The role of a program evaluation unit in the Illinois State Educational Agency (SEA) as it attempts to provide meaningful data for a variety of audiences about projects that have extremely short life is investigated. The focus is on two programs—migrant programs and neglected/delinquent programs—funded under Title I, Public Law 89-750. A common dilemma of these programs is determining the success of children whose attendance is of short duration (less than two months in the migrant programs and an average of seven months in the neglected/delinquent programs). Government guidelines had influenced the SEA and Local Educational Agency (LEA) staff to use standardized tests on a pre and post basis. The evaluation unit found such testing inappropriate because of time factors, student attendance patterns, and student language abilities. As soon as communication linkage developed, there was mutual agreement by the state evaluation personnel and field people that standardized tests provided meaningless data. It was concluded that the intervention of state data collection in local projects requires that the chief audience of the data should be the LEA's themselves. It is only in this way that relevant information can be amassed that will lead to improvement of projects. Data must be collected in a variety of ways and using a variety of tactics. (RC)
AN EXPLORATION OF THE EVALUATION OF SHORT-TERM COMPENSATORY EDUCATION PROGRAMS: THE ROLE OF AN EVALUATION UNIT IN THE STATE EDUCATION AGENCY

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An Exploration of the Evaluation of Short-Term Compensatory Education Programs; The Role of an Evaluation Unit in the State Education Agency

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For four years—1972, 1973, 1974, and 1975—an Internal Program Evaluation Unit in the Illinois Office of Education has been responsible for compiling annual evaluation reports of the use of federal funds for compensatory education programs in the state. Through this experience the evaluation unit has become acutely aware of the difficulties of providing meaningful evaluative data to meet the legitimate request by Federal Government for annual evaluation reports. This paper intends to depict the role of an internal evaluation unit in evaluating two programs—migrant programs and neglected/delinquent programs—funded under Title I, Public Law 89-750. A common dilemma faced by these programs is determining the success of children whose attendance is of short duration (less than two months in the migrant programs and an average of seven months in the neglected/delinquent programs).

The following discussion includes a common introduction to the concept of compensatory education; a description of the responsibilities assumed by the evaluation unit in the Illinois Office of Education; separate discussions of migrant and neglected/delinquent programs illustrating the activities of the evaluation unit; and a conclusion dealing with the role of an evaluation unit at the state level.

Compensatory Education

Both Title I 89-750 Migrant and Title I 89-750 Neglected/Delinquent are considered to belong to the generic category of compensatory education. The philosophy underlying compensatory education deals with social justice:

The central thrust of ESFA is to eliminate poverty. The underlying notion was familiar—poor children given the opportunity to do well in school will do well as adults.

(Murphy, 1972)

Compensatory Education assumes that schools can play a major role in improving the academic performance of students in the lower end of the educational achievement spectrum. Compensatory Education attempts to facilitate this through the application of extra funds, specially designated personnel, equipment, and materials to the education of disadvantaged children. Along with the extra funds, is the requirement by the Federal Government for annual reports from the states. Federal guidelines indicated that the evaluation should take place at least annually, that evaluation would indicate effectiveness of programs in meeting specific educational needs of disadvantaged children, and that "effectiveness" be determined through the application of appropriate objective measures.
Such a requirement is often inappropriate in both the Title I 89-750 Migrant and Title I 89-750 Neglected/Delinquent programs in Illinois. Both of these programs involve children who enter and leave the programs in unpredictable patterns, attending for short amounts of time, and having reading and language patterns that limit success on verbal measures of progress.

The evaluation specifications stated above could possibly be met in year-long programs through traditional tactics such as pre- and post-testing with alternate forms of standardized instrumentation. However, in short-term projects such as these, the psychometric hazards inherent in testing are likely to be magnified. Sources of error in testing have long been known to psychometricians (Cronbach, 1969); however, the sophistication of educators in schools and classrooms rarely approaches such sophistication (Hotvedt, 1974). Title I projects in attempting to comply with the federal requirement for "evaluation" based on "objective measures" are likely to consider the "hard-data" of student gain to be an appropriate determinant of the success of programs. Indeed, requests from the State Office for Title I 89-750 evaluative data from projects in Illinois has tended to reinforce such beliefs.

