be mid-January. Because of the lateness of the negotiating process, San Francisco is funding their institutional vocational education from August to mid-January out of Title I funds, and then using the five-percent monies to carry on from mid-January through June. San Francisco cited the delays on the part of the State in making allocations, defining procedures for negotiating, and making decisions on the use of MDTA-purchased equipment as the reason for following that course of action.

It must be concluded that if the five-percent supplemental CETA funds are to have any significant impact on vocational education, the whole process leading up to the delivery of training and services needs to be accomplished with greater speed and cooperation.

D. Manpower Advisory Councils and Vocational Education

In Section II prime sponsors were asked for information on the structure of their manpower advisory councils. Information was sought on the composition of the councils and methods for selecting membership. Specific data was requested on the degree to which vocational education institutions were represented, both prior to and after the enactment of CETA.

The methods by which manpower advisory council members were selected was significant for measuring the effect of CETA on the relative standing of vocational education. The overwhelming majority of respondents (50 prime sponsors) used the old CAMPS structure (with varying degrees of modification) as the basis for CETA councils. Of the thirty-eight (38) prime sponsors with vocational education representatives on their manpower advisory councils, only one (1) prime sponsor had no vocational education representation prior to CETA. Our random sampling thus showed no significant change in vocational education representation as a result of CETA. If the former CAMPS structure was the basis for selection of the new advisory councils as it was, the number of vocational education representatives serving on manpower advisory councils probably would not increase. Our random sampling showed that this was the case in most local jurisdictions.

By asking prime sponsors if representatives of vocational education institutions served on manpower advisory councils and what the number of these representatives were, we attempted to determine how much potential influence vocational education representatives might have in making future local manpower decisions. Thirty-eight (38) prime sponsors responded that institutional vocational education representatives do serve on their manpower advisory councils in numbers ranging from one (1) to three (3), with two (2) being the average number. The question of whether or not representatives of vocational education institutions served on manpower planning councils prior to the enactment of CETA measures change. In this case, change has not occurred. Almost all respondents indicated that they had vocational education representatives on their manpower planning councils prior to the enactment of CETA as well as after the enactment.

E. Consortia and Vocational Education

Thirty-six (36) of the responding prime sponsors are members of a consortium arrangement while twenty-three (23) of the respondents are not. Responses to this question provide some insight into the complexity of the prime sponsors' organizational structure. The majority of the consortium arrangements were city-county alliances. Consortium arrangements generally contain numerous jurisdictions, and thus may contain more vocational education institutions than a single jurisdiction prime sponsor. It was found, as a result, that consortium arrangements generally tended to have more representatives of vocational education institutions on their manpower advisory councils than single jurisdiction prime sponsors.

Prime sponsors who are members of consortium arrangements may receive an additional consortium incentive allocation under CETA. Of the thirty-six (36) consortium members surveyed, twelve (12) prime sponsors said that they definitely would use consortium incentive money for the purchasing of additional vocational education slots or services. Eleven (11) prime sponsors were unsure as to how they would spend the money, while thirteen (13) consortia prime sponsors said they would not spend the additional funds on vocational education. Those prime sponsors who were unsure about how the money would be spent (11 respondents) often felt that they would have to plan cooperatively for the disbursement of the incentive money when it became available.

F. The Impact of CETA on Vocational Education

The purpose of this report is to determine if CETA is impacting on the provision of institutional vocational education. Four questions, in particular, in the survey were crucial in making that determination: 1) Will CETA maintain, increase, or decrease the level of institutional vocational education training (slots, enrollees) in comparison with previously funded vocational eucation programs under MDTA and EOA? 2) How many total enrollees were served in manpower slots at vocational education institutions in FY 1974, compared to the anticipated number for FY 1975? 3) How many new slots above the number that existed in FY 1974 will be created as a result of the five-percent supplemental money, and how much of that supplemental money is being spent for the creation of such new slots? 4) How much CETA Title I money have prime sponsors allocated for vocational education?

The response to the first and second questions indicate that CETA is not having an expansionary impact on the numbers of slots and enrollees at vocational education institutions. Twenty-seven (27) prime sponsors responded that the level of institutional vocational education under CETA is being maintained at previous levels, and ten (10) prime sponsors indicated that there would be a decrease in the level. Therefore, almost two-thirds of those local prime sponsors who returned the survey indicated a lack of positive impact under CETA. In addition, some prime sponsors are maintaining the level of training at their local skills center or public vocational school because of State demands during the negotiating process. Still other prime sponsors are maintaining the overall level of vocational education, but reducing the level at the traditional institutions, formerly funded under MDTA and EOA, and turning instead to proprietary schools or community colleges.

HOW WILL CETA AFFECT THE OVERALL LEVEL OF VOCATIONAL EDUCATION

(N = 58 Prime Sponsors)

	Maintain	Increase	Decrease
Number of Prime Sponsors	46.6%	36.2%	17.2%

* No response from one (1) prime sponsor

Data on the number of enrollees in FY 1974 compared to FY 1975 further substantiates the lack of increases in institutional occupational training under CETA. Fourteen (14) prime sponsors indicated that they actually anticipated a decrease in the number of enrollees to be served in institutional vocational education under CETA. Twenty (20) prime sponsors responded that they anticipated serving a larger number of enrollees under CETA, however not all of these increases are a result of creating additional slots above the number that existed prior to CETA. Some of those twenty prime sponsors will simply increase the turnover of enrollees per slot -- reducing the length of time each enrollee will undergo occupational training.

Only sixteen (16) prime sponsors responded that they were using the five-percent supplemental monies to create new slots above the number that existed prior to CETA, while thirty-seven (37) prime sponsors indicated that no new slots were being created as a result of the supplemental funds.

In addition to the survey questions on straight slots and numbers of enrollees, prime sponsors were asked if they planned to spend any of their five-percent supplemental funds on individual referral training. An individual referral or less-than-class-size (LCS) slot is an open one, rather than a slot in a particular manpower funded class that is designated for a specific area of occupational training. Twenty (20) prime sponsors responded that they would spend some of their five-percent funds on individual referrals. Five (5) prime sponsors were undecided and thirty-four (34) indicated that no five-percent funds would go for individual referral training (a number of prime sponsors will use Title I training funds for individual referrals).

Some of the advantages of providing individual referral training are as follows:

1) allows a prime sponsor to train a potential enrollee in an occupational area where there is less than class size enrollement;

2) allows the prime sponsor a great deal of flexibility as to where individual referrals will be trained, because a prime sponsor can purchase individual referral slots wherever the most effective training can be provided (with the five-percent monies, prime sponsors are subject to State approval through their negotiating of a non-financial agreement);

3) allows a prime sponsor to experiment in conducting training in various occupations without having to make large investments in equipment or teaching staff;

4) allows for greater flexibility in programming for individual client's interests and capabilities.

