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ABSTRACT

The Newport-Mesa Unified School District has developed an innovative approach to the organization and administration of Pupil Personnel Services. This approach reflects the Statement of Educational Principles and the Management and Operations Principles of the District which emphasize results--from which reasonable student progress can be demonstrated. The District's Pupil Personnel Services programs, made up of counselors, psychologists, and managers, work toward these results by the use of both interventive methods--helping young people with special problems--and preventive methods--helping to prevent students from developing problems that could interfere with their ability to make reasonable progress. The results management approach to Pupil Personnel Services places emphasis on the school setting priorities regarding the school needs to which pupil personnel resources should be allocated. This priority setting process may indicate, in some situations, that certain results to which the school is not now allocating resources are of high priority and should have resources allocated to them. This, in turn, may require that pupil personnel specialists develop new skills and knowledge in order to contribute these new results. Inservice training is being provided both at the District and at the school level to help staff develop these new skills. (Author)

NEWPORT-MESA UNIFIED SCHOOL DISTRICT

MEMORANDUM

ED 086914

TO: Dr. Norman R. Loats, Deputy Superintendent

FROM: Dale Woolley, Director, Pupil Personnel Services

SUBJECT: Progress Report - Pupil Personnel Services DATE: July 9, 1973

At the time of unification the Newport-Mesa Unified School District began to take steps to give priority to the development of a guidance program. These steps were brought about by concerns of the staff and Board of Education for the lack of coherence and demonstrated effectiveness of the three programs that existed in the component districts. Research and Development was assigned the priority to engage in a project aimed at the development of a new approach for Pupil Personnel Services programs in the District. It was proposed that this approach be coherent, realistic, and serve as a frame of reference to apply resources effectively to students in each school in the District.

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The K-12 Guidance Project was developed as a joint effort of Research and Development and Instructional Operations Divisions to develop a guide that could be used in constructing an operational plan to implement the concepts outlined in Board policies regarding educational principles and management and operations principles. A progress report was made to the Board of Education in May of 1971, at which time a preliminary draft of the guidelines was presented for perusal. In the fall of 1971, the administration gave the go-ahead to the newly formed department of Pupil Personnel Services to begin helping schools implement various accountability concepts in their Pupil Personnel Services programs using the guidelines that had been developed to date by the K-12 Guidance Project. In March of 1973 a revised draft of the Pupil Personnel Services Programs Guidelines was published. This is the fourth draft of these guidelines to be produced to date. The development of the guidelines has received input from personnel both within and without the school district and has been included in the Meet and Confer process for the past two years. The 136 page document is presently serving as a reference document for Pupil Personnel Services staff in the District for implementing accountability concepts in the various school Pupil Personnel Services programs. It should be noted at this point that this approach to accountability in Pupil Personnel Services developed by this district is the subject of a publication of the California Personnel and Guidance Association which is being distributed nationwide. This document is the California Personnel and Guidance Association Monograph No. 6, entitled Results Systems Management: The Human Side of Accountability.

The Results Management Approach

The approach this district has developed for the improvement of Pupil Personnel Services is referred to as results management. The results management approach emphasizes four major principles:

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1) Allocation for Results. The tradition in educational institutions is that resources are allocated to procedures; funds are spent to employ personnel to engage in specified kinds of activities. The guidelines call for an alternative to that tradition. The alternative is that resources are committed to specified results, results that are held to be necessary for the educational progress of our children.

2) Results Agreements. The second idea basic to the guidelines is that management, having committed resources to necessary and specified results, now comes to an agreement through a negotiation process with technical staff on what specifically the results will be. This is a notion of visibility, an idea that what the technical staff will accomplish will be something that is detectable and agreed upon, and that management and technical staff will be able to tell in what degree the agreed upon results have been accomplished.

3) Technological Planning. The third idea upon which the guidelines rest is that the available technology; i.e., the procedures, activities, and methods promising to be effective are applied systematically to the results that are defined, described, and agreed upon. Getting results is not left to chance. The technical staff makes interventive and preventive plans on how technology will be applied to discharge its accountability for results.

