DOCUMENT RESUME

ED 207 769 RC 012 947

AUTHOR Hearn, Norman E.
TITLE Treatment of Rural Areas: Planning Guidance for Administrative, Legislative, and Regulatory Action for FY 1982-83.
INSTITUTION Office of Elementary and Secondary Education (ED), Washington, D.C.
PUB DATE [81]
NOTE 21p.

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS Access to Education; Change Strategies; Definitions; Delivery Systems; Educational Administration; *Educational Finance; Educational Legislation; Educational Needs; Educational Policy; Elementary Secondary Education; Equalization Aid; *Federal Aid; *Federal Programs; Federal Regulation; *Government School Relationship; Rural Education; *Rural Schools; Rural Urban Differences; School Districts; School Funds; *Small Schools
IDENTIFIERS *Department of Education

ABSTRACT

Effects of Federal education policy on rural and small school include inequities and neglect. Funding formulas based on concentrations of targeted pupils and average cost per pupil appear to deprive small and rural local education agencies (LEA) of a fair share of Federal education monies. Selection criteria such as density and Education Division General Administrative Regulations (plan of operation, quality of key personnel, time-committed-to-the-job, budget-and-cost-effectiveness, evaluation) penalize small and rural LEAs. Other regulatory and administrative practices that complicate, impede, and discourage small and rural LEA participation in Federal education programs are maintenance-of-effort provisions; matching requirements; paperwork burdens; a propensity to favor large over small grants; and difficulties in obtaining technical assistance and information about Federal programs. Suggestions for a rural initiative include: analysis of formula and criterion effects on rural and small LEAs, rural "set-asides," direct rural communication, paperwork burden reduction, technical assistance participation, improving the data base, identifying and validating successful rural practices, and legislation to compensate for extra costs necessary to assure quality education for rural children. (NEC)

UNITED STATES DEPARTMENT OF EDUCATION

MEMORANDUM

TO : Assistant Secretary for
Elementary and Secondary Education

FROM: Senior Policy Analyst Norman E. Kearn
Office of Elementary and Secondary Education

SUBJECT: Planning Guidance for Administrative, Legislative, and Regulatory Action for FY 1982-83

TREATMENT OF RURAL AREAS
[1981]

This paper will summarize what is known about Federal education policy effects on rural and small schools. It will suggest what additional data are needed and what the Department of Education might do to address the special educational problems that have been identified.

I. Background

Definition of Rural

Rural Americans are most commonly defined as that 32 percent, or 65 million individuals, who reside in counties outside the U.S. Census Bureau's Standard Metropolitan Statistical Area (SMSA) which includes a city of at least 50,000. The U.S. Department of Agriculture defines rural as any community of less than 2,500 population. A non-metropolitan county is defined as one having fewer than 20,000 urban residents that are not adjacent to a SMSA. The Municipal Year Book 1976 lists counties containing cities of 10,000 or larger as urban; all others are rural. The Rural Development Act of 1972 defines rural as anything outside a city of more than 10,000 population, or for funding purposes, outside of cities of 50,000 or more.

Definition of Rural School District

A rural school district or local education agency (LEA) is by definition one that is located in a rural area. Such LEAs are also referred to as "small"," non metro", "remote" or "isolated". Using the Census Bureau's "nonmetropolitan" definition, in 1979 about one third, or 14 million children (ages 5 to 17) were enrolled in rural public schools.

The Secretary of Education defined "small LEA" for purposes of implementing the Regulatory Flexibility Act as one with a student enrollment of fewer than 1500 students. This definition includes 65 percent of all LEAs in the U.S. and 11 percent (or 4.8 million) of the total enrollment. States also define rural school districts variously. For example, Texas and Oregon define a small (and rural) school district as one having fewer than 1,000 average daily attendance (ADA). Some programs also define rural for special purposes. The National Rural Project funded under P.L. 94-142 considers a district to be "rural" when the number of inhabitants is less than 150 per square mile or when located in counties with 60% or more of population living in communities no larger than 5,000 inhabitants. Obviously, definitions of rural and rural LEAs are often adapted to the special mission, location and characteristics of programs or agencies.

