The American Association of Community and Junior Colleges surveyed its 919 member colleges in 1976 regarding their knowledge of and participation in the Comprehensive Employment and Training Act's (CETA) locally-based delivery system. Responses from 519 colleges (56.5%) revealed that 478 (88.6%) of the respondents participated in CETA at some level, and 59 (11.4%) did not. Of the 478 colleges for which the level of participation could be determined, funding distribution per year indicated that 241 colleges (51%) received between $1-$99,000, 150 colleges (31.4%) received between $100,000-$499,000, and 28 colleges (5.9%) received $500,000 or more. Knowledge of the members and institutional voting representation on prime sponsor Manpower Planning Councils appeared to be related to the level of participation, with those receiving more funding being more informed. Respondents indicated that they viewed the CETA administration as confusing, that they felt the system fails to give adequate emphasis to job training programs, that CETA may not be serving the most needy, and that there is a lack of concern for individual participants. Recommendations for legislative and procedural improvements are included and a statistical summary of survey results is appended. (LB)
COMMUNITY AND JUNIOR COLLEGES AND THE COMPREHENSIVE EMPLOYMENT AND TRAINING ACT

Participation and Recommendations for Improvement

Office of Governmental Affairs: American Association of Community and Junior Colleges, One Dupont Circle N.W., Washington, D.C. 20036
COMMUNITY AND JUNIOR COLLEGES
AND THE COMPREHENSIVE EMPLOYMENT
AND TRAINING ACT

Participation and Recommendations for Improvement

Office of Governmental Affairs/American Association of
Community and Junior Colleges/One Dupont Circle,
N.W./Washington, D.C. 20036

Price $2.00

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One Dupont Circle, N W
Washington, D C 20036
Acknowledgments

This report is the result of the efforts of the staff of the office of governmental affairs, American Association of Community and Junior Colleges, and the cooperation of member institutions of the national organization. It grew out of concern for obtaining up-to-date and accurate information on the involvement of community and junior colleges in the federal Comprehensive Employment and Training Act (CETA). It seemed obvious that there were many opportunities within the program for response of members but little information was available on the extent of participation.

The governmental affairs office, therefore, planned and organized a national questionnaire survey to obtain the necessary information. Claire Olson and Nancy Jordan, then members of the staff, developed the study, and tabulated and interpreted the findings. Both gave considerable spare time and effort to the project.

We believe the data will give some clues as to ways in which community and junior colleges have and can become involved in CETA programs. And the information should be of assistance to persons in government as they plan for the future—particularly with an additional $1.5 billion to flow through CETA in the next year. Ms. Olson, therefore, has put together the report which appears in the following pages. We are glad to provide this service to members of AACJC and to others who might be interested.

John E. Tirrell
Vice President for Governmental Affairs
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INTRODUCTION

The Comprehensive Employment and Training Act was enacted in late 1973, taking effect in 1974 CETA replaced a number of categorical programs authorized by the earlier Manpower Development and Training Act, placing most of the authority, as well as most of the funds, in the hands of local and state prime sponsors, which were empowered to make specific programmatic decisions under broad guidelines.

Many community colleges had been involved with MDTA, especially as offerors of institutional training. A number housed elaborate skill centers which were prime institutional training sites in the areas they served.

With the advent of CETA, such institutional training arrangements were no longer secure. Prime sponsors were free, but not required, to continue them. With decisions now being made at the local rather than the national level, it was to be expected that there would be changes in existing delivery systems as well as considerable diversity in the new arrangements.

In an effort to find out how CETA has impacted community and junior colleges, the American Association of Community and Junior Colleges surveyed its member colleges in the summer of 1976, two years after the initial implementation of the new program.

The survey tested the colleges' knowledge of some key elements of CETA's locally-based delivery system, asked whether they participated (or had tried to) and at what level of service and funding, in what aspects of CETA they were involved, and how their experience in CETA compared with MDTA. Respondents were also invited to make both specific and general comments.

Of the 919 colleges to which the survey was sent, 519 responded—a return rate of 56.5%. Presumably many of the non-respondents are also non-participants.
Only 11.4% of the respondents (59 colleges) stated that they do not participate in CETA programs. Thus we know definitely that at least 460 community and junior colleges participate in CETA at some level.