In Section IV, question 12, prime sponsors were asked whether or not they were satisfied with the non-financial agreements they had negotiated with the State. Forty-four (44) prime sponsors responded that they were satisfied, seven (7) responded that they were not satisfied, and eight (8) could not respond because they had not completed negotiating their non-financial agreements.

Once again it must be pointed out that there exists a good deal of confusion and lack of understanding among prime sponsors in the area of vocational education. Fourty-four (44) prime sponsors indicated that they were satisfied with the outcome of their negotiations with the State, and yet it was previously shown that nine (9) prime sponsors did not know what method the State had used for distribution. In addition, twenty-five (25) prime sponsors did not even know if the State had taken out administrative costs from the five-percent funds.

Three major reasons were cited by the seven prime sponsors who indicated that they were dissatisfied with their negotiations with the State: 1) lack of flexibility given them in determining how the five-percent monies would be spent, 2) insufficiency of the amount of the five-percent monies allocated them by the State; and 3) dissatisfaction with the State's extracting administrative costs from the grant before notifying them of their share.

Section VI, question 1 asked prime sponsors if they planned to use CETA Title I money to supplement their five-percent funds and if so, how much. All but one (1) prime sponsor in the random sampling are planning to use Title I funds for vocational education in some form. The amount to be used is, of course, greatly varied. The largest amount of Title I money to be used by any one prime sponsor is $3,146,000 and the smallest amount is $7,257. Twelve (12) prime sponsors could not respond to the question of how much of their Title I money would be used for vocational education, but forty-seven (47 were able to provide us with a dollar figure. In terms of percentages, (of the 47 prime sponsors) an average of

19.3 percent of CETA Title I money is being spent on vocational education. The following chart represents the breakdown among prime sponsors in terms of the percentages of Title I money going into vocational education.

PERCENTAGE OF TITLE I ALLOCATION ALLOTTED TO VOCATIONAL EDUCATION

(N = 59 Prime Sponsors)

	Number of Prime Sponsors
1-10%	15
11-20%	14
21-30%	7
31-40%	6
41-50%	2
51-60%	3
Over 61%	-
No Response	12
TOTAL	59

The 19.3 percent average for Title I expenditures is for overall vocational education, and includes monies to be spent at skills centers as well as at proprietary schools, etc. The percentage would be significantly lower if it was based solely on expenditures at vocational education institutions. Data that would allow for a determination of the amount of Title I money being spent at vocational education institutions is not available from the survey results.

However, it is possible to make some general determinations of how Title I funds will be spent. In question 3 of Section VI prime sponsors were asked how they would use the Title I money they have earmarked for vocational education. Nine (9) prime sponsors are using the earmarked Title I money strictly for training. Another six (6) prime sponsors are going to spend their entire Title I vocational education allotment for wages and/or allowances. One (1) prime sponsor is not using any Title I money for institutional vocational education. The remaining prime sponsors are using Title I for combinations of training, administration, wages and allowances, and other services such as counseling. Of the forty-three (43) prime sponsors who are using their Title I funds in a combination of ways, thirty-six (36) will be providing training as an element of the combination. However, even though most prime sponsors in the random sampling are spending some Title I money on vocational education, this does not necessarily reflect a positive impact of CETA on institutional occupational training, since only nineteen (19) prime sponsors will provide all of their occupational training at traditional vocational education institutions. In addition, it was previously noted that almost two-thirds of the prime sponsors included in this report indicated a lack of positive impact on the level of institutional vocational education in their planning areas.

If a better understanding and a more cooperative spirit had existed, States could have used the five-percent supplemental funds to really assist prime sponsors in their planning, and in turn prime sponsors may have been more willing to commit larger sums of Title I money to existing vocational education institutions. Instead, however, prime sponsors expressed frustration in their negotiating experiences with the State, citing the lack of flexibility afforded them to exercise their programming alternatives. Instead of taking the opportunity to open the door to existing institutions, the attitude of many States was to push prime sponsors to go outside the system and to spend substantial amounts of Title I money for training at proprietary school, OIC's, etc. The level of training taking place at vocational education institutions is, in most cases, simply being maintained as it existed under MDTA and EOA. After this initial experience it is entirely possible that prime sponsors will redirect more of their resources away from the traditional institutions in order to gain the flexibility in programming they are being denied by the States.

The following are examples of CETA's impact in Jersey City, New Jersey, Pittsburgh, Pennsylvania, and Topeka, Kansas. In the case of Jersey City, the overall level of vocational education funding will be increased, in the case of Pittsburgh the level will be maintained, and in the case of Topeka the level will be decreased; however, in each of these jurisdictions the circumstances are rather significant.

Jersey City, New Jersey

Jersey City's share of the Governor's five-percent vocational education grant was $134,000. In negotiating their non-financial agreement, the State insisted that Jersey City maintain the level of the local skills center as it existed under MDTA and EOA. The $134,000 share of the five-percent funds was not adequate to maintain this level, so the State insisted that Jersey City add enough Title I money to maintain the level.

Since Jersey City wanted to provide vocational education training outside the local skills center, they needed to use additional Title I money to purchase the outside slots. The cost of those slots, together with the cost of maintaining the funding level of the local skills center, caused an increase in the overall level of vocational education in Jersey City. However, this represented a forced increase with Jersey City losing some of the flexibility that was intended by CETA.

Pittsburgh, Pennsylvania

The City of Pittsburgh has not yet finalized its non-financial agreement with the State, but they do plan to maintain the overall level of vocational education. However, even though they intend to maintain the overall level, they do not intend to maintain the funding level of the skill center as it existed under MDTA. Pittsburgh's reason for cutting expenditures at the skill center is based on a review conducted by the Mayor's Office of the MDTA courses which revealed a number of problems such as, counselors not spending sufficient time with the MDTA students they were paid to serve, training equipment that was ordered late and had not arrived until courses were almost completed, poor performance in relation to cost, failure to use the spin-off concept in training,* excessive administrative costs, and poor attendance.

Pittsburgh has been negotiating directly with the skill center rather than with the Governor's Office or the State Board of Vocational Education. Pittsburgh is only going to use its five-percent monies to fund 185 slots at the skill center, rather than the 250 slots that existed prior to CETA. They will then use Title I money to fund 100 individual referrals at proprietary schools. Their share of the five-percent money, together with the Title I money they plan to use, will maintain the level of vocational education in Pittsburgh, however they are going outside the traditional vocational education institution to do so.

Pittsburgh refuses to sign a non-financial agreement to fund the skill center, even with only their five-percent money, until the previously mentioned problems are resolved. The skill center has enough MDTA "carry-over" money to continue its present operations until December 31, 1974, and the City hopes by that time solutions will be found to the problems that exist.