Diversity

Many think of rural as synonymous with agriculture, but in fact rural populations are strikingly diverse with only 20 percent living or working on farms. Rural communities include fishing villages in Maine, coal company towns in Appalachia, farming communities in Iowa, Delta counties in Mississippi, recreation communities in Colorado, Indian reservations in South Dakota, small college towns in Minnesota, migrant settlements in Texas, retirement communities in Florida, and Alaskan native villages.

Rural Poverty

Bureau of the Census and Department of Labor reports indicate that the incidence poverty in nonmetropolitan areas is 50 percent higher than in metropolitan areas, and the average family income is 15 percent lower. National Center for Educational Statistics (NCES) reports show that of the 2,000 U.S. school districts where the median family income is less than $7,000 annually, 75 percent are rural, and of the 1,600 U.S. school districts where 30 percent (or more) of the students come from families living in poverty, 68 percent are rural.

Educational Attainment

Department of Agriculture analyses of Census, NCES and other data indicate that "Rural/metro students attend schools with relatively fewer support staff and services, less revenue, and

less per pupil expenditures" (Fratoe, Rural Education and Rural Labor Force in the Seventies). Therefore, according to Fratoe,"rural students are more likely (1) to attend public schools that expend less for instruction, (2) enroll in school later, (3) progress through school more slowly, (4) complete fewer years of school, (5) score lower on national assessment tests and (6) be classed as functionally illiterates".

Migration to Rural Areas

The vast rural-to-urban migration that was the common pattern of U.S. population movement in the decade after World War II has halted and reversed. According to Calvin Beal in testimony before the House Select Committee on Population in 1978, "During 1970-1973 non-metropolitian areas gained 4.2% in population compared to 2.9% for metropolitan areas". Much of the gain was in non-metro counties adjacent to metropolitan counties. Ross and Green in Impact of the Rural Turnover on Rural Education, (1979), report that growth in non-metro counties from 1970-1975 was 6.6 percent as compared to 4.1 percent for metro counties. The difference between the Beal and Ross/Green data is probably due to definitions of rural. All agree however that this reversal in migration is putting new social and economic strains on rural schools that may need special consideration in educational policy making at State and Federal levels.

Problem Identification Approach

The various definitions and obvious diversity of "rural" argue for a problem -identification approach to rural education needs. Examination and acceptance of the characteristics or "reality of rural America" is, according to Paul Nachtegal (Improving Rural Schools, 1980), "a pre-condition to any reform of Federal policy". Researchers basically agree that the following special characteristics of "rurality" become a liability to rural applicants in the competition for funds and services:

1. Sparsity of population
2. Isolation from information, resources and assistance
3. Smallness in size, number and units
4. Limitations of the economic base.

These conditions tend to be regarded negatively by policy makers. This leads to the stereotyping of rural schools as inferior and often results in actions to abolish rather than assist them. Researchers and rural constituents have suggested that policy makers and educational managers will need to analyze each rural condition, ask what the implications of each characteristic are for Federal regulations, evaluations, and procedures and adjust offending practices in ways that will not handicap rural schools in the provision of information, funds and services.

Comment

The basic complaint of what must be regarded as a significant rural constituency is, in the words of Jonathan P. Sher, that "rural needs and concerns are routinely neglected by Federal education agencies..." though in the opinion of Tom Gjelton, "it is hard to show there has been any malicious neglect...". There is nevertheless enough indications of inequity to cause Federal agencies to undertake systematic review of their policies to determine what, if anything, might be done to redress rural grievances. Subsequent sections of this paper summarize the evidence and suggest actions.

II. Do present Federal funding policies discriminate against rural schools?

During the past five years, several studies have indicated that at the receiving end of allocations rural schools (variously defined) receive less Federal dollars than urban areas. The following are examples of oft-quoted findings from such studies:

- 53% of the educational deprived children live in rural (non SMSA) areas but received only 35% of HEW Federal outlays for educationally deprived children. (The Seventh Annual Report on Government Services to Rural Americans, GPO, 1977).

- 78% of all U.S. school districts received Federal ESEA assistance while only 42% of school districts under 300 enrollment received ESEA funds (Gjelton, NCES Statistics of Local Public School Systems, 1975).