Stake (1972) and Wardrop (1971) have provided well considered critiques of student gain data: Tests do not measure learning, but rather correlates of learning, and such correlates are not direct evidence of achievement. Stake (1972) points that the correlation of tests scores with performance of many specific educational tasks is seldom high.

If we really want to know whether or not a child is reading at age-level, we have a reading specialist listen to him read. She observes his reading habits. She might test him with recognition, syntax decoding, and paragraph comprehension exercises. She would retest where evidence was inconclusive. She would talk to his teachers and his parents. She would arrive at a clinical description which might be reducible to such a statement as "Yes, Johnny is reading at or above age-level."

The scores we get from group reading tests can be considered estimates of such a clinical judgment. These test scores correlate positively with the more valid clinical judgments. Though rare objective, such estimates are not direct measurements of what teachers or laymen mean by "the ability to read." Achievement gains for a sizable number of students will be poorly estimated by them....

Stake and Wardrop (1971) point out that error alone could show that a quarter of the students tested by standardized achievement tests could show a gain of at least one year on a retest simply due to the errors of measurement of the test. The table below was provided by Stake (1972) to illustrate that "growth" on most standardized tests is a matter of only a few raw-score points.
Gain in Items Right Needed to Advance
One Year Gain Equivalent on Three Typical Achievement Tests

<table>
<thead>
<tr>
<th>Type of Test</th>
<th>Grade Equivalent</th>
<th>Items Needed to Improve One Year G.E.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comprehensive Test of Basic Skills,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Level 3: Reading Comprehension</td>
<td>5.0 6.0</td>
<td></td>
</tr>
<tr>
<td>Metropolitan Achievement Test, Intermediate Form 3: Spelling</td>
<td>20 23</td>
<td>3</td>
</tr>
<tr>
<td>Iowa Tests of Basic Skills, Test A 1: Arithmetic Concepts</td>
<td>24 31</td>
<td>7</td>
</tr>
<tr>
<td>Stanford Achievement Test, Form W, Intermediate II: Word Meaning</td>
<td>10 14</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>18 26</td>
<td>8</td>
</tr>
</tbody>
</table>

More and more over the past few years, criterion referenced measures have been utilized in the Title I 89-750 Migrant and Title I 89-750 Neglected/Delinquent projects as the "objective" measure determining success. However results of criterion referenced tests also are questionable as evaluations of student success: 1) Criterion referenced tests may report immediate recall, but do not indicate student ability to relearn a skill once it has faded from memory. 2) It is unrealistic to expect criterion referenced tests to deal with each of the complex performances expected as the result of learning. 3) To be fair to the program, the testing needs to be reasonably close to the teaching—the current state of development in criterion referenced test does not always allow this. 4) In addition, the skills depicted by criterion referenced tests do not develop very rapidly and for short-term arrangements real growth will be difficult to discern. (Stake 1971.) Also, considering the current state of the art, many criterion referenced tests materials require further work on construct validity to determine whether the given test items are measuring progress accurately.

These were but a few of the considerations in mind as the Program Evaluation Unit undertook to provide annual reports to the Federal Government from the state. In addition to accepting the objective measure data from projects and acting as a broker of dubious impressions other approaches were considered to be necessary. Student outcome data is only a part of what program evaluation might be.

The next section describes the structure and function of the Program Evaluation Unit in Illinois. The following two sections depict the activities and approaches implemented by the unit in providing evaluative reports on migrant and neglected/delinquent programs.

The Program Evaluation Unit

Prior to 1972 reports from the state to the Federal Government were constructed by third party contractors. The data gathering tactic utilized was an annual "self assessment" questionnaire asking individual projects to report such information as...
student success, inservice, and dissemination efforts. After review of past reports submitted by the third party contractor—state officials found that although such reports would comply with the federal requests for data there was little, if any, information that would provide insight into the nature of compensatory education programs or the leadership provided by the state office.

Consequently an internal evaluation unit was organized to provide continuity in evaluation from year to year, and to utilize a broader range of data gathering tactics on a wider range of issues. Reports were to be concerned not only with student outcomes but project organization and administration at a local and state level. Reports were to be recommendatory directed local, state, and federal audiences.

