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ABSTRACT

This report highlights the major findings and recommendations of four Title IV-funded agencies which provide racial desegregation services; the General Assistance Centers, the State Educational Agencies, the Training Agencies, the Training Institutes, and the Local Education Agencies. The study is based on a statistical analysis of responses to mail questionnaires from 140 Title IV projects, from site visits to school districts served, and from interview data. The first three agencies cited are compared to each other, while the last is treated separately. Two key variables that affect service delivery from the regional offices and projects are explained. These are: commitment (amenability to desegregation), the relationship to the institution at which the project is located, and, for GAC's, organizational characteristics. The final section analyzes the context in which the programs as a whole operate, and suggests some ways in which Title IV can be strengthened. (Author/AM)

TITLE IV OF THE CIVIL RIGHTS ACT OF 1964: A REVIEW OF PROGRAM OPERATIONS

EXECUTIVE SUMMARY

PREPARED FOR THE U.S. OFFICE OF EDUCATION,
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PREFACE

Title IV of the Civil Rights Act of 1964 authorizes the U.S. Office of Education (USOE) to provide technical assistance and training services to school districts for the purpose of meeting special needs associated with implementing a school desegregation plan or with operating a desegregated school system. This assistance is provided through direct financial aid to school districts themselves as well as indirect aid made possible through grants and contracts with service organizations that assist school districts. These organizations include the General Assistance Center, State Education Agency, and Training Institute. This is the final report of Rand's evaluation of Title IV operations, conducted at the request of the Office of Planning, Budgeting and Evaluation (OPBE) of the U.S. Office of Education under Contract No. OEC-0-74-9262.

The study pursues two broad purposes defined for it by USOE. The first is to describe the current Title IV service delivery system. The second is to evaluate current operations to assist federal officials in improving program functions. This report is intended to increase understanding of Title IV operations and is oriented to the needs of federal officials.

This report highlights the major findings and recommendations. A companion report* available from The Rand Corporation includes a detailed discussion of theory, methodology, and data analysis, as well as additional findings and recommendations.

* S. Crocker et al., *Title IV of the Civil Rights Act of 1964: A Review of Program Operations*, The Rand Corporation, R-1901/2-HEW, August 1976.

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Phyllis Ellickson and Milbrey McLaughlin served as our reviewers, and their critical comments on both volumes of this study have improved them immeasurably.

Also, we wish to thank the members of our advisory committee, whose practical knowledge of school district and Title IV program operations provided us with invaluable insights.

Finally, we appreciate the guidance of Robert York, who served as the technical monitor of this study, and we gratefully acknowledge other personnel at the U.S. Office of Education and in the Title IV project offices and client school districts for cheerfully responding to our many questions.

Although this study would not have been possible without the assistance and cooperation of many people, responsibility for any errors rests with the authors.

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I. INTRODUCTION

The purpose of this study is to describe Title IV projects and, by trying to discern the factors that affect their success in delivering technical assistance, to suggest ways in which the operation of Title IV can be strengthened.

Title IV provides technical assistance and training services to school districts in various stages of desegregation by direct grants to school districts and indirect assistance from three types of service agencies funded specifically under Title IV. The General Assistance Center (GAC) and State Education Agency (SEA) are empowered under Section 403 of Title IV to provide both technical assistance and training services to school districts requesting such assistance. Section 404 provides for the establishment of the Training Institute (TI) for offering desegregation-related training services to requesting school districts. Section 405 provides for direct funding of school districts (direct-funded Local Education Agencies—dfLEAs) to hire a desegregation specialist and, in some cases, provides for desegregation-related in-service training.

Title IV is a complicated program in its own right and even more so because it works through an intricate system of influences. First, Title IV lacks a clear mandate. The program Regulations and Guidelines are concerned almost exclusively with procedural details; there is no clear definition of desegregation-related assistance—that policy goal toward which Title IV technical assistance is ostensibly directed. As a result, some projects may be doing the wrong things; others may be floundering, unable to decide what to do or how to do it. As long as there is no substantive intervention by the USOE, there will be wide variation in what is defined by the Title IV project people as being appropriate assistance. Second, since Title IV is a national program, implemented through regional field offices to accommodate regional diversity, the program is not consistently implemented in accordance with federal intent. The unanticipated result of this diversity is to greatly weaken the USOE's ability to initiate or implement change through Title IV. Third, a majority of the Title IV project and regional office personnel are recruited from the ranks of professional educators. It is these same educators, unified by professionalism, communication, and interdependence, who in the past have resisted attempts to redefine education goals and to redistribute resources, including resisting the goal of school desegregation. Finally, these forces are legitimated by a change-resistant society, which has not merely failed to actively promote school desegregation but has frequently been vocal in its opposition to it. Thus, at all levels, we see forces operating that run counter to the legislated intent of Title IV and that could have an important impact on the way in which the program is implemented.

Given the complexity of the program and the attendant influences on it, we chose not to "evaluate" the Title IV program in the traditional sense of the word. To evaluate is to ascertain worth. It would be irresponsible to make a judgment as to whether or not Title IV should exist without a thorough understanding of how it operates, the limitations under which it operates, and its intended goal. Even if we understood all there was to know about Title IV, it would still be difficult to design an evaluation that we were confident had the ability to measure the effectiveness of Title IV apart from other sources of federal, state, or local funding, which

are also designed to assist the school districts in their desegregation efforts. Consequently, we have chosen not to concentrate on asking, "Should Title IV exist?" but to ask instead, "Given that it exists, what are its strengths and weaknesses and what can be done to improve its operations?" The ultimate goal of this study is to increase the effectiveness of the Title IV program by recommending ways in which the program can capitalize on its strengths.

This study of Title IV operations is based primarily on a statistical analysis of mail questionnaires from 140 of the 164 project offices (GACs, SEAs, TIs, and dfLEAs) and interview ratings from on-site interviews at 40 project offices and 74 of the school districts being served by these projects. Also, personal interviews were conducted at 7 of the 10 regional offices responsible for administering the Title IV program, and with personnel in the Equal Educational Opportunity Programs (EEOP) division of the USOE (the federal supervisory agency) in Washington, D.C. In these latter interviews we were interested primarily in determining the respondents' interpretation of the intent of Title IV and how it operates, and their perceptions of what the federal role is and should be with respect to Title IV. At the project office and client school district levels, we were interested primarily in determining how Title IV projects are staffed and organized, what activities they offer, to whom their activities are directed, how those activities impact upon the clients, from whom they receive support, and what kinds of problems they encounter while implementing their program.

Our analysis draws equally upon three components: the construction of a theoretical framework, tested against both the observations made in the site visits and a statistical analysis combining coded site visit data and mail questionnaire data. Debriefings were held following each wave of site visits. These debriefings permitted the data collection, conceptual frame, and hypotheses to evolve gradually over a period of several months. After the last site visit and debriefing, a conceptual scheme for the study was agreed upon, and a series of interviewer rating forms was devised and prepared for each visited project and its clients. These forms contained various measures against which each project and each observed client was rated by the interviewer on a scale from 1 to 6.

The study used two major types of outcome measures. One type of outcome measure consisted of interviewer ratings of the impact a project office had on the policies, programs, personnel, institutional structure, and training aspects of its client school districts. Analyses of the association between various project office and district characteristics enabled us to isolate characteristics that had a strong positive or negative effect on project office impacts. These ratings also permitted us to combine some site visit information with the mail questionnaire data from the same projects in statistical analysis.

The second type of outcome measure consisted of a classification of the types of activities conducted by different project offices. From the mail questionnaire data we clustered the activities undertaken by the projects on the basis of intercorrelation matrices into three clusters:

Cluster	Activities	
Desegregation	Preventing dismissal or displacement of minorities Assisting districts in developing desegregation plans Assessing new desegregation capabilities	
Technical Assistance	Proposal-writing Developing and disseminating materials Gathering statistical information Maintaining libraries	
Training	Training in use of new methods/materials Training directors of local projects Training supervisory personnel	GAC only

We were able to make a determination on the basis of our field work that the desegregation cluster consisted of activities that were directly related to desegregation and were district-specific; the technical assistance cluster comprised activities that may also be directly related to desegregation but were less apt to be district-specific; and the training cluster consisted of activities that were at times only tangentially related to desegregation. Again using correlation analysis, these clusters enabled us to identify factors that were associated with the projects undertaking more or less of these three types of activities. Further examples from the field work were used to supplement these statistics to give specificity to the results of the data analysis.