- Less than 5% of all Federal program funds reach rural school districts(under 500 enrollment) which comprise 41.8% of the nation's districts (Senator John Melcher, Education Daily, July 16, 1980)

- LEAs of 25,000 or more received 39% of eight LEA-oriented programs though they serve 28% of the total U.S. pupil population. Programs include ESEA I, ESEA I-B, EHA VI-B, AEA III, VEA I-B & F, ESEA IV-B and C.(Uses of State-Administered Federal Funds, 1977-78).

- Suburban areas receive through ESEA Title I over 11% more and central cities 15% more than nonmetropolitan areas. Large central cities receive 18% more per formula eligible child than do rural nonmetropolitan areas. Compared with the national average of $193 per formula-eligible child, large central cities receive 109% of the average($210), and rural nonmetropolitan areas, 92% ($177).(ESEA Title I Funds Allocation, NIE, 1977).

- Although one-third of the nation's school children and one-half of the nation's poor families live in rural areas, such areas received only 11% of the library and materials funds, 13% of basic vocational aid, 14% of guaranteed student loan monies, 8% of migrant education aid, 13% of dropout prevention funds, and 20% of bilingual education monies. (Testimony, Senate Subcommittee on Rural Development; also Federal Initiatives and Rural School Improvement, Abt Associates, 1975).

A six-State Rand study of two Federal education programs concluded that (1) ESEA Title IV-B formulas do not seem to be biased against rural districts and (2) ESEA Title IV-C funding patterns vary across States but then finer-grained definitions than "nonmetropolitan are used, "isolated districts tend to receive less funding in proportion to their enrollment even in cases where the overall funding pattern favors rural areas". (Funding Mechanisms and their Effects on Rural Areas: Analysis of Two Federal Programs, Rand, 1979).

Even though the variety of research designs and definitions confound and temper generalizations on the effects of present Federal delivery systems on rural areas, one trend clearly emerges. As suggested by Rand, when the definition of rural is "refined" to eliminate urban centers, and as the pupil enrollments become smaller as the population becomes sparser, such school districts receive less and less Federal funds per pupil, despite other evidence that their costs increase and their need is as great or greater than urban areas.

III. Do present funding formulas deprive certain small and rural districts of a fair share of Federal education monies?

Though the evidence is fairly persuasive that Federal dollars do not reach certain sized and isolated rural districts, it is not entirely clear why this happens. Studies, testimonies, and observation suggest the following causes.

Concentration Handicap

Some formulas make eligibility contingent upon concentrations of a specified number of targeted pupils. For example, the ESEA Title concentration grant formula may actually work against rural districts because counties will receive money for children in excess of 5,000(which may represent far less than 20% while less populated counties must reach 20% of their disadvantaged population before they are eligible. Counties in effect count students twice which means" that a concentration grant is a automatic gift to metro counties" (Rand). (Also,if incentive grants were to be funded, the award for extra effort would probably go to wealthier urban districts).

Average Cost Penalty

Some allocation formulas are based on average costs per pupil. For example, the ESEA Title I basic grant formula is based on per pupil expenditures (PPE)in individual States. States with low PPE's do not benefit as much as States with higher PPE's. The assumption in the formula is that poorer States are buying and providing the same level or quality of education with less money. If this were true, the formula penalizes efficiency. If it is not true then the poverty of poorer States is perpetuated by the Federal Government rather than alleviated.

IV. Do selection criteria penalize small and rural districts? Though the criteria used by ED and SEA grant managers vary somewhat among discretionary programs (beyond the EDGAR Standard Criteria), there is some evidence that critics are correct when they claim that "funding criteria have a distinct urban bias" (Sher, Phi Delta Kappan). Several examples are offered by observers.

Density Bias

Applications for ESAA basic grants (desegregation aid) are rated by readers and Federal officers on the basis of a combination of numerical and percentage measurements. Rural districts are predestined to lose on the numerical score. Rural researchers refer to this as "density bias". Density bias also shows up in needs assessment sections of applications when needs are considered more severe when they are clustered in groups rather than spread apart. Under the bilingual education program, for example, a school district's application is rated partly on its "need" points. Need is defined on the basis of both the number of students of limited English proficiency and the comparable percentage. Thus a small rural district is always at a disadvantage because the large urban district will be able to score extra points due to its higher number of students.