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* The spin-off concept allowed students unable to master all of the skills in a particular primary occupation to be exited from the course earlier with skills in a lower-level secondary occupation. This methodology required an additional half-time teacher to be present in the classroom and was included in the budget.

Topeka, Kansas

The City of Topeka was dissatisfied with the State's distribution of the five-percent supplemental vocational education dollars. The State's total special supplemental grant amounted to $559,946. Of that amount $435,536 was allocated to the balance-of-State. A total of only $124,410 remained of the five-percent funds for all local prime sponsors in the State of Kansas.

The State informed the City of Topeka that its share of the supplemental funds was $29,677 based on 1970 census data on total labor force, poverty level, numbers of unemployed, etc. At the same time Topeka was notified of its share of the supplemental funds, the State also notified them that it was taking additional funds out of the $29,677 for the State vocational education program for ex-offenders. All local prime sponsors had their share of monies cut by the State for the ex-offender program. Topeka was left with $13,676 of the supplemental vocational education funds to use for planning of vocational educational training and services in their planning area. The State said that the amount they took from each prime sponsor's share of the five-percent money was dependent on the number of inmates in State penal institutions from each prime sponsor's area.

Topeka has not yet signed its non-financial agreement with the State due to their disapproval of the amount of their five-percent supplemental allocation.

Topeka has hoped to get assistance in determining whether or not the State could legally absorb the bulk of the supplemental vocational education monies. However, there is no one to turn to for assistance, there is no appeals process, and the CETA rules and regulations governing the supplemental vocational education funds are worded rather loosely, simply stating that "the Governor shall determine the amount of funds to be made available in each prime sponsor's area ..." There are no controls on the State to assure an equitable distribution, regardless of the legislative intent for the vocational education funds.

CETA will probably have a negative impact on vocational education in Topeka. There will be a decrease in the level of institutional vocational education training. Prior to the enactment of CETA, $200,000 of MDTA money was spent in Topeka for vocational education training. Currently, under CETA, Topeka will spend $114,000 of its CETA Title I money on institutional training at their local skills center. With the $13,676 of the five-percent vocational education funds, three more slots at the skills center will be funded. The FY 1974 slot level in Topeka was 165. In FY 1975, under CETA, the slot level will be approximately 102.

G. <u>Where CETA Vocational Education Will Take Place</u>

In making the determination of whether or not CETA is impacting on institutional vocational education, it was important to determine if those institutions had the capacity to expand (Section III, number 3). Only two (2) prime sponsors in the sample indicated that their vocational education institutions could not expand their operations. Therefore, prime sponsors could have, if they so desired, used CETA dollars (supplemental and Title I) to impact positively by expanding training at existing vocational education institutions. However, data collected from the random sampling indicates that expansion of training at traditional institutions is not taking place. Twenty-seven (27) prime sponsors indicated that they were simply maintaining the level of overall vocational education and ten (10) prime sponsors indicated that there would be an overall decrease in the level of training.

In asking prime sponsors where CETA vocational education training will take place, the question related to the use of both the five-percent monies and any Title I monies prime sponsors planned to use for vocational education. Of the fifty-nine (59) prime sponsors who responded to those questions, only nineteen (19) plan to do all their vocational education training in the traditional institutions (including those prime sponsors who indicated that they had no skill center or public vocational education institution and where former MDTA funds were channeled through community colleges). Prime sponsors were then asked where they were going to provide occupational training through the use of Title I money only. In both questions it was discovered that the majority of prime sponsors (40) in our sample will be doing their occupational training at a variety of sites. Fifteen (15) prime sponsors will do some training at proprietary schools and nineteen (19) prime sponsors will use community colleges, four (4) of which have no skills center or public vocational education institution.

WHERE LOCAL PRIME SPONSORS ARE PROVIDING VOCATIONAL EDUCATION TRAINING UNDER CETA

(Figures Shown Represent Both Title I Expenditures and the Five-Percent Supplemental)

(N = 58 Prime Sponsors, Multiple Responses Will Cause the Total to Exceed N)

	Skills Center	Public Voc. Schools	Proprietary Schools	Community Colleges	Other
Number of Prime Sponsors	37	17	15	19	11

At this point it is important to note that twenty-two (22) prime sponsors indicated that they would also provide some individual referral training slots in addition to class-size slots, and it is difficult to conclude in many cases where individual referrals would be trained. However, individual referrals are often purchased outside traditional institutions.

Data on where occupational training will take place is difficult to tabulate. However, two significant factors emerged from the responses in this area: first, only nineteen (19) prime sponsors have decided to do all occupational training at vocational education institutions and; second, most prime sponsors are using a variety of training sites. CETA dollars are not being used to increase training at vocational education institutions. From the above data it must be concluded that local prime sponsors do not feel that they can receive adequate vocational education training solely from those institutions.

H. Recruitment and Placement; Determination of Occupational Needs, and Contracting

It was important for purposes of this study to determine which offices or agencies would be assessing occupational needs, providing recruitment and placement services and carrying out the actual contracting for training and services for vocational education enrollees. It was learned that in the area of recruitment, twenty-two (22) of the respondents are relying strictly on the Employment Service for recruitment under CETA. Nine (9) prime sponsors are using the mayor's office for recruitment and referral, only one (1) prime sponsor is using the local education board as its sole source of recruitment. The other prime sponsors (twenty-two respondents) are using either a combination of those agencies (i.e. Employment Service and the mayor's office) or another agency not listed for recruitment of enrollees in the survey. While the recruitment function is being assumed by some of the mayors' offices and consortia groups, the bulk of this responsibility continues to lie within the purview of the Employment Service, the traditional provider of these services.

The survey also inquired of prime sponsors which agency, under their non-financial agreement, would be responsible for determining occupational needs within their planning area. Almost half (twenty-five (25) of the respondents) stated that they would use a combination of agencies to assess labor market needs within the community. The Employment Service was generally one of the agencies used in this grouping. Only three (3) respondents stated that they would use the Employment Service exclusively for determining occupational needs. The data suggests that the Employment Service and the mayors' offices will probably maintain the most significant roles in determining occupational needs in the various planning areas.

Prime sponsors were also asked which agency would have the mandate for the actual contracting of training to be provided vocational education enrollees under CETA. This question was particularly significant since the State has traditionally operated vocational education. In the survey an attempt was made to discern if the State is still retaining this contracting power and authority, or if it is being relinquished to mayors' offices and consortia governing bodies. Twenty-four (24) of those surveyed stated that the mayors' offices and consortium decision-making bodies would have the mandate for contracting training. Another eleven (11) respondents indicated that a combination effort would be undertaken for contracting training, with mayors' offices or consortium decision-making bodies usually considered significant forces in this effort. Fifteen (15) respondents indicated that the State Vocational Education Office would retain the responsibility for contracting and four (4) respondents indicated that the local Education Board would assume this responsibility.