4) Maintenance of Technology. The fourth idea upon which the guidelines rest is that technology will be aggressively acquired and improved. Management and technical staff will feel obligated to continuously update and upgrade the methods, techniques, and procedures available for application to the agreed-upon results. Getting better at doing the job is part of the technician's job, and getting technically proficient personnel to do the job is a managerial task.

Results management reflects the Statement of Educational Principles and the Management and Operations Principles of the District which emphasize results---from which reasonable student progress can be demonstrated. Reference A in the appendix includes a chart which illustrates the relationship between the pupil personnel specialist and the school manager in a results management system.

Possible Pupil Personnel Results

The results agreements that are negotiated each year between the pupil personnel specialist and the manager can contain results in any or all of four major areas: student improvement, staff development, school programs development, and self-development. The student improvement section is divided into two categories of results: placement counseling and corrective intervention counseling. Placement counseling is aimed at helping students take advantage of the best opportunities in life and includes aiding them to become more aware of their own strengths and weaknesses, enrolling in appropriate courses, obtaining information needed for

making decisions about postgraduation activities, etc. Corrective intervention counseling deals with helping those students with personal, social, learning, or attendance problems, or a combination of these which are preventing them from making reasonable progress in school. This division of results in the student improvement area allows schools and individual counselors to set priorities in relation to the needs of students in the school and in the counselor's caseload. Reference B in the appendix discusses further the concept of results agreements and outlines the various results that can be contributed by pupil personnel specialists and which would be specified in their results agreements.

Implementation Plan

The implementation of this results approach in Pupil Personnel Services began three years ago using volunteer schools. Each year has seen more schools using concepts from results management. The overall effort is an evolutionary one where the results management model is revised and improved upon as it is implemented. For the 1973-74 school year, Pupil Personnel Services will be a Key Result Area for all principals. One of the requirements of this Key Result Area (see Reference C) is that each school is to study the guidelines and indicate to what extent the school will implement the guidelines during the following school year as well as decide what results in the pupil personnel area are to receive high priority for that school. Each school is also being asked to submit an annual report regarding the pupil personnel program in their school (see Reference D).

Progress to Date

Results management calls for a major change in the way we go about our business in Pupil Personnel Services. Instead of engaging in activities which we hope might produce some desired results, we are asked to first decide on what results are important and then determine what activities might best produce those results. It is difficult to change one's mode of operation overnight, but change is occurring. Results agreements were in operation between guidance specialists and their managers in most of our elementary, middle, and high schools during the 72-73 school year. As an example of results being contributed under these results agreements, three high schools have career centers, three middle schools have student opportunity study labs, a dozen elementary schools have motivation labs, and three-fourths of our schools have tutor corps operating effectively - all having been contributed by pupil personnel specialists under school programs development clauses in their results agreements. Progress is being made in developing more accurate and efficient methods of determining the high priority needs of students on each campus. Staff members are developing new skills to enable them to produce the results demanded by these identified high priority needs.

Summary

The Newport-Mesa Unified School District has developed an innovative approach to the organization and administration of Pupil Personnel Services. This approach reflects the Statement of Educational Principles and the Management and Operations Principles of the District which emphasize results--from which reasonable student progress can be demonstrated. The District's Pupil Personnel Services programs, made up of counselors, psychologists, and managers, work toward these results by the use of both interventive methods - helping young people with special problems, and preventive methods - helping to prevent students from developing problems that could interfere with the student's ability to make reasonable progress. Pupil Personnel Services specialists can be found at all school levels: elementary, middle, and high school, engaging in such activities as individual counseling, teacher and parent consultation, and the development of special school programs such as school Motivation Labs and Tutor Corps. To date, 85% of the schools in the District have implemented the results management approach to Pupil Personnel Services to some degree. The results management approach was introduced first at the elementary level and is now expanding into the middle school and high school levels. The results management approach to Pupil Personnel Services places emphasis on the school setting priorities regarding the needs of the school to which pupil personnel resources should be allocated. This priority setting process may indicate in some situations that certain results to which the school is not now allocating resources are of high priority and should have resources reallocated to them. This in turn may require that pupil personnel specialists develop new skills and knowledge in order to contribute these new results. Inservice training is being provided both at the District and at the school level to help staff develop these new skills. As this results management approach is implemented in the District to a further extent we should begin to see a closer match-up between pupil personnel high priority areas of the schools and results that are being contributed by pupil personnel specialists. Schools are also becoming more proficient in setting the priorities of the school in the area of Pupil Personnel Services. It has been pointed out that results management requires new skills that take time to develop but that progress can be seen. The results management approach, when fully implemented, should allow for results to be contributed in areas which are of high priority for helping students make reasonable progress in school.