EDGAR Criteria Disadvantage

EDGAR (Education Division General Administrative Regulations) specify common criteria for rating proposals for ED's discretionary grant-programs. There is reason to suspect that in certain cases these-criteria are interpreted by readers, and Federal and State program and contract officers in ways that penalize small and rural districts. Five examples follow :

(1) The "Plan of Operation" criterion awards points for a "clear description of how the applicant will provide equal access and treatment of the underrepresented, such as minorities, women, handicapped, and elderly." Rural communities are typically homogenous which puts them at immediate disadvantage where they are short on minority population. And though participation of women may be a national priority accepted in urban centers, rural areas still tend to cherish the traditional value of women as homemakers and reject attempts to alter their roles through participation in Federal projects. The dispersion of handicapped pupils in rural sparsely-settled areas, also causes rural personnel to consider the high cost of locating and transporting such pupils to project sites before applying.

(2) The "quality of key personnel" criterion would seem to be a fairly objective selection criterion, but again rural schools are at severe disadvantage because of low pay and isolation in attracting and holding highly qualified personnel. Raters of proposals are likely to consider degrees and years of experience as "quality points", both standards not ususally found in rural communities.

(3). Even more inequitable, is the "time-committed-to-the-job" standard found in EDGAR criteria. Rural personnel are notorious for their many "hats": bus drivers, lunch room managers, administrators, part-time teachers, etc. It is unlikely that a small rural school could tolerate personnel devoting fulltime to one task. Futhermore, it presents an awkward personnel situation when full-time Federal project personnel are prohibited by regulations from sharing routine duties with regular personnel. This criterion also offers points for nondiscrimination in employment practices for the "underrepresented", thus twice penalizing rural areas with few or no minorities.(Though an appeal is allowed, which requires even more paperwork).

(4) The "budget-and-cost-effectiveness" criterion is often translated into a per pupil costs quotient, which casts small enrollment LEAs into an unfavorable comparision arena with larger LEAs, usually assuring them a lower ranking. Rural LEAs can offset this disadvantage by paying project personnel less; but that militates against them on the "quality-of-personnel" criterion if they must settle for personnel with less credentials and experience. A few States have recognized this "diseconomy of scale" handicap by incorporating a "sparsity factor" into finance formulas and selection criteria.

(5) Rural and small LEAs are particularity disadvantaged on the "evaluation" criterion. Rural schools are not likely to have research personnel available to design sophisticated evaluation models that would compete successfully with urban projects. Furthermore, according to Kathryn Hecht, The Interstate Compact for Education,(1980) the size of a typical grant to a rural LEA usually would be insufficient to support an adequate evaluation design of any kind. Hecht notes that evaluations usually require from 5 to 10% of a project budget. For a typical rural project of $10,000, the amount to be allocated for evaluation would be $500 - $1,000, hardly enough for a valid evaluation and certainly not enough to support a design that would win many points in competition with larger projects.

V. Do present ED Administrative and regulatory practices inhibit rural and small school participation in Federal programs?

In addition to built-in criterion and formula biases, rural critics cite other regulatory and administrative practices that complicate, impede, and discourage small and rural LEA participation in Federal education programs.

Maintenance of Effort Susceptibility

The maintenence-of-effort (MOE) provision is either legislatively or administratively mandated in most ED programs. Findings of non-compliance due to failure to maintain level support increased ten fold in 1978-1979 and are likely to escalate in the 1980's, causing LEAs to lose Federal funds through audit exceptions. The Rand study, Maintenance of Effort Provisions, An Instrument of Federalism in Education (1980), notes that MOE compliance "is generally a small school district problem" for two reasons. "First, the budgets of small districts show greater proportionate fluctuation to small changes in enrollment, staffing, or school revenue sources. Second, the conditions which might trigger MOE problems in small districts are not likely to be noticed or responded to as quickly as those in large districts which have more sophisticated accounting systems and greater visibility at the State level."

Matching Impediment

There is a tendency for Federal program legislators, regulators, and managers to include local matching as a provision for entitlement or eligibility. Though such provisions may encourage local "ownership" and possibly adoption of the program after Federal funds cease, they have the initial effect of discouraging financially poor and small districts from applying and participating.

Paperwork Burden - Cost vs. Benefit.

Rural constituents are among the forefront of decriers of excessive Federal paperwork. During the ten regional roundtables on rural education (1979) they repeatly complained that "existing Federal education programs place a disproportionately greater administrative burden upon and are operationally less flexible in small rural districts than in larger urban schools due to the diseconomies of scale".

