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ABSTRACT

The examination of administrative and political issues in career education entitlement (voucher) plans opens with a discussion of various rationales and models for entitlement programs. A discussion of existing and proposed entitlement schemes covers the Basic Educational Opportunity Grant Program (BEOG), the educational benefits provided under the G. I. Bill, the Tuition Assistance Plan (TAP) of New York State, and entitlements proposed by Norman Kurland, Herbert Striner, and Charles Benson and Harold Hodgkinson. The discussion of administrative issues covers: general administrative concerns; a new entitlement agency; participant, institution, and program eligibility; student protection; information; advice and counseling; special issues related to participant support services; employed participants' needs; participant placement; and entitlement evaluation. The discussion of political issues assesses the likely reactions of the public in general, students, professionals in postsecondary education (not institutional spokesmen), institutional spokesmen, educational associations, other leading lobbying groups, the States, and the Congress. A discussion of next steps offers two proposals: one for experimenting with a new program, the other for building on existing entitlements. Four appendixes (a bibliography, administrative and political issues in career education voucher and entitlement plans, and an experimental entitlement scheme for adults to aid career related education) comprise 25 pages. (JR)

A CAREER EDUCATION ENTITLEMENT PLAN:
ADMINISTRATIVE AND POLITICAL ISSUES

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A CAREER EDUCATION ENTITLEMENT PLAN:
ADMINISTRATIVE AND POLITICAL ISSUES

FOREWORD

The National Institute of Education is interested in examining the economic and financial implications of an entitlement program centering on career education and also in looking at administrative and political issues which should be considered in implementing such a program. To pursue this objective it developed a proposal and supporting work statements.¹ Subsequently, NIE contracted through the Career Education Project of Providence, Rhode Island, with Professor Henry Levin of Stanford University, to undertake the economic and financial studies relevant to the program, and with Professor John C. Honey of Syracuse University, through the Career Education Project and the Syracuse University Research Corporation, to carry out pertinent administrative and political studies. Terry Hartle, Research Associate of the Educational Testing Service, Washington, D. C., co-authored this report with Professor Honey.

To address the administrative and political issues which may surround an entitlement plan, it is necessary to have in hand relatively specific financing arrangements which will govern the scheme. These were provided by Professor Levin in a draft report on March 3, 1975, presented at a meeting in Washington attended by him, NIE representatives and Messrs. Honey and Hartle.

¹See Appendix A.

In view of the fact that Professor Levin not only developed suggested financing arrangements and discussed associated economic issues, but also addressed himself to several administrative issues, this report will make frequent reference to the Levin draft report of March 9th.

The methods used in preparing this report were a) consultation with knowledgeable persons; b) a review of relevant literature; and c) structured interviews. Appendix B contains a selected bibliography. Appendix C is the Draft Outline of this report, dated January 30, 1975, which was used for some interview purposes. Appendix D is a summary statement, An Experimental Entitlement Scheme for Adults to Aid Career-Related Education, used in connection with assessing political reactions to the idea.

The cooperation of many persons in preparing this report is deeply appreciated. In particular Mr. Chris Lotze of the NIE staff has been constantly helpful. While the authors have drawn extensively on Professor Levin's draft report, their interpretations of his materials, as well as all other aspects of this report, are their own responsibility.

I. INTRODUCTION

The discussion which follows covers the definitions used in the report; the rationale for an entitlement scheme of the type proposed; and the Levin financing proposal, together with some comment on that proposal.

Definitions

Career Education: The range of education and training which prepares both for work and self-development from the vocational or academic track in high school through the provision of opportunities to adults to ready themselves for new or changed careers. The concept covers full-time and part-time education and the age span from approximately eighteen through retirement.¹ The distinction between secondary and postsecondary education is not rigidly drawn.²

¹It has been suggested that the entitlement be available upon completion of high school and that if this is earlier than age 18, e.g., 16 or 17, the entitlement could become operative then. A problem with setting formal completion of high school as the activating time for entitlements is that many persons who have dropped out of high school would be precluded from the entitlement, an obviously undesirable provision in terms of the goals being sought by the program.

²NIE, in commenting on this definition, prefers to exclude self-development as an aspect of education to be covered. This poses a screening problem with respect to programs approved under the proposed entitlement scheme. Experience under the post-Korean G. I. Bill may be useful in this connection since "All three (G. I.) bills require that a veteran enroll in an approved course of instruction in order to be eligible for benefits. The G. I. Bill of 1944 permitted avocational courses; these were banned in 1948, and are not permitted under the latter two bills." (House Committee Print No. 81, Report of Educational Testing Service, Princeton University, on Educational Assistance Programs for Veterans, September 19, 1973, Government Printing Office, Washington, D. C., p. 22.)

Levin's definitions are found on page 2 of his draft report.

Some difference of view exists as regards application of the entitlement through the retirement years. Levin's report (p. 26) says "We have also suggested that the entitlement can be used at any time over the life of the individual. This flexibility would permit the recipient to choose the time pattern and nature of training without being required to take the education or training at one time or under the aegis of any single program." In discussions, however, Levin favors a cut-off, perhaps at 50, in consideration of costs and the lesser social utility of encouraging older persons to undertake career training. NIE and Honey-Hartle favor extension through retirement years both on social-humanitarian and political grounds.

Entitlement or Voucher Plan is used in a manner similar to that employed in voucher schemes for schooling, i.e., awards provided by government to the individual student to permit the pursuit of specified educational objectives. The term "entitlement" is used in this report in preference to "voucher" because of the negative connotations frequently associated with voucher plans.

Entitlement may be given as compensation for services (e.g., the G. I. Bill for military service) or for completion of, or in anticipation of, public or other service. While NIE has been interested in entitlements related to public service, that limiting condition is not directly addressed in either the Levin report or this one.¹

¹Two reports of relevance to service-learning are the Mid-Project Progress Report of the American Association of Community and Junior Colleges (AACJC), One Dupont Circle, N. W., Washington, D. C., The Project for Service Learning, December 24, 1974; and the conference background paper for a conference on "The Future of the College Work-Study Program and Public and Community Service," December 6, 1974, conducted by the AACJC and the National Center for Public Service Internship Programs, Washington, D. C.

The Rationale for an Entitlement Program

In a society which has achieved free public education for virtually all citizens through twelve years of schooling and which is animated by increasingly powerful egalitarian inclinations, the notion of free schooling beyond the high school is inevitable. Not that the idea is totally new by any means. State colleges and universities, community and junior colleges, city universities and other types of postsecondary institutions have offered low- or no-tuition education for many decades. What is relatively new is the idea that funds for education beyond the high school should be vested in students so that they, armed with the wherewithall, may make the decisions about time and place to pursue further study.

Public policies for educational entitlements have mixed basic rationales. The educational benefits provided or permitted under the various G. I. Bills represent a form of compensation for service to the nation. The survivors' educational benefits under Social Security recognize the value to the individual of a continued opportunity for education in spite of changes in the family composition. The Federal EOG and subsequent BEOG programs seek to make postsecondary education available to all citizens regardless of economic status. Some state programs like New York's Tuition Assistance Plan are designed with two objectives in mind: to help the economically less advantaged and to assist private institutions of higher education.

The arguments in support of postsecondary entitlements may be roughly categorized as relating to issues of efficiency, equity and social benefit.

Levin presents the efficiency arguments (p. 5 ff) and they need not be repeated here other than to comment on the probable impact on private institutions of a large-scale entitlement scheme. We may assume that the more viable institutions, in terms of being able to attract students and their entitlements, would stay alive; the rest would gradually phase out in the absence of other substantial public or private support to keep them solvent.

Levin also discusses the equity arguments (p. 9 ff) and we would simply add that equity of opportunity for those who are culturally and economically disadvantaged takes more than entitlements. It will require, in most cases, the provision of remedial and supplementary education, special counseling and advising services and special assistance with placement for employment.

The social benefit arguments are to some extent addressed by Levin. He comments (p. 38) that "Traditionally, education has been represented as a device for equalizing opportunities among persons born into different social classes when the social class refers to differences in family income, wealth, occupational status, and other aspects of the social stratification system. In recent years, questions have been raised about whether education alters the class order or reinforces it (Jencks 1972; Bowles 1972; Karabel 1972; Carnog 1972; Blau and Duncan 1967; Duncan and Fetherman, and Duncan 1972). And further he says (p. 42), "...the expansion of job skills and capabilities among the students from lower social class backgrounds is not likely to be matched by comparable increases in the

number of jobs that will absorb such an expansion unless there are public policies to expand the number of jobs available. But, it must be emphasized that there is nothing inherent in postsecondary entitlements for either education or training that would increase the number of such jobs."

Essentially, Levin's point, an important one, supported recently by the writings of a number of scholars, is that improved education and educational opportunity must not be seen as the single or major route to transforming society into a more equitable, humane condition. The tendency to burden education with expectations that it cannot and should not be expected to meet frequently leads to disillusionment and to irrational decision-making.

There are, however, some views about the social benefits to be derived from a broad entitlement scheme which may be noted. Kurland in his December 10, 1974 report, "Study of Adult Education" (p. 5), quotes a New York State Board of Regents position paper, on the issue of lifelong learning, as follows: "There are even broader social changes leading us into a society which is comprehensively committed to lifetime learning. This is an era in which learning will be at or near the center of activity for a substantial portion of most individuals' lives and will have direct influence on many functions of society...."

Striner, in arguing for an educational entitlement plan for all workers 17 and beyond, says "By providing the funds necessary to make this right (to education) a reality, the nation will benefit. Productivity will increase; people will move more freely into the tight labor market

skills; the competition with foreign producers will be more effective; there will be fewer frustrations or "blue-collar blues" of workers who see no horizons for sharing in the bright new world of technology; and, finally, local, state and federal income tax proceeds will grow as a result of the more effective use of our manpower resources. This entitlement of every worker to train or retrain for a better job is a national capital investment which is basic to the functioning of a modern, industrial society."¹

Coleman has commented² that vouchers for the young would remove them from being beholden to parents or pressured by parents regarding post-secondary education. Decision-making by youths about their own educational futures would encourage the development of judgment and maturity. The implication of a resultant societal benefit seems clear.

We may add to these suggestions of benefit to society from the broad entitlement idea, a few additional comments. Certainly a scheme which opens postsecondary education to all citizens will be a significant factor in reducing the frustrations which are generated by denial of access or of opportunity to escape, through reeducation, from dull and frustrating work. But, also such a scheme may ultimately produce strong pressures to create more and better work opportunities. It may generate demand for

¹Striner, Herbert E., Continuing Education as a National Capital investment, The Upjohn Institute for Employment Research, March 1972, pp. 64-65.

²Youth: Transition to Adulthood, Report of the Panel on Youth of the President's Science Advisory Committee, June 1973.

societal changes which will enhance the quality of life both in work and leisure settings. It may focus attention more directly on technological change and innovation as instruments for improving the quality of the "work experience." This may particularly happen as those who have carried on the dull, routine, menial tasks of society are provided opportunities through education to aspire to more challenging jobs. Without placing on education the obligation to be society's main change-agent, we do suggest that considerable stimulus to societal betterment might follow from providing all citizens an opportunity to pursue education, beyond the high school, in preparation for their life's work.¹

The Levin Proposals

The models proposed by Levin (p. 12 ff.) are as follows:

Model I is for entitlements that can be used only for postsecondary formal education and training. In general, the educational opportunities permitted under the G. I. Bill are covered, i.e., education and training in public and private colleges and universities as well as proprietary institutions, vocational schools, and correspondence schools approved by the Veterans Administration.