In terms of funds, we estimate the distribution as follows:

- $1 - 99,999 per year: 241 colleges (51%)
- $100,000 - 499,999 per year: 150 colleges (31.4%)
- $500,000 or more: 28 colleges (5.9%)

In terms of programs, we found the following distribution:

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<thead>
<tr>
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<th>$1-99,999</th>
<th>$100,000-499,999</th>
<th>$500,000 or more</th>
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<tbody>
<tr>
<td>Training Only</td>
<td>27%</td>
<td>10%</td>
<td>7.4%</td>
</tr>
<tr>
<td>Public Employment only</td>
<td>19.9%</td>
<td>4.7%</td>
<td>0.</td>
</tr>
<tr>
<td>Both</td>
<td>53.1%</td>
<td>85.3%</td>
<td>92.6%</td>
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A full statistical summary of survey results is found in the appendix to this report.
MODEL DISTRIBUTION OF PROGRAMS

A random selection of actively participating institutions shows that upwards of 75% have one or more of classroom training, individual referrals and public employment program employees under CETA. Sixty-two percent receive funding through Sec 112 which authorizes five percent of State CETA funds for vocational educational services. Also, about 25% receive funds under the governor's discretionary program (four percent of State CETA funds). About 17% of the colleges participate in the national priority (Title III) programs.

Training programs cover a wide range of occupations. Some examples are clerical and secretarial, bookkeeping and accounting, automotive technology, civil service career preparation, nurses aides and licensed practical nurses, farm mechanics, small engine and motorcycle repair, tool and die welding, carpentry, and production machine operator.

Especially with individual referrals, CETA students are integrated with other students at the colleges and receive the same supportive services supplied to regular students, and generally also receive special remedial, counseling, psychiatric and health services, job placement, and work orientation. Many of the colleges have "skills centers" where both CETA and regular students undertake job training programs. Such centers are complete with the necessary training equipment, educational personnel, and the student support services to help students succeed in their educational programs.

Generally, the colleges put limited emphasis on employment of persons funded by Titles II or VI of CETA, the Public Employment Programs. Most colleges have just a few such employees, more often from one to five than over five. However, a few colleges have PEP employees in significant numbers, the largest number being 144 employees in a large urban college. That college gives its PEP employees released time and individual counseling to assist them to upgrade their skills and be better prepared for unsubsidized employment. A number of respondents made special note that...
they had been able to hire a fair proportion of their PEP employees (about 30%) on a permanent, full-time basis.

Funds coming to colleges from Sec. 112 (vocational education services) generally cover regular CETA program activities. However, occasionally such programs have a special focus. A few examples include a supplementary delivery system, counseling and skill training, bilingual office technical program, and technical workshops.

Governor's discretionary programs were funded for such activities as an offender assistance program, career awareness, one-stop centers, outreach counseling for women, an occupational needs study design, career guidance for adults, a water treatment plant training program, job preparation for Spanish-speaking persons, and programs for bilingual electricians and secretaries.

Finally, colleges utilized Title III (national priority) funds for a women's program, senior adult job placement, programs for migrants, a nurse aide program, training companion aids to homebound elderly, women's educational development, a youth job training program and English as a second language.
ATTITUDES TOWARD CETA

In the survey colleges were asked whether they were more involved with manpower programs under CETA than they had been under MDTA. Of the respondents who answered the question, 253 said they participate more fully under CETA, and 59 said their participation was greater under MDTA, while 33 saw no change.

In addition, and often, irrespective of their answers to that question, respondents offered many comments about the comparative effectiveness of the two approaches to employment and training. Often the respondents had strong views on the subject, both favorable and unfavorable, including some who explained at considerable length their reasons for deciding against further involvement with CETA.

On balance the respondents approved of the CETA approach, pointing to the benefits of flexibility and local control. A number saw CETA as an ideal opportunity for the community college to serve its community. Many colleges spoke of excellent relations with and cooperation from prime sponsors (while other colleges held the opposite view).

To give the flavor of their views, let the colleges speak for themselves.

"County (or other local) prime sponsorship gives the community college a tremendous opportunity, or even mandate, to become involved. It should enhance the college-local government linkage.”

“I have been associated with MDTA and CETA for twelve years. The CETA program is a vast improvement over the MDTA program. The CETA program has allowed much more self determination by local governing boards, industry and citizens. The delivery system of CETA is working better, and gaining moment-
Many of the frustrations that I experienced under MDTA no longer exist under CETA.

"The community colleges are, in general, missing a golden opportunity to serve the country, and to generate financial and other support, by not performing a more complete role in CETA, and other revenue sharing programs. If we don't take advantage of our opportunity, someone else will.

"The advantages of CETA over MDTA are many. Under CETA, funds are more responsive to the local or area need for manpower training. Our college participates in a training contract with the local Office of the State Employment Commission for Title I funding of individual referrals and class-size training. Additionally, our college contracts directly with the State Education Agency for CETA-Section 112 funds, however, resources of the State Employment Commission are utilized for determination of eligibility of both Title I and Section 112 students.