D. N. W.


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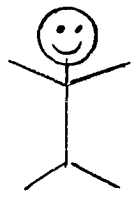
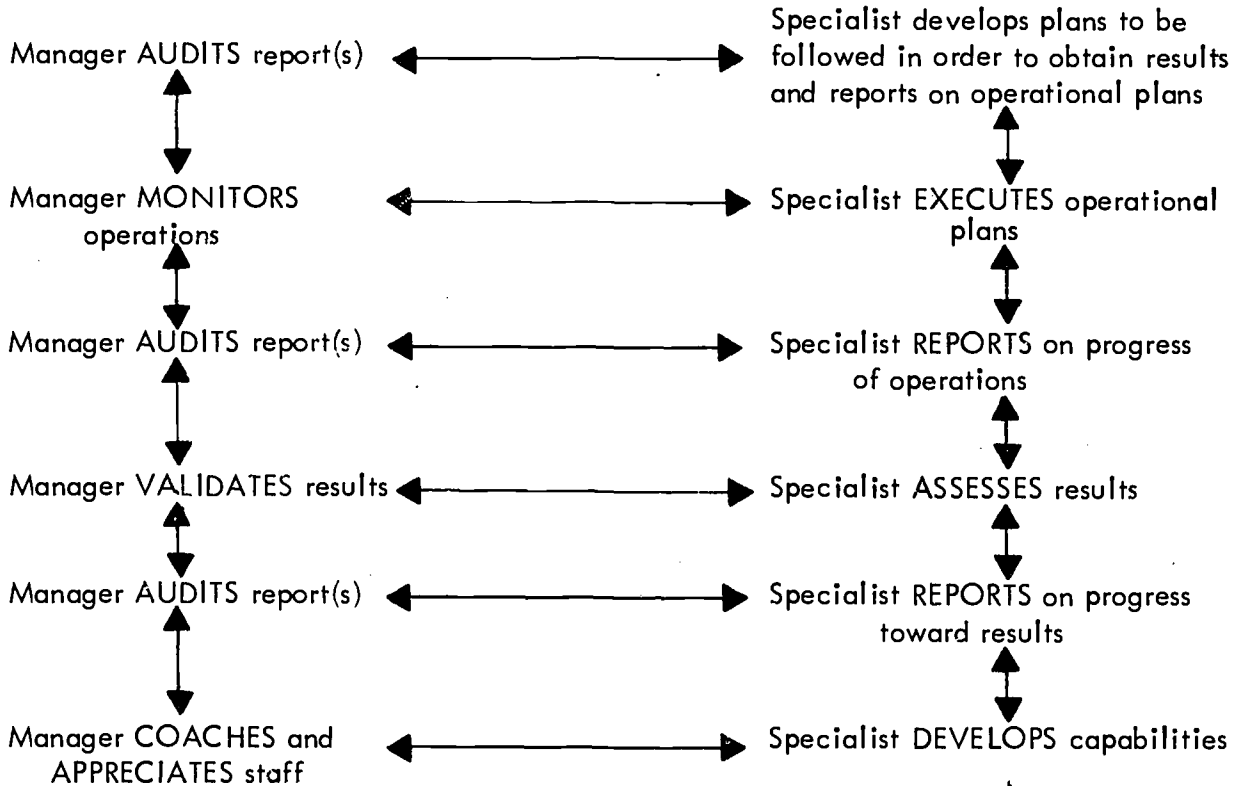
APPENDIX

Major Activities of PPS Specialist & Manager
During School Year Under a Results Management Approach

Together, the pupil personnel specialist and the manager develop a RESULTS AGREEMENT based on areas in which specialist can offer contributions and on needs of school. This document is agreed upon and signed by both parties.