Model II covers the education and training provided for above and also includes non-formal education and training activities as well as apprenticeship and on-the-job training. The Manpower Development Training Act on-the-job training programs are the precedent for this latter provision

¹See Appendix D, I, Rationale for an Entitlement Program, for other references containing statements of rationale.

Model III includes all of the components of Models I and II and in addition permits some investment of entitlements in complementing physical capital that is necessary for particular careers, e.g., carpenters' tools.¹

Other features of the Levin proposals are as follows:

- The basic entitlement (PSE) would be \$10,000. This figure is based on the four-year state subsidy per student in four-year public institutions in such states as California (p. 18).²
- The PSE would become available to each person at the age of eighteen to be used over a minimum of four years, but also for use over the life span (p. 19).
- The entitlement would presumably be paid for out of federal funds, raised by means of the income tax (pp. 16-17).
- Government guaranteed loans or income-contingent loans would supplement the resources available to the student (p. 19).
- The composition of grant and loans might vary "according to the social class background of the eligible individual and other factors" (p. 20).
- To obtain high levels of participation among low income populations it will be necessary to permit entitlements to cover other educational expenses, e.g., child care, as well as the costs of maintaining the student (p. 20).

¹Levin does not include a model which builds from the present national entitlement program (BEOG).

²The need for periodic adjustment to account for the effect of inflation on the basic entitlement is noted by Levin (p. 18). The wide variation in educational costs from state to state, and thus the differing purchasing power of the PSE in different parts of the country, is not considered, however.

-- "...states would have to be willing to 'piggyback' their own resources on top of federal resources to fund the entitlements"

3). The result would be a major shift away from present state financing of institutions to direct support of students.

In summary (p. 25), Levin notes issues which would have to be explored further in the future and which his report does not resolve. He says, "These include establishing the source of public revenues, the magnitude of entitlements, the pattern of entitlements by social class and other attributes of recipient, the composition of entitlements between grants and loans, and the total public support requirement for PSEs."

Levin does not include any dollar estimates of annual cost. Based on an age-eligible national population of 140 million, and assuming a 50 percent participation rate (derived from G. I. Bill experience for high school graduates) we foresee an annual bill of \$175 billions at least in the early years. This might be reduced by \$10 billions through phasing out about half of federal and state current investments in postsecondary education (a rough estimate by Cartter and Dresch as to what current dollars might be eliminated under a general entitlement scheme). A 10 percent participation rate would cost \$35 billions which presumably could be reduced by \$10 billions.

Assuming a 60-40 percent grant/loan division of entitlements, the grant portion would amount to \$99 billions (50 percent participation) or \$15 billions (10 percent participation).

Another approach to calculating costs would be to consider phasing in the PSE by making it available only to 18 year olds as they reach that

age. Since there are currently about four million 18 year olds, the annual cost of full funding of PSEs would be \$4 billion. Approached in this manner, it would take about 50 years to have the PSE, as a life-long resource, available to virtually all citizens.

A four-year experimental program, using a scientifically derived sample of 3,000 persons, and employing only grants, would cost \$7,500,000 annually, assuming all in the sample opted to use their entitlements in each of the four years. Possible savings to federal, state, or local governments in programs which the participants might drop out of, e.g., BEOG, are not calculated in this estimate.

Administrative costs are not included in any of the above estimates.

II. EXISTING AND PROPOSED ENTITLEMENT SCHEMES

A number of entitlement programs for support of higher/postsecondary education are in existence or have been proposed. Three that are currently in operation are discussed in the following paragraphs: the federal Basic Educational Opportunity Grant Program (BEOG); the educational benefits provided under the G. I. Bill for Vietnam veterans; and the Tuition Assistance Plan (TAP) of New York State. Three proposed entitlements (among many) are selected for brief note: the ideas developed by Norman D. Kurland of the New York State Department of Education; the proposal of Herbert E. Striner, Dean of the College of Continuing Education, the American University, Washington, D. C.; and the suggestion by Charles S. Benson and Harold L. Hodgkinson in their book Implementing the Learning Society.¹

The reasons for discussing these operating and proposed entitlements are first, that they provide administrative and political perspectives on experience to date, and second, that they give a sense of the directions in which thinking is moving on the part of knowledgeable leaders in post-secondary education. Whether an entitlement scheme in the vein of the Levin proposals is acted upon or not, there is a great deal to be learned from where we now stand with respect to the entitlement idea. The following discussion is not definitive in terms of revealing the strengths and limitations of present entitlement programs or of fully exploring

¹Jossey-Bass, San Francisco, 1974.

the ramifications of the three proposed schemes. The intent here is simply to provide sufficient information to suggest directions of future more detailed investigation.

The Basic Educational Opportunity Grants (BEOG) were incorporated in the Higher Education Amendments of 1972. The principal features are summarized below.

1. The Commissioner of Education shall pay to each student who has been accepted for enrollment in, or is in good standing at, an institution of higher education (according to the prescribed standards, regulations, and practices of that institution) for each academic year during which that student is in attendance as an undergraduate, a basic grant in the amount for which the student is eligible.
2. The maximum grant is \$1,400 minus the expected family contribution.
3. The grant cannot exceed fifty percent of the cost of attendance for the student.
4. The grant plus expected family contribution cannot exceed the student's cost of attendance.
5. The Commissioner will determine and publish a schedule of expected family contributions for various levels of family income taking into account effective income of the student or his family, the number of dependents of the family and of students in postsecondary education in the family, the assets of the

student and his family, and unusual student or family expenses such as unusual medical costs.

6. Students attending on a part-time basis have their grants reduced proportionately.
7. Students are eligible for grants for four years with a one year extension permitted.¹

Several aspects of the BEOG program which are the subject of considerable debate may be noted. The funds appropriated for the program have not permitted payments of the full entitlement to those who are eligible; indeed, the average for the current year will be approximately one-third of the full entitlement; the maximum, perhaps one-half. (Current figures are not yet available.) Virtually all spokesmen on BEOGs urge full funding but this has not been viewed by the Congress as feasible.

The program is administered by the federal government to individuals. The states have argued that they should be involved in the administration at least to the point of knowing which of their citizen-students are BEOG recipients since this would aid in administering state student assistance programs. Institutions have argued that they should administer the BEOGs since they do "packaging" of student assistance using other federal program monies as well as their own dollars.

Institutions have also argued for a cost of education allowance to accompany the BEOG award, and to go to the institutions where the student is studying.

¹Compilation of Higher Education Laws, 1972. Joint Committee Print, 92nd Congress, 2nd Session, U. S. Government Printing Office, Washington, D. C., November 1972.

The complications involved in determining student and family incomes, and thus needs, have been widely criticized.

The limitation of BEOGs to undergraduates has been viewed as too restrictive.

Emphasis on four academic years implies a confirmation of traditional postsecondary collegiate education, whereas many of the pressures in society are in the direction of opening up postsecondary education to lifelong learning in various types of institutions, some non-collegiate in nature.

The inadequacy or non-availability of informational, advising and counseling services, especially for potential BEOG recipients who are, by virtue of economic and cultural position, not collegiate-oriented has been widely noted.

In spite of these criticisms, it seems fair to say that the BEOG program is now widely recognized as the pivotal feature of federal postsecondary educational assistance in the Congress, in the Executive Branch, and among the concerned public including spokesmen for postsecondary education. Current efforts are directed to improving the administration of the program, and to funding it more adequately, rather than to its elimination.

The G. I. Bill for post-Korean veterans¹ provides a basic entitlement to veterans who have served for at least 181 days. The entitlement is for a period of 1 1/2 times active duty, e.g., 18 months of active

¹Public Law 358, 89th Congress, June 1, 1966.

duty provides 27 months of entitlement. The maximum entitlement, however, is for 36 months except that time to complete high school or to complete required refresher, remedial or deficiency courses may be added on. Fifty dollars a month is permitted for such "preparatory" work up to a maximum of \$450.

Basic assistance for full-time schooling is \$230 a month for a single person with eligibility limited to 10 years. Vocational counseling is provided on request and one optional change of program is permitted with additional ones allowed if accompanied by Veterans Administration (V. A.) counseling. A variety of other details regarding training are spelled out in the act as amended.

The G. I. Bill is, of course, not a general entitlement but is service-connected. As such, it usefully illustrates the kinds of provisions which might characterize any public-service related entitlement program for postsecondary education.

The New York State Tuition Assistance Program (TAP) was introduced in the New York Assembly in January 1974 and passed in that year.¹ TAP has the objective of increasing financial aid to full-time undergraduate students through a tuition-related award program. It also seeks to assist the private institutions of the state through the payment of differential amounts to qualified students, depending on the tuition charges of the institutions they attend.

¹Information on the TAP is drawn from an unpublished paper by Gordon B. Van de Water, "Public Aid for the Private Sector -- the New York Experience," April 1974, Syracuse University.

For freshmen and sophomores, TAP awards are based on \$1,700 tuition, or one-half of tuition plus \$1,500, whichever is less. Awards are progressively scaled down as family net taxable income rises. For juniors and seniors, the awards are \$200 less in recognition of their greater earning power. A student with a family net taxable income of \$2,000, attending a private institution, would receive \$1,700 a year for his first two years and \$1,500 for his last two. The same student attending a State University of New York (SUNY) lower division campus, where the tuition is \$640, would receive that amount. It would be \$600 in a SUNY upper division campus. A net taxable family income of \$12,000 would yield \$970 and \$770, respectively, for the first two years and last two years in a private institution. On a SUNY campus, a student in the \$12,000 income bracket would receive \$100 for each of the four years.

Other New York State student aid programs are gradually being phased out or modified as TAP is phased in.

Whether TAP will, in fact, aid the private institutions in New York remains to be seen. One thing is quite certain. Tuition increases in the private sector have risen about 10 percent for the 1975-6 academic year. They are quite likely to continue to spiral as long as inflation is a feature of the economy. The gap-closing features of TAP, unless it is tied to a cost of living index, will be unsuccessful. While public institutions in New York may also raise their tuitions, this appears to be a politically unacceptable route to follow, and thus is unlikely to occur, at least to any substantial extent.

However, TAP, coupled with the federal BEOG program and other forms of federal and institutional assistance, should enable a substantial number of students, at least in the immediate situation, to attend institutions of their choice, whether they be public or private.

Norman D. Kurland, Director of the Study of Adult Education in the State Education Department of New York, has developed two proposals for entitlements. The first is a general scheme, the summary of which states the following:

Every American age (16)¹ and over would have a lifelong educational entitlement. An individual would be able to use his entitlement at any time for any approved educational expenditure such as guidance services, tuition, and materials, as well as for maintenance. In addition, a portion of the entitlement may be used to support educational and cultural programs in which the individual shares benefits with others, such as support of public television stations. After a specified age (35), the entitlement could also be used for income maintenance for a sabbatical period.

The plan suggests ways of dealing with differential costs to the student in public and private higher education institutions. It also recognizes that there may be some groups for which additional provisions must be made if the goal of equality of opportunity is to be realized.

On financing, two basic alternatives are examined: an earmarked tax and trust fund approach like Social Security and a general revenue approach. In either case, a certain amount of expenditures for existing programs would be reduced, so that the net amount of new money required could vary from almost none to about \$6-7 billion annually depending upon how large the entitlements are to be and which current programs are displaced.