This report is the summary of Rand's study of Title IV. Section II discusses the theoretical basis underlying Title IV and documents the program as specified by the Regulations and Guidelines. Section III provides a description of the regional office, and Sec. IV describes the four types of project offices. Section V discusses the key variables that seem to impact on the ability of the project offices to deliver services, and Sec. VI sets forth our recommendations for improving and strengthening Title IV. A companion report (Crocker et al., 1976) covers the same topics in greater detail and describes our study design and the data and statistical analyses used to arrive at our conclusions. The second phase of Rand's study of Title IV is in process. In this phase we are looking specifically at the effect on program operations of adding assistance in the area of sex discrimination to the program's prior desegregation focus. We expect the follow-up study to enhance the findings reported upon here.

II. BACKGROUND

Title IV technical assistance and training services are delivered by four types of projects that are provided for by the enabling legislation (Civil Rights Act of 1964, PL 88-352, Title IV, Sections 401 to 406). The legislation describes technical assistance as the provision of "information regarding effective methods of coping with special educational problems occasioned by desegregation." The activities authorized under technical assistance include:

a. Helping a district to desegregate without demoting or dismissing minority staff.
b. Assessing desegregation-related needs in a district.
c. Developing administrative methods and techniques to cope with desegregation-related problems.
d. Developing curricula, teaching methods, and materials for use in desegregated classrooms.
e. Training school personnel in the use of (d).
f. Helping districts develop the capacity for school/community interaction.
g. Helping school staff to utilize other federal and state resources that would assist them in coping with their desegregation-related problems.
h. Training school staff in the preparation of desegregation plans.

Any other activity that the Office of Education deems appropriate in providing technical assistance to desegregating school districts can also be authorized.

Training activities authorized include training school personnel in one or more of the above problem areas except (b) and (g). Training for TIs is defined as "the operation of short-term or regular session institutes for special training designed to improve the ability of teachers, supervisors, counselors, and other elementary or secondary school personnel to deal effectively with special educational problems occasioned by desegregation." The institutes may be held on campus or elsewhere, during a summer session or during the regular academic year.

The recipients of both technical assistance and training services in FY75* are school districts that are in some stage of the desegregation process.

> . . . a school board shall be deemed to be "desegregating" if (i) it is not under a current legal obligation to desegregate, and (ii) it enrolls in its schools significant proportions of both minority and nonminority group students.
>
> . . . a school board shall be deemed to be "desegregating" if it is implementing or developing a plan for desegregation (i) which has been or will be undertaken pursuant to a final order issued by a court of the United States, or a court of any State, or any other State agency or official authorized by State law to issue such an order, or (ii) which has been required and approved by the Secretary of Health, Education, and Welfare as adequate under Title VI of the Civil Rights Act of 1964.

* Title IV awards were made in FY74 on a forward-funded basis (i.e., for activities to be conducted during FY75). Since the project activities occur in FY75, the projects will be referred to as FY75 projects throughout.

In effect, this means that all school districts enrolling students of more than one race are either desegregating or desegregated and therefore eligible for Title IV assistance.

It should be pointed out here that Title IV is a relatively small federal program ($21.7 million in FY75). This $21.7 million is less than one-tenth the size of the Emergency School Aid Act (ESAA), a program which also assists school districts in desegregation through direct grants. So while it is true that the legislation and regulations provide for a wide variety of activities through four different project types to a large number of school districts, the low level of funding implies that many district-level needs cannot be met in depth through Title IV.

The technical assistance and training services funded by Title IV are essentially services under contract to the USOE that provide help to desegregating or desegregated school districts that want the help. The technical assistance and training units act as a noncoercive arm of the federal government. When the units were established, the USOE hoped that locally based help would be more readily accepted than technical assistance from Washington, the source of most of the sanctions that forced districts to desegregate. Title IV imposes no punitive measures against school districts, although, on occasion, judges have referred school districts to their local GAC or state department of education for assistance in developing a desegregation plan or in maintaining and operating their schools in a desegregated fashion. The Civil Rights Act makes desegregation assistance and training to school districts *available* under one or more Title IV project types. Unlike some sections of the Act, Title IV assistance is not compulsory, and an invitation by the district to the GAC, SEA, or TI is required in both the Act and in the Regulations and Guidelines.

Although the regulations provide for a great deal of overlap between allowable activities of the various project types, there are specific perceptions at EEOP about the role of specific project types. The GAC (usually located at a university or college) is seen as a Title IV *institution* with no other funding source and is intended to provide interdisciplinary skills for desegregation assistance. It is understood as taking on the widest scope of activities in both technical assistance and training. The SEA grant represents an attempt to link the state department's educational structure to desegregation efforts. The TI is intended to act as a locally based in-service vehicle designed to help teachers, counselors, or administrators in one or a few districts. The dfLEA grant represents in-house desegregation assistance as opposed to assistance by outside agencies.

Also, the regulations imply an awareness by EEOP personnel of the necessity for multiple-level entry points into a school system if change is to be promoted. Some authorities in implementation strategy favor a "top-down" approach where only persons with formal authority (such as district superintendents) are selected to receive services. These strategists assert that change can succeed in a school district only if it begins at the top and percolates down. Other authorities favor directing services to the perimeter of the system (that is, to teachers and counselors), with those change effects eventually rippling into the core of the district because the perimeter personnel actually implement district policy. Title IV regulations subscribe to the top-down approach in the sense that the district superintendent's approval must be secured (by letter) for any Title IV project operating in a district, but the regulations also allow for assistance to be directed both generally and

specifically to any part of a school district's organization. Further, there is an unwritten understanding that the GAC targets both the administrative core and instructional perimeter, the SEA the administrative core, and the TI the instructional perimeter. The important point is that the Title IV program does not subscribe to a single approach to promoting change in school districts.

III. THE REGIONAL OFFICE

Title IV is administered through the regional offices of the USOE. Within each regional office, Title IV (along with a similarly focused program, ESAA) is administered by the Equal Educational Opportunity (EEO) unit, the regional counterpart to the USOE's EEOP. EEOP is responsible for developing the Title IV Program Regulations and Guidelines for the regional offices to implement; the regional offices are responsible for interpreting these guidelines and implementing them in a fashion that accommodates regional diversity yet does not compromise the intent of the law. The regional offices are also responsible for reviewing proposals submitted by each of the four Title IV project types in their region.

This section describes the regional office administrative structure, field operations, and proposal review process. The primary data sources for these findings were the interviews conducted from April to August 1975 with administrative and operations personnel at USOE and seven of the ten regional offices. These were the seven offices responsible for administering the projects in our site visit samples. Interviews were also obtained from a sample of panelists who participated in the proposal review process.

ADMINISTRATIVE STRUCTURE AND OPERATIONS

All of the regional offices visited shared a common basic organizational structure. The Regional Commissioner and the Director of School Systems took administrative responsibility for Title IV. Actual operational responsibility for Title IV was vested in the EEO unit, which is a part of the Division of School Systems. Within the EEO units, the Program Manager and Program Officers are responsible for implementing both Title IV and ESAA projects.

Title IV projects reportedly account for far less than 20 percent of the Program Officers' work, with ESAA projects taking up the rest of their time. Typically, Program Officers were assigned to projects within a geographic area across states or within a state and were usually responsible for implementing projects in the field. In the larger EEO units (thirteen to seventeen Program Officers), the Program Managers' duties were primarily administrative, with additional administrative and field coordination responsibilities delegated to other staff members. In the smaller EEO units (two to five Program Officers), administrative authority was vested solely in the Program Manager, who was actively involved in the operational aspects of the projects as well.