Since most formula-based Federal aid is tied to school enrollment, the smaller the system, the less aid it receives. But with any grant there is a minimum amount of paperwork that accompanies the grant regardless of size. This means that in many small rural districts, the administrative burden imposed may outweigh the benefits. One example given by a rural superintendent was the school boards decision not to apply for ESEA Title IV B funds because it would cost the district $5,000 in staff time and other resources to get $500 library books and materials.

Big is Better?

Even when small rural schools do compete for Federal monies, they are faced with a Federal and State propensity to favor large over small grants. In an analysis of the distribution of Federal education discretionary grants in four rural States (Ia. Ka., Mo., Neb.), Jacobsmeyer in Rural and Small Schools in Region VII (1981) observed that "metropolitan public schools received considerably more discretionary grants(44 vs. 13) and were awarded a substantially greater amount of funds ($8.4 million vs. $1.4 million) than nonmetropolitan school districts." As summarized by Gjelton in The Rural Experience with Federal Aid,(1980), "Washington officials seem stuck in a mentality which demands large-scale solutions, which value transferability over local relevance and which sees innovation as a process which only happens in large, resource-rich educational centers". As evidence, ESEA Title IV-C is cited which in recent years has supported fewer but large developmental grants ($50,000 - $100,000) and has practically phased out "mini grants" ($500 - $1,500). According to Enrich in Evaluation of the National Diffusion Network (1977), the typical "developer" is an urban or suburban school, while the typical "adopter" is a rural school, reinforcing the notion that urban solutions are appropriate for rural education problems. Smaller universities and college express the same criticism of Federal policy in the research and development area by noting that most grants go to the same larger prestigious, urban universities (Edington, CRESS).

Technical Assistance Gap

The plight of small and rural schools is recognized by provisions in various program authorizations for ED or SEAs to provide technical assistance to schools in applying for and operating a Federal program or projects. In fact, the Educational Amendments of 1978 authorize technical assistance (Sec. 266) to "State educational agencies, institutions of higher education... and elementary and secondary schools- (1) in determining benefits available to them under Federal law; (2) in preparing applications for, and meeting requirements for applicable programs; (3) in order to enhance the quality, increase the depth, or broaden the scope of activities... and (4) in order to encourage simplification of applications, reports, evaluation and other administrative procedures".

This function was reinforced by the Department of Education Organization Act (P.L. 96-88) Sec. 422 (a) "Technical Advice" as follows: "The Secretary is authorized, upon request to provide advice, counsel, and technical assistance to applicants or potential applicants for grants and contracts and other interested persons with respect to functions of the Secretary or the Department. But according to Gjelton writing in Rural Educator, 1980-81", "... the programs are underfunded, and the record of technical assistance programs in rural areas is a dissappointing one". He noted that in one State, assistance in developing applications for Title IV-C grants is assigned to the regional education assistance centers, which themselves compete for the grants - against districts they are assigned by the State to help. Considerable technical assistance is authorized by Title IV, Civil Rights Act. Funds are available to LEAs, SEAs, colleges and universities, and desegregtion centers to assist local schools prepare and implement desegregation, voluntarily or court-ordered. Though much of the early assistance went to the rural South, it is likely that most technical assistance now occurs in large metro areas as desegregation suits moved North. ESEA Title I, provides for technical assistance for dissemination and the design of evaluation programs. But again an HEW Sanctions Study found that assistance to be "inadequate". Though statistical data on the degree and nature of technical assistance to small and rural LEAs are not readily available, it is nevertheless self evident that ever-reoccuring restrictions (freezes) on salary and expense (S&E) funds for the Department have practically assured that ED program officers or others have been unable (if not unwilling) to provide assistance to those LEAs most in need (usually rural areas).

Information Blackout

Consistently rural educators complain that they do not have access to information about Federal programs. Rural schools and small town newspapers are seldom included in mailings of bulletins, press releases and letter notifications of meetings. Because of the large number of rural LEAs - 7,000 - 11,000 depending on definition - it is not "cost-effective" to communicate to so many. States and ED resort to notices in publications and word-of-mouth communications and rely on the Federal Register to meet the legal requirement for public notification.