In order to fill such a role, the unit required autonomy from program staff, and independence to report findings accurately and validly whether they were favorable or unfavorable to any of the parties concerned. The goal was credibility in spite of being associated with the state office. It was decided that the unit would have to be located outside of the program area, that it would have to examine office administration as rigorously as it examined local projects, and that it would maintain a distinction between evaluation and project monitoring. Evaluation was to be focused on issues and questions of worth; project monitoring could check the details of congruence between projects and proposals. Where as monitoring might conclude that a project that had been conducted according to plan was appropriately implemented, evaluation could also point out that the value of the project was impaired in several respects according to identified standards.

It was in this spirit that the evaluation unit undertook to implement a variety of tactics in order to tap multiple sources of data for evaluative purposes. General data to satisfy federal requirements of information about student success, inservice, and dissemination of project techniques is gathered annually via a Local Educational Agency self report questionnaire. Additional data is gathered by the evaluation unit through observation of programs, interviews with state officials, project personnel, students, and others to illuminate evaluative issues. The two sections below sketch these approaches as implemented by the evaluation unit in examining migrant and neglected/delinquent projects.

Compensatory Education: Title I 89-750 Migrant

First, let us look at migrant education. In 1966, Title I of the Elementary and Secondary Act of 1965 was amended to specifically include children of migratory workers. This amendment was added because reported statistics from Title I indicated that migrant children were not receiving supplemental help under Title I 89-10. Most of the Title I 89-10 programs were designed for the resident deprived child. Special programs were not set up to meet the needs of the migrant child. Parents of migrant children were unaware of what the schools or community could offer them or their children. Amendment 89-750 was added to Title I to fill this gap. The amendment provided that the migrant program be national in scope, that it be a flexible program, and that individual states try to coordinate and cooperate with other states who were trying to educate migrant children.
While there are various migrant streams across the United States, this paper focuses on the one that flows from Texas to Illinois. These migrant children rarely finish any semester in Texas schools; they often leave early in the spring and arrive back late in the fall. To compensate for this loss of time, schools in the "north" are reimbursed for the cost of adding the students at the end of or beginning of a regular term semester. These are called regular term projects. This paper, however, concentrates on summer term programs; it is here that the planning, time, and money from the federal, state, and local agencies are focused.

Ideally, migrant children (usually ages 6-13) would be at the summer session for the entire eight weeks. This ideal makes the following assumptions; that the families do not arrive late from other work locations; that they do not leave during the middle of the summer school term to go to Wisconsin or Michigan to work on with crops; that they do not leave early for Texas; that the oldest children do not decide to work in the fields; that the parents decide they even want their children to attend school during the summer; and that the children themselves decide they want to attend regularly.

If the children do attend on a fairly regular basis for the eight weeks a decision needs to be made as to what programs/activities need to be provided. How much do these children know? What are their problems? The Migrant Student Record Transfer System (MSRTS) was supposed to answer a basic need of rapid access to educational and personal data including health information. The MSRTS is supposed to provide transit of data from school to school via a state terminal and a national terminal at Little Rock, Arkansas. Test data and information concerning general education attainment and interest would be sent to a school as soon as the information was requested from the state and national terminal operators. While the final judgement is not yet in, the MSRTS has not been able to provide ready access to meaningful educational data for teachers. Generally, only the health data has arrived in a format that is useful to local schools. This is unfortunate since, ideally, the academic information could go a long way in providing Local Education Agencies with the opportunity to individualize instruction.

Eight weeks, at the maximum, is not a long time to attempt to assist a child to compensate for his education problems. Unless information is available from previous years or previous teachers at that same summer school site, the migrant child may well find himself undergoing a series of time consuming tests.

Each project director and the staff must evaluate their program. The national migrant guidelines request the submission of a local evaluation to the State Education Agency, as well as the submission of a state evaluation report to the United States Office of Education in Washington, D.C. However, there are no specific guidelines as to what evaluation procedures are necessary or even desirable.

The evaluation procedures that will be discussed below generally describe the evaluation techniques used in Illinois from FY 72 to FY 75.