"This institution has been more involved in manpower activities under CETA. This is due to the fact that the CETA program allows more flexibility in the selection and operation of programs which this institution feels are needed to meet the needs of industry and the community. The above-mentioned flexibility, allowing more control, input and decision making on the local and state level with regard to programs offered, designed and operated, is of great benefit, not only to this institution, but to the entire state. A pre-packaged or categorized program for the entire state would not allow this institution, or any other, to provide training that would lead to maximum employment opportunities in this area. With the flexibility provided under CETA, this institution can be a prime sponsor, strengthen its own training program through a consolidated effort, and at the same time, operate under its philosophy of meeting the needs of its students and the community it strives to serve"
On The Other Hand, there are those who believe that the CETA system is just a touch this side of disaster. They found disorganization, political influence (that they couldn't penetrate), confusing and conflicting regulations, and a lack of focus on the needs of the CETA clients. Again, we will let the colleges speak for themselves.

"MDTA probably did as well more quietly."

"CETA is a complete failure as far as institutional training goes."

"It is a bureaucratic nightmare—mass confusion, programs funded for too brief periods of time, local politics involved too much to let training take place."

"The political football approach causes massive waste and is very ineffectual in getting at the heart of the problem that the Act was supposed to address."

"Special interest groups, outside of the public educational system, of the community have been given the opportunity to participate in CETA programs rather than the community colleges and the public school system."

"The MDTA concept was better because (a) it was not as political, (b) not as much money was taken off by different agencies for administration, and (c) individuals involved understood manpower training."
The survey showed that there is a definite correlation between knowledge of how CETA works and participation in CETA programs. For example, only 21% of non-participants stated that they know who serve as members of the prime sponsor manpower planning council, while 84% of participants between $100,000 and $499,000, and 93% of participants over $500,000 do have this information.

Similarly, 14% of non-participants responded that their institutions have voting representation on such councils, while 58% of the $100,000 - $499,000 group and 78% of the over $500,000 group have institutional voting representation.

Again, 88% of the non-participants do not know what agency serves as prime sponsor for their area. Participants at any level have this information. We could identify almost no correlation between participation and type of prime sponsor, although the groups with highest participation are more likely to be served by a county prime sponsor or a combination of prime sponsor agencies.
RELATIONS WITH PRIME SPONSORS

As with all of CETA, there is tremendous variation depending on the local situation and the practices of the individual prime sponsors. Overall, however, our respondents who volunteered comments on the subject expressed satisfaction with their prime sponsor agencies, or the certain individuals in those agencies. Twenty respondents reported that they enjoy good relationships with their prime sponsors and 16 gave them “high quality” ratings while 11 rated them of “low quality.”

Clearly, some prime sponsor agencies are very responsive to community colleges and their people, enough even to prompt an occasional thank-you letter—a rarity in American business life. A good many prime sponsor agencies understand the importance of training in manpower development and are willing and anxious to work with training institutions. Again, it would appear from our comments that a number of prime sponsor agencies (city, county, and state) have developed systems for receiving input from all interested parties and of making all groups feel they are being treated fairly.

As clearly, there are prime sponsor agencies that are viewed as disorganized, inefficient, and guilty of favoritism. Several of our respondents report that their numerous attempts to participate in CETA, whether in the planning process or being funded, have been rebuffed. They are the “outs” who have not yet figured how to get “in.” Some prime sponsors are viewed as inefficiently administered and bogged down with administrative detail and excessive paperwork. Others are reportedly staffed with people who are insensitive or inexpert in manpower training, with limited knowledge of educational processes. For colleges served by more than one prime sponsor, there is the built-in confusion of having to work with two systems which operate differently.
VIEWS OF MANPOWER PLANNING COUNCILS

As was mentioned above, community college participation and knowledge of the CETA planning process varies with their involvement with CETA itself. For the middle group, 84% know who serve on their manpower planning council and 58% have voting representation on such councils.

Some respondents seemed to feel that their manpower planning councils were basically ineffective tokens whose role is to ratify decisions already made. One thoughtful comment was received, which will be quoted here:

"The final decision making authority in terms of the expenditures of CETA monies rests with elected officials. This is probably as it should be. What must be reckoned with is the fact that in most cases local politicians do not understand nor do they have time to learn manpower and the manpower planning process. Congress obviously recognized this in that they provided for the creation of Manpower Planning Councils which would be broadly representative and which could provide advice or recommendations of the Primes."

"This is essentially very sound thinking. The problem comes with the implementation. Planning councils are at the mercy of and totally dependent upon the Primes (local politicians). The Primes screen, select, and appoint Planning Council Members. They also determine the level of staff services to the Planning Council."