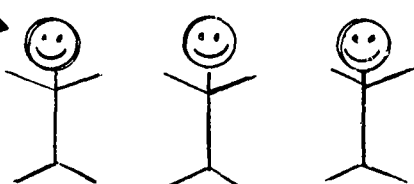
MANAGER

SPECIALIST



Manager sees results produced to which he and organization were committed.

Specialist produces results to which specialist and organization were committed.



Children who might not otherwise do so now make reasonable progress in school.

CLARIFICATION OF TERMINOLOGY

Results Agreement

A contractual agreement which specifies the results the Pupil Personnel Specialist has agreed to contribute. The agreement contains four categories of results: student improvement, staff development, programs development, and self-development.

Operational Plans

Operational plans are formulated by the specialist after outcomes have been agreed upon. The plans indicate how the specialist expects to achieve the agreed upon results.

Report on Operational Plans

Reports, preferably written, given to the manager by the specialist that indicate what the specialist is planning to do. Since, in results management, the manager is encouraged not to issue directives (i.e., tell staff what plans they are to use to accomplish agreed-upon results), the visible plan can become the basis of administrative checkpoints.

Report on Progress of Operations

Reports, written or verbal, given to the manager by the specialist that indicate the extent to which the operational plans have been implemented. Numerous progress reports on operations may occur throughout the school year.

Report on Progress Toward Results

Reports, written or verbal, given to the manager by the specialist that present information related to progress being made toward the accomplishment of the agreed upon results. Several verbal or written estimates may be given to the manager during the year with a final written report made at the end of the year.

Auditing

A process the manager engages in whereby he/she verifies to his own satisfaction the accuracy and consistency of the contents of reports made to him by pupil personnel specialists. Normally the manager would verify various parts of a report on a sampling basis.

Monitoring

A process the manager engages in whereby he/she gathers firsthand information on the operations of a pupil personnel specialist. He/she may sit in on a parent study group, be involved in a conference with parent or student, etc.

Assessing

Pupil personnel will, of necessity, continuously assess their own results and management will have the benefit of this assessment in that pupil personnel will periodically report the amounts and kinds of results achieved. The specialists must assess results as they go along in order to check on the effectiveness of their operations. If the desired results are not being obtained using one process, perhaps another process should be tried.

Validating

In order to effectively audit the reports on progress toward results, management will need to occasionally "see for himself." By this personal check on results the manager stays "in touch with the firing line," and through such activity he reinforces results-getting and results report behaviors on the part of his staff. Normally this validation would be done on a sampling basis. It is recognized that most managers have little technical knowledge regarding psychological assessment; however, normally they can place themselves in a position to recognize whether improved behavior is evident or not.

Developing Capabilities

When results are specified in writing and staff sets out to achieve these results, it is quite normal for staff to realize that they need more technology than they presently have if they are to reach their goals. This suggests the need for not only inservice training, but also moral support from the management level to help the staff acquire the necessary skills and to live with the frustration that is sometimes involved when attempting to learn new ways of achieving results.

Coaching and Appreciating Staff

The manager of a staff is not all that different from the coach of a team. A good staff can get mediocre results and even the wrong results under poor management. A not-so-strong staff can get more of the right results under good management. Since it is up to the manager to get the best out of his/her staff, staff development becomes a key to good management. In allocating resources to definite technology, the manager is building team strengths. The manager sees to it that his/her staff has opportunities to acquire the capabilities they need to obtain the results they have agreed to obtain. Staff development also includes providing a working climate in which staff members realize their contributions are appreciated.

For further information contact:

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Costa Mesa, California 92627

NEWPORT-MESA UNIFIED SCHOOL DISTRICT

PUPIL PERSONNEL SERVICES

RESULTS AGREEMENTS

One of the central ideas in the results management model is that the relationship between manager and producer be contractual, entailing agreement on what is to be accomplished in terms of specific results. Disagreements on results are negotiated through manager and producer cooperation, resulting in mutually acceptable outcomes, thus giving meaning to the concept of accountability. The results agreement is the vehicle for accountability in the results management approach. The agreement does not specify procedures, methods, or other actions, only results.

Areas Covered in the Results Agreement1. Amount of time to be spent in counseling role:

The results agreement should contain a statement that describes the extent of the assignment for the guidance specialist, e.g., a full time assignment, two periods per day assignment, etc.