I. Job Counseling, Wages and Allowances

It is important for the purposes of this study to determine if job counseling was to be provided as a provision included in non-financial agreements. For the purposes of the survey, we were primarily interested in whether counseling services were being paid out of CETA Title I monies or from the five-percent monies. At least 73 percent (44 respondents) were planning to use a portion of the five-percent monies for providing counseling services. Nine (9) prime sponsors stated that Title I monies would definitely be used to cover the costs of counseling services. Six (6) respondents stated that job counseling would not be provided as a provision of their non-financial agreements. Twenty-two (22) of those responding stated that they would be using a combination of agencies to provide counseling services. Sixteen (16) respondents stated that they would use the traditional agency, i.e., the Employment Service. Only five (5) respondents were using only the Mayor's Office for this function, while the five (5) remaining respondents planned to use skills center staff. Eleven (11) prime sponsors did not respond to this question.

Sixteen (16) of those responding planned to use their five-percent vocational education monies for the provision of wages and allowances for program trainees. The majority of respondents, however (40 prime sponsors) will use Title I monies rather than the five-percent monies to pay for the provision of wages and allowances.

Prime sponsors were also questioned about the time of day vocational education training would be provided in their area under CETA. Thirty-one (31) of those responding stated that vocational education training would be provided only in the daytime. A sizeable number, but not quite fifty percent of the respondents (26 prime sponsors) indicated that they would have both day and evening training. Two of the respondents did not answer the question. It is possible that some jurisdictions providing evening classes may be serving employed enrollees who are seeking upgrading of skills or occupational training in a new field. Drawing such a conclusion, however, is difficult because it is not clear whether the motivation for the evening or off-hours courses is to actually offer upgrading-training or a result of shop and classroom space not being available during the day.

J. Applications for CETA Vocational Education Programs

Questions 1 and 2 of Section V of the survey asked prime sponsors how many client applications had been received for CETA funded vocational education programs, and the types of assessment formats that are being used to determine a potential enrollee's career interests. The rationale for that section was to measure client response, as well as to determine the degree of flexibility afforded potential enrollees in receiving the type of training they desire. Asking prime sponsors for the number of applications they had received proved to be inconclusive. Twenty (20) prime sponsors were unable to respond for various reasons, such as:
1) referrals for occupational training to be carried out under CETA came from various agencies; and
2) the local agency responsible for applications did not have the information readily available. Twenty-one (21) prime sponsors responded that they had not yet received any applications. This is a result of the lateness in start-up dates for CETA vocational education programs. In many jurisdictions, institutional vocational education was still being conducted with "carry-over" MDTA funds. Eighteen (18) prime sponsors responded that they had received applications for CETA-funded vocational education programs. The highest number of applications received was two thousand (2,000).

In learning of the types of assessment formats being used, it was found that many prime sponsors used a combination of techniques which allowed for a large degree of flexibility for potential enrollees. The most common methods employed are aptitude and vocational interest testing. Many prime sponsors used the tests in combination with an open application enabling a potential enrollee to fill in his/her training interests.

K. Purchase of Equipment

Since local government had little direct role to play in vocational education under MDTA, the purchasing of equipment for occupational training was purely a function of the State. Now that institutional vocational education has become a part of CETA, an attempt was made to determine if prime sponsors were spending CETA monies, either through their share of the five-percent supplemental monies or through Title I money, for the purchase of additional equipment. Only thirteen (13) prime sponsors indicated that CETA money in either form, would be spent on the purchase of additional equipment. Three (3) prime sponsors indicated that they were uncertain about equipment purchases at the time they responded to the survey. The two reasons mentioned for needing additional equipment were: 1) training is being provided in new occupational areas, and; 2) the skills center, or public vocational education institution had indicated that there was insufficient equipment on hand to serve CETA enrollees.

L. Administrative Costs

Questions 20 and 21 of Section III of the survey were directed to the issue of administrative costs. Administrative costs were a serious source of confusion and dismay to prime sponsors because of the ambiguity of CETA rules and regulations. This resulted in varying interpretations of administrative costs, which tends to complicate analysis of the survey data.

The CETA rules and regulations merely state that the five-percent supplemental vocational education funds are subject to a twenty percent limitation on administrative costs.* Administrative costs are defined as follows:

Sec. 98:12(e)(1)

> Administrative costs shall be limited to those necessary to effectively operate the program. Such costs include overall program administration as well as program activity administration costs incurred by prime sponsors, sub-grantees, and contractors. Costs should not generally exceed 20 percent of the total planned costs for a grant, unless the Program Narrative Description under Sec. 95:14 (b)(2)(i) sets forth an explanation of how such additional costs have been determined and a detailed documentation to support that amount (sec. 108(d)(2)

The source of confusion is obvious. Some of the questions regarding administrative costs that arose from the sample are:

1) Can the State take its own administrative costs off-the-top of the Governor's five percent special grant?

* CETA Rules and Regulations, June 4, 1974, Sec. 95:57(1)(i)

2) If so, should the State notify each prime sponsor of its administrative cost set-aside at the same time it notifies them of their supplemental allocation?

3) Is the twenty-percent ceiling on administrative costs limited to the entire State grant, or is there also a ceiling on how much a State can take from each prime sponsor if administrative costs were not deducted from the top? In other words, if the State takes 20 percent of its total supplemental allocation for its own administrative costs, does this mean that prime sponsors cannot use any part of their allocation from the State for administration?

4) Can a local prime sponsor use over twenty percent of their share of the five-percent funds for their administrative costs, while using CETA Title I money for training?

The failure of the rules and regulations to address this issue definitely, allows the States to derive their own interpretation. As a result, the possibility exists that local prime sponsors could lose substantial amounts of vocational education monies to administration when such funds should be spent on training. When asked if the State had taken any of the vocational education funds for its own administration, it was found that twenty-five (25) or forty percent of the respondents simply did not know. This fact coupled with the fact that nine (9) prime sponsors in the sample did not know what method was used by the State to determine their share of the five-percent monies, suggests not only ignorance on the part of prime sponsors, but the total absence of uniform State allocation mechanisms. If CETA is to impact on the vocational education system, then States must cooperate by making sure local prime sponsors are aware of distribution formulas, rationales for deducting administrative costs, and actual amounts of administrative costs they are taking.