"This is simply not functional. Planning Councils must be given more teeth. They must be given, some say in the number of members, the representativeness of the members, the manpower planning process, and lastly, they must be given staff to provide services to them. Effective Manpower Planning Councils are the only mechanism CETA provides to ensure that broadly representative, community based, participatory planning occurs. The overall success or failure of CETA is dependent upon the extent to which Planning Councils can function in an effective manner." — (Peter L. Van Groll, Moraine Park VTAE District, Fond du Lac, Wisconsin)
CETA ADMINISTRATION

Asked whether they think it is "confusing," colleges overwhelmingly said "yes"—by a vote of 94 to 38 on responses from applicants who answered that question. A number of respondents took a forgiving, patient tone. Yes the program is confusing. It is new, with a new staff, trying to pull together previous programs and create a new system. It will improve—or, it is now visibly improving.

More specific problems causing confusion were cited.

1. Lack of clarity on policies, objectives and guidelines, resulting in inadequate guidance and conflicting regulations, between the state and the prime sponsors, or between multiple prime sponsors. As one put it: "One is never sure which to communicate with, and whichever way we go is usually in the incorrect way." Since the colleges are often county or district based, they may deal with one or more prime sponsors, as well as a balance of state area or regional consortiums. They then confront a lack of conformity in terms of forms, policies, systems, procedures and reporting requirements. Thus excessive time may be spent with administrative detail.

2. Inadequate communications—information systems between prime sponsor, manpower planning council, subcontractors and others. Sometimes colleges need to go to the Department of Labor or a paid information service to get information that prime sponsors should share routinely, of meetings, guidelines, deadlines, regulations, etc.

3. CETA personnel. One would guess that there is a fairly high turnover of CETA staff, which brings a number of problems. For example, decisions made by one staff member may be revoked by his successors, or, a relationship built with an agency through one person may be lost when he leaves. A number of respondents commented that in general CETA staff lack experience with manpower training, or indeed had not mastered CETA programs and requirements sufficiently to provide effective guidance to program applicants. Also, in many cases it takes excessive...
time to get approvals of projects, leaving little lead time for project operators.

(4) CETA is "political." Quite a number of respondents (18) felt that the goals of the program were being lost in a power struggle, resulting in "little concern about the needs of the students." A typical comment: "In our district the CETA program is mixed up with county politics. Job slots have been almost entirely county and city public service jobs. I am not sure what we have gained in this model other than another large staff of CETA employees." Another facet of the "politics" of CETA is the competition among applicant groups, many of which had their own special position in the MDTA system, as well as new applicants, all now relating to a single agency at the prime sponsor level.

(5) Red Tape. While the question was not asked in the survey, 38 respondents addressed the paperwork problem, indicating that this may be an area in which much improvement is needed. "The paperwork is legion"—the phrase was supplied by two respondents, one in Texas and one in Oregon, who are apparently in touch with the same muse. If the respondents are correct, the reporting requirements are excessive and repetitive. "There have been several times when CETA staff has required "special" reports and then asked for practically the same information two or three weeks later," said one. "We spend more time filling out forms than we do dealing with students," reported another. An additional problem is that the paperwork—administrative service—is not recompensed to the program operators. Thus staff to handle it cannot be hired, and it does, indeed, take up time of staff who should be dealing with the CETA clients. The paperwork requirements and other confusions have caused more than one college to decide that CETA participation is not worth the effort. After two years as a subcontractor running a local CETA intake center, which was touted as a model for its effectiveness, one college notified its manpower agencies that it no longer wished to be considered. "You can imagine the shock wave that went through the CETA community when I made that decision," said a college official. "There were those who could not understand why we would give up some of that great federal money. We still stand ready to undertake any training responsibility which the Consortium might feel that we are best equipped to do. We will do so, however, on the basis of a simple contract, where the college will be paid to do a job without all the expensive time-consuming paperwork that is associated with the program. We have other contracts with other agencies which work smoothly and very effectively."
PROCEDURAL IMPROVEMENTS SUGGESTED

According to our respondents, some changes in the system of operations would help the CETA system run more smoothly.

(1) Solve the question of who pays the participants, the Local Employment Security Office or the State Office (the respondent is in a balance-of-state area). It would be better to deal with the local office and let that office deal with the State. There are problems of communication with the state office.

(2) Problems with individual referrals. The college should be able to bill for reimbursement at the time of registration. The pro rata reduction for drop-outs fails to recognize the administrative costs to the institution. The stipend checks should be mailed to the student to cut college administrative overhead. Accounting procedures need to be simplified. If a college has 350 referral students, it has 350 budgets and reimbursement requests, with no funds given for administrative or clerical support.