All seven Program Managers in the seven offices visited were male. In terms of ethnicity, three of the Program Managers were black, three were white, and one was Spanish-surnamed. Of approximately fifty Program Officers and trainees in the seven regions, fewer than 10 percent were women; approximately fifteen were black, and six were Spanish-surnamed. Typically, the ethnic composition of an EEO unit reflected the ethnic composition of the regions, with the greatest concentrations of black and Spanish-surname EEO staff in the south and southwest.

Although regional office staff members had diverse backgrounds and could not

be considered "professional" implementors of school desegregation, no training programs designed to increase sensitivity to desegregation and to explore the social and political constraints affecting the implementation of desegregation existed in any of the EEO units. Rather, new employees underwent on-the-job training through an apprentice-like arrangement with more experienced Program Officers. Though all employees had continuous training to accommodate changes in forms, guidelines, and procedures, there were no consistently held substantive sessions dealing with the social and political context of the EEO units' work.

FIELD OPERATIONS

The Administrative Manual (the operational handbook of procedures and forms issued by EEOP) outlines procedures for two tasks to be undertaken by the regional offices: monitoring and proposal review. All of the Program Managers interviewed listed these two tasks, as well as technical assistance to projects, as their primary foci. However, even though there was agreement on the tasks to be undertaken, there was a great deal of variation among regional offices in implementing these tasks.

The majority of the EEO staff viewed technical assistance as a process of disseminating and/or clarifying administrative and regulatory information. This assistance would include clarifying Civil Rights compliance requests, clarifying Title IV regulations, working out contractual problems, defining authorized activities, and determining district eligibility, for example. Whenever possible, they would respond to requests from the Title IV projects for program-related technical assistance, such as helping to plan an evaluation, and distinguishing between desegregation-related and nondesegregation-related activities. However, this programmatic assistance was undertaken less frequently and was perceived by the projects as being less helpful than the procedural assistance given by the regional offices.

The second major task of the regional offices—monitoring—is outlined in some detail in the Administrative Manual. According to the manual, monitoring is the systematic and periodic process of reviewing, evaluating, and reporting the programmatic and fiscal operations of an approved, funded project. The manual describes the specific responsibilities of the Program Manager, Program Officers, and grantees and sets forth specific monitoring procedures for both the grantee reports and the site visits.

Self-reports by the EEO staff indicated that during the site reviews the procedural steps outlined in the manual were, in fact, followed. However, five of the seven regional offices reported the use of regionally developed monitoring forms in addition to the USOE-provided monitoring form. Thus, while formal reports were filed on the basis of the USOE document, actual evaluation of and feedback to the projects were based on locally devised instruments which varied from region to region. These dual monitoring forms suggest that projects are not being consistently monitored or evaluated across regions. Further, the widespread use of alternative monitoring forms suggests that the solution to the inconsistent evaluation problem is not merely the development of a better form imposed on the regions by EEOP. Rather, an alternative approach might be to use locally developed forms that have been approved by EEOP as being congruent with their overriding monitoring efforts. Such

an approach would provide the regional offices with the flexibility to target specific regional issues and problems in implementation/compliance, and would simultaneously provide evaluation consistency on a national level.

The third major task undertaken by the regional offices is proposal review. Proposals are reviewed by panelists selected by regional office personnel who rate each proposal according to an established set of award criteria. Points are given to each proposal on the separate criteria and these points are added together to provide a total score for a proposal. The total scores awarded by each panelist reviewing a specific proposal are then summed and averaged to provide the official score. The official scores are ranked nationally by project type and projects are funded in rank order from the highest score until the funding allocation for a project type is exhausted.

In an attempt to make the regional proposal review effort as consistent as possible, the Administrative Manual delineates detailed procedures for the intake and processing of applications prior to paneling, as well as for the role of Program Managers and Program Officers during paneling. In a concomitant effort, EEOP developed a comprehensive training packet, which provides instructions to panelists receiving Title IV applications. Basically, the training packet is designed to increase the consistency of review panels across regions, and to "help ensure that no application has an advantage over any other application simply because it has been submitted in one region and not in another" (Goldberg, 1973). Yet, even though it is the goal of EEOP personnel to achieve national review standards in all regional offices through the use of these guidelines, a great deal of regional variation nevertheless continues to exist.

For example, the regional office is responsible for selecting and training the panelists and for scheduling the review of the proposals by the panelists. Although the Administrative Manual is very explicit about who may serve on the review panels, there are no guidelines regarding either selection procedures or criteria for selection. As a result, this procedure varied from region to region and resulted in a great deal of variation in the quality of panelists both within and across regions. Methods of training these panelists also varied from region to region. Although the general procedures for training were well-defined, the specific methods as well as the amount of time allocated for training varied considerably. Even the scheduling of the proposals for review by panelists varied across regions. Some regions batched proposals by project type, others by state, and still others had panelists review proposals in random sequence. Given the different guidelines and quality criteria for the different project types, this random ordering of proposals is counterproductive, since it would make it more difficult for panelists to differentiate the criteria to be used for each project type. In addition, the Program Officer is to serve only as a resource person throughout this process. While this procedure has the obvious advantage of allowing new applicants to enter the competition on an equal footing with projects of long standing, it has the disadvantage of depriving the panel of a good source of information about existing projects.

Thus, we see that although there has been some attempt by EEOP to standardize procedures across regions, a great deal of regional variation exists. This variability does not appear to be a deliberate attempt to circumvent EEOP guidelines, but rather seems to result from attempting to conform to an ill-defined charge. Consequently, as presently constituted, the effectiveness of the Title IV regional offices

depends upon the commitment and expertise of their staffs. If the responsibilities of the regional offices were to be more clearly defined by EEOP, the regional offices as well as the EEOP would be better able to judge their effectiveness and to specify steps that could be taken to improve their operations.

IV. THE PROJECT OFFICES

This section will give a brief description of each of the four Title IV project types—GAC, SEA, TI, and dfLEA. In order to highlight the differences between them, the three projects external to the school district (GAC, SEA, TI) will be compared to each other; the dfLEA, which is the only Title IV grant made directly to school districts, will be treated separately.

GENERAL ASSISTANCE CENTER

Twenty-six GACs were operating in FY75. Our description of these centers is based on mail questionnaire responses from 24 of the 26 GAC Project Directors (92 percent responding) and from site visits to 12 GACs (46 percent of those funded) and 36 of their client school districts.

General Assistance Centers receive approximately 50 percent of the total Title IV budget. They are the largest of the project types in terms of funding level (average grant is $340,188), number of districts served (average is 98), and number of staff (average number of full-time staff is 8). They also undertake a broader range of activities (both technical assistance and training) than do SEAs (technical assistance) even though GACs and SEAs are authorized to conduct the same activities according to the rules and regulations governing the administration of Title IV (see Table 1). GACs most frequently undertake in-service training, develop curricula and materials, assist districts in needs assessment, and help districts with school/community relations. SEAs are noticeably more likely than GACs to help districts write ESAA or other proposals to obtain additional funds, conduct surveys to obtain statistical information that will assist in identifying desegregation problems, help districts understand their responsibilities under the desegregation guidelines, and disseminate to the districts materials on school desegregation. State Education Agencies, however, are located in state departments of education which normally provide technical assistance to school districts and, in fact, all of the SEA activities listed above could be considered typical state department activities in that they involve assisting districts in work required to meet state or federal laws, regulations, or funding requirements.