In discussions with Department of Labor officials regarding the administrative cost provisions of the CETA rules and regulations, it was learned that the twenty percent limitation is on the entire State grant for vocational education rather than a limitation on the amount a State can take from each prime sponsor. Therefore, if a State does not take administrative costs off-the-top prior to determining the distribution among prime sponsors, it could then take over twenty percent from one prime sponsor while taking a much smaller amount from another. It is obvious that the system could lend itself to inequity, particularly if prime sponsors are not well informed.

Department of Labor officials also indicated that there is no restriction on what local prime sponsors can spend for their own administrative costs. If the State agrees to allow a local prime sponsor to exceed twenty-percent, they may do so as long as no more than twenty percent of the entire State grant is used for administration. Several local prime sponsors have indicated that in negotiating their non-financial agreements, they proposed to the State that all, or a large portion, of their five-percent monies be spent on the administrative costs for the operation of their local skills center. They would then spend a portion of their Title I money to maintain training at the slot level that existed prior to CETA. In those jurisdictions where local prime sponsors are following such a course of action, the five-percent monies are not being used to increase vocational training and only enough Title I money is being used to maintain the existing system.

In cases where one prime sponsor uses over twenty percent of the supplemental monies on administration and the State has already taken a percentage for its own administrative costs, other prime sponsors within the State will be greatly limited in the amount they may use for their local administration.

Of the twenty-four (24) prime sponsors who responded that the State had taken administrative costs, ten (10) did not know what method was used by the State, eight (8) responded that administrative costs were taken off-the-top from the entire State's grant, and six (6) indicated that administrative costs were taken directly off their share of the five-percent monies.

Nine (9) prime sponsors indicated that the State had not taken any money for their own administrative costs.

ADMINISTRATIVE COSTS

(N = 58 Prime Sponsors)*

Were Administrative Costs Taken by the State? (five-percent supplemental monies)

	Yes	No	Don't Know
Number of Prime Sponsors	41.4%	15.5%	43.1%

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CONCLUSIONS

This study was undertaken to determine the impact of the Comprehensive Employment and Training Act of 1973 on the provision of institutional vocational education. The results of the survey demonstrate that CETA is not having a measurable impact on the provision of institutional vocational education. Realistically, it can be concluded that the system is merely being maintained as it existed under MDTA and EOA.

A major reason for CETA's minimal impact may be the confusion and lack of knowledge that exists among local prime sponsors. The deficiency of expertise on the part of prime sponsors can be attributed to the fact that a Federal-State partnership existed prior to CETA. Local prime sponsors have even experienced difficulty in compiling statistical data on programs that existed under the old categorical system. Evidence of this was found in the survey when statistical data on traditional manpower programs as well as institutional vocational education was requested from prime sponsors. States continue to have a strong voice in planning and funding institutional vocational education activities under CETA, a role which is strengthened by their allocation of the Governors' five-percent supplemental grant.

The major thrust of CETA is to allow prime sponsors the programmatic flexibility they lacked under the categorical grant system. However, States control the supplemental vocational education funds, and have great latitude in allocating these funds to local prime sponsors. Once these monies are allocated, the State then negotiates a non-financial agreement with the prime sponsor. This gives the State two crucial points of control - determining how much money a prime sponsor receives and largely deciding how the money is spent. In addition, the State has the option to withhold up to twenty percent of the entire State grant for its own administrative costs. Since it is, in many cases, the State, and not the local prime sponsor who has the ultimate say in how the supplemental vocational education funds are to be spent, those funds do not afford the flexibility to prime sponsors which was intended by CETA. The whole system of negotiating with the State for the provision of vocational education training and services through non-financial agreements is confusing, time consuming and often an inequitable process. Prime sponsors cannot plan for their share of the five-percent monies until the State notifies them of the amount of their share. The slowness of a State to provide this information then creates a problem for prime sponsors trying to develop their overall CETA plans because they have no idea of the amount of Title I money that may be needed for vocational education to supplement their five-percent share.

Local prime sponsors' were in many instances, not notified by the State of the allocation mechanism used to distribute the five-percent monies. There were also many who did not know whether or not administrative costs had been withheld by the State before their allocation was received.

The CETA rules and regulations fail to define a process for allocating the five-percent monies. They thereby allow the State a tremendous degree of flexibility and for potential inequities to become part of the process. This is also evident concerning the issue of administrative costs. The regulations merely state that "costs should not generally exceed twenty percent of the total planned costs for a grant..." Prime sponsors are unclear as to whether this restriction also applies to the amount of their share of the five-percent monies that could be used for administration. Many prime sponsors did not even know if the State had taken any administrative costs out of the five-percent funds. Others responded that the State had taken a share for administrative costs but were unsure of whether or not the State had done so off-the-top or whether they had taken a percentage of each prime sponsor's share.

The confusion, slowness and complexity of the process and the lack of flexibility for local prime sponsors have produced frustration in local jurisdictions and created barriers to expansion and innovation in institutional vocational education. The five-percent monies could have been used for expansion of institutional vocational education through new programming and improved skill training. Instead CETA funds are basically being used to maintain the existing system.

RECOMMENDATIONS

An uneasy relationship has traditionally existed in the field of institutional manpower training among the Federal, State, and local levels of government. The uneasiness is often a result of a lack of understanding of the operations of each level of government. State vocational education officials need to be made aware of local prime sponsors' need for the flexibility that is necessary to effectively serve their clients, and which is mandated under CETA. At the same time, local prime sponsors must be attuned to the system of State operations. If such a mutual educational process can be achieved, State and local officials could work cooperatively to make existing vocational education institutions more responsive to those in need of occupational training.

The five-percent supplemental vocational education funds should be used by States as a method of introducing local prime sponsors to the potential capabilities of existing vocational education institutions. If the educating process is successful and an effective working relationship is developed among State officials and local prime sponsors, then greater opportunities would be possible for improving and expanding vocational education training at existing institutions to better serve the client population.

The CETA rules and regulations dealing specifically with the five-percent special supplemental grant to Governors need to be clarified. They should better reflect the intent of CETA by specifically allowing prime sponsors greater flexibility in the use of the five-percent funds. The rules and regulations should require the States to employ an equitable distribution formula to allocate supplemental funds, and to provide each prime sponsor with the calculations used to arrive at their share.

In addition, procedures for determining allowable levels of administrative costs should be defined in the CETA regulations. A mechanism for deduction of a State's administrative costs from the Governor's grant should be formulated and all prime sponsors informed of that mechanism, as well as the actual amount withheld for State administration. Further clarification on the twenty-percent ceiling on administrative costs is required. Prime sponsors have expressed confusion with the current wording. Questions have arisen concerning whether or not a local prime sponsor can use over twenty-percent, or even their entire share of the five-percent funds, for their administrative costs, while using CETA Title I funds for training. Another question raised by prime sponsors was whether or not there is a ceiling on the amount a State could take for it's administative costs from each prime sponsor's share, if such costs were not originally deducted off-the-top.