2. Categories of results:

The results that the guidance specialist is contributing to the school should be categorized into four basic areas: Student Improvement, Staff Development, Program Development, and Self-Development. The specialist does not necessarily have to contribute results in all four categories. Whenever possible the specialist should designate the amount of time to be devoted to obtaining each result listed in the agreement.

A. Student Improvement:

The results that could be contributed by a guidance specialist in this category can be divided into two sub-categories: Placement and Corrective Intervention. Placement Counseling attempts to reduce the number of students who end up mismatched in school courses, post-graduate training, jobs, etc. Corrective Intervention Counseling attempts to reduce the number of students with problems (casualties) that interfere with their making reasonable progress in school. Possible contributions of the specialist in these areas include:

Placement Counseling Results

1. Helping students know varieties of opportunities.
2. Helping students know characteristics of opportunities.
3. Helping students know how self and opportunities match.
4. Helping students acquire plans for taking advantage of opportunities.

Corrective Intervention Counseling Results

1. Helping students abandon learning deficit symptoms.
2. Helping students abandon attendance and work deficit symptoms.
3. Helping students abandon contra-social symptoms.
4. Helping students abandon contra-self symptoms.

A results agreement written in either one of these sub-categories should contain four basic sections: (1) The number of students to be involved in a treatment program, (2) The name of the result area in which the specialist will be working, such as "students needing assistance in enrolling in an appropriate pregraduation educational program," "students needing assistance in reducing symptoms of attendance deficiency," etc., (3) The number of students out of the total number who will demonstrate improvement, and (4) A visibility clause.

EXAMPLE: Of the 50 ninth grade students most in need of assistance in reducing symptoms of attendance deficiency for which I will design and carry out a treatment plan, 20 of these students will display visible and assessable behaviors as evidence of reduction of symptoms. I will provide to management upon request information reasonably construed as evidence of the alleged improvements.

B. Staff Development:

Possible areas of contributions in the Staff Development category include:

1. Assisting staff in learning treatment techniques.
2. Assisting staff in learning diagnostic techniques.
3. Assisting staff in learning programs components operation.

Results contributed in this area should again be described using the four part statement described under student development.

C. Program Development:

This clause of the results agreement specifies results that the guidance specialist will contribute to the school that could be considered an improvement in the school resources. General areas of contribution include:

1. Developing Aide Cadres (Tutor Corps, adult volunteer programs, etc.)
2. Developing Data Systems (design of follow-up studies, acquisition of information on incoming students, etc.)
3. Developing Need Laboratories (career centers, motivation labs, etc.)
4. Parent Education Programs.

Results that could be contributed in this area might be the development of a professional library for the counseling staff; the planning, development, and implementation of a career development center; a group of parents who now have new understandings regarding the behavior of their children, etc.

D. Self-Development:

The self-development clause specifies what skills and knowledge the specialist will add to his or her repertoire during the school year. Possible areas of contributions could include:

1. Learning new treatment techniques.
2. Learning new diagnostic techniques.
3. Learning new programs components operation.

3. Signatures of Specialist and Manager:

Once the contents of the results agreement have been agreed upon by the guidance specialist and the manager, both parties should sign the results agreement document as an indication of this agreement.

4. Renegotiation of Agreement:

Occasionally new information may appear during the year indicating a change in priorities is in order. This change in priorities could create a need to revise the results agreement document. If this is the case the sections of the agreement in question should be renegotiated with the resulting addendum being signed by both parties and attached to the original agreement.

Evidence

You will note that in the visibility part of the example used in part 2A above, the guidance specialist indicates that evidence will be provided to the manager upon request regarding how the guidance specialist decided that a certain result was obtained. Normally the guidance specialist would be expected to provide a written report to the manager at the end of the year in which the specialist would list names of students who had improved in relation to various clauses in the student improvement section, the names of staff members who had acquired new skills and knowledge in reference to clauses that might have been written in the staff development category, etc. The guidance specialist should be in a position to provide evidence upon request of the manager that would indicate why the guidance specialist had decided there was improvement. It behooves the guidance specialist, therefore, to keep some sort of anecdotal records during the year in which he/she can collect documentation that could be used as evidence later in making decisions as to whether or not the student has improved, the staff member developed new skills, a tutor corps operating effectively, etc.