General Assistance Centers, on the other hand, are most frequently located at colleges or universities and share no ties to state government. As the table shows, they are less likely to carry out activities that are government oriented and are more likely to develop curricula, instructional techniques, and administrative procedures. Although these activities could be considered more typical of an educational institution, GACs do not function similarly to TIs. Training Institutes have a much narrower focus than do GACs; TIs are authorized to conduct training but not to undertake technical assistance. In addition, TIs are located primarily in university schools of education whose regular mission is to train teachers. Therefore, TIs do not need to convince school districts that they are capable of delivering training services. Desegregation-related technical assistance, which GACs undertake, is not normally a university function, however. Therefore, a GAC would have no institutional life of

Table 1

GAC Activity Profile

Activities *more* often undertaken by GACs than SEAs[a]	GAC	SEA
Develop new instructional techniques	87	55
Train in use of new methods/materials	83	67
Develop curricula	77	47
Help districts assess needs	75	59
Develop techniques for school/community interaction	71	66
Develop new administrative procedures	63	42
Facilitate sharing of common experiences	54	47
Develop evaluation techniques	27	12

Activities *less* often undertaken by GACs than SEAs[a]	GAC	SEA
Write proposals	50	76
Develop and disseminate materials	46	56
Interpret federal guidelines	39	65
Help districts cope with crises	33	40
Help develop desegregation plans	18	39
Prevent minority staff dismissal	9	32
Obtain statistical information	9	58
Assess new desegregation capabilities	4	29

[a]Percent of Project Directors responding activity undertaken "most frequently."

its own without a Title IV grant. General Assistance Centers tend to operate as independent organizations rather than as extensions of their universities as do the TIs. In cases where the GACs did not operate autonomously, they tended to deemphasize desegregation-related activities and to emphasize training. Since training activities are both less controversial and more of a traditional university function, it is not surprising that greater university involvement in a GAC results in this pattern.

Consequently, prior to receiving a Title IV grant, GACs need to develop viable working organizations that are capable of providing a broad range of services to a large number of school districts. As a result, their organizational characteristics and methods of interacting with district personnel are critical variables in determining whether they have an impact on the districts they serve. Among the project offices that we visited, we found a significant correlation between a GAC's impact at the district level and the presence of the following characteristics: a well-specified plan, with explicit schedules and milestones and a clear description of staff responsibilities; access to pivotal people in the district; the ability to interact with the district superintendent, central office staff, and other members of the school district and community. The same relationships did not hold for the SEAs or TIs, however, since they are not faced with the tasks of building a new organization or functioning as a general, all-purpose service organization. In addition, since GACs operate autonomously, they need to establish their own reputations in order to have credibility with the school districts in their service areas. Long-established GACs have earned credibility with client districts on the basis of their helpfulness in the past. However,

newly funded GACs reported the need to offer districts whatever services they requested; whether or not their requests were desegregation-related, in order to establish a relationship with the districts. Once this relationship was established, the GAC was able to take a more active posture regarding the types of services it would provide districts. In turn, GACs, which are more active in assessing district needs, tend to undertake desegregation activities more often and training activities less often.

General Assistance Centers work with all levels of the school system to promote change; they plan and target their activities to both the administrative and instructional areas of the system more than other project types. Training Institutes generally undertake training and therefore work with school-level personnel; SEAs focus on technical assistance and generally work with administrative-level personnel. Since GACs frequently undertake both technical assistance and training, it follows that their activities will be targeted to both the administrative and school levels. Since their services are targeted to more people at more levels within school systems, GACs may have the greatest direct potential for effecting overall change at the school-district level.

STATE EDUCATION AGENCY

In FY75, 39 SEAs were operating. Responses to mail questionnaires from 36 of the 39 SEA Project Directors (92 percent responding) and site visits to 13 SEAs (33 percent of those funded) and 26 of their client school districts provide the data for this description.

The typical Title IV SEA is housed in the Bureau of Equal Educational Opportunity at a state department of education. On the average, SEAs have a much smaller project staff than do GACs (three full-time staff as compared to eight) and receive a commensurately smaller grant ($128,964 as compared to $340,188), yet they serve nearly the same number of school districts as do GACs (90 compared to 98). Although smaller, the SEAs are able to provide services to a large number of school districts because they focus primarily on technical assistance activities, which are less labor-intensive than the training frequently undertaken by GACs and TIs. The four activities more often undertaken by SEAs than by other project types include assisting districts in writing proposals, helping districts interpret federal guidelines, obtaining statistical information from school districts, and disseminating materials. Also, SEAs were judged by our interviewers to be the most effective in the area of minority recruitment at the local district level, although this activity was undertaken frequently by less than one-third of the SEAs. State Education Agencies assist districts by providing superintendents and other administrators with recruitment sources that often extend beyond state borders to national networks. In one specific case, the SEA Project Director was responsible for placing two assistant superintendents in both districts visited.

In general, SEAs report more frequently undertaking desegregation activities than any of the other project types. However, in cases where USOE regional personnel and federal-level personnel were more actively involved in helping the SEA to plan their activities, the SEAs undertook technical assistance activities more frequently and desegregation activities less frequently.

The kinds of activities undertaken frequently by SEAs are the same kinds of activities in which other administrative units of the state department are involved. Unlike GACs, the SEAs are closely connected to the institution at which they are located. Besides undertaking similar types of activities, 44 percent of the SEA Project Directors indicated that their most recent job prior to Title IV was with some other division of the state department of education, and over one-third indicated that they served the department of education in another capacity while administering the Title IV project. Since state departments of education already have ongoing relationships with school districts, SEAs need to undertake less "institution" building than the GACs, and they are usually able to function with a fairly simple management system. On the other hand, their close connection with the state limited the amount of desegregation-related activities undertaken by SEAs, except for two cases where the state was very supportive of desegregation. In these two cases the SEAs undertook desegregation-related activities more often. In general, however, SEA Project Directors report the lowest level of support in carrying out their program from personnel at the institution at which they are located, compared to other project types.

The kinds of activities undertaken by SEAs are generally short-term and less subject to advance planning or anticipation than the training activities undertaken by GACs and TIs. As a result, SEA Project Directors report experiencing more implementation problems than any of the other project types. Major implementation problems cited by SEA Project Directors include loss of staff members, underestimating staffing requirements, and having to adhere to state regulations. State Education Agencies also report undertaking activities in the same school district as other project types more frequently. Thus, even without a concerted effort on the part of SEAs to communicate with other project types they are more apt to encounter them. If it were considered desirable to have a single agency coordinate Title IV efforts, our data would suggest that the SEAs would be the most appropriate agency.

State Education Agencies plan and target their activities only to the administrative core of the district. This approach is consistent with the SEA activity profile in that technical assistance activities more often involve higher-level administrative personnel in school districts. This method of interaction is also consistent with the way a state department of education typically functions in a school district. However, if change is to take place throughout the system, this approach requires that the results filter down from higher-level administrators to lower levels in the district.

TRAINING INSTITUTE

In FY75, 47 institutes were operating with an average grant size of $93,426. Our description of these institutes is based on data from

ail questionnaires sent to the TI Project Directors (41 of 47, or 87 percent responding) and from site visits to six TIs and eight of their client school districts.

Training Institutes are usually located in small colleges near the districts they serve. The institutes provide training for an average of nine school districts. Their most frequent activities include training school personnel in the use of new methods and materials, developing new instructional techniques, and sensitizing pupil-contact personnel to the environment of a desegregated school. Although TIs are re-

stricted to training activities by the Title IV legislation, the longer an institute is funded the more likely it is to undertake technical assistance types of activities.

Training Institutes that exist for longer periods tend to provide less training of school personnel and instead assist the district in solving short-range problems. These problems, such as helping districts deal with racial conflict among students and helping them cope with other crises, are further removed from the training emphasis of TIs stressed in the regulations. Since TIs work closely with a small number of districts, it is likely that over time they seem less external to the district and begin to function more as an in-house consultant.

Institutes generally hold training sessions for a number of weeks during the summer months and conduct follow-up activities and short in-service training sessions during the school year. Because of this schedule, any delay in funding or delay in notification of funding severely restricts their ability to implement the summer institutes as planned. This schedule also results in variable staffing requirements for TIs. During the summer, they have an average of six staff members, but they retain only two staff members during the school year. TIs have close ties to the colleges or universities at which they are located and these ties, in part, make this flexible staffing requirement feasible. TIs generally recruit their staff from the institution at which they are located, whose schedules generally permit teachers to work intensively on Title IV during the summer months and part-time, if necessary, during the school year while still fulfilling their university teaching responsibilities.