What the entitlement approach basically does is shift a major portion of decisions regarding educational expenditures away from government and provider institutions to the individual and it makes public support policy "age-neutral" and virtually

¹Numbers are in parenthesis to indicate that they are illustrative at this point.

neutral as to the time, duration, place and manner in which adults learn.

A second Kurland entitlement proposal, dealing essentially with adult education, has been discussed in terms of a "bill." However, as he notes, no bill has been drafted and the reference is simply for purposes of convenience. The following paragraphs present in summary form this proposal.

The bill provides financial assistance to/all/selected groups of/adults to assist them in undertaking learning activities at any time in their lives and it provides for needed support arrangements to help adults use their learning benefit more effectively.

The bill recognizes the growing importance of life-long learning to the future viability of American society and marks a major commitment of the American people to the goal of equity of access to learning opportunities for all Americans.

The main provisions of the bill are:

1. Every adult American (25)* and older would receive an annual Educational Entitlement (EE) which in the first year of the program would be worth (\$200).
2. The EE could be used for any of a broad range of educational activities including counseling, tuition, purchase of educational materials, support while studying, contributions to educational and cultural agencies, and other activities specified in the bill.
3. Unused EE would remain available throughout the individual's life and would earn interest at a rate specified in the bill.
4. At any time prior to age (65) that an individual had used all of his EE he could draw upon his future EE. The amount he could draw would be found by multiplying the current year's EE by the difference between his present age and (65).

¹Numbers placed in parenthesis indicate that they are subject to change.

5. Persons over (65) would continue to receive annual EE but would not have drawing rights.

6. The EE will be managed by a public corporation established for the purpose, with structure and duties prescribed in the bill.

7. The Congress shall/annually appropriate funds/ or: provide a special tax/ to meet the claims against the corporation and for operating expenses. The corporation shall have the power to issue bonds, adjust the interest rate on the EE, and do such other things as may be required.

8. Each individual will have an EE account with the corporation and will draw against it by writing checks to eligible providers of EE services.

9. The states will determine which organizations shall be eligible to receive EE funds under guidelines to be set by the Secretary of HEW. The states will similarly have responsibility for monitoring the performance of providers.

10. EE will be treated as taxable income in the year used.

11. An individual who prior to age (25) shall have had any educational benefits paid for directly or indirectly by public funds, shall have the age at which the EE begins increased by one year for each year in which his public support exceeded the EE in the year in which he became (25), except that support to complete high school or its equivalent will not be counted.

12. Funds are authorized to enable each state to establish a system of information and counseling services to insure that persons wishing to use their EE know what educational alternatives are available to them and to insure that they have help, if needed, in planning their education. Included are provisions to insure maximum utilization of existing services.¹

Herbert E. Striner has proposed a national educational entitlement as a means of dealing with unemployment, inflation and low-productivity as well as worker dissatisfaction. His scheme is based on western European experience where education has been used to stabilize and expand employment. He describes it as follows:

¹Unpublished draft paper by Norman D. Kurland, "Financing Life-Long Learning," The State Department of Education, Albany, February 5, 1975.

1. A permanent education and training law should be enacted, which makes it a right for every worker over the age of 17 to pursue an education-training program. Such a program could be for as long as 24 months, on a full-time basis, with all educational costs and a personal income stipend provided. The stipend should approximate, on the average, three-fourths of the worker's immediately prior employment income; it should relate to the size of the family or number of dependents, as well as prior employment income, with a reasonable upper limit. For those with no prior work experience, a stipend should be provided to cover basic living needs. This new law should specify that additional funds are to be made available for special things necessary for successful education-training programs and placement; e.g., travel, short-period housing, special tools, etc.

2. The new act should federalize all state unemployment insurance funds and convert them into a National Economic Security Fund. The NESF would fund both the new education-training program and unemployment security benefits. The latter would be for those whose unemployment is probably short term -- for those whose reemployment in the same skill, company, or industry is held to be likely within six months. Two years after enactment of the new law, the NESF should be supported by a 1.5 percent payroll tax, shared equally by the employer and employee on all wages up to \$9,000. The objective would be that of producing sufficient income to fund training and stipend costs as well as unemployment security benefits. When one looks at the relevant data given (p. 72) for our present unemployment insurance system, it would appear that the 1.5 percent payroll tax on all wages up to \$9,000 would more than meet the financial demands of the program envisioned.

Given the present (1971) distribution of income in the United States, a 1.5 percent tax on all wages and salaries of all income earners would yield a return of \$7.5 billion. By 1975 this figure would be approximately \$9 billion. Thus, a continuing education and training program costing \$6-7 billion for one percent of the labor force would be possible without using any unemployment insurance reserves, if the suggested program were to be placed in operation in 1973.

3. The new act should, in addition to providing direct funding to students, provide for institutional grants to encourage the development, expansion, and availability of education-training courses and programs designed to meet the goals of the act. Basic education in reading, communications, and computation is to be the keystone in this effort. Every skill or training program must have a reading comprehension unit capable of bringing the student up to the necessary level of reading competency for skill training.

4. The act should stipulate that the student or trainee will receive NESF reimbursement for attending any accredited institution of his choice, and that the sole criterion for institutional grants is accreditation. Care should be exercised in making grants to ensure that redundant facilities, be they public or private, are minimal. All institutional grants should call for the submittal of program plans clearly establishing objectives and accountability standards. All funded institutions should have adequate counseling and placement staffs or plans which relate their education-training programs to existing counseling and placement resources. If the latter is the case, these interinstitutional arrangements should be evaluated annually to determine effectiveness. The use of private, for-profit educational and training institutions should be encouraged under this act. Any sudden increase in the numbers of people returning into educational and skill-training programs will call for the use of all of our facilities. Up until now, our for-profit training institutions have been under-utilized by federally funded programs. Public purse strings have too often been limited to public school programs, many of which have been inadequate. The focus should be on how best to train or retrain workers for our nation's manpower needs; this will, of course, mean using for-profit institutions whenever their instruction and facilities are best suited to the program at hand.

5. NESF payments for counseling, testing, and placement should be made to all persons or agencies, private as well as public, providing such services. The present state employment services should also be reimbursed for counseling, testing, and placement activities which they are called upon to provide for education-training programs under this act.

6. NESF grants should be made for the establishment of special residential education-training programs. In this case, individual personal income stipends should be reduced to reflect the food and housing costs assumed by the residential facility. A major group to benefit would be the prison and ex-inmate population. Education and training centers could be established in detention or correctional institutions, funded under this program. After leaving an institution, the ex-inmates would be eligible for subsidized reentry (or for many of them first entry) into an educational and training program.

7. The implementation of this continuing education and training act and the utilization of NESF call for a type of administrative organization which does not exist at present

in any of the executive agencies of the federal government. The organization would need a combination of backgrounds in adult education, manpower services, and economic development. For the first several years, this new program must be free of the shackles of prior agency commitments and personnel. In addition, because of its cross-agency responsibilities, it should have the direct support of the Executive Office of the President. Thus, for the first several years of its existence, I suggest that a special Bureau of Continuing Training be established in the Office of Management and Budget to bring this new program to life. Following an operational experience of several years, in which patterns of operation and precedents would be established, the function of this bureau could then be moved to a regular agency, or to a newly created agency.¹

Benson and Hodgkinson have proposed an entitlement scheme within the context of a variety of aid and other measures in order to eliminate the class-induced differentiations which now characterize participation in postsecondary education. In their words:

To free college eligibility attendance from the influence of social class represents the greatest opportunity to improve the efficiency of higher education within our grasp. Today, unless he is extraordinarily gifted intellectually or physically, a poor youth is unlikely to attend a four-year public institution and highly unlikely to attend a prestigious private institution, plainly a situation that needs correction. Students of similar competence should have the same chance and incentive to go to college regardless of the income or personal assets of their parents, both of which are irrelevant to the decision of going to college or not.

There are two important objectives at stake: moving from a regressive system for distributing educational services, one that favors the privileged classes, toward a fair, progressive system; and shifting the distribution of income from older to younger families.

We propose the following measures to achieve these objectives. First, the practice of charging low or zero tuition fees in public institutions should be continued. Second, all students, regardless of parental income, should be provided maintenance grants of \$2,000 for four years. Third, all students should

¹Continuing Education as a National Capital Investment, Herbert E. Striner, The W. E. Upjohn Institute for Employment Research, Kalamazoo, Michigan, March 1972.

be provided tuition grants up to the value of two years' worth of fees in representative private institutions. Fourth, these financial arrangements should be accompanied by a supplementary, national income-contingent loan plan. Fifth, to avoid discrimination against persons who do not choose to attend college immediately after high school or who are not eligible at that time, the financial arrangement should be available at any time during a person's adult life, for discontinuous or part-time attendance. Sixth, a broad range of institutions should be available. The present hierarchical plan should give way to a regional pattern of specialization, to allow a person to study in more than one institution, serially or simultaneously.¹

¹Implementing the Learning Society, Charles S. Benson, Harold L. Hodgkinson, Jossey-Bass, San Francisco, 1974, pp. 118-119.

III. ADMINISTRATIVE ISSUES

The discussion which follows deals with issues which, for the most part, would arise in connection with either a limited experimental program or a full-scale national program. Consequently, no distinction is drawn. However, the model most frequently in mind in thinking through these issues has been a full-scale national program. Section V below considers two possible next steps in pursuing the entitlement idea. One of these is a limited experimental program and certain of the administrative problems in and approaches to such an experiment are suggested.

The matter of political feasibility is taken up in Section IV below. The discussion of administrative issues which follows moves from a tacit assumption of political feasibility.

This section discusses the following: general administrative concerns; a new entitlement agency; determining the eligibility of participants; determining the eligibility of institutions and programs; protection of the student consumer; information, advice and counseling about entitlements; special issues relating to support services for participant; needs of employed participants, placement of participants; and evaluation of the entitlement experience.

General Administrative Concerns

We are assuming a primarily federally funded entitlement program with funds flowing from Washington to eligible individuals. But, we also assume a continued state role in funding students and institutions

in postsecondary education (although that role would undergo modification). And, we assume a continued mix of public, private, non-profit, proprietary, and business institutions involved in education and training.

As we have suggested elsewhere, while the federal role in postsecondary education is becoming dominant, it is important that a partnership arrangement be established among the federal government, the states and institutions, with leadership being supplied from Washington.¹ We would maintain that under a massive new entitlement program it would be essential for states and institutional representatives to be involved in planning the program; kept currently advised with respect to entitlement actions by the federal government; and be called upon to assist in appraising the institutions and programs offering education and training, for eligibility purposes, and for program evaluation on a post-hoc basis. There are probably other roles for states and institutions to play also. Suffice to note the importance of the federal government's approaching its responsibilities under entitlement legislation in a manner to be responsive to the partnership concept.

An additional general concern relates to the ability of the federal bureaucracy to administer a very large new, and in some respects, rather revolutionary scheme. If effective action is to occur, objectives, often very generally stated in law, must be further defined through interpretation and implementing regulations. There must be widespread awareness of objectives and a desire to achieve them. This may call for new attitudes and workways.

¹Honey and Hartle, Federal, State, Institutional Relationship in Postsecondary Education, Syracuse University Research Corporation, Syracuse, New York, February 1975.