(3) Procedural delays of many kinds were reported. Specific areas included lack of timely and adequate guidelines from prime sponsors, delayed decision-making giving applicants short notice on project approval, delays in reimbursements—here two approaches were suggested, first, a larger advance payment than the present 25%, and second, transfer to the college comptroller of the approved budget. According to this respondent, "the reimbursement policy hampers the delivery of training services and makes it difficult to maintain an organized program operating according to schedule. The college is a creditable institution and is quite capable of executing the budget accurately and responsibly."

(4) Need for coordination between CETA, vocational education, WIN, and other programs which deliver similar kinds of services. "God help the institution which hires the same person to provide these services to clients from all these agencies. Prorating requires a master public accountant." Coordination is needed at the local, state, and federal levels to minimize competition between these agencies and prevent program overlap.
TRAINING AND EDUCATION IN CETA: PROGRAM CONTINUITY

The overwhelming consensus of the respondents is that the CETA system fails to give adequate emphasis to the role of training. A major problem seems to result from the current thrust of CETA in response to recent high levels of unemployment. The emphasis on public employment, on putting people immediately into jobs, seems to have made prime sponsors in many parts of the country turn emphatically away from training. Perhaps responding to pressure from higher levels, the prime sponsors are interested in "volume, not results," as one respondent put it.

Two obvious problems result from this shift in priority: (1) Although the emphasis on public service employment may satisfy immediate political pressures, it is actually only postponing critical unemployment. (2) The people being employed are not those most in need of skills training and career development, but are the ones who have training and job experience and are acceptable to employers.

The emphasis on immediate employment rather than career development tends to turn local manpower planners' thoughts away from creative approaches to job training, including modes of working with employers on job development and job restructuring to create viable jobs for CETA participants. A respondent comments that cooperative efforts between prime sponsors, planning councils, training institutions, and employers could help to provide current and accurate labor market information, job training programs, and jobs with upward mobility, which would be of long term benefit to CETA participants.

Quite a number of colleges find that their prime sponsors look more favorably at on-the-job training and work experience programs than on institutional training programs, which in the short run seem more costly. However, the colleges feel that the prime sponsors are being very shortsighted in taking this view, failing to comprehend the lasting long-term benefit that participants can derive from education.
Respondents suggested a number of approaches to this problem. They suggested that a specific percentage of CETA Title I funds should be set aside for training programs at the prime sponsor level. This would involve a change in legislative requirements, but might be worth serious consideration. Such a set-aside would enable the prime sponsors to make longer-range commitments to training and would lend stability to training arrangements.

The current lack of stability is for some of the respondents a problem of such great magnitude that they question the wisdom of participating in CETA at all. In fact, our survey did stimulate some lengthy letters from heads of large, well-respected community colleges reviewing the problems they had with CETA and stating that they were withdrawing from involvement.

In an institutional setting, training requires advance planning. Space, equipment, faculty, and administrative services must be organized and in place. Often CETA programs are funded for too brief a time, and worse, funding decisions are made so late that training institutions have difficulty getting geared up to start at the required time. Training would be more effective if these two conditions were improved. Then a training institution could set up its system, get its teachers, have its space and equipment ready, and be able to carry on an effectively functioning program for CETA clients. A set-aside for training under Title I would encourage the prime sponsors to develop continuing arrangements with training institutions. This does not mean that the training institutions would not be accountable for results, or that they would not be dropped for lack of effectiveness. It does mean that the training would be more effective, however, for the continuity would permit training institutions to do a better job.

Respondents also suggested some changes in legislative restrictions on training which, in their view, would benefit CETA clients. Many believe that if CETA is to encourage its clients to develop the skills to give them upward mobility, more emphasis on guidance and counseling is needed, the limit of 12 months in time should be eliminated, and the restrictions on basic skill development should be removed. Many participants in CETA programs lack competence in language and math, which inhibits their success in the job market and restricts them to the lowest skilled and most insecure jobs. Yet this kind of training (remedial educational work) is not permitted in many CETA training arrangements. Again, many CETA clients need work orientation and the development of personal habits and goals.
which help them find and keep jobs Some may need this, plus remediation, plus specific job skills Twelve months is not adequate for a job of this magnitude In addition, a longer period for training would enable some of the participants to earn certificates, associate degrees, or even begin work toward a higher degree, which would help them with their longer term employability

Respondent comments on this subject follow

We need a legislative priority on training in regard to other services in Title I The long range advantage of CETA in the next 10-20 years will be the residual of trained, skilled, employed workers resulting from the training activities, and not those recipients of temporary work assignments