In contrast to GACs, which are also housed at universities, TIs report a more active university involvement in planning the projects' activities, and they more frequently report an involvement in teaching at the university and having the university adopt their materials. This close connection may result from the fact that TIs undertake activities that are typical for an education department to undertake, and therefore the Title IV institute may be perceived as an extension of the university work. Their recruitment of university personnel also reinforces this close working relationship and precludes TIs from developing as separate and independent organizations like the GACs.

Training Institutes also work more closely with their client school districts in planning the institutes' activities than do the GACs or SEAs. This procedure, established early in the process, fosters a close working relationship between the TIs and the districts. The districts specify their needs and the institutes and districts jointly develop programs that address those needs. This procedure leads toward a good working relationship between institutes and districts and results in minimal implementation problems. Since the clients are given the opportunity to select the TIs service and to specify their needs, there is little problem with changing district needs. However, this method of organizing also results in TIs less often developing long-range goals and functioning independently from the districts they serve. Without a long-range focus, a TI is less apt to design its program to include extensive follow-up.

In planning their programs, TIs work both with the administrative core and with instructional areas of the district—district superintendents, principals, and teachers. However, their activities are usually directed to instructional personnel only—teachers, primarily, and principals and counselors secondarily. Consequently, to have the maximum impact, TIs must rely on institute participants to influence other personnel in their school districts. From our field work we found that institute

participants did not feel fully qualified to train other nonparticipants, although they did consider the training sessions useful in terms of their own specific jobs. It is not surprising that institute participants, not usually involved in training peers and certainly not in training superiors, would find a short-term institute insufficient preparation for taking on additional work responsibilities. Furthermore, in a majority of the cases the TIs had not made explicit plans to provide participants with the additional support needed to enable them to act as trainers. Thus, it would appear that in most cases the ability of TIs to effect change throughout a district is limited.

DIRECT-FUNDED LOCAL EDUCATION AGENCY

While the preceding three Title IV project types provide indirect assistance to school districts from the Office of Education, the USOE also provided for direct assistance in the form of the dfLEA. The dfLEA grant enables a district to hire a desegregation specialist and, in approximately one-third of the cases, the grant also provides for desegregation-related in-service training.

The dfLEA grant is the smallest in size of any Title IV project types. In FY75, 52 dfLEAs were operating with an average grant size of $35,700. The description that follows is based on data from mail questionnaires sent to each of the dfLEA Project Directors (39 of 52 responding). In addition, nine dfLEAs were visited by Rand staff to obtain supplementary material.

Generally, dfLEA projects undertake an extremely wide variety of activities, which tend to vary according to the district's stage of desegregation. In districts that reported they were presently *developing* a desegregation plan (first stage), the dfLEA was primarily conducting human relations training with pupil-contact personnel and district administrators. If the district was in the *process of implementing* a desegregation plan (second stage), the dfLEA undertook activities that were related to the implementation process, such as working with the community, helping schools to assess their needs, helping teachers to obtain practical experience prior to teaching in a desegregated classroom, and helping to ensure that minority personnel were not demoted or dismissed as a result of desegregation. In districts that had *completed the implementation* of a desegregation plan (third stage), the dfLEAs tended to coordinate Title IV with other federal programs and to use these funds to undertake activities that could be regarded as typical compensatory education or ESAA-type activities (training in use of new methods/materials and direct services to students). The use of Title IV funds by districts in later stages of desegregation indicates that they are more likely to be receiving funds for desegregation from other federal programs than are districts in earlier stages of desegregation. In fact, of the dfLEAs that report having completed the implementation of their desegregation plan, 100 percent of them also report receiving additional funds to meet their desegregation needs, compared to 81 percent of the dfLEAs in the process of implementing their plan, and 57 percent presently developing a plan.

Only 51 percent of the dfLEA Project Directors (also called desegregation or advisory specialists) reported having any staff members in addition to themselves. Among these 51 percent, the average number of full-time staff was 1.6. Most advisory specialists are recruited from within the district and come from administrative

or teaching positions. In addition to their positions as advisory specialists, they tend to have other supervisory or administrative responsibilities, which could serve as a source of influence for the Title IV activities they undertake. In addition, the advisory specialists seemed to have access to their superintendents: 85 percent of them reported meeting with them three or more times during the first six months of the Title IV project. Yet, in practice, advisory specialists seldom had line authority for desegregation-related decisions. Only 38 percent of all advisory specialists reported a great deal of influence in deciding upon the method of school desegregation, and 29 percent reported a great deal of influence on the timetable for school desegregation or the selection of specific schools. Personnel selection and budgeting matters are the least often perceived areas of influence (15 percent and 10 percent, respectively).

Advisory specialists had the most authority and received the most support in districts where the superintendent was committed to desegregation. They also seemed to have the most impact on the desegregation efforts of their districts when commitment was high. Conversely, in those districts where superintendent commitment was rated low and the degree of district support was not clear, it was difficult to identify any Title IV impacts on the districts.

The dfLEA directors plan the activities they will undertake with the administrative core of the district. Their activities are directed, however, to the instructional area of the district. As a result, the advisory specialist is in the position of trying to influence principals, teachers, and the community to support the superintendent's program. In addition, the advisory specialists report receiving a great deal of support from the administrative core, but much less support from the instructional periphery of the district. This lack of instructional support, combined with their lack of line authority, leaves little reason to expect that advisory specialists will have impact in their districts.

V. KEY VARIABLES

In the course of this study, we were struck by the extreme variation in project operations across all aspects of Title IV. It is this variability that enabled us to identify key variables affecting service delivery from the regional offices and projects. These key variables can be summarized as commitment (amenability to desegregation), relationship to host institution (the institution at which the project is located), and, for GACs, organizational characteristics.

COMMITMENT

Commitment was a key to effective service delivery at every level of Title IV operations. At the regional office level, the commitment of the Regional Commissioner to EEO programs was a major factor in differentiating the way in which regional offices implemented Title IV.

The regional offices where the Regional Commissioner was perceived as not being committed to EEO programs, but as using the office as a political springboard, were characterized by low morale and little staff confidence in the effectiveness of Title IV. In these regional offices, the Program Managers reported a lack of autonomy and a lack of support from the Regional Commissioner. The lack of autonomy and support was reflected in two of the regions by the Regional Commissioner's hiring of EEO staff without the consent of the Program Manager, as well as by the Program Manager's reluctance to institute termination proceedings against projects for fear of hurting the political ambitions of the Regional Commissioner. The perceived commitment factor affected field operations as well. These regional offices reported making far fewer on-site visits (one or two) than did the other offices (six to eight site visits yearly). Conversely, in regional offices where the Commissioner was perceived as committed to EEO goals, staff confidence in Title IV was high, staff morale was high, and the Program Managers were given the autonomy and support they needed.

We also found that the SEAs engage in desegregation-related activities only when there is state support for desegregation. In the course of our field work, most of the 13 SEA Title IV units we visited showed little evidence of state commitment to desegregation, while others had no way to demonstrate their avowals of commitment. Four of the SEAs we visited were in states that had mandated desegregation. In two of these cases, however, the formal mandate was not accompanied by stated goals and objectives to be accomplished; in the other two cases, the state mandates were accompanied by stated goals and objectives and by a schedule for desegregation. In the latter two states, the state Title IV units were able to pursue desegregation activities more aggressively. We feel this means that state commitment and follow-through are necessary conditions for the SEA Title IV unit to engage in effective delivery of desegregation services.

The desegregation environment at the district level was a critical variable in explaining Title IV project office impacts; for TIs and dfLEAs, an amenable desegre-

gation environment was found to be a necessary condition for impact, while for GACs it was a contributing factor and for SEAs it was not important.

As a measure of district amenability, our interviewers were asked to judge the extent to which the districts they visited were amenable to or opposed to the school desegregation movement. These interviewer ratings were based on a combination of measures including the extent to which the local school board, district voters, and district superintendents favored the legal requirements of school desegregation. We then correlated this measure with our district impact measures. The major finding is that a GAC or TI is judged more effective when the district environment is more favorably inclined to desegregation, but that a SEA is not. SEA impacts are not related to the local desegregation environment. This is consistent with our interviewers' findings that the SEA was most effective when undertaking information dissemination activities and when the *state* was committed to desegregation. Neither of these conditions is dependent on district amenability.