States should be encouraged to move with more speed in allocating and distributing the supplemental vocational education funds in order to allow prime sponsors to incorporate those funds in their CETA manpower plans for the fiscal year, without having to modify their plans. The slowness of the distribution and negotiating processes makes it difficult for prime sponsors to determine the amount of CETA Title I funds they will allocate to vocational education training and to prepare a truly comprehensive approach to manpower problems and needs within their jurisdictions.

Finally, an appeals process should be instituted that would enable prime sponsors to raise objections and seek redress of grievances that may arise from the distribution of the five-percent funds or negotiation of non-financial agreements.

APPENDIX I

CITY PROFILE DATA ON 100 CITIES SELECTED FOR SURVEYING

TYPE OF GOVERNMENT	Number of Cities
Mayor-Council	56
Council-Manager	36
Commission	8

TOTAL POPULATION	
Under 100,000	4
100-200,000	40
200-500,000	31
Over 500,000	25

POPULATION MIX*	
Cities with a White population over 50%	90
Cities with over 25% Blacks and other ethnic groups	38
Cities with over 10% Spanish origin	16

PERCENT OF POPULATION UNDER 18 YEARS OF AGE	
Population under 18 equals 20-25% of total population	3
Population under 18 equals 25-30% of total population	22
Population under 18 equals 30-35% of total population	56
Population under 18 is over 35% of total population	19

TOTAL SCHOOL ENROLLMENT	
Total school enrollment is under 20% of population	10
Total school enrollment equals 20-25% of population	64
Total school enrollment equals 25-30% of population	24
Total school enrollment is over 30% of population	2

MEDIAN YEARS SCHOOL COMPLETED	Number of Cities
Under 10 years	3
10-11 years	12
11-12 years	32
12-13 years	53

* In the Population Mix category there is an obvious overlap with some cities fitting into more than one category.

The following is a list of the sixty (60) cities who responded to our survey and whose responses are analyzed in this report:

Akron, Ohio
Albany, New York
Allentown, Pennsylvania
Amarillo, Texas
Atlanta, Georgia
Baltimore, Maryland
Birmingham, Alabama
Buffalo, New York
*Charleston, West Virginia
Charlotte, North Carolina
Chicago, Illinois
Cincinnati, Ohio
Cleveland, Ohio
Columbia, South Carolina
Columbus, Georgia
Des Moines, Iowa
Duluth, Minnesota
East St. Louis, Illinois
Erie, Pennsylvania
Evansville, Indiana
Flint, Michigan
Fort Wayne, Indiana
Fort Worth, Texas
Greensboro, North Carolina
**Hampton/Newport News, Virginia
Honolulu, Hawaii
Houston, Texas
Huntsville, Alabama
Jackson, Mississippi
Jacksonville, Florida
Jersey City, New Jersey

* The City of Charleston was one of the sixty who returned the survey, however they are now a member of a statewide consortium and were unable to complete the survey. We have, therefore, excluded Charleston from our analyses.

** Hampton/Newport News returned one survey for both cities because they are members of the same consortium. Our analyses, therefore, includes Hampton/Newport News as one respondent.

Knoxville, Tennessee
Lansing, Michigan
Las Vegas, Nevada
Madison, Wisconsin
Miami, Florida
Milwaukee, Wisconsin
New York, New York
Oakland, California
Omaha, Nebraska
Philadelphia, Pennsylvania
Phoenix, Arizona
Pittsburgh, Pennsylvania
Roanoke, Virginia
Rochester, New York
St. Paul, Minnesota
Salt Lake City, Utah
San Francisco, California
San Jose, California
Savannah, Georgia
Shreveport, Louisiana
Springfield, Missouri
Tacoma, Washington
Tampa, Florida
Topeka, Kansas
Trenton, New Jersey
Tucson, Arizona
Tulsa, Oklahoma
Worcester, Massachusetts
Yonkers, New York

APPENDIX II

NATIONAL LEAGUE OF CITIES

UNITED STATES CONFERENCE OF MAYORS

September 3, 1974

SURVEY

IMPACT OF CETA ON VOCATIONAL EDUCATION PROGRAMS

* Please Return By September 16 to: NLC and USCM Manpower Project
Office of Urban Services
Attention: Rosa Rozansky

I. PRIME SPONSORSHIP INFORMATION

1. City ______________________ State ______________________

2. Name of Manpower Planner ______________________

3. Is your city a member of a manpower consortia?

36 yes *23* no

If yes, what type of consortia? (e.g. city-city, city-county, etc.):

City-County arrangements are the most common among those included in our random sampling

4. What was your total Title I allocation? *Highest - $57,440,000*
Lowest - $ 834,824

5. What was your share in terms of dollars of the five percent vocational education supplemental funds allocated to your state? *Highest - $2,720,450*
Lowest - $ 22,871

* *Italic print represents cumulative totals or averages of total respondents included in our random sampling*

1620 Eye Street, N.W., Washington D.C. 20006 / 202-293-7300

6. What method was used by the state to determine your share?

9 respondents - did not know

21 " - based on unemployment and census data

15 " - proportion of Title I funds with the State

5 " - straight five percent of Title I allocation

9 " - other

7. Are the vocational education training and services negotiated in your non-financial agreement incorporated into your FY 1975 plan?

38 yes *21* no

8. Please identify below the manpower programs and number of slots funded in FY 1973 and in FY 1974:

FY 1973	No. of Slots
____ NYC In-School	____
____ NYC Out-of-School	____
____ NYC Summer	____
____ CEP	____
____ Mainstream	____
____ SER	____
____ OIC	____
____ Other (Please list)	
________	____
________	____
________	____
________	____

Insufficient Data for a meaningful tabulation

FY 1974	No. of Slots
____ NYC In-School	____
____ NYC Out-of-School	____
____ NYC Summer	____
____ CEP	____
____ Mainstream	____
____ SER	____
____ OIC	____
____ Other (Please list)	
____________	____
____________	____
____________	____
____________	____

II. MANPOWER ADVISORY COUNCIL INFORMATION

1. How was your manpower advisory council selected? (e.g. Was the old CAMPS structure the basis for selection?)

   50 prime sponsors responded that CAMPS was the basis for selection.