A study by Jerome Murphy of Title I of the Elementary and Secondary Education Act (ESEA) revealed some of the problems in implementing federally-initiated reform and suggested the limited capacity of federal and state agencies to achieve hoped-for reform.

To blame the problems on timidity, incompetence, or "selling out" is to beg the question. I have identified a number of contributing causes: the reformers were not the implementers; inadequate staff; a disinclination to monitor; a law and tradition favoring local control; and absence of pressure from the poor. The primary cause, however, is political. The federal system -- with its dispersion of power and control -- not only permits but encourages the evasion and dilution of federal reform, making it nearly impossible for the federal administrator to impose program priorities; those not diluted by Congressional intervention, can be ignored during state and local implementation.¹

This dispersion of power and control makes it difficult for a program administrator to impose federal directives conflicting with local priorities, since the affected local interests can complain about federal bureaucrats to their congressman and their Washington-based lobby groups. Morton Grodzins' description of a good federal administrator is a classic:

{This dispersion of power} compels political activities on the part of the administrator. Without this activity he will have no program to administer. And the political activity of the administrator, like the administrative activity of the legislator, is often turned to representing in national programs the concern of state and local interests, as well as other interest group constituencies ... always [the administrator] must find support from legislators tied closely to state and local constituencies and state and local governments. The administrator at the center cannot succeed in his fundamental political role unless he shares power with these peripheral groups.²

¹Jerome T. Murphy, "Title I of ESEA: The politics of Implementing Federal Education Reform," Harvard Educational Review 41 (1971): 60.

²Morton Grodzins, The American System: A New View of Government in the United States (Chicago: Rand McNally and Company, 1966), p. 270.

Consequently, translating an innovative reform act into action is made by incremental, marginal changes, not great leaps forward.

Another uncertainty inherent in administering an entitlement plan would be the role into which OE would be cast. Traditionally a thinly staffed, relatively low-prestige agency, OE would have to assume administrative control of a budget much larger than anything it had ever dealt with before. We have cited suggestive figures above. Setting aside the political realities of obtaining such substantial sums, the potential administrative demands in managing the program could be overwhelming. Bailey and Mosher's study of ESEA, a bill with only a fraction of the fiscal impact of a fully operational entitlement plan, described the process of implementation this way:

When, as in the case of ESEA, a law unprecedented in scope has to be administered through state and local instrumentalities, on an impossible time schedule, by an understaffed agency in structural turmoil, beset by a deluge of complaints and demands for clarification of the legislation at hand, as well as cognate legislation already on the books, the wonder is not that mistakes are made -- the wonder is that the law is implemented at all.¹

Also, experience with program implementation suggests that simplicity in policies is much to be desired. The fewer the steps involved in carrying out the program, the fewer the opportunities for disaster to overtake it. The more directly the policy aims at its target, and the fewer the decisions involved in its ultimate realization, then the greater the likelihood it will be implemented.

¹Bailey and Mosher, ESEA: The Office of Education Administers a Law (Syracuse: Syracuse University Press, 1968), p. 99.

Finally, no matter how the federal government is organized or re-organized, virtually all social programs cut across the jurisdictions of different bureaus, departments, and overhead agencies. This requires extensive clearance, and there is no easy means to accomplish this. New programs often find (as did several of the reform-minded "Great Society" programs) that they must fit into arrangements that have been made with other purposes in mind.

The above points suggest that an entitlement program would require special administrative machinery in HEW. At the minimum, the program would call for a substantial number of people trained in management, evaluation and program development. It would be a bitter disappointment to raise citizens' hopes in anticipation of an entitlement program and then fail to deliver because of inept administration.

A New Entitlement Agency

Given the massive size of the projected program, and other problems and issues alluded to above, it is suggested that a new agency, the Postsecondary Entitlement Administration (PSEA) be placed under the Assistant Secretary for Education on a par with the National Institute of Education, the Office of Education, the Fund for the Improvement of Postsecondary Education and the National Center for Educational Statistics. PSEA would have a director who reports to the Assistant Secretary for Education. In addition to coordination of other postsecondary programs with the Deputy Commissioner for Higher Education in OE, PSEA would be responsible for coordination with other federal agencies having entitlement-related

activities, e.g., Social Security Administration and Veterans Administration, and with the states.

The ongoing developmental and administrative responsibilities of PSEA would focus on eligibility of participants; eligibility of education and training institutions; consumerism issues; information advice and counseling; support services for participants; special issues relating to employed participants; and evaluation of the PSE experience.

Determining the Eligibility of Participants

In his discussion of this subject, Levin (pp. 25-26) has indicated that any person reaching the age of eighteen should be eligible to receive a postsecondary entitlement. He has suggested that for those below the entitlement age who have graduated from high school the entitlement should be available. Questions have been raised as to whether high school completion ought to be a prerequisite to eligibility for those below eighteen. Some number of high school dropouts might be ready to undertake vocational and career-related training before the age of eligibility. A reasonable solution might be that the eligibility of below eighteen year olds who have not completed high school could be determined by counselors associated with the advisory services which are discussed below. One of the responsibilities of counselors, who have been especially trained for the purpose, might be to certify that below eighteen year olds who are interested in eligibility have developed educational or training plans which are career-related and thus merit an entitlement.

Since Levin, in his paper, speaks of eligibility lasting over the lifetime of the individual, there would appear to be no further question

of who is eligible after age eighteen. If eligibility is limited to a lower age, say 45, on grounds of financial feasibility and social benefit (should society pay for the education of older persons who will have only a few years in which to apply their learning?) some political issues may arise. We would not anticipate particular administrative problems, however.

Under a limited experimental program participants might be selected nationally on a stratified sample basis (much in the way in which national opinion polls construct samples). Or, participants might be selected by lottery if a limited experiment is to be tried out in one state or region.

Determining the Eligibility of Educational and Training Institutions and Programs

The question of eligibility of training institutions and programs to provide services to those holding entitlements is considered here separately from issues of consumer protection. Obviously, they are inter-related matters and Levin addresses both together (pp. 29-32). We believe it is clarifying to discuss them separately while bearing in mind their close connection.

In considering eligibility, a distinction is noted between institutions and programs. Obviously, some institutions, such as a Harvard or a Berkeley, maintain such high standards and are so widely acclaimed as first-rate in all their components that they are institutionally eligible. Others, perhaps especially in the proprietary sector, are not

strong in all of their programs but may, in fact, offer one or more which are solidly competent. Thus, arrangements which permit determinations of eligibility for institutions, or for programs within institutions, are desirable.

The World War II G. I. Bill had clearly demonstrated that unless institutions and programs were screened and, to some degree, regulated, the availability of large sums of federal dollars for education and training would generate numerous shoddy fly-by-night educational activities. Indeed, when the Korean G. I. Bill was passed in 1952, it provided that no course offered by a private proprietary school was authorized for veteran enrollment unless the school had been in existence for two years prior to approval and at least 15 percent of the enrollees were non-veterans.¹

At the present time, the Office of Education depends on accreditation of institutions as the means of determining which ones will be eligible to receive federal funds under its existing entitlement programs. As Orlans, et al., have summarized, the meaning and origins of accreditation² one idea underlies the system: the status of being accredited is worthy. Six regional accrediting associations came into being in the 19th century to articulate the level and content of instruction in high schools and colleges. By the first third of this century the emphasis was shifted to

¹Report of Educational Testing Service, Princeton University, on Educational Assistance Programs for Veterans, September 19, 1973, 93rd Congress, 1st Session, House Committee Print No. 81, G.P.O., Washington, D. C., p. 181.

²Private Accreditation and Public Eligibility. Prepared for the U. S. Office of Education under contracts with the Brookings Institution and the National Academy of Public Administration Foundation, Washington, D. C., October 1974, p. 37.

judging whether each institution was achieving its own goals. A National Commission on Accrediting (NCA) was formed in 1949 by institutional heads who were concerned with having more control over their own institutions. The NCA is being replaced in 1975 by the Council on Postsecondary Accreditation which will absorb the Federation of Regional Accrediting Commissions of Higher Education and include representatives of agencies accrediting specialized programs, proprietary schools and the public.

Current practice in OE regarding accreditation tends to work to the advantage of those schools in the traditional collegiate sector of postsecondary education. Of the 2,738 degree-granting institutions of higher education listed in the 1973-74 Higher Education Directory, over 2,200 or 80 percent were fully accredited by regional commissions while more than 350 or 13 percent held "candidate" status; only 7 percent (about 190) were neither accredited nor negotiating for accreditation.¹ Thus, one may conclude, regional accreditation has virtually lost its power of discriminating among higher education institutions.

The opposite situation exists in the proprietary sector. Here estimates suggest that accreditation includes from 28 to 17 percent or less of the universe of 6-10,000 or more proprietary schools. In some states the number of accredited schools has been too small to meet public needs. Orlans explains the public policy implications of this situation in the following manner:

¹Robert Kirkwood, 2491, A Report on the Federation of Regional Accreditation Commission of Higher Education, Washington, D. C., October 24, 1973, p. 5.

...in early 1973, 21 states had two or less accredited trade and technical schools and seven states, two or less accredited business schools. Nationally, goodly numbers of reputable proprietary schools (not to mention public and nonprofit vocational schools offering similar training) remain unaccredited. They are, therefore, ineligible for OE student aid programs, though many have participated satisfactorily in vocational rehabilitation and manpower training programs administered by individual contracts -- i.e., state vocational and employment office staff have monitored their training and job placement performance and found them satisfactory. (pp. 480-481)

Frank Newman, in a study authorized by the Secretary of HEW in 1973, recommended that national standards of institutional eligibility, divorced from standards of educational quality, and thus from reliance on the accrediting agencies, be set up. An institution would be eligible if it is financially responsible, i.e., accountable for use of student and public funds; its recruitment and public information policies are honest and accurate; it provides a prospectus on its financial and educational status; and it conducts a program of some educational value for some clients. Newman proposed that a National Commission on Institutional Eligibility be created to serve as an eligibility grantor for schools which do not fall within the purview of an agency recognized to determine eligibility, and to act as an appeal board for institutions denied eligibility.

The 1974 Orlans study is the current definitive work on accreditation and eligibility. Orlans concludes that accreditation should continue to be used for eligibility purposes but that unaccredited institutions should have a chance to gain eligibility. To this end he recommends the establishment of a private Committee for Identifying Useful Postsecondary

Schools to give selected unaccredited schools and programs an opportunity to become eligible for federal programs. In part Orlans says (p. 17), "OEs basic stance of relying heavily on accrediting agencies with monopolistic powers and subjecting them to increasing scrutiny should be changed to a policy of relying less heavily on the agencies, of recognizing more than one agency in a given area or field, and of specifying additional conditions with which all institutions must comply to acquire and maintain eligibility."

While Orlans believes eligibility determination should remain in federal hands, he indicates that the states "can be most helpful in monitoring compliance with OE regulations and alerting Washington and regional HEW staff to developments which might jeopardize a school's eligibility." To this end he recommends federal funds to the states for training state education staff and to assist with the costs of providing information about postsecondary schools.

Our own recommendation is that the proposed Postsecondary Entitlement Agency be given the responsibility for setting entitlement policy. Tentatively, we would follow Orlans' recommendation of continued use of accreditation; the setting up of a Committee for Identifying Useful Postsecondary schools (and Programs); and providing assistance to the states for their more full and effective involvement in the ongoing maintenance, review and extension of institutional and program eligibility. Indeed, we would emphasize the latter as a direction in which to move under well-defined federal standards.