Further analysis of the role of the district desegregation environment showed the importance of organizational characteristics on a GAC's impact in a school district, regardless of whether or not the district has a favorable desegregation environment. That is, when a GAC has a well-organized plan for serving school districts, it does not need to work in favorable desegregation environments to have an impact.

Our data analysis turned out quite differently for TIs. Since TIs work closely with districts, their operations in the local district appear to be extremely influenced by whether or not the district is amenable to desegregation. This implies that when a district is not planning to desegregate the institute probably undertakes more traditional in-service training, whereas a district that intends to desegregate is likely to get assistance with specific desegregation-related problems in the classroom. Since many other programs are available for professional educational training, we suggest that institute funding be tied to favorable district desegregation environments.

Unfortunately, because of the wide variation in activities undertaken and the small number of dfLEA districts we visited, we could not score them on their impact. However, in the preceding section we learned that the dfLEA advisory specialist derives influence basically from two sources: from the superintendent and from the specialist's own role in the district. The data show that the greater the frequency of contact with the superintendent through meetings, written communication, or verbal communication, the more influence the advisory specialist perceived. Frequent contact with the superintendent serves several purposes: It prevents the advisory specialist from operating in a vacuum and demonstrates the support of the superintendent to both the specialist and to other district personnel. Also, the more committed the superintendent is to desegregation, the more influential the role of the advisory specialist is perceived to be. Thus it would appear that the advisory specialist's influence is related to the superintendent's commitment to desegregation. These data are confirmed by our site visits.

In our field visits, we found that those advisory specialists who received the most support from their districts and who were located in districts with a high level of commitment to desegregation seemed to have the most impact on the desegregation efforts of their districts. Conversely, in those districts where superintendent commitment was rated low and the degree of district support was not clear, Title IV efforts

seemed fractionated and it was difficult to identify participants or impacts on the districts.

HOST INSTITUTION

The relationship between the host institution and the Title IV project office is important for all project types. Present Title IV program regulations *presume* that any of the four Title IV project types can actually carry out whatever they decide to do but do not use criteria that test whether this is true. The result is that a specific project that is judged effective on other criteria might not be able to *operate* effectively because it is hamstrung by its own institution. For example, as noted above, the primary source threatening desegregation-related activities for GACs is likely to be its own host university. SEAs need a high level of state commitment to be judged effective, and TIs need to do training in districts with amenable desegregation environments or else they tend to follow standard teacher training approaches. Finally, we indicated that the range and type of duties for the advisory specialist are related to the superintendent's commitment to desegregation and the specialist's position in the district.

It was important for GACs to be protected from any pressures from alumni or university officials who might regard desegregation activities as too controversial for a university affiliate to undertake. One GAC Project Director reported that alumni letters to the university administration about their desegregation work with school districts prompted the university to take an interest in the center's activities and to attempt to tie the GAC more directly to the education department and its traditional training activities. At the same time, we observed cases in which GACs, with too direct a connection to their education departments, tended to undertake educationally conservative activities more frequently. Hence our visits to GACs showed that autonomy or independence of the Title IV agency was an important variable.

On the other hand, during our dfLEA and SEA site visits it seemed that *dependence* was an important criterion for their effectiveness. Many SEA and dfLEA projects were judged more effective by our interviewers because the state or district showed evidence of a desegregation commitment and the Title IV person was *firmly tied into the state or district administrative structure*. In these cases, independence from the major administrative unit was not an advantage.

The important link is the amenability of the host institution to desegregation-related assistance. When the host institution is perceived to be less amenable, the appropriate relationship for a Title IV unit is *independence*. When large SEA grants are awarded because a state shows commitment to desegregation, the Title IV Project Director should be closely affiliated to the state structure, preferably by holding a high administrative position; but at a minimum, formal reporting requirements to the chief state school officer would provide the incentive for a close connection. When the state is not committed to desegregation, the relationship of the SEA Title IV unit to its host institution becomes less important.

The same situation is appropriate for the dfLEA advisory specialist; measures should be devised to ascertain the administrative connection of the advisory specialist to the superintendent.

ORGANIZATIONAL CHARACTERISTICS

The third key variable affecting service delivery was applicable for GACs only (since they are the only Title IV project type that needs to build its own institution). The way in which a GAC was organized and its interaction with district personnel were critical variables in determining whether the GAC had an impact on the district it served. Organizational characteristics of the more effective GACs include: (1) a specific plan of how the GAC will serve the school districts in the area; (2) a long-range plan for providing change-oriented desegregation assistance rather than simply reacting to requests for service; (3) specific milestones for school districts; (4) clear description of GAC staff responsibilities; (5) prescribed feedback by staff and school districts; (6) specific staffing requirements; and (7) an ability to implement their activities and adhere to their schedules as planned. With the exception of the last characteristic, no other variable significantly affected the SEA's or TI's impact on its client school district.

Methods of interacting with school districts that characterize more effective GACs include: (1) well-defined methods for gaining access to influential school district officials; (2) extensive contacts with the superintendent and central office staff in school districts assisted; and (3) extensive contacts within the communities served (schools, community groups, school board members, and other public officials). These district interaction variables reflect the importance of organization for a GAC.

To give an example of how such interaction might take place, in one of the centers that we visited the staff insisted on first sitting down with the district superintendent and mutually agreeing upon goals and methods to be used in that particular district. They then required that a district member, with direct access to the superintendent, be designated as their contact person. In turn, the GAC required that this contact person perform certain duties, such as keeping a written log of GAC-affiliated district activities. This contact person was paid for performing these duties out of center funds. This approach was used by the GAC not only as a method of keeping the superintendent more informed on their activities than he might otherwise be but also as a mechanism to ensure that someone in the district was highly motivated to pursue desegregation-related activities.

VI. POLICY OVERVIEW AND RECOMMENDATIONS

In the preceding sections, the projects were described and key variables affecting service delivery were identified. Building on these analyses, in this section we will first examine the context in which the program as a whole operates, and then suggest some ways in which we believe Title IV can be strengthened, given the constraints under which it operates.

OVERVIEW

To understand the operation of Title IV one should keep in mind the limitations that American Federalism imposes upon Washington. Orfield, describing the various failures of federal agencies to successfully compel local officials to meet federal standards, states the problem succinctly:

> From the beginning, a Congress sensitive to localism has created problems characterized not by federal control, but by a bargaining situation, with the states and localities operating at a substantial advantage. The federal-state relationship has been one of diplomatic cooperation, with national officials trying to advise or persuade rather than direct local and state administrators. (Orfield, 1969, p. 7.)

As federal administrators saw that Congress would be more sympathetic to local officials than to themselves, they realized that attempts to enforce federal regulations were simply a bluff easily called. As Key wrote nearly forty years ago, federal agencies were likely to "close their eyes to frequent departures from the conditions of the federal grants." (Key, 1937, p. 167.) If this statement is generally true about the role of the federal government in influencing local activities, it is nowhere more true than in the case of education. For historical reasons, education is the most localized of all activities of government in the United States. Orfield (1969, p. 9) points out that only after decades of political confusion was the U.S. Office of Education established, and then only as a politically powerless office for collecting statistics. He further asserts that the survival of USOE depends on its continued ability to accommodate local school officials.

This situation manifests itself clearly in the confused role assigned the U.S. Office of Education by Congress. Sometimes, legislation instructs USOE to act as a nationalizing force in education, to prod recalcitrant school districts to conform to national standards of quality or reform. On the other hand, every member of Congress is elected from a local constituency, and even the most committed members have at least one eye focused on how well their state or district is faring in obtaining its share of the "social welfare pork barrel." (Stockman, 1957, p. 30.)

In addition, local school officials who object to "federal intrusion" have ready channels for combating federal pressures in their state political system, their congressional representatives, and even in the Office of Education's regional offices.