0.0 KEY RESULT AREA: Pupil Personnel Services (District with Individual-Common)

This area has been included outside of MPD&A for 1971/1972 and 1972/1973. It is included in MPD&A for 1973/1974 in order to simplify total efforts for objective setting agreement, and reporting.

1.0 IS1.1 District IS Data

A statement of Management and Operations Principles has been adopted as a policy statement by the Board of Education. Guidelines have been developed for implementing this policy in the area of Pupil Personnel Services. Certain concepts of these guidelines for implementing results management in Pupil Personnel Services have already been implemented in the majority of schools in the District. These include the development of agreements between pupil personnel specialists and school managers in order to help insure accountability for results in the area of Pupil Personnel Services. Not all schools have been able to demonstrate that a results management system exists in the school that focuses on results rather than procedures.

1.2 Principal's "IS" Data (to be provided by principal; see 4.1 below).2.0 SHOULD2.1 District "SHOULD" Data

Pupil Personnel support services should be provided so as to enable students of the District to make reasonable progress in those primary and shared responsibilities outlined in the Statement of Educational Principles. These services should be based on the four major principles of results management: (1) the allocation of resources for the attainment of specific results; (2) the allocation of resources for the continuous updating and upgrading of the methods, techniques and procedures available to obtain the needed results; (3) results to be attained by the pupil personnel specialists will be specified in advance through a negotiation process resulting in an agreement between the manager and the specialists; (4) technical staff make visible plans on how technology will be applied in order to obtain the agreed upon results.

2.2 Principal's "SHOULD" Data (to be provided by principal; see 4.2 below)3.0 DISTRICT EXPECTATIONS 1973-74

By June 30, 1974, it is expected that:

3.1 The school IS situation in regard to results now being obtained in the pupil personnel area will be established.

3.2 The school SHOULD statement for results in the pupil personnel area that need to be accomplished in order for students to make reasonable progress in school will be established.

Key Results Area: Pupil Personnel Services

- 3.3 The School IS situation in regard to the implementation of the results management guidelines in the area of Pupil Personnel Services will be established.
- 3.4 The school SHOULD situation related to the implementation of the results management guidelines will be established.
- 3.5 School Pupil Personnel Services Program Objective for 1974-75 will have been established (consistent with the concept of OBJECTIVE in the District's simplified Management Model).
- 3.6 School Outcome and Process Evaluation Plans for implementing results management concepts in the area of Pupil Personnel Services will have been established (consistent with the concept of EVALUATE ALTERNATIVE RESULTS in the District's Simplified Management Model).
- 3.7 Modification, selection, and/or design of program processes to be used for implementing results management concepts in the area of Pupil Personnel Services will be established (consistent with the concept of ALTERNATIVE WAYS and DETERMINING BEST ALTERNATIVE WAY on the District's Simplified Management Model).
- 3.8 Requests for Special Assistance to carry out Pupil Personnel Services Program Objectives for 1974-75 (if any).

4.0 PLANNING OBJECTIVES, EVALUATION PLANS, REPORTING PLAN, AND REQUESTS FOR ASSISTANCE To be provided to N. R. Loats by June 30, 1973, 5:00 p.m. (Use 4.0 and 5.0 as the format to provide information).

- 4.1 IS
To be completed by principal for review with N. R. Loats. It is to describe the current status of the expectations as provided in 3.0 above. This section should discuss the IS in regard to school Pupil Personnel Services results and the present status of implementation of result management concepts.
- 4.2 SHOULD
To be completed by principal for review with N. R. Loats. It is to describe the ideal future status consistent with the expectations in 3.0. This section should discuss the SHOULD in regard to school Pupil Personnel Services results and the utilization of results management concepts in the Pupil Personnel Services area of the school's program.
- 4.3 Planning Objectives to accomplish 1973-74 expectations as stated in 3.0 to be completed by the principal for review by N. R. Loats. Each objective statement should include what will be accomplished and the criteria to be used to determine if the "what" has been accomplished.

Key Result Area: Pupil Personnel Services

4.4 Evaluation Plans to be completed by the principals for review with N. R. Loats. Each evaluation plan should include a description of data collection tools, procedures to be used to obtain the data relative to each of the objectives established above.