Protection of the Student Consumers

In response to a growing concern with the protection of the student in postsecondary education, the Education Commission of the States (ECS) held a conference in mid-1974. The conference described as "minimal safeguards" recommendations that the states provide, in law and regulation, for equitable tuition refund policies, licensing and bonding of school agents, specifications for contracts between students and institutions, and minimal standards for advertising and recruitment. Orlans et al., in discussing student protection (p. 49 ff), endorsed the ECS recommendations.

Levin (p. 30 ff) discusses several aspects of consumer protection as follows: "...participating programs should meet minimal requirements with respect to financial accountability, educational and training content, procedures for handling complaints and the provision of information on their operations. Second, specific training and apprenticeship programs should be covered by a standard contract between the PSE authorities and the participating institution that describes the nature of the training program, the amount of each type of instruction, major equipment that will be utilized, methods of evaluation of results, and proficiency goals for the program. Finally, any institution or program that is eligible for PSE programs must agree to periodic auditing on either a random basis or on the basis of complaints by participants."

We endorse these recommendations, with certain additional emphases. First, in our view all PSE arrangements with institutions or programs should be carried out on the basis of contractual agreements with the

students. There is a growing use of contracts in collegiate institutions and we favor this. Thus, contracts should not be limited to training by proprietary educational or business enterprises.

Second, a much closer understanding is needed of the competencies which are necessary for particular professions, occupations, careers, or trades. Thus, we favor continuing analyses of required competencies so that programs, and the contracts which apply to them, can more accurately describe educational and training expectations. This can also reduce the hazard of entitlements serving as a means of confirming existing practice, some of which is outmoded. The federal Postsecondary Entitlement Administration (PSEA) should take the lead in encouraging studies of required competencies.

Third, the Postsecondary Entitlement Administration (PSEA) should also assume responsibility for promulgating guidelines for all aspects of consumer protection. The states should be expected, with federal financial assistance, to serve as the administering instrumentality for consumer protection regulations and should be the first locus, after institutions, of complaints and appeals. Ultimately, the PSEA must determine whether eligibility will be withdrawn from particular institutions or programs for violations of contracts and other consumer protection conditions.

Information, Advice and Counseling About Entitlements

One major national goal identified by the National Commission on the Financing of Postsecondary Education was that "each individual...be

able to enroll in some form of postsecondary education appropriate to that person's needs, capability and motivation." The Commission added, however, that access by itself can be meaningless: "access is dependent upon information; that is, potential students must be informed about the programs offered by the individual institutions -- their strengths and weaknesses, expectations about student achievement, and the availability of financial and other assistance."¹

As American society moves toward acceptance and encouragement of other forms of education beyond the high school than traditional college education, one major need is to provide good information to prospective students. Most college-bound students consult such well-known sources as Barron's Guide, Lovejoy's Guide, and the College Handbook (to mention a few of the most popular) before deciding upon a school. The information provided in these guides typically includes subjects such as:

| | |
|-----------------------|--|
| <u>Admissions:</u> | Requirements and percentage of students accepted. |
| <u>Enrollment:</u> | |
| <u>Campus:</u> | Size, environment, dormitory capacity. |
| <u>Costs:</u> | Tuition, room and board, books and supplies, fees. |
| <u>Financial Aid:</u> | Scholarships, loans, grants, and availability of work-study, percentage of students currently receiving aid. |
| <u>Programs:</u> | Degrees granted, distribution of study programs, special programs offered. |
| <u>Calendar:</u> | |

¹The National Commission on the Financing of Postsecondary Education, Financing Postsecondary Education in the United States, Government Printing Office, Washington, D. C., December 1973, p. 55.

Accreditation Status:Learning Environment: Library size, student-teacher ratio.Student Life: Sports, clubs, publications, regulations.Off-Campus Atmosphere: Culture, recreation, nearby colleges.

These guides have been recently referred to as "mountains of sterile facts." Orlans points to the "refreshing selection of facts, irreverent style, and blunt opinions" in such handbooks as The Underground Guide to the College of Your Choice and The Insider's Guide to Colleges. The extracts below from The Insider's Guide make little effort to restrict themselves to official data or journalistic objectivity in describing their subjects:¹

While the Sierra Club member will find _____ College a veritable Eden, the cosmopolitan student will more than likely find his four years there to be comparable to Christ's forty days in the wilderness of Judah....

_____ College's students are middle-minded, middle class, and of middling ability.... Freshmen are used to a 12:30 curfew easily. Parking a la high school, is prevalent....

Despite the fine academic reputation at _____ College, social climbing is still an honored tradition.... Late model cars and well-stocked wardrobes are nearly universal -- and are items you would do well to consider if you're thinking of attending _____....

There is no typical student -- the university accommodates the whole gamut of student types. From freaks to jocks and intellectuals to hardhats.... Drinkers still predominate, but grass abounds.... Some are impressed with _____'s prestige. Just a step below the Ivies and on a par with _____ and _____ they would have you believe. Don't. Academically, _____ rates as a lemon, capable of fooling any buyer....

¹Yale Daily News. The Insider's Guide to the Colleges (New York: Berkeley Books, 1972) various excerpts.

Academically _____ is a fine college and getting better.... The departments are obviously strong, although math has slipped and sociology is understaffed.... Grading is not exceedingly tough; the average grade point is 2.9 on a 4 point scale....

In direct contrast to the situation in the collegiate sector where information is relatively plentiful, there is a paucity of useful data about opportunities in the non-traditional sector of education. One problem is that only now an accurate inventory of proprietary schools is becoming available. There is a continual ebb and flow of such schools as new ones are launched and unsuccessful ones close their doors. Less than half of all states license the operations of private vocational schools and a considerably smaller proportion take any measures to evaluate instructional courses.

Harvey Belitsky has pointed out some information that a potential student can seek in attempting to select a proprietary school.

In the absence of dependable data on the employment experiences of private vocational school graduates, only indirect and qualified impressions are possible. In the first place the utilization of the schools under numerous government-financed training programs represents a measure of the confidence placed in the courses, teachers, and managements. Second, close contacts between the schools and employers are likely to ensure the presentation of "relevant" training. Third, graduates recommend the schools to others, and in fact they are a principal source of new students; thus they must have been pleased with the training and employment received.¹

There is little reason to believe, however, that all students are cautious enough to make such a careful study of the institution he or she is considering.

For those with the time, energy, and money to pursue a more detailed search there are, of course, other avenues to explore. Computer-based

¹Belitsky, Harvey A., The W. E. Upjohn Institute for Employment Research, Private Vocational Schools, Kalamazoo Michigan, June 1970.

information systems, for example, represent one of the more recent innovations in career guidance. But, such systems are being adopted much more slowly than had been anticipated a few years ago. Several systems developed recently have been unable to continue operations because of high costs and/or poor conceptualization.¹

The most personal, and also the most expensive form of dissemination of educational information is through counseling services. Such services are offered by public and private counseling agencies, social welfare agencies, high school guidance counselors, and college admissions officers and others.

One example is the Regional Learning Service (RLS) operating in a five-county area of central New York State, with headquarters in Syracuse. The RLS is designed to bridge the gap between educational opportunities and those interested in pursuing some form of postsecondary education. The clientele varies in terms of age, experiences, and career goals. Counseling is provided by trained personnel either through personal contact or over the telephone, depending upon the need of the individual. The client is assisted to do the following: explore career alternatives; discover educational requirements for careers; establish goals; diagnose progress toward goals; choose appropriate educational or training programs; apply for entrance, financial aid and advance credit; and prepare for academic evaluation. A fee is charged for the service.

¹One example of a published guide which is comprehensive for a metropolitan area is the Prospect Union Educational Exchange publication Educational Opportunities of Greater Boston. This report is designed to protect consumers against fraudulent or incompetent schools. It includes a list of all day and evening classes as well as home study courses available at local institutions. There is no fee to the schools listed and a small charge to buy the publication.

A similar program is the Career Counseling Service of the Education Development Center (EDC) (Newton, Massachusetts). This program aims at "home-based" individuals; that is, those not working or studying on a full-time basis. Through professional counseling, individuals are encouraged to make a decision about their status, i.e., to return to school, seek employment, or even remain "home-based." The thrust is to advise individuals of opportunities that may be open to them. Unlike many other counseling operations, no fee is charged.

Services similar to those, though generally much less comprehensive, are offered by a number of agencies across the country that provide educational, vocational, and personal counseling not requiring long-term consultations. The primary problem with many counseling organizations is that they must charge a fee for their services. Fees range from \$25.00 per hour to \$160.00 per case. The initial experience of the Regional Learning Service suggests that many are unwilling or unable to pay a fee.

If a major rationale for an entitlement plan is to enable citizens to prepare for careers that meet their needs and interests, then allowing students to spend a small portion of their entitlements to acquire information and counseling would appear to be wise policy. This would enable them to make informed decisions and to use their entitlements more effectively.

Responsibility for the development of adequate informational and counseling services, on a national scale, should, we believe, reside with

the federal government as a concomitant of a national entitlement scheme. Obviously, extensive decentralization of the services would be called for. We believe that the proposed Postsecondary Entitlement Administration should develop guidelines for the states to establish comprehensive postsecondary information services and should provide federal funds to assist the states. Encouragement should be given to incorporating and building on existing centralized information services and to utilizing national channels to assist the states, e.g., associations of institutions, professional societies, etc. Care will need to be taken to avoid simply sanctifying existing practices, however.

Closely associated with the development of statewide information systems should be the creation, through the states, of regional advisory services of the types discussed above. This will be a very costly endeavor (if modeled on the Regional Learning Service of Central New York or the Career Counseling Service of Providence). We do not, however, see any escape from the necessity to provide informed, professionally-grounded advice to entitlement holders if the vast federal resources involved in entitlements are to be well applied. Obviously, institutions will carry some of the burden. But, especially for that substantial number of persons who come from family backgrounds which are not attuned to postsecondary and career education; who have had inadequate counseling in school; who are very unclear about career aspirations; or who want in mid-life to change careers or to start careers outside of the home,

broad counseling assistance and first-rate information services will be essential.¹

Special Issues

The paragraphs following consider briefly issues related to support services for participants, needs of employed participants, and placement of participants.

Support services for participants may be considered to include remedial educational programs for those who lack basic skills necessary to participate in a postsecondary entitlement program. They may also include a range of other services such as child care, transportation, legal assistance, health services, emergency aid and residential support.²

One view is that PSE participants, on the advice of counselors, should be permitted to use some limited portion of the entitlement for remedial training.

With respect to other support services, we believe that they should be made available through public financing (e.g., child care centers,

¹See Levin, p. 33 ff. Also, for a discussion which carries much that is suggestive of the rationale for good informational and counseling services, see Levin, pp. 38-51. In this section, Levin considers issues of social class, race, sex, age and urban-rural or geographical implications in the entitlement idea. While Levin does not make a case for counseling as an activity to be paid for by partial use of the entitlement, by implication he develops a strong rationale for doing so.