The first (and unfortunately often the only) evaluation procedure used by many program people consists of the usual pre-post-standardized tests. As previously noted, Robert Stake and James Wardrop (1971) raise excellent points about the general utility of relying too heavily on these tests. Common sense seems to also illustrate the fallacy of judging a project as successful because a child's tests scores rose from 3.3 on the pre-test to 3.5 on the post-test during a two-month program.
In the absence of firm guidelines by the Federal Government and the State Education Agency, the annual report questionnaire completed by each of the projects shaped their behavior. When the LEA report questionnaire that the migrant project sites used to record data from their FY 72 evaluation report to the State Education Agency itself is scrutinized, one notices that the emphasis is heavily on standardized tests. The FY 72 pre-test and post-test dates were asked for by grade level. The name of the test and the test battery are also requested.

Three of the summer projects used the Wide Range Achievement Test (WRAT). Two of these three projects expected students to achieve one week gain on the WRAT for each week of instruction. The third project wrote, "It was most difficult to have a standard of success to assess results due to the attendance of some children. Many students who took pre-tests were not in school near the end of the program as they had started to work in the fields." Such instruments used the Metropolitan Achievement Test, the Iowa Test of Basic Skills, and the Peabody Picture Vocabulary Test.

In FY 72 the annual report questionnaire had been designed by a third party evaluator under contract to the State Education Agency while the report itself had been written by the newly formed internal evaluation unit. The report had to emphasize the great losses of data because there were so few sites that could supply pre-test and post-test standardized test data on the same children.

In FY 73 and FY 74 the internal evaluation unit developed the end of the year LEA report questionnaire which then listed standardized tests as just one method of evaluation along with teacher-made tests, observation, and criterion reference tests.

The data reported back from the sites, when analyzed either by project or by separate subject area, indicates that observation followed closely by teacher-made tests were by far the most frequently used methods of evaluation during FY 73 and FY 74; standardized tests came in third. Interviews conducted by the evaluation unit with staff at the state and local levels over these years have indicated a general attitude that the standardized achievement test was a waste of time and money for migrant children. Disregarding the question of instrument bias and whether migrant children had the necessary English reading skills to make the tests valid, the data just could not be fed back quickly enough from the pre-test; and nobody seemed to think that the post-tests proved anything anyway.

In addition to data on student success gathered and reported by each of the local projects, the evaluation unit decided to use a case study approach to attempt to describe what projects were in reality. One case study was conducted by the evaluation unit to explore the contention of state office personnel that good migrant education projects had positive effects on general community attitude toward the migrant population. In order to test this hypothesis evaluation unit staff visited what was considered to be an exemplary program. The evaluators observed classes, talked with students, teachers, the project director, the local principal and the superintendent. In addition, the evaluators interviewed community members—the pharmacist; a banker; a grocery store owner, clerks, gas station attendants, and the manager of the canning factory complex that hired the migrants locally. This last individual had also been on the school board for 20 years.
The case study effort showed that the local summer school program for migrant children had no effect on local attitude. The children had been segregated into a different part of the buildings from other students, there was no community concern about this policy. The community was content to maintain the policy of segregation. The quality of the local migrant education program was independent of community attitudes toward migrants in general.

Compensatory Education: 89-750 N/D

In November 1966, Title I of the Elementary and Secondary Education Act of 1965 was amended to include neglected or delinquent children living in state or private institutions. As in other Title I programs, the intent of the amendment was to provide supplemental educational services to a targeted portion of the children at institutions. Targeted children were to be the most educationally disadvantaged children at the facility. Programs were to be based on specific assessments of the educational needs of the deprived children and were to be written in performance terms in relation to those needs. (Program Guide 44 Regulation 116.18(b))

Targeted Title I students in the correctional facilities in Illinois have been described in the following manner on applications for grants:

- These students are lacking the fundamentals of reading.
- The students are lacking in motivation and have histories of past school failures and truancy.
- At the present time, targeted Title I students are functioning four or more years below expected grade level.
- These students are between the ages of 16 and 17, and are functioning below the sixth grade level and math levels.
- Approximately 20% of the students are non-readers.
- This inability to read makes it impossible for them to follow a normal academic schedule.

- At the present time, 15 delinquent and/or socially maladjusted young men, ages 16 to 18 are functioning five years or more below their expected reading arts level.

- At present, 151 delinquent boys ages 13 to 20 score below 4.0 in math as measured by SAT. They are six or more years below grade placement. They have IQ's below 90.

- It is realistic to assume that most, or all, of these youths will not pursue their academic training after parole.