4.5 Reporting Plan

- .1 Data required by the District by a given date (to be established at the agreement conference).
- .2 Data to be submitted by the principal by a given date to help him get his job done.

4.6 Requests for Assistance (if any)

- .1 Funds to be provided by the District, outside of your budget, for what purpose and proposed dates.
- .2 Inservice to be provided by the District and proposed dates. Please specify the outcome desired.
- .3 Other services to be provided by Support Service and Research and Development Programs noting the purpose and proposed dates.
- .4 Equipment/Supplies to be provided on a loan basis or as needed basis by the District for what purpose and proposed dates.
- .5 Other items requested for what purpose and proposed dates.

5.0 AGREEMENT SECTION (Use 4.0 and 5.0 as the format to provide information)

We have read the information related to (1) IS, (2) SHOULD, (3) District Expectations, (4) Individual Principal/School Planning Objectives, Evaluation & Reporting Plans, and (5) Requests for Assistance (if any), and agree to work together to complete the established objectives. It is further agreed that either party may request a new or modified agreement if the conditions change significantly from the time of completing this agreement.

Date _____

Principal's Signature _____

Date _____

N. R. Loats _____

ANNUAL
PROGRESS REPORT ON ACCOUNTABILITY IN
PUPIL PERSONNEL SERVICES:

MANAGEMENT STAFF

School _____
Name _____
Date _____

Reference D

DIRECTIONS

Results Report Audit: Have you reached an agreement with your Pupil Personnel staff on results expected? yes no. If yes, in what form is the agreement? verbal written. Please indicate below the percentage of a full time work year (10 mos.) allocated in the agreement.

Operations Report Audit: Have you audited reports on your Pupil Personnel staff's operational plans? yes no. If yes, what form of report? verbal written. Please indicate below which result categories have written operation plans.

Progress Report Audit: Have you audited progress reports by your staff on their results and operations? yes no. If yes, what form of report? verbal written. Please indicate below which categories of results have received progress audit.

Operations Monitoring: Indicate below in which categories of results you have observed the operations specified in staff plans.

Results Report Verification: Indicate below which categories of results you have observed by means other than report by your staff.

Results Attempted: Indicate the number and type of clients to receive assistance from your Pupil Personnel staff and the number and type of program components to be developed.

Results Attainment: Indicate the amount or quantity of each specified result actually attained.

Please comment on some entries on reverse side. Circle and indicate corresponding number.

RESULT AREAS

FTE (%)
.1

PLAN (✓)
.2

PROGRESS (✓)
.3

MONITOR (✓)
.4

VERIFY (✓)
.5

ATTEMPT (#)
.6

ATTAIN (#)
.7

RESULT AREAS	FTE (%) .1	PLAN (✓) .2	PROGRESS (✓) .3	MONITOR (✓) .4	VERIFY (✓) .5	ATTEMPT (#) .6	ATTAIN (#) .7
MISMATCH REDUCTION TOTAL	I						
Student awareness of opportunity varieties	1						
Student awareness of opportunities characteristics	2						
Student awareness of notching of self and opportunities	3						
Student possession of reasonable plan for placement	4						
CASUALTY REDUCTION TOTAL	II						
Learning and Progress Problems	5						
Effort and Attendance Problems	6						
Interpersonal and Social-Negation Problems	7						
Intrapersonal and Self-Negation Problems	8						
STAFF COMPETENCIES DEVELOPMENT TOTAL	III						
Counseling Competencies	9						
Consulting Competencies	10						
Test and Inventory Competencies	11						
Interview and Observation Competencies	12						
Research Competencies	13						
Development Competencies	14						
PROGRAM DEVELOPMENT TOTAL	IV						
Data Systems Development	15						
Career Laboratory Development	16						
Motivation Laboratory Development	17						
Intervention Aide Development	18						
OTHER RESULTS TOTAL	V						
	19						
	20						
	21						
	22						
OTHER PEOPLES' PRIORITIES TOTAL	VI						
Orders (One-shot tasks)	23						
(Repetitive tasks)	24						
(Emergency tasks)	25						

REF. 11.14