²See Program Activities and Services Guide for Prime Sponsors under the Comprehensive Employment and Training Act of 1973, U. S. Department of Labor, Manpower Administration, Washington, D. C., April 1974, pp. II-9 ff. This CETA guide is one of a series of CETA publications put out for the guidance of training contractors. The series is suggestive of useful approaches which might be taken by the proposed Postsecondary Entitlement Administration in providing guidance and information to postsecondary educational and training institutions.

obviously essential for mothers who wish to study or work; legal assistance for low income individuals; and subsidized health programs and public transportation) or should be funded out of low cost loans or state programs available to PSE recipients. While a great deal of public policy would need to be clarified before all such services are available under these suggested arrangements, we see the goals as being in this vein. It would also be essential that counseling and informational services be fully informed about the range of opportunities for support assistance.

The needs of employed participants will call for special attention. The matter of negotiated leave from work, either on a part-time or extended basis, is, of course, an essential for use of the PSE by those who are working. Some labor contracts provide for such leave. It will be necessary to make provision in virtually all labor contracts for educational leave if the PSE is to be a reality for the employed.

A number of firms now provide on-the-job training for employees. Such training is in most instances closely related to the needs of the individual business or industry. If PSEs were to be used to replace the firm's own investment in such training, a government subsidy for the firm would be the consequence. This is not an objective of the proposed entitlement plan, of course. Whether staff agencies responsible for eligibility can develop guidelines which will satisfactorily delineate the business and industrial training programs that warrant use of the PSE and those that do not, remains to be seen.

Placement assistance for participants who do not already have jobs to which they may return (in all likelihood the vast majority will not have such jobs or will not wish to go back to ones formerly held) will be an essential if the goal of career education is to be addressed. Clearly, the existing network of federal and state employment services must be used. This will require close cooperation between the proposed Postsecondary Entitlement Administration and the Department of Labor; state agencies responsible for the PSE program and state employment offices; counseling and advisory services; and institutional placement services.

We are assuming, of course, that informed counseling will be available to potential users of the PSE about market and employment conditions, antecedent to the start of training. We are also certain that in a fluid and somewhat volatile economy such as ours, there will be some mismatching between training taken and post-training employment opportunities. However, only if such mismatching is kept to a reasonable level (5%) can the PSE be viewed as successful both for individual participants and for the society.

Evaluation of the Program

Levin (pp. 35-36) has briefly discussed some of the types of information which will be needed for program evaluation and sees this as a responsibility for the overall agency administering the program. We concur with his observations. We also see the need for continuous program evaluation as an obligation of state participating agencies and of individual training institutions. The development of a comprehensive evaluation

system, which ultimately affords an appraisal of the adequacy of education and training provided, as measured by career satisfaction, is an enormous task. A number of writers on the subject of lifelong learning have noted the growth of evaluation as a specialized arena of expertise and recommend the establishment of specialized evaluation units in connection with experimental lifelong learning programs.¹ We recommend the establishment, in the proposed Postsecondary Entitlement Administration, of a special office which will concentrate on planning and administering a continuing evaluation of the program results of the PSE. Because of the frequent tendency in government agencies to devote more attention to evaluation of administrative processes than to program outcomes, we recommend that these two types of evaluation be conducted separately but in close consultation. Both are essential; administrative inadequacies can obviously frustrate accomplishing program goals.

¹See, for example, Hesburgh, Miller and Wharton, Patterns for Lifelong Learning, Jossey-Bass, San Francisco, 1973, and Vermilye (ed), Lifelong Learners -- A New Clientele for Higher Education, Jossey-Bass, San Francisco, 1974.

IV. POLITICAL CONSIDERATIONS

Two factors discussed in I above have a considerable bearing on the political reactions¹ which might be anticipated to the PSE idea. The first is the appraisal of rationales for such a broad entitlement and the second is the anticipated cost. On balance, while there is widespread appreciation of the potential individual and societal value in making life-long postsecondary education available to all, there is also a new realism about not expecting education per se to provide the solution to many grave societal ills. As for anticipated cost, our rather crude calculations have demonstrated the extremely large dollar outlay which would be required under almost any implementing formula.

The following discussion is based on information drawn from relevant literature, a limited number of conversations with knowledgeable persons that focused on the issue of political feasibility, and on our own considerable experience in working at the interfaces between government and postsecondary education. We offer assessments as to the likely reactions of the public in general; students; professionals in postsecondary education who are not institutional spokesmen; institutional spokesmen; educational associations; other leading lobbying groups; the states; and the Congress.

¹We use the term "political reactions" to mean the affirmative or negative judgments which might be expressed by various categories of interested citizens at the time when implementing legislation is being formulated in the Congress or the Executive Branch of the federal government.

The Public at Large

Given that higher learning is widely viewed as the route to social and economic advancement in our society, the idea of a national life-long entitlement would undoubtedly be viewed with great interest by a large number of citizens. The more cautious responses would begin to emerge as the specific aspects of the program such as tax costs, other types of benefits foregone, possibly favored treatment of some segments of the population over others, etc., are clarified. There are indications that especially with respect to postsecondary education, the middle class is feeling so heavily burdened there might be resistance to an entitlement designated especially to aid the poor. Some evidence also suggests that among the many needs which citizens want government to address, postsecondary education may not have priority. A recent study on federal aid to education concluded that "consideration of tax reform, health insurance, social security provisions, and welfare reform (not to mention the onrushing energy crisis) stands far higher on the federal agenda than a major initiative in (education)."¹

Students

The notion of a general life-long learning entitlement is exciting to students who are professionally oriented toward careers in academic or public administration if one can generalize from inquiry in a single institution. But, these professionals-in-the-making also ask hard questions about who will benefit most; about funding; and about other "public goods" foregone.

¹Timpone, "Reform Through Congress, Federal Aid to Students: Its Limited Future," Law and Contemporary Problems, School of Law, Duke University, Vol. XXXVIII, Winter-Spring 1974, No. 3, pp. 493-512. Nonetheless, we may assume that a debate on the PSE data would generate substantial public interest and that latent support is heavy.

It is probable that an organization like the National Student Lobby would take a strongly affirmative stand for the PSEs both out of conviction and political sophistication. The leadership of the Lobby is well aware that the programs which emerge from the Congress reflects judgments on the merits of competing ideas and of the voter strength behind them. They would probably see very strong support for PSEs on their part as a way of at least keeping that item on the national agenda. Among the Lobby's constituents it is likely that minority and economically disadvantaged students, middle and lower-middle class students, and those in public universities, colleges, community colleges, and in proprietary institutions would be the most enthusiastic backers.

Professionals in postsecondary education who are not primarily oriented to the welfare of a particular institution (e.g., foundation officials; researchers at research centers studying higher education, and administrators in education-related organizations) have been sounded out by Kurland with respect to his scheme for a life-long entitlement. Their response has been to express keen interest; to feel the idea has a future; to appreciate that many complex problems would have to be worked out; and to hope that it will be kept alive through further exploration and discussion. Prestigious study groups such as the Carnegie Commission have endorsed the entitlement concept with their "Two Years in the Bank" proposal.

Institutional Spokesmen

The most pronounced, but probably muted opposition, is likely to come from institutional leaders. Any general entitlement would consume

so many dollars that the aspirations of institutional spokesmen for other forms of aid, e.g., for general support, research, facilities, and even for institutionally-administered student aid, would almost certainly be thwarted. While the views which led to very negative reactions to the BEOG program in 1972 are to some extent suppressed by institutional spokesmen, those views had not died. And, for good reason. Vital as tuition is for the income side of the ledger for most universities and colleges, there are important needs which cannot be addressed with tuition dollars. Student aid monies allow institutions to attract diversified student bodies; research funds stimulate the intellectual life of the entire campus; facilities funds keep the physical enterprise intact. General support funds provide a degree of flexibility for innovation, for encouraging the experimenter, and for leavening the generally slow-to-change academic environment. If PSEs are to be achieved at the cost of even dreaming about these other forms of support, the price will be seen as much too high.

Some parts of collegiate institutions may be quite affirmative, however. Continuing and adult education programs have not had the status and the benefits available to other segments of their universities. Their clienteles are more likely to be of the "life-long learner" types. And, so they would be likely to see themselves at the forefront of institutional "readiness" to respond to such an entitlement scheme.

State institutions are likely to have a special problem with the Levin proposals. While they might be more inclined to support the

egalitarian implications inherent in the PSEs, than would private colleges and universities, it is quite unclear as to what the consequences might be for continued state government support. Would legislatures see the massive federal funding of PSEs as a signal that states' monies could be diverted to other pressing public needs? Since state institutions receive some 65 percent of their operating budgets from state governments, they can be justifiably concerned. Would state institutions become "federalized?" In view of the very limited exploration in the Levin paper of the impact of the PSEs on state financing, we can only speculate about these matters.

Proprietary institutions would, we suppose, embrace the life-long entitlement concept enthusiastically. They live entirely on student fees. They are already attuned to providing training to a wide age-range of students, many of whom are working. Proprietary programs do not follow academic calendars for the most part so that their schedules, and the variety of their offerings, make them attractive to much more than the traditional college age population.

Proprietaries should probably anticipate federal constraints on fee adjustments, beyond those tied to cost of living guidelines, for participants in the PSE program. They should probably also expect to encounter fairly rigorous program standards and consumer protection requirements. These may act as deterrents to their all-out political support for the PSE.

Educational Associations

The reactions of educational associations will mirror the views of their memberships. They tend to be more politically sophisticated,

however, since one of their major roles is in influencing the thinking of Congressmen, Senators, and Congressional staffs about postsecondary issues. They would thus be more alert, for example, to the strength of the egalitarian appeal of the PSE scheme than would many of their institutional heads (especially in the private sector). The associations with state funded memberships could be deeply concerned about the impact of a major federal entitlement program on state legislatures. The associations of proprietary schools would in all likelihood strongly back the entitlement idea while arguing against the imposition of too rigorous federal standards and constraints.

Other Leading Lobbying Groups

The reactions of such organizations as the National Education Association (NEA), the AFL-CIO and the U. S. Chamber of Commerce are fairly predictable. The NEA would probably have mixed views. It favors the extension of educational opportunity. It also believes that the federal government should meet between a quarter and a third of the costs of elementary-secondary education as contrasted with the current approximately 6-8 percent. And, it would undoubtedly feel that a higher priority exists in more adequately funding those levels of education than the postsecondary sector. Thus, it is likely that the NEA would not be a strong supporter of the PSE concept; indeed, it might be a vigorous opponent.

The AFL-CIO has long favored extension of postsecondary educational opportunity by the federal government. Its support would seem to be

assured unless it is clear that other higher priority social programs, e.g., health insurance and income maintenance would be seriously jeopardized.

The U. S. Chamber of Commerce, traditionally viewing education as the domain of the states, local communities and the private sector, would probably oppose a massive program of the kind envisaged here.

The States

In the absence of a clearer understanding as to how the PSE concept would affect the states, it is difficult to judge reaction. Obviously, given the fiscal difficulties which states are now experiencing, they would favor the PSEs if the consequence were an opportunity to substantially reduce state expenditures for postsecondary education. On the other hand, the cost of the PSEs, and the possible impact on other pending federal business, especially welfare reform, might cause many states to withhold strong endorsement. The Education Commission of the States (ECS) has favored extension of educational opportunity and would probably endorse the idea while perhaps questioning timing and detail. It is certain that ECS as well as individual spokesmen for the states would feel strongly that the administration of any new massive federal entitlement program must be administered in such a manner as to complement and be supportive of state planning, coordination and investment in postsecondary education.