- About 75% of the teenage boys are functioning extremely low (first and second grade levels) in reading and math.
- Many of these same boys are lacking in almost all social skills necessary to interact with their peers. This condition results in an inability of these boys to function in a regular departmentalized junior high school program.
These excerpts from an actual application spell out a consistent picture of the adolescent delinquent—academic achievement is seriously limited. There are obviously many other problems to take into account in the education of delinquent youth. Severe socio-environmental difficulties such as low evaluation of education, destructive and aggressive behavior in opposition to what is often preferred as an educational opportunity.

Further, recidivism is a fact of life for institutionalized student. In 1972, rates ranged from a low of 7% to a high of 83%. One institution listed reasons for recidivism to include "poor parental supervision, parental rejection, other family problems, peer delinquency, gang orientation, community attitude, high delinquency, criminal milieu, and social economic conditions."

Title I, or any educational program, for such youth requires much that is not present. Academic endeavors require compliance. It is just such a lack that institutions most often point to as reason for lack of student success. Institutions most frequently report "lack of motivation", nonattendance (students are often above the legal school leaving age and cannot be required to attend class) and leaving the program prior to completion (remember the seven month attendance average) as the greatest barriers to success. This represents but a brief sketch of the setting for problems to be faced by the federal requirement for evaluating Title I 89-750.

Federal requirements include the following:

That the local educational agency will make an annual report and such other reports to State educational agency, in such form and containing such information (which in the case of reports relating to performance is in accordance with specific performance criteria related in program objectives), as may be reasonably necessary to enable the State educational agency to perform its duties under the title, including information relating to the educational achievements of students participating in programs carried out under this title; and will keep such records and afford such access there to as the state educational agency may find necessary to assume the correctness and verification of such reports...

That effective procedures including provision for appropriate objective measures of educational achievement, will be adopted for evaluating at least annually the effectiveness of the programs in meeting specific educational needs of educationally deprived children.

---Section 141 (g) (8)---

In other words, based on specifically stated student oriented objectives and activities measured "objectively" an annual report will indicate the effectiveness of programs in meeting specific educational needs. From 1972 through 1974 Illinois reports to the Federal Government lamented the failure of objective writers to master the art of setting standards:
An effort should be made by the SEA to locate available tests designed specifically for short-term institutionalized children. (1972 page 100)

...An effort should be made by the SEA to locate available test designed specifically for short-term institutionalized children (1973 page 45)

Yet testing pre- and post-treatment to determine program success through student outcome measures is fraught with hazards and short-term programs. One teacher commented on the standard of one month gain per one month in program: "I do not think this is realistic because it does not take into consideration the student's background, personality, needs, school history and social adjustment." (Hanna City page 14) Short-term test, retest of such Title I students allows the possibility that regression effects an error score would give the appearance of gain where there may not have been any. (Stake, Wardrop, 1971) Short-term evaluation using such tests as the Stanford Achievement Test or Wide Range Aptitude Test (as these programs typically do) is not likely to accurately assess gain.

Individualization is the instructional tactic most often reported by programs. If individualization means personalized objectives, activities, and criteria for success, what manner of determining student success is appropriate? Gain scores on norm referenced achievement test do not measure success appropriately in these cases. The alternative suggested by the evaluation unit was criterion referenced testing, (1973). However, irregular attendance, sudden leaving, and noncooperation are not matters that any testing process can overcome.

The next possibility suggested by the evaluation unit (1974) was that there should be follow-up studies on samples of students to determine program effectiveness. The type of longitudinal study, purposed by Wholey et al. (1973) served as the model for these evaluative suggestions:

...To look for longitudinal rather than short-term effectiveness.

...To establish and revalidate the usefulness of short-term output measures as predictors of the values of long term output measures.

...To sample program recipients seeking insights on the persistence or lack of persistence of program benefits.

Yet in the evaluation unit's 1972 report, comments on recidivism indicated that programs begun for students in the institution had no follow-up in the home community. Community schools were not anxious to accept the student upon release. A re-entry coordinator in the Chicago area has been seeking to alleviate such problems. A re-entry report dated April 25, 1976, indicated that only about one-third of paroled students re-enter public schools. This corresponds almost precisely with legal school leaving age. The report indicates that, "School re-entry problems are related to several factors, the most prominent of which is the lack of planning for school re-entry prior to parole.... Another factor affecting (sic) successful re-entry is that of the expectation of school administrators for the behavior of the returnee.... Parolees are required to fulfill standards of conduct which may be unrealistic for even the most successful of students."
What can be seen in the preceding discussion illustrates the difficulty of utilizing student outcome data either short-term or long-term to illustrate program success in correctional facilities.