2. Are representatives from vocational education institutions on your local manpower advisory council?

38 yes   21 no

If yes,

A) How many? 2 (average)

B) Were representatives of vocational education institutions members prior to the enactment of CETA

X yes   ____ no Yes was the overwhelming response

C) How were those representatives selected? ____

Appointment by Mayor or Executive Committee of a

Consortium arrangement

D) Please list names, titles, and agencies of those representatives of vocational education institutions on your local manpower advisory council:

____

____

____

____

E) Please list below and on the back of this page, if necessary, the names, titles, and agencies of all other members of your manpower advisory council:

____

____

____

____

____

____

____

III. VOCATIONAL EDUCATION SYSTEM

1. Please list by name and location the vocational education institutions in your planning area. If there are none, please indicate and then list the name, location, and distance to the closest institution:

____

____

____

____

2. How will CETA vocational education funds affect the level of institutional vocational education training in comparison with previously funded vocational education programs (MDTA and EOA funded)?

   27 maintain the level

   22 increase the level

   10 decrease the level

3. Do existing vocational education institutions in your planning area have the capacity to expand to meet the possible increase in slots occurring from the CETA vocational education monies?

   57 yes   *2* no

4. How many vocational education enrollees were in your local vocational education institutions (filling manpower slots) from your planning area in FY 1974 in comparison to the anticipated number for FY 1975?

   FY 1974 *462 (average)*

   FY 1975 *528 (average)*

   (14 respondents indicated a decrease in FY 1975 enrollees)

   20 indicated an increase

   25 indicated a maintenance

IV. NON-FINANCIAL AGREEMENT

1. Who at the state level did you negotiate your non-financial agreement with?

   Name ____________________

   Title *Representatives of State Vocational*

   Agency *Education Departments, State Boards of Education.*

2. What is the starting date for the delivery of training and services negotiated in your non-financial agreement?

October 1, 1974 (average)

3. In terms of dollars, what amount of your share of the five percent CETA vocational education funds will be spent on creating new slots? ______________________

16 respondents will create new slots

4. How many slots will be created? *37 will not create new slots*

5. In terms of dollars, what amount of your share of the five percent CETA vocational education funds will be spent on individual referrals? ______________________

6. Based on the amount of dollars allotted for individual referrals, what is the estimated number of individual referrals that will be serviced? *20 prime sponsors are doing ind. 34 are not; 5 undecided*

7. What is the anticipated total number of enrollees for CETA vocational education programs? *528 (average)*

8. Please identify below the types of training and the number of slots to be provided with CETA vocational education funds:

	No. of Slots
_____ Auto Mechanics	_____
_____ Welders	_____
_____ Carpenters	_____
_____ Machinists	_____
_____ Tool and Dye Makers	_____
_____ Printing Pressmen	_____
_____ Bookbinders	_____
_____ Draftsmen	_____
_____ Assemblers	_____
_____ Plumbers	_____
_____ Bricklayers	_____

Clerical, Auto Mechanics, Welding, and Medical Skills were most common

No. of Slots

_____Nurses Aides _____

_____Teachers Aides _____

_____Licensed Practical Nurses _____

_____Medical Assistants _____

_____Dental Assistants _____

_____Orderlies _____

_____Secretaries _____

_____Stenographers _____

_____Clerk Typists _____

_____Bookeepers _____

_____Cashiers _____

_____Beauticians _____

_____Key Punch Operators _____

_____Computer Operators _____

_____Waste Water Treatment Operators _____

_____Firefighters _____

_____Police Officers _____

_____Telephone Servicemen _____

_____Recreation Workers _____

_____Stationary Engineers _____

_____Meatcutters _____

_____Other (Please list including slots) _____

_____________________ _____

_____________________ _____

_____________________ _____

_____________________ _____

9. Identify any vocational education services to be provided with CETA monies not previously mentioned.

10. Where will CETA vocational education training be provided and how many slots at each of the following:

(includes five percent and Title I Funds) — **No. of Slots**

_11_ Public Vocational Schools ____

_37_ Skill Centers (previously funded by MDTA or EOA) ____

_15_ Proprietary Schools ____

_19_ Community Colleges ____

11 { ____ On-the-Job Training ____

____ Other (Specify) }

11. How did your city determine how your share of the CETA vocational education funds would be spent?

Insufficient data for meaningful tabulation

12. Was the non-financial agreement negotiated with the state to your city's satisfaction?

44 yes   *7* no *(8 no response)*

If not, why?

Three reasons were stated for the "no" responses. They were: 1) dissatisfaction with the State's allocation of the five-percent funds; 2) administrative costs taken by State; 3) lack of flexibility granted in the negotiations process

13. In accordance with your non-financial agreement, who will determine occupational needs within your planning area for the establishment of vocational education training with CETA funds?

3 Employment Service

18 Mayor's Manpower Office

1 Local education board or service center (what is the composition of the board?)

25 Other (Specify) *Combinations*

12 *No response*

14. In accordance with your non-financial agreement, who will provide recruitment and placement services for CETA vocational education enrollees?

22 Employment Service

9 Mayor's Manpower Office

1 State Vocational Education Office

___ Local education board or service center (what is the composition of that board?)

22 Other (Specify) *Combinations*

5 *No response*

15. In accordance with your non-financial agreement, who will have the mandate for the actual contracting for training to be provided to vocational education enrollees in CETA programs?

2 Employment Service

24 Mayor's Manpower Office

15 State Vocational Education Office

4 Local education board or service center (what is the composition of that board?)

6 Other (Specify)

5 *Combinations*

3 *No response*

16. In accordance with your non-financial agreement, will job counseling be provided?

44 yes 15 no *(9 of the 15 indicated that they would provide job counseling out of Title I funds)*

If yes, which agency has been selected to do job counseling and why was that agency selected?

22 - combination of agencies; 16 - Employment Service;

5 - Mayor's Office; 5 - Skills Center Staff; 11 - No response

17. At what time of the day do you anticipate providing CETA vocational education training?

31 Daytime

Evenings

26 Both

2 *No response*

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18. What percentage of the total slots will be provided in the daytime? *majority of training will take place in the daytime or in combination with evening training.*
What percentage of the total slots will be provided in the evenings? ____________

19. In accordance with your non-financial agreement, will wages and allowances be provided?

16 yes   *43* no   *(40 of the 43 indicated that wages and allowances will be paid out of Title I)*

If yes, what percentage of your share of CETA vocational education funds will be spent on wages and allowances?

inconclusive data

20. Were administrative costs taken from your share of the CETA vocational education funds?

24 yes   *9* no   *don't know - 26*

21. What percentage of your CETA vocational education funds are being used for administrative costs? *inconclusive data*

A) If the percentage for administrative costs is in excess of 20 percent, how did the state justify it?

____

____

____

22. Will the purchase of additional equipment be required for training to be provided with CETA vocational education funds?

13 yes   *43* no   *don't know - 3*

If yes,

A) On what basis was that decision made?

New areas of occupational skill training,

insufficient equipment for CETA enrollees.

B) What is the procedure for purchasing additional equipment?