Congressional Reaction

The Congress is on record as favoring entitlements (for low income students) which, if funded to the authorized level, would require an outlay of from one to two billions of dollars. This is viewed as too costly and so the BEOG program has been phased in gradually with the average entitlement falling far below the authorized maximum of \$1,400.

Congress is also on record as being unenthusiastic about institutional aid. As one Congressman, very influential with regard to postsecondary legislation, put it: "I don't trust the colleges and universities. Federal institutional money just drops into the pot. We never hear of it again. It does nothing for me. But, if I work to see that the Johnnys in my district get funds to go to college, everyone knows about it -- his family, his neighbors, his friends. It helps Johnny; it helps me."

On the face of it, then, the PSE proposal, except for questions of cost, should be appealing to the Congress. Recently, in hearings before the House Subcommittee on Postsecondary Education, Charles Saunders, speaking for the American Council on Education, said "...adequate funding is our first priority in reviewing student aid legislation.... All the past and future promises of equal educational opportunity remains empty rhetoric until the authorizing legislation establishes the Basic Educational Opportunity Grant (BEOG) as a true entitlement."¹ Representative James O'Hara (D-Michigan), replied that he did not foresee appropriations in the future sufficient to fully fund the BEOG program.

It is thus clearly outside of political reality to suppose that the PSEs, costing so much more, could be funded. An experimental program, costing much less, but testing the idea, is not likely to be well received either. Implied in supporting an experiment is serious interest in ultimately backing a full-scale endeavor. If BEOG's can't be fully funded, are we really to expect a multi-billion PSE program to be funded?

¹Higher Education and National Affairs, American Council on Education, Washington, D. C., March 14, 1975.

The fundamental reason is not to be found in anti-postsecondary sentiments, or anti-federal-government-in-the-postsecondary-business views, but in the priorities which are on the Congressional agenda. To most Congressmen, welfare reform, tax reform, and health legislation take precedence over postsecondary education.

One knowledgeable staff man in the Senate who is recognized for his accurate reflection of the position of a leading "education" Senator, when apprised of the Levin PSE scheme said "Never, never, never!" He went on to say there are too many worthwhile needs for public money which should take priority. He summed up his opposition to the idea by saying "Not now; not next year; not ever." He added that he thought the productive route to go was through gradually expanding the BEOG program in the direction of a general entitlement for life-long learning.

An additional factor to consider in assessing Congressional reactions is prevailing views about the NIE, itself, and the appropriateness of its sponsoring the PSE idea. NIE was conceived as an educational research organization. The Fund for the Improvement of Postsecondary Education was designed to be the experimental arm of the government's postsecondary activities. While the PSE concept does involve some background research, it may be presumed that Congressional questions will be raised as to whether, in fact, the NIE is involving itself in exploring experimental action programs which run beyond its mandate. Given the serious congressional relations problems which have confronted the NIE, one may ask how politically astute it would be to press forward with the PSE idea, at least as proposed by Levin.

Our conclusion is that, on balance, the PSE, as discussed in this paper, does not have political viability. This is not to say that the entitlement concept is not worthy; indeed there is widespread support for the idea insofar as we can judge. Our final section suggests alternative next steps.

V. NEXT STEPS

Two proposals are offered as to how the entitlement idea for career education might be pursued. The first of these emerged, in our thinking, as we proceeded to explore the PSE, and current literature and activities pertinent to it. We do not think it is politically viable, however, and include it with that caution. To those who may not accept our assessment of the political feasibility of a new entitlement scheme, this proposal will offer a possible next direction.

1. An Experimental Entitlement Program

The enormous cost of a national entitlement strongly suggests that a several-year experiment with a limited sample of recipients would be useful as a means of learning more about patterns of response and utilization; needs for information, counseling, guidance and special services; administrative issues of the kind discussed under III above; responses of institutions; political reactions; etc., etc.

Given the fact that the New York State Department of Education is already engaged in studying the idea of an entitlement program for adults, we suggest that NIE explore with that agency a cooperative federal-state experiment. A further asset in the New York situation is the existence of the Regional Learning Service of Central New York with established facilities for dealing with informational, counseling and guidance requirements of potential students. The RLS would need to be expanded to provide coverage for a statewide sample of PSE recipients, or similar

services would need to be created elsewhere in the state. But, the fact is that a crucial element in the PSE concept is already partially in place in New York State.¹

We have suggested a sample of 3,000 persons on a national scale (as judged by the number used for national opinion polls) and assume that such a sample could be reduced for application in a single state. The construction of the sample, a technical task, would need to account for the variations of social class, race, sex, age, and urban-rural or geographical location which Levin has discussed (p. 38 ff).

Since the proposed experiment would be undertaken at the behest of the federal government, we believe that the cost of the PSEs should be met by it. However, in view of the interest of New York State in the entitlement idea, it would seem reasonable that it should bear the administrative costs of conducting such an experiment either through its own appropriated funds or through private grants.

The duration of the experiment should probably be not less than five years.

2. Building on Existing Entitlements

A markedly different approach, and one widely recommended, is to build on existing entitlement activities of the federal government and several of the states. The political reality is that the federal Basic Educational Opportunity Grant (BEOG) program is in place; it represents Congressional-Executive Branch consensus as to what the major thrust

¹Given the substantial experience of the Career Counseling Service of Providence, Rhode Island, we believe that consultants from that Service should be invited to participate in relevant planning activities surrounding the inauguration of an experimental entitlement program.

should be in federal funding of postsecondary education; it is almost certain that in the foreseeable future no other major federal initiative will be forthcoming in postsecondary education.

That the BEOG is already undergoing modest transformation is evident from the state of hearings which are currently in process. Such issues as the following are receiving attention and are suggestive of the possibility that ultimately the BEOGs could evolve into a general entitlement in the vein of the Levin proposals: Can full funding, to the authorized \$1,400 level be achieved? How can the administration of need determination, which is a part of BEOG, be simplified for students, their families and other participants in the process? Is supplemental aid to institutions which educate and train BEOG recipients necessary? What should be the mix of grant and loan funds for BEOG recipients? What are the minimal "need to know" data which should be provided to the states about BEOG recipients? Is it possible to develop general guidelines which will make state and institution-based student aid programs complementary to the BEOG concept? Where do we stand with respect to the adequacy of informational, guidance and counseling requirements of BEOG recipients? How well does the BEOG program appear to be meeting its objectives?

In addition to the BEOG program, several states now have entitlements. New York State's Tuition Assistance Plan (TAP) is among the best-known and the largest, although quite new. Experience from the TAP program and others is also needed as we build from where we are, especially in terms of developing well-informed ideas with regard to the respective

roles of the federal government and the states in funding and administering a general entitlement scheme like the Leven PSEs.

Our specific suggestion is that NIE form a small working group, probably in cooperation with the Fund for the Improvement of Postsecondary Education (FIPSE) on the issue of general entitlements. To keep the focus of the working group in sharp perspective, its assignment might be titled: "Moving from the BEOG to General Entitlements: Next Steps."

We recommend that the working group be kept relatively small. It might include representatives from the following: Office of Education; NIE; FIPSE; New York State Department of Education; Regional Learning Service of Central New York; American Council on Education; and Carnegie Council. This working group could assess, especially upon completion of the current Congressional activities related to Title IV of the HED Act of 1965, as amended, what next steps may seem feasible with respect to the evolution of the BEOG program; what data and investigations are required to pursue these next steps; and how the interest of government and other bodies in a general entitlement plan can best be pursued on a continuing basis. This modest approach would, in our view, be both practical and politically feasible.

APPENDIX A

ADMINISTRATIVE AND POLITICAL ISSUES
IN A CAREER EDUCATION VOUCHER PLAN

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Proposal No. 1-2S1471

The Career Education Program of the National Institute of Education has determined that a need exists to experiment with a program of financial support to youths and adults for career-related education and training. To pursue this need, NIE is commissioning two background papers, one concerned with the economic and financial implications of an entitlement program; the second, with the political and administrative implications. It is with the latter that this proposal is concerned.

As stated by the Career Education Program, the basic rationale for the proposed entitlement program is efficiency. It is assumed that the cost of services will be lower, and the outcomes of services (earnings, employment effects, and job satisfaction) will be improved, under an entitlement plan. It is also assumed that if consumers know their own wants and needs, entitlements will permit individuals to make relevant choices. Further, the scope of services offered by schools and firms will more closely reflect consumer interest than at present.

Several administrative models have been conceptualized. In one model, the federal government would administer the program nationally but probably working cooperatively with the states. In a second model, the states would be the prime agent with funding shared by other government levels. A third model might place chief reliance on communities. An added feature may be that the entitlement is compensation for some type of public service.

Some of the administration problems which need to be considered are accreditation of eligible institutions; certification of individual eligibility; dissemination of information; etc. Political and public policy questions which may call for attention include, among others, relationships to existing entitlements such as the G. I. Bill and the BEOG program; congressional and legislative reactions to specialized entitlements for career education in the face of a strong interest in postsecondary education as a whole; the possible opposition of certain collegiate institutions to a program which could be construed as competitive with their interests; etc.

The paper to be prepared will consider:

1. The broad features of possible administrative models for an entitlement program and the advantages and drawbacks of each.
2. Major administrative issues and suggested approaches or solutions.
3. The organizations and individuals who may be favorably disposed toward, or opposed to, the entitlement program concept as discussed in the paper.

Among other specific steps to be taken in the preparation of the paper are the following:

1. Consultation with Career Education Program and other NIE officials as well as other interested public officials.
2. Review of existing literature on current entitlement program experiments as well as other relevant literature.
3. Consultation in person or by telephone or letter with those responsible for preparing a report dealing with the economic and financial implications of an entitlement program.

4. Consultation with officials of the Education Development Center/
Career Education Project to build, in appropriate ways, on the
experiences of those organizations.

The paper to be prepared with be completed within 63 working days
of the signing of the contract. A draft will be completed within 45
working days for discussion with appropriate NIE and EDC/CEP officials.

WORK STATEMENT

The Scope of Work of the Contract Will Read:

- A. The consultant is to write a paper that assays the political and administrative implications for an educational entitlement program for "blue collar" and lower-paying "white collar" persons. The following items should be addressed explicitly:
1. Building upon the structures established within EDC, outline the broad features of possible administrative models suited for such an entitlement program and assess their relative advantages and disadvantages.
 2. Discuss the major administrative problems posed by entitlement programs and relate these to the experiences of the Career Education Project. Suggest possible solutions and compare these to procedures in existing financial assistance programs.
 3. Identify relevant professional organizations, pressure groups, unions, agencies, and opinion leaders which support -- and also those which might oppose -- an entitlement program for the clientele now served by the EDC Career Education Project. Include projections of support/opposition if such a program were expanded to a more inclusive population.

B. Deliverables

1. The paper outlined in Section A, above, is to be delivered within 45 working days after signing of the subcontract.
2. It is expected that 20 copies will accompany the original.
3. Discussion of the preliminary draft with NIE is to occur on or near the 30th working day after signing of subcontract.

APPENDIX B
SELECTED BIBLIOGRAPHY

APPENDIX B

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APPENDIX C

A CAREER EDUCATION ENTITLEMENT PLAN:
ADMINISTRATIVE AND POLITICAL ISSUES

APPENDIX C

A CAREER EDUCATION ENTITLEMENT PLAN:
ADMINISTRATIVE AND POLITICAL ISSUES

Draft Outline, January 30, 1970

Introduction

A brief background statement on the transformation of higher education from a collegiate-based system, to postsecondary education with emphasis on openness of opportunity, institutional variety, and life-long learning, will introduce the paper. Note, here, Alice Rivlin on the need for social experimentation.