The emphasis should be on training and retraining and related work experience aimed at enhancing employability plus assistance in finding work, counseling, etc Attention needs to be concentrated on those characteristics of the participants which tend to prevent successful permanent employment It certainly does nothing for the economy to attempt to move them into public employment

A specific percent of money should be set aside for training at the prime sponsor level This would lend stability to long range commitments for colleges and training agencies Each year we must fight for money and can't look forward to expanding and improving programs

Our experience with local CETA personnel has found them to be very cooperative However, the philosophy of CETA appears to inhibit their effectiveness from the point of view of education Apparently, they are forced to fund only programs which result in "instant jobs" This means that the placements are at the lowest level If they were allowed to be concerned about upward mobility and opportunity for
advancement into middle management, they could fund longer range programs. This would be educational programs teaching people the skills of communication and interpersonal relations, which are critical to move people beyond the production line. As an example, we had a program teaching Mexican-Americans to speak English. This is a crucial need; yet it is impossible to make these people job-ready in six months or even a year.

It is impossible to do any long-range planning for a class-size training program. It is definitely an "if and when" operation. No one seems to know if or when any program will be funded or when the funds will be released. If a program is funded, the timing is usually 3 to 9 months late. When a program is finally funded, the training agency is expected to start the program immediately, within 4 weeks. With a sixty day to 6 months delivery date on equipment, employing competent instructors, finding suitable housing and getting everything set up including procuring instructional materials, it is almost an impossible task to set up a meaningful program. I have worked with MDTA and CETA since 1967 and it seems to get worse instead of better, it referring to the "red tape" and uncertainty.
Respondents offered some interesting comments focusing on the experience of the reason for it all—the CETA participant.

Two threads of concern were reflected in a number of comments. First, that CETA may not be serving the most needy, and second, that concern for the individual participants is being lost in a mire of paperwork and conflicts over turf.

Respondents suggested that CETA placement and completion requirements are set so high by the prime sponsors to show good results that the people who really need the training are not being referred. They state that CETA is unrealistic in its expectations from programs which are designed for the disadvantaged, who are hard to reach and hard to teach. There is danger that with too strong an emphasis on “positive terminations,” marginal candidates, those really most in need of services, may be screened out of the program. Said one respondent: “There is reason to believe that the disadvantaged receive less manpower services than under MDTA, and CETA funds are being used to balance local government budgets.”

Related to this is the suggestion that prime sponsors using individual referrals should provide additional funding for counseling, tutorial, and other services to the CETA participants. It would seem that these costs are not covered in individual referral contracts. All colleges make available the services customarily available to students, and many also provide more intensive additional services to the CETA individual referrals. However, they state that there is a limit to the extra services they can provide, and many feel that the needs of the clients are not fully served.

A need for greater CETA training flexibility was indicated. One respondent suggested that “some consideration should be given to allow a week off for the trainees. They are in class from eight to five o’clock, five days a week, for the duration of the training. They are non-traditional students...
Even regular students need a break. It becomes long and tedious and some drop out because they are overwhelmed by the 40 hour week.

There is a suggestion of a breakdown when it comes to job placements following training. "We get them and train them, help them learn skills and grow in confidence," said one college official. "Then the person is back on the streets. CETA fosters false hopes." As a practical solution to this problem, it might be useful to consider making the training institution responsible for placement. As the quotation below suggests, it may be that they can do it better. In addition, the ability to place is a measure of the effectiveness of training. It could be argued that institutions which cannot place people who have completed training for the local job market may not understand the job market well enough to be involved in training. As one respondent put it:

"The ultimate objective for each student completing vocational training is gainful employment. Under the present manpower programs, we are responsible for providing vocational training to students, and Employment Security is responsible for job placement. More positive and effective job development could be attained, if the training institution is given job development/placement responsibility. The student's instructor, under the coordination of the training institution's job developer, would be able to job develop for the student between 2-4 weeks prior to the student's completion date. The instructor is better qualified and knowledgeable of the student's potential for employment."

The second thread in respondents' comments was that concern for the individual participant is being lost in a mire of paperwork and conflicts over turf. This is a typical comment: "Students are often lost in the CETA bureaucracy without someone taking a special interest. Federal regulations are more restrictive which results in the student not being served because it's not allowed in the regulations—There are so many rules and protection of turf that the individual client is forgotten." Unsolicited comments of this nature appeared often enough in our survey responses to indicate a problem which may need investigation.
RECOMMENDATIONS FOR IMPROVEMENTS IN CETA

The survey results provide grounds for a new look at CETA with regard to community college participation. Therefore, the following recommendations for legislative and procedural improvements are offered:

1. State and local manpower planning councils need to be strengthened so that their involvement in CETA planning, implementation, and review is more uniformly effective. One method, which was used in the 1976 amendments to the Vocational Education Act, would be to give the planning councils their own staff, independent from the prime sponsor staff.