Regional office field staff members are generally recruited from among professional educators in the local region. Thus, the entity responsible for federal im-

plementation becomes staffed by persons with localized interests that may not always be in agreement with federal efforts. In addition, a majority of the Title IV project personnel were formerly professional educators who have been socialized through schools of education into a frame of reference similar to that held by the regional office personnel. Communication is maintained among these professionals through meetings and journals in which the issues are defined so that they are consistent with the profession's ideology and system maintenance needs.

Finally, the system becomes self-perpetuating by an elaborate set of exchanges: school superintendents hire graduates of education schools and education school deans recommend superintendents for positions in larger districts; state and federal officials allocate funds to school districts, while the local school boards provide the political support to keep state and federal legislators in office. These educators, unified by professionalism, communication, and interdependence, and supported by a change-resistant society can easily resist attempts to redefine education goals and to redistribute resources, including resisting the goal of school desegregation.

Title IV also does not escape the problems created by system-maintenance behavior when it reaches outside the public schools and goes to universities for help. The higher education system has its own goals, and neither community service nor desegregation are usually high among them. The academic community values scholarly research as its most important product; service plays a secondary role. The faculty is usually on a national "publish or perish" status ladder where work of a service nature is sometimes accorded little value and in many cases serves as evidence that the faculty member is not seriously committed to scholarship. Thus there is little incentive for a university faculty member to devote energies to the successful operation of the Title IV project.

These constraints, coupled with the fact that Title IV services are generally directed to school districts judged to be not very receptive to desegregation, combine to restrict the potential of the Title IV program. Simply put, the Office of Education is placed in the position of attempting to implement a federal program to assist school desegregation without consistent support from Congress, its own bureaucracy, or from its client school districts. As a result, there is a tendency at all levels of Title IV—federal, regional, and project office—to limit activities in recognition of these constraints. For example, at the federal and regional office level the proposal review process has served to replace administrative judgments with universally applied funding criteria.

Panelists who are not USOE employees assign numeric scores to proposals on the basis of predetermined criteria. Each proposal is given an equal chance; panelists are not permitted to discuss the past success of the projects and they do not site-visit any projects. Recommendations for funding are made on the basis of these numeric scores and the funding level is negotiated with little regard to the substance of the proposals. This system has the advantage that it places the Office of Education and its regional offices beyond the reach of criticism from unfunded projects. On the other hand, it enables awards to be made on the basis of minimal information, it can reward proposalmanship rather than competence, and it permits administrative judgments to be avoided in the name of "fairness."

In addition, the Regulations and Guidelines emanating from Washington and the monitoring of the projects undertaken by the regional offices are concerned almost exclusively with procedural details rather than progammatic content. Since

there is a great deal of regional diversity, it would be undesirable for Title IV technical assistance to be rigidly defined and specified by the Regulations and Guidelines. However, there is currently no corrective feedback mechanism from the USOE regarding programmatic content in the system. This leads to a program that can be so adaptable in its services as to concentrate on short-term district needs without addressing itself to long-term desegregation policies. As a result, at the project office level there is a tendency to provide education-related assistance rather than desegregation-related assistance. This is in keeping with the professional goals of the project staff, and as long as there is no substantive intervention by USOE we can expect the present system to define practically every education-related program as also being desegregation-related.

Finally, the local context inclines project offices to minimize dissonance by adopting a nonaggressive posture. When faced with a recalcitrant district, and without much definition or support from Washington, the change agent tendencies of a Title IV project are inclined to be overwhelmed.

RECOMMENDATIONS

Having reviewed a number of contraints on Title IV operations, in this subsection we will outline a set of policy recommendations beginning with recommendations concerning the role of the federal EEOP with respect to Title IV, followed by recommendations concerning the regional offices, and concluding with recommendations specific to each of the four project types.

There is always a tendency to dwell on what is wrong with a program without giving credit to its good aspects. In this study we have tried to build on what was good and to suggest ways for improvement. The major strength of the present Title IV program is that it permits assistance to school districts in varying stages of desegregation. The major weakness is that the program's lack of specificity dilutes the benefits of such assistance most of the time both for districts receiving services and for the service agencies delivering them. In all cases, our recommendations are made expressly to strengthen the existing Title IV program; by attempting to target the assistance and to specify agency responsibilities, we feel the program will move closer to its potential.

FEDERAL EQUAL EDUCATIONAL OPPORTUNITY PROGRAM

During the course of our study, we became aware of a number of constraints under which Title IV operated, which seemed to erode its potential effectiveness, namely, its lack of a clear mission and its need for an amenable district environment. Therefore, we make the following recommendations to USOE.

- *The USOE should provide a more explicit view of the federal mission of the program.*

We feel that the Title IV program should have a set of explicit goals. It is too small a program to tolerate the burden of a virtually unrestricted mandate to serve the largest number of school districts in the largest variety of ways. The lack of

boundaries on the goals of Title IV agencies has cost the program much of its identity and made it extremely difficult for regional offices to provide a consistent and coherent direction. The flexibility provided by regionalization is important and should be maintained, but it should be limited to the interpretation of explicit and consistent national criteria in the light of local conditions.

- *A much closer link between the regional offices and EEOP should be established.*

Regional office accountability cannot be maintained with the mechanical use of routine forms. The Office of Education has tended to allow Title IV to run itself. There is no formal charge to the regional offices delineating their responsibility in implementing Title IV. Rather, the charge is transmitted through meetings between the EEOP staff and the Program Manager of the EEO units in the regional offices. This "low profile" strategy has resulted in the diffusion of Title IV by an educational system with its own priorities. Reform must come from EEOP because, as we have indicated, there are few other sources for change in Title IV. The danger inherent in maintaining the program with loose connections between the regional offices and the EEOP is that regional educational priorities may eventually supersede national desegregation policy, turning Title IV into a program that functions purely as an adjunct to ongoing district programs.

- *The USOE should attempt to target Title IV assistance to districts with the greatest potential for change.*

Our data show that in FY75, most Title IV assistance was provided in districts judged to be less receptive to desegregation. Of the 67 districts scored on this variable, 48 percent were judged to be in the least amenable categories, 37 percent were in the middle, and only 15 percent were judged as amenable. These results imply that Title IV has largely ignored the principle of maximizing impact by working in receptive districts. The Rand evaluation is not the first to make this point; the earlier Commission on Civil Rights evaluation notes it as well. One can certainly argue with good reason that less receptive clients should be assisted. But it is not so certain that so many of these limited Title IV funds should be allocated to such environments, and this would seem to be the result unless conscious consideration is given to the local context in the funding procedure. In addition, the present mix of Title IV client school districts encourages projects to take a passive stance rather than to actively pursue desegregation activities. Unless a project office is extremely motivated, the district environment in which it works does not encourage it to pursue such activities.

REGIONAL OFFICES

Federal programs are reportedly regionalized in order to allow variations of the particular regional setting to influence policy implementation. This implies that regional offices could interpret various substantive criteria differently depending upon the context of the assistance rendered to the Title IV project. In fact, a great deal of the variation that we found between regional offices could be a manifestation of this "regionalization" working properly. However, other variation seemed to be

caused by inconsistent interpretation of procedures. The distinction between "inconsistent" versus "regional" interpretation is that in the latter case there exists a series of policy rulings, which are referred to as the basis for the underlying decision. Although the decision may vary from region to region, the important point is that criteria exist by which the decision is made. Inconsistency, on the other hand, refers to variation in regional office rulings, which is due to the absence of criteria to which regional offices can refer, leading to a wide variation from region to region for both the mechanisms and justifications for specific rulings. Examples include variation in monitoring forms, methods of panelist selection, and training of panelists. Therefore, the intent of the following recommendations is to eliminate what we understand as "inconsistency" by standardizing procedures across regions, while permitting regional variation to exist within the program.