____

____

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V. APPLICATIONS

1. How many applications have been received to date from individuals interested in vocational education training slots established from CETA vocational education funds?

21 respondents - 0; 20 - don't know; 18 - received average of 255

2. In applications for CETA vocational education slots, what method is used for the determination of a potential enrollee's career development interests?

____ Application lists existing programs

2 Application is open for individual to fill in his or her interests

16 Applicant is tested for occupational interests and aptitudes

9 Other (Please explain) ____

22 *Combinations*

10 *No response*

VI. ADDITIONAL FUNDING

1. Will you use Title I funds to supplement your share of the CETA vocational education funds?

58 yes *1* no *12 - don't know*

If yes, how much? *58 used an average of 19.3 percent of their Title I funds*

2. Where will vocational education training, through the use of Title I funds, be provided?

15 Skill Centers

3 State Vocational Education Institutions

____ Proprietary Schools

____ Community Colleges

____ On-The-Job Training

37 Combination (Specify) ____

4 *No response*

3. If Title I funds will be used for vocational education programs, please explain how those funds will be spent:

9 prime sponsors - training only

6 " - wages and allowances only

43 " - combinations including training, administration, wages and allowances, services

1 " - not using Title I

4. If you are a member of a consortia, will you use any consortia incentive money when it becomes available for the purchasing of additional vocational education slots or services?

12 yes *13* no *11 - unsure*

VII. MISCELLANEOUS

1. Please elaborate on any unusual circumstances that might have occurred in the negotiating of a non-financial agreement for your planning area (e.g. problems not previously mentioned in this questionnaire):

dissatisfaction with allocating of the five-percent monies, negotiating process, and administrative costs provision.

2. What kind of information or technical assistance would your city require in order to provide effective vocational education training through the use of the CETA supplemental vocational education funds?

1) assistance in improving on labor market data

2) clarification of CETA rules and regulations

3) a speedier and more efficient system for negotiating for vocational education training and services through use of the five-percent funds.

3. Please list the name, title, and phone number of the individual who filled out this questionnaire?

Name *Manpower Director*

Title ______

Phone Number ______

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APPENDIX III

The following pages have been extracted from the Forms Preparation Handbook for Prime Sponsors Under the Comprehensive Employment and Training Act of 1973, U. S. Department of Labor, Manpower Administration, May 1974.

E. Prime Sponsor/Vocation Education Non-Financial Agreement

The purpose of this agreement is to develop a financial, statistical and narrative plan for the expenditure of vocational education funds in the prime sponsor's area.

The prime sponsor will develop his vocational education plan in conjunction with his CETA prime sponsor plan. He should be notified of the vocational education funds available to his area by the Governor as soon as possible after the ARDM notifies the Governor of the amount allocated to his state. When the plan is developed, it should be submitted to the Vocational Education Department for their approval. This plan when approved and signed will constitute a non-financial agreement between the prime sponsor and the State Vocational Education Department. A copy of the agreement should be sent to the Governor for his inclusion in his Grant Application. The agreement will consist of the following sections:

a. Agreement Signature Sheet

b. Vocational Education Project Operating Plan

c. Vocational Education Program Narrative

Being a non-financial agreement, no money will change hands. The Vocational Education Department promises to provide the services outlined in the agreement upon receipt of the funds from the Governor.

a. Non-Financial Agreement Signature Sheet

1. Purpose

The Agreement Signature Sheet constitutes a legal and binding document when signed by both parties. The State Vocational Education Board is legally bound to deliver the training and services outlined in the program narrative and the project operating plan upon receipt of the funds from the Governor. Both parties agree to operate the CETA program in accordance with Federal regulations, the assurances and certifications and the Comprehensive Manpower Plan which is part of the agreement by reference.

2. General Instructions

When an agreement is reached between the prime sponsor and the Vocational Education Board on the training and services to be delivered, the agreement signature sheet can be signed. At least three copies of the agreement will be signed. One for each of the signing parties and one to go to the Governor. Any change to the agreement will require prior bilateral approval of both the prime sponsor and the Vocational Education Board.

3. Facsimile of Form

See following page.

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3. Facsimile of Form

U.S. DEPARTMENT OF LABOR
Manpower Administration

VOCATIONAL EDUCATION AGREEMENT SIGNATURE SHEET

1. PRIME SPONSOR	2. VOCATIONAL EDUCATION BOARD

Pursuant to Section 112(c) of the Comprehensive Employment and Training Act of 1973, this Agreement is entered into by the State Vocational Education Board of *(3. Name of State)*.. and *(4. Name of Prime Sponsor)*..
This Agreement consists of this sheet, the Project Operating Plan and the Program Narrative.

As per this Agreement the State Vocational Education Board of *(5. Name of State)* .... is committed to provide for the Prime Sponsor the training and services outlined in the Program Narrative. These services and training will be provided upon receipt of funds from the Governor.

6. The estimated costs of these services and training by cost category are:

COST CATEGORY	ESTIMATED COSTS'
Training	
Administration	
Allowances	
Services To Clients	
TOTAL	

7. APPROVED FOR THE PRIME SPONSOR	8. APPROVED FOR THE VOCATIONAL EDUCATION BOARD
BY	BY
NAME AND TITLE	NAME AND TITLE
SIGNATURE	SIGNATURE

MA 2-199C
May 1974

4. Instructions for Completing Non-Financial Agreement Signature Sheet

(1) Prime Sponsor. Enter the name and address of the prime sponsor in whose area the training and services will be provided.

(2) Vocational Education Board. Enter the name and address of the State Vocational Education Board providing the services and training.

(3) Enter the name of the State.

(4) Enter the prime sponsor's name.

(5) Enter the name of the State.

(6) Enter the estimated amount of Vocational Education funds from the Governor's Special Grant which will be spent for the listed cost categories.

(7) Signature of prime sponsor will be entered here.

(8) Signature of representative of Vocational Education Board will be entered here.

b. Vocational Education Project Operating Plan

The Special Grant Project Operating Plan used by the Governor in his grant application will also be used by the prime sponsor in his non-financial agreement. Section VIII B of this Handbook contains detailed instructions on the completion of this form. Only Part I, Vocational Education Projects, will be completed by the prime sponsor for his non-financial agreement.

c. Prime Sponsor/Vocational Education Board Non-Financial Agreement Program Narrative Form

A detailed explanation of the following four areas will be developed by the prime sponsor for the expenditure of the Governor's Vocational Education funds available for the prime sponsor's area:

1. The training and services to be provided by the Vocational Education Board to the prime sponsor upon receipt of the necessary funds from the Governor.

2. The objectives and need for these services and training.

3. The results and benefits expected from these services and training.

4. How these services and training are being coordinated with the prime sponsor's CETA grant activities.

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