2. Greater technical assistance to prime sponsors and training for prime sponsor personnel is needed to help them bring about better understanding of the complexities of employment and training, and DOL regulations. Especially with apparent staff turnover, prime sponsors seem to have difficulty keeping up with program and regulation changes. DOL regional offices or state manpower agencies should have this responsibility specifically allocated to them.

3. Within the states, more coordination among agencies is needed so that agencies working toward related goals are able to work together productively rather than impose differing requirements on the same groups. To some extent the law already requires this of the State Manpower Services Council. In addition, the 1976 amendments to the Vocational Education Act require CETA membership on the State Vocational Education Advisory Council. However, it does not seem that the mandated goal of a "consistent, integrated and coordinated approach" has been reached. A comprehensive mapping of programs is needed, together with a listing of their goals and requirements. An interagency council should be required to study, propose, and oversee the implementation of coordinative measures.
(4) Clearly, the Department of Labor must take a very close look at CETA reporting requirements. Information needs should be rationalized and codified to eliminate all unnecessary repetition, as well as reporting of unneeded information. It could be expected that DOL technical assistance to prime sponsors could be helpful in this regard as well; one gets the impression that a considerable amount of prime sponsor reporting requests are due partly to misunderstanding of DOL regulations, and partly out of fear of making mistakes which will create conflicts with DOL.

(5) CETA legislation should be amended to require greater prime sponsor emphasis on training and education. As suggested by our survey respondents, a set-aside or requirement that a certain minimum percentage of prime sponsor funds be allocated to training is one approach.

(6) In addition, a legislative change is needed to permit more than 12 months training experience, at least for CETA clients whose basic reading and mathematics skills are so poor that their long-run hopes in the job market are dim. For such persons remedial education, plus job behavior skills, may be a necessary part of training for meaningful entry into the job market. Through this, CETA would be of better service to the disadvantaged persons it is expected to serve.

(7) Respondents' comments suggest that greater flexibility in CETA job training arrangements would seem helpful. A more effective CETA focus on the disadvantaged could be achieved through (1) allowing more training time when needed, including basic skills; (2) administrative allowances to institutions providing training, which would be used for counseling and related services; (3) flexible schedules, including time off, to encourage the psychological transition to the world of work; (4) more effective placement, including arrangements whereby training institutions undertake the task.
APPENDIX
SURVEY RESULTS
COMMUNITY AND JUNIOR COLLEGES
AND CETA

1) 519 of the 919 member institutions returned surveys, giving us a return rate of 56.5%.

2) Of the total returned, 59 of 11.4% do not participate. 88.6% of the respondents DO participate in CETA programs.

3) 7.9% (41) of the total respondents participate, but incomplete survey information makes it impossible to determine the level of participation.

4) Of the 478 surveys for which the level of participation can be determined, the schools participate as follows:

<table>
<thead>
<tr>
<th>Total Dollars Received</th>
<th>Numbers</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>$500,000 +</td>
<td>28</td>
<td>5.9</td>
</tr>
<tr>
<td>$100,000 - $499,000</td>
<td>150</td>
<td>31.4</td>
</tr>
<tr>
<td>$1 - $99,000</td>
<td>241</td>
<td>51.0</td>
</tr>
</tbody>
</table>

5) Knowledge of the members and institutional voting representation on the prime sponsor 'manpower planning council proved to be strongly related to the level of participation. Each of these questions was tabulated within the groupings as described above.

a) Knowledge of members - "yes" (question #8)

<table>
<thead>
<tr>
<th>non-participants</th>
<th>$1 - $99,000</th>
<th>$100 - $499,000</th>
<th>$500,000 +</th>
</tr>
</thead>
<tbody>
<tr>
<td>21.4%</td>
<td>65.9%</td>
<td>84%</td>
<td>92.6%</td>
</tr>
</tbody>
</table>
b Institutional voting representation - "yes" (question #9)

14 3%  33 6%  58%  77 8%

These relationships are shown in the following charts:

a Knowledge of members on manpower planning council and level of participation

b Institutional voting representation on manpower planning council and level of participation
6) Prime Sponsors. Various patterns can be noted in the relationship between prime sponsor and the level of community college participation. Prime sponsor level of participation is as follows. For the purpose of comparison, the number of types of prime sponsors in each category has been translated into percentage terms.