The barriers to effective utilization of testing in evaluation are great. The barriers to gathering useful follow-up is also great. It is not likely that either of these approaches alone to evaluate programs is sufficient to provide useful data.

The prime audience for the evaluative reports to be produce was originally considered to be the Federal Government. The unit has utilized the federal guidelines as criteria for making judgements about annual report questionnaire data collected once a year from each of the projects. In addition, on-site visits were conducted to add to the descriptive dimensions of the reports. Initially, reports were focused on tabular data depicting various dimensions of the projects, including student success. Since 1974, however, descriptions moved away from tabular presentation into more narrative styles.

Data in the 1974 report included "snapshots," or brief capsulations of projects. Further, one site was described in the manner of a "portrayal" (the technique of using portrayal in evaluative reports has been explored at the University of Illinois in a separate report (Hanna City). Both "snapshots" and the "portrayal" were constructed in descriptive narrative style. The snapshots were four or five brief paragraphs long, and the more extensive portrayal was seventeen pages long. The purpose of the snapshots was to allow the reader to gain some understanding of the issues, conditions, and feelings which existed in respect to Title I 89-750 projects. The extensive portrayal was constructed to allow readers of the report to make their own judgments as to the value of the Title I 89-750 project.

Conclusion

The data collected by the evaluation unit for the annual reports are intrusions into the operation of Title I 89-750 projects. The power of such evaluative intervention should be recognized. It is necessary to understand that the primary audience for evaluative data should be the project itself. Although the federal requirement of objective measures of student gains cannot be denied, it must be recognized as inappropriate for short-term projects such as Title I 89-750 Migrant and Neglected/Delinquent. As it is immediately beyond the power of the Illinois Evaluation Unit to change inappropriate phrasing in federal guidelines, it can only attempt to influence local efforts to utilize practices that are as sound as possible.

Recommendations in reports by the evaluation unit have been aimed to compliance with federal requirements by suggesting the best practices preferred. Projects need to be able to write objectives in appropriate formats and they needed "objective measures" of student success.

The evaluation unit, in providing a range of choices on the LEA report questionnaire including standardized tests, criterion referenced tests, observation, and other methods for projects to select from in ascertaining student success have alerted projects to a range of possibilities. Many projects now utilize multiple methods, and criterion referenced methods are increasingly utilized.

The evaluation unit, further, can attempt to caution projects to use tests that are appropriate considering the nature of the project.
The "objective measure" approach to evaluation, although in compliance with federal guidelines, has little relationship to project improvement. For example, when questionnaires asked to what they attributed student success neglected/delinquent projects personnel typically reported that it was the good project, when asked to what they attributed lack of success, project personnel typically reported factors relating to the students. We could not expect otherwise if we consider evaluation only to be a report of student scores.

The next step suggested by the evaluation unit was the collection of longitudinal information. As this was only a suggestion and not a requirement the level of intrusion is small if not non-existent. Future requests for data from projects could include such a study, or the evaluation unit, as an active external data collector, could gather such data on its own.

In fact, the role of the evaluation unit has been to supplement data reported to the State Office of Education through activities of its own. The efforts of the evaluation unit have been to use data gathered from a variety of sources in a variety of ways. Survey data, teacher judgements, student judgements, and external observer judgements have been used to add perspectives on the implementation of programs. Data such as these have been combined into case studies, snapshots and portrayals.

Reports of this type are used to provide projects with perspective on their own activities and the activities of other projects. An additional step in this approach, not yet taken by the evaluation unit, could be to provide such descriptions to panels of review of relevant audiences or expert juries for comments. The comments could then be appended to the original document to be reviewed by project personnel in decision making decisions about how to improve their project.

These efforts of the evaluation unit in the Illinois Office of Education have been to broaden the nature and scope of evaluation as practiced at the project level and as supplemented by efforts of the evaluation unit. Evaluation for Title I 89-750 Migrant and Title I 89-750 Neglected/Delinquent must have payoff at the local level. Any data collection that does not do so can only be viewed as a kind of imperialism.
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