Definitions of key terms will also be provided. These will include, probably among others, the following:

Career Education. The range of education and training which prepares both for work and self-development from the vocational track in high school through the provision of opportunities to adults to ready themselves for new careers and the pursuit of new personal interests. The concept covers full-time and part-time education and the age span from age sixteen to retirement. The distinction between secondary and postsecondary education is not rigidly drawn.

Entitlement or Voucher Plan is used in a manner similar to that employed in voucher schemes for schooling, i.e., awards provided by government to the individual student to permit the pursuit of specified educational objectives. (Section II, below, enumerates several entitlement or voucher plans currently in use, as well as a number of proposed

plans, which are relevant to career education goals.) An entitlement can be a specially designed program for a sub-group of the total population (e.g., middle-income; low-income; culturally disadvantaged...) or for a sample of the sub-group, in an experimental situation. Or an entitlement may be for the entire population or for a portion of the population which has made specified social or economic contributions (e.g., military or other public service or service to the business or industrial firm).

i. Rationale for an Entitlement Program

The discussion here will focus on issues of 1) efficiency, 2) equity and 3) social benefits. In the formulation of the rationale, reference will be made to the following sources, among others:

- a) NIE background papers on the current project which suggest efficiency as a central value.
- b) The Levin outline and Levin article "Aspects of a Voucher Plan" and article in Change (October 1973) "Vouchers and Social Equity."
- c) Report of the Panel on Youth of the President's Science Advisory Committee, June 1973, p. 169 ff.
- d) Report of the American Council on Education (ACE) Committee on Financing Higher Education for Adult Students, p. 18, Objectives.
- e) Kurland (New York State Department of Education) May 30th statement in "The Education of Adults in New York in the Last Quarter of the 20th Century" and other papers.
- f) Dresch (Yale) Notes on the Kurland Educational Entitlement Fund, p. 11, October 31, 1974.

- g) Ziegler "Civic Literacy and the Future of Adult Learning," EPRC, Syracuse University Research Corporation.
- h) Carnegie Commission, Toward a Learning Society, October 1973, p. 4.
- i) National Commission on the Financing of Postsecondary Education, Report of, pp. 345-346.
- j) Comprehensive Employment and Training Act (CETA) (U. S. Department of Labor) on the economic value to society of providing counseling and education and training to disadvantaged and un- and underemployed.
- k) Vermilye, Life-Long Learners -- A New Clientele for Higher Education, 1974.
- l) Belitsky, Private Vocational Schools -- Their Emerging Role in Postsecondary Education.
- m) Striner, Continuing Education as a National Capital Investment.
- n) Bushnell, "Needed: A Voucher Plan for Adults," Education, September/October 1974.
- o) NIE Recurrent Education, 1973.
- p) Hesburgh, Miller and Wharton, Patterns for Lifelong Learning.
- q) Houle, The External Degree.
- r) National Advisory Council on Adult Education, Annual Report, 1972.
- s) Compact, February 1971, "New Higher Education Financing Proposed in Wisconsin" on choice and economic benefits to private institutions.

- t) American Association of Junior Colleges (AAJC), Reimer, "The Impact of Educational Vouchers on Junior Colleges," September 1971.
- u) College and University Business, May 1972, Wish et al, "If Private Colleges are Pricing Themselves Out of the Market, Voucher Plan Could Save Them."
- v) Gould Commission on Non-Traditional Study, Diversity by Design, p. 1, Chapter 1, and Tables on obstacles to learning by would-be learners.
- w) Hartle paper on "Economics of Higher Education," Spring 1974.
- x) Sterling paper on "Restructuring BEOG," Spring 1974.
- y) Jencks and Reisman, The Academic Revolution.

II. Alternative Approaches to Entitlements

This section will consider a) selected existing entitlement programs with the actual or potential capability of serving career education goals; b) proposed entitlement schemes which have as an objective serving career education goals; and c) the Levin proposed models.

Illustrations of a) above are: the BEOG program; the G. I. Bill; the New York State TAP entitlements.

Illustrations of b) above are: the Kurland proposal for an Educational Entitlement Program; the Lawrence modifications of the BEOG program (Vermilye, p. 183); Dresch proposal for a Human Investment Fund, p. 273 in Recurrent Education; Biederman and Billings proposal for income contingent loans, p. 279, Recurrent Education; Edding (p. 243) and Budd,

p. 251, in Recurrent Education; Gordon, Two Years in the Bank, Carnegie Policy Council; Striner, National Economic Security Fund, p. 21 ff, in Continuing Education as a Capital Investment; Belitsky, loan-grant program for all persons seeking employment, rehabilitative training, in Private Vocational Schools, p. 16; Bushnell, Voucher Plan for Adults.

The Levin proposed models are the following:

1. Post-Secondary Formal Education - would include all of the post-secondary opportunities that are generally covered by the G. I. Bill, public and private colleges, universities, proprietary, vocational, correspondence schools, etc.... Must be accredited on the basis of some criteria with respect to provision of information, financial reliability (performance bond), willingness to conform to other rules set out such as refunds.
2. Post-Secondary Formal Education Plus Non-Formal Training Opportunities - could be used for apprenticeships and on-the-job training programs as well as formal education providing that certain criteria were met. Formal agreement setting out the conditions of training including the process, content, and goals of program as well as evaluation of results for each trainee. Some criteria would have to be set with respect to what types of training would be eligible.
3. Post-Secondary Formal Education, Non-Formal Training Opportunities, and Complementary Physical Capital. All of the above plus the option of using some or all of entitlement for investments in tools, facilities and equipment which can be used in conjunction with self-employment

or in conjunction with other individuals (Small Business Administration precedent).

III. Administrative and Political Issues

The issues which are listed below will be addressed, in the report, in the context of the particular model or models proposed by Professor Levin, if available. Discussion will be informed by the experience of other entitlement programs and by literature on proposed entitlements. (See I above for a number of relevant references.)

a. Eligibility of Participants for Entitlement

Who will be eligible? How will eligibility be determined in cases when less than a complete population is covered? Issue of full-time and part-time students.

b. Administration of the Program

It is assumed that discussion focuses on a federally-funded (fully or partially) program. Will the program be administered by the federal government through the states? To individuals directly? Through institutions? The importance of simplicity of administration, as judged by other entitlement experience, will be considered.

If administration is through the states, what special federal requirements on the states should be imposed?

c. Institutional Eligibility and Consumer Protection

How will training institutions be accredited? Approved for receipt of federal funds? By federal government? by states? by private accrediting agencies? Other? (See Hodgkinson in Vermilye, p. 87 on Regional Examining Agencies.)

What issues of consumer protection will need to be considered and dealt with? (Orlans study)

d. Institutional Participation

What guidelines will govern institutional participation? Will institutions decide on admissions under the program? What admissions standards, procedures, etc.? Traditional admissions criteria? Lottery? Other?

e. Dissemination of Information About the Program

Will there be need for extensive publicity? Or will participants be expected to find out about program on their own initiative? What data requirements exist for whatever level of dissemination activity is decided upon?

f. Advice and Counseling for Participants

What types of advisory and counseling services will need to be provided to potential and actual participants? With regard to career goals; personal capabilities; institutional resources; qualifications for experience credit and granting of experience credit. (Consideration will be given to a wide range of counseling approaches, e.g., the Providence Career Education Project, Education Development Center home-based counseling service; the Regional Learning Service of Central New York; the CETA Program; V. A. counseling under the G. I. Bill; etc.) Will entitlements cover the cost of such services?

g. Support Services

What special support services may be needed for certain participants, e.g., child care facilities. (See Program Activities Services Guide, II 27 and other CETA materials.)

h. Employed Participants

What issues related to released time for employment must be dealt with?

i. Evaluation of Outcomes

What evaluation measures can be used to judge effectiveness of program? (For example, see Houle The External Degree on evaluation issues and approaches, and Rivlin, Systematic Thinking for Social Action.)

j. Relationship to Existing Entitlement Programs and Benefits

What is the relationship of the proposed program to existing entitlement programs, e.g., G. I. Bill; BEOG program; TAP program (New York State); industrially funded career education opportunities; etc.?

Will vouchers vary in terms of individual need; training to be taken? Will vouchers provide for compensatory education?

k. Political Issues

What repercussions would arise from experimenting with one segment of the population when other segments may also have similar needs?

Is it feasible to consider a new limited experimental program when we appear to be moving quite rapidly toward general

educational entitlements for postsecondary education, probably including career education on a life-long basis. (BEOG; Harte; Gordon; Kurland; etc.)

What kinds of employer-related problems may be expected under a program which removes employed persons from work for periods of educational leave? What employer-related problems in a program which requires employer financial participation?

Labor union support for an entitlement program for career education is probably forthcoming. Are there issues which need to be considered to assure such support?

Will the traditional collegiate sector of higher education be supportive of a career-focused entitlement program? What may be their objectives and how can these be addressed?

IV. Steps to Implementation of an Experimental Program

Using the Levin model(s), and with the background derived from II above and the issues arrayed in III above, this section will delineate specific steps to implementing a career education experimental entitlement program.

V. Summary comment.

Bibliography

List of persons interviewed.

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APPENDIX D

AN EXPERIMENTAL ENTITLEMENT SCHEME
FOR ADULTS TO AID CAREER-RELATED EDUCATION

APPENDIX D

AN EXPERIMENTAL ENTITLEMENT SCHEME
FOR ADULTS TO AID CAREER-RELATED EDUCATION

The National Institute of Education is in the early stages of exploring an entitlement scheme for adults to aid career-related education (the emphasis on career-related simply means that education for purely personal pleasure or self-development might be excluded). NIE is interested in having "first-impression" reactions from knowledgeable persons who are concerned with the state of postsecondary education in the nation.

We may assume that an experimental program would be run in one state or region as a means of testing this entitlement idea. Thus, data and information on costs, relationships to existing PSE financing arrangements, administration, counseling and placement requirements, eligibility of institutions to participate and of individuals to receive entitlements, would all be generated.

As presently envisioned, the entitlement would be a \$10,000 fund available to each qualified individual from age 18 (or lower if high school has been completed) through his or her lifetime. The figure is set to parallel average state investment in the four year postsecondary education of an individual at a public institution, e.g., California. The amount would vary (for the additional four collegiate years, perhaps) with family income. Adjustment to existing state and federal postsecondary funding arrangements is assumed so the total national cost would be feasible. The purposes for which education could be pursued are parallel

to those permitted under the G. I. Bill. In addition, on-the-job training and apprenticeships would be funded under adequately regulated conditions. Further, a portion of the fund could be used to purchase necessary physical capital, e.g., carpenters tools, essential for employment. A loan program would make income-contingent loans available to supplement the entitlement.

Adequate counseling, informational and placement services and data would be provided to potential trainees and potential institutional trainers. These services could be paid for by entitlement holders through the use of a limited portion of the entitlement.

Programs would be screened for eligibility under federally proposed standards by states and/or private organizations. A postsecondary entitlement agency would administer the program. One of the responsibilities would be to maintain a continuing evaluation of the program.

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