<table>
<thead>
<tr>
<th>Prime Sponsor</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>municipality</td>
<td>89%</td>
<td>70%</td>
<td>87%</td>
<td>10.7%</td>
</tr>
<tr>
<td>county</td>
<td>9%</td>
<td>27.4</td>
<td>23.3</td>
<td>35.7%</td>
</tr>
<tr>
<td>consortium</td>
<td>17.9</td>
<td>10.4</td>
<td>16.7</td>
<td>14.3%</td>
</tr>
<tr>
<td>entire state</td>
<td>14.3</td>
<td>12.9</td>
<td>6.0</td>
<td>7.1%</td>
</tr>
<tr>
<td>balance of state</td>
<td>5.4</td>
<td>25.3</td>
<td>19.3</td>
<td>3.6%</td>
</tr>
<tr>
<td>combination*</td>
<td>3.6</td>
<td>13.7</td>
<td>24.7</td>
<td>28.6%</td>
</tr>
<tr>
<td>don't know</td>
<td>37.5</td>
<td>3</td>
<td>6</td>
<td>0%</td>
</tr>
<tr>
<td>no response</td>
<td>3.6</td>
<td>0</td>
<td>6</td>
<td>0%</td>
</tr>
</tbody>
</table>

This data needs further analysis, and a look at the breakdown of prime sponsors across the country. From the above information, the following points should be noted:

a. Of group #1 (non-participants), 37.5% of the respondents indicate that they do not know who the CETA prime sponsor in their area is, as compared with 3%, 6%, and 0% in each of the other categories.

b. There is a higher percentage of two or more prime sponsors (combination*) in each of the three participating categories, as compared with those that do not receive CETA funds. 28.6% of those receiving $500,000 or more have two or more prime sponsors, possibly indicating an advantage to having more than one source of funds, except for single county funding.

c. 8.9% of the non-participants indicate that they have a county prime sponsor, as compared with 27.4%, 23.3%, and 35.7% in each of the three participating groups. This may show a relationship between county prime sponsor and the ability of community colleges to secure funds.

7) Training versus Public Service Employment. Because the survey information was often inadequate in identifying the source or program of funding, it was noted whether the school participated in training activities (including Title I class size training programs; individual refer-
rals, training under Title III of “national-priority” groups, vocational education services - the 5% provided to the state under Sec 112 of Title I and training activities under the Governor’s Discretionary Fund) or Public Employment Programs (Title II and VI) only or BOTH. There is a significant relationship between participation in both types of programs and high overall participation. This correlation is understandable and perhaps even obvious. Data is provided below:

<table>
<thead>
<tr>
<th></th>
<th>$1 - $99,000</th>
<th>$100 - 500,000</th>
<th>$500,000 +</th>
</tr>
</thead>
<tbody>
<tr>
<td>Training ONLY</td>
<td>27%</td>
<td>10%</td>
<td>7.4%</td>
</tr>
<tr>
<td>Public Employment ONLY</td>
<td>19.9%</td>
<td>4.7%</td>
<td>0%</td>
</tr>
<tr>
<td>BOTH</td>
<td>53.1%</td>
<td>85.3%</td>
<td>92.6%</td>
</tr>
</tbody>
</table>

It seems important to note that 46.9% of those receiving between $1 - $99,000 participate in Training or Public Employment programs exclusively.

8) CETA versus MDTA. The survey asked whether the “amount of activity increased or decreased under CETA as compared with MDTA.” The responses of those participating institutions are noted by level of participation.

<table>
<thead>
<tr>
<th></th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase</td>
<td>51.5%</td>
<td>72.7%</td>
<td>74.0%</td>
</tr>
<tr>
<td>Decrease</td>
<td>16.7%</td>
<td>11.3%</td>
<td>7.4%</td>
</tr>
<tr>
<td>Same</td>
<td>12.0%</td>
<td>7.3%</td>
<td>11.1%</td>
</tr>
<tr>
<td>No Response</td>
<td>20.0%</td>
<td>8.7%</td>
<td>7.4%</td>
</tr>
</tbody>
</table>

The institutions at the highest level of participation have more often experienced an increase in activity. It cannot be determined how many indicated an increase or “no response” in fact did not participate in MDTA, and therefore cannot compare. The small decrease is encouraging.

9) Comments. The last page of the survey (see attached) asks for general explanations of the problems and successes of their relationship with their prime sponsor, as well as details of some quantified, but deserves careful examination.
What is perhaps most significant about these comments is the broad range from overwhelming enthusiasm and understanding of the objectives of the program to total frustration and/or confusion by the process of local administration of funds.

The wide range of responses is indicative of the unique quality of each community and its political circumstances. Many claim that CETA is "too political" yet the above survey data shows that those that effectively cope with the politics and know or get involved with the manpower planning council, are most likely to do well.