- *The federal EEOP staff and regional office personnel should establish a set of consistent administrative criteria.*

The purpose of this recommendation is to establish standard criteria, not to ensure that those criteria be interpreted the same way from region to region. For example, the solution to the inconsistent evaluation problem as evidenced by alternative monitoring forms is not merely the development of a better form *imposed* on the regions by EEOP. An alternative approach might be to use a nationally developed form based on the present regional forms, which is congruent with the overriding monitoring efforts of EEOP. We feel that efforts such as this will develop a national thrust for the program and, at the same time, permit regionalization to operate.

- *Panel selection and training procedures should be standardized, a minimum percentage of holdovers from previous years' panels should be used, and panelists should be tested on their understanding of program operations.*

We suggest that the same criteria for selecting panelists be used across all regions and that these criteria specify who should serve on the review panel in terms of occupation and tenure. Also, so that persons who are panelists for the first time can learn the system, some specified proportion of the previous year's panelists should be in each panel, and this proportion should be standardized for all regions (for example, 25 percent of this year's reviewers might be the previous year's reviewers).

The present training procedures do not seem sufficient to assure that panelists completely understand how to review proposals. Therefore, we suggest that some method of testing be devised at the end of the training session to find out how well panelists understand the instructions. One possibility is to review one or two of the past year's proposals for each project type, have each panelist score them, and discuss discrepancies. It should also be possible to specify performance criteria for panelists and to devise measures of interpanelist reliability prior to the actual review of the proposals.

- *A consistent method of presenting proposals to panelists should be adopted.*

Proposals are presently presented to panel reviewers in a number of different ways. We suggest that one of two methods currently in use at some regional offices

be adopted; all proposals for the same project type should be reviewed simultaneously (for example, all GACs) or all proposals for various project types within the same state should be reviewed simultaneously (all GAC, SEA, TI, and dfLEA applicants from one state). A standard procedure for all regions utilizing either of these two methods can be adopted with little difficulty. We feel that either of these two procedures would enable panelists to make better judgments concerning how well the proposed projects would meet the needs of the districts.

- *Award decisions should include information from the Program Officers concerning the operation of ongoing projects.*

We are aware that there has been a continuing dialogue about the issue of including Program Officers' evaluations of present projects in the review phase. Arguments against such evaluations usually revolve around the notion of favoritism. Arguments in favor stress the Program Officers' knowledge about specific projects. The latter arguments seem more compelling to us. Unfortunately, discrepancies can exist between work that is proposed and work that is actually accomplished. Eliminating evaluative information concerning ongoing projects enhances the probability of funding projects on the basis of a polished proposal and failing to fund projects that may have the greatest impact.

- *Some modification of the regional ranking system should be made to ameliorate the effects of artificially high proposal ratings from some regions.*

The present awards system, in which each regional office panel awards a summary quality point rating to each project, and then funding is decided by placing all projects in a single national ranking, has two disadvantages. First, it permits a regional distribution of Title IV grants that can vary dramatically from one year to the next just by chance. Second, it provides incentives for regions to bid against one another. This has led to an inflation of points awarded to projects, which will probably continue and soon lead to a breakdown in the present system.

PROJECT OFFICES

The following recommendations are specific to each of the four Title IV project types. In forming these recommendations, we have attempted to build on the unique strengths of each project type and to suggest ways that would capitalize further on these strengths.

General Assistance Center

- *GACs should be given flexibility in selecting client school districts and should not be required to work with all districts requesting assistance.*

Our field work experience revealed that GACs judged most effective by our interviewers have a clear conception of the assistance process and are rather selective, choosing districts where they can anticipate a favorable impact. However, the existing statistical point system for funding (which encourages GACs to seek requests for assistance from districts with large minority population) hampers this selectivity by providing them with a counterincentive to work with a larger number

of districts. Therefore, we recommend that the statistical point award criteria be discarded and that GACs be allowed to select the districts with whom they will work.

- *An additional point award criterion measuring effective organizational characteristics should be added for GACs.*

GAC organizational characteristics retained an independent effect on local-level impacts regardless of the district desegregation environment. These results argue for the inclusion of an additional award criterion measuring GAC organizational characteristics in the point award system. The addition of this criterion means that GACs should be judged on the basis of their planning and conceptual capability, including such things as whether they have a general action plan and a method of implementation and whether they plan by objectives. The GAC proposal should also reflect a well-developed conceptualization of the process by which change is induced in school districts.

- *An additional point award criterion should be added for GACs measuring their autonomy from their host institution.*

As was mentioned in the previous section, GACs that did not operate independently from their host institution undertook fewer desegregation-related activities and were judged to be less effective.

- *GACs should be funded for multiple years in order to allow them to maximize their institutional advantages and method of operation in school districts.**

The GAC needs time to develop credibility with all levels of district personnel, in addition to being able to develop its own viability as an independent organization in the university setting. Additional data analysis showed that the longer a GAC has been funded, the more likely it was to engage in multiple activities. In addition, we encountered many circumstances during our field work in which district-level personnel pointed out that past contacts provided the basis for present assistance. The current tendency for GACs to narrow their activity focus because of a time constraint caused by lack of multiyear funding could ultimately result in the Title IV program losing the two primary advantages of GAC services to local school districts —breadth and depth of service delivery.

State Education Agencies

- *SEAs should be funded for information dissemination activities only, except when state commitment to desegregation is high (specified state policies with procedures for enforcement exist).*

We recommend that in all cases except those in which the level of state commitment is high, the average SEA grant be reduced to a level consonant with those activities judged effective. Our interviewers were most impressed with SEA efforts in the areas of information dissemination (including providing sources for minority recruitment). This does not, of course, exhaust all possible areas of technical assis-

* It is our understanding that EEOP is now funding GACs for multiple years.

tance in which SEAs might be effective. Nevertheless, it indicates that the technical assistance role for a SEA can be handled at a much lower average funding level than is presently allocated. Where the state commitment to desegregation is high, it seems extremely useful and helpful to continue to fund a large Title IV SEA unit. But where the state commitment is lacking or there is no clear state policy with procedures for its *enforcement* (as presently seemed to be the case in the overwhelming majority of sites we visited), both the activity profile and SEA district interaction pattern indicate that a smaller scale of activities would allow the SEA to operate more effectively in those areas where it is stronger.

Training Institutes

- *TI client districts should be limited to those with favorable desegregation environments.*

Unlike the GACs, which, when well-organized, can still be effective working with less amenable districts, our analysis indicated that the desegregation environment of the client school district accounted for whatever TI impact could be attributable to organizational characteristics. In other words, if a TI has a well-organized plan for dealing with school districts, it does so probably because the districts it works with are favorably inclined. This is not to say that all TIs can be effective in districts that are amenable to desegregation, but rather that a favorable desegregation environment is a necessary condition. Therefore, we recommend that the institutes be limited to working with districts that either plan to or are already desegregating.

- *An additional point award criterion for follow-up procedures should be added for TIs.*

Presently, few of the TIs systematically undertake follow-up activities to ensure the dissemination of their services to other parts of the school district. Without this dissemination, the potential effectiveness of TIs is severely limited.

Direct-Funded Local Education Agencies

- *dfLEA grants should be awarded only to districts with favorable desegregation environments.*

A favorable district desegregation environment can be operationally defined as a district that is actively desegregating either voluntarily or in response to a court order. Thus, we suggest that dfLEA grants be limited to districts in any of these conditions:

a. Under federal (including Office of Civil Rights), state, or local court order for new desegregation.
b. Under suit by an individual, a local, or national pressure group to prohibit resegregation.
c. Implementing or in the last year prior to implementing a voluntary desegregation plan.

- *dfLEA advisory specialists should report to the district superintendent as a condition of the grant award.*

From our study of dfLEAs it was apparent that there was a large tendency for the advisory specialist to play a peripheral role in the district. Advisory specialists who worked closely with the superintendent were found to have the most influence and greatest potential for effecting change in the district.

CONCLUDING REMARKS

In concluding this section on policy recommendations, we state our own limitations. We do not feel that our knowledge of the program is inclusive enough to recommend specific operational procedures with the assurance that these are the best or only alternatives. Operations personnel are far more qualified to do this. Our specific suggestions are intended to be instructive rather than definitive; we hope they will be of assistance to program personnel.

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