Rural personnel seldom subscribe nor have access to the Federal Register. As a result, rural schools do not learn of Federal funding opportunities nor about technical assistance. In addition they seldom respond to requests for comments on how regulations affect them. Lack of direct communications with small and rural schools has probably contributed more than any other factor to the general perception that little or no consideration is given to rural conditions in ED program policy development during the past several years.

VI. What Can Be Done?

The data on the effects of present ED policies on rural and small schools, though sometimes flawed, nevertheless tend to support rural critics' claims of a tilt toward large urban schools. The fact that the concept of "rurality" is complex need not deter efforts to address the various aspects of the rural school problem. The Government is basically concerned with equitable and nonburdensome administration of Federal education programs for rural as well as all schools. Delivery of services and monies to rural schools is complicated and compromised by factors of (1) distance (sparsity), (2) access (isolation), (3) number and size (small), (4) cost (high) and an assumption of inferiority (quaint, non-urbane culture). To the extent that present policies, regulations, procedures, criteria, and communications penalize on these characteristics, ED can examine its practices and take steps to change burdensome and inequitable policies. Most thoughtful observers, however, support a cautious approach to solutions until more and better data provides a clearer understanding of the rural condition. Without additional insight, any proposal to help may cause problems for rural schools. With this caveat in mind, suggestions for a rural initiative in the Department include the following activities:

1. ED needs systamtic, in-depth, program-by-program analysis of formula and criterion effects on rurual and small LEAs. If data are not readily available, steps should be taken to acquire it.

Discussion:

To date, the National Institute of Education and the Office of Elementary and Secondary Education, have supported a small field study to examine Federal policy effects on rural and small schools from the local perspective entitled The Rural Exerience with Federal Aid, Tom Gjelton; National Rural Center, September, 1980. This study was mainly exploratory but it provided some significant insights for a more comprehensive study. More data are needed about the "sparsity factor" used by several rural States to compensate sparsely settled and isolated rural schools for the extra costs of transportation, small pupil-teacher ratios, etc.

2. An option of proposing legislation, revising regulations, and policy guidelines to provide "set-asides" for rural LEAs should be explored

Discussion:

A set-aside for rural schools was recommended by participants in the 1979 national rural education seminar and the 10 regional roundtables. Rural spokespersons also have suggested the set-aside remedy. Senator John Melcher (D-Montana) has proposed attaching such a provision to any block grant legislation. The former Deputy Assistant Secretary for the Equal Educational Opportunity Program also proposed set-asides for basic grant programs of ESAA. A few states provide rural set-asides to assure rural districts a fair share of State/Federal competitive funds. This option could be examined on a program-by-program basis to determine the legal and administrative feasibility of this approach to assuring a measure of rural equity.

3. Steps should be taken to increase communications with small and rural LEAs including measures to provide rural schools access to information on ED regulations, proposed legislation, grant announcements, R.F.P.'s and technical assistance.

Discussion:

Continuing to rely on the Federal Register, SEAs, and trade newsletters to reach rural constituents will guarantee continued low participation of rural schools in programs and in ED policy formulation. Through a small ED contract in 1979, A.A.S.A. and the National School Board Association conducted several sessions with their rural memberships to review Federal policy roles. A.A.S.A. also surveyed the states and identified names and addresses of 7,800 small school administrators for a rural communications network. This mailing list was used to inform rural members of new regulations, solicit comments on the Regulatory Flexibility Act, and advise them of the FHA construction loan availability (USDA). The Assistant Secrtetary and rural specialist also addressed several conferences of small and rural school personnel and hosted rural visitors seeking information about funding opportunities. This activity should be expanded and continued to include inviting rural administrators to discuss education policy issues and visits by assistant secretaries to small and rural schools to demonstrate ED's concern and intent.

4. Efforts should be made to reduce the disproprtionate paperwork burden of Federal programs on small and rural LEAs.

Discussion:

Paperwork burden is a complaint from all-sized LEAs, but allegedly rural LEAs often decide not to participate because there is neither time nor personnel to undertake the requirements of applications, assurances, reports, evaluations, etc. The Regulatory Flexibility Act (P.L. 96-354) would allow ED to exempt "small entities" from certain requirements if a regulation or rule were found to have "a significant economic impact on a substantial number of small entities" - defined by ED as LEAs under 1,500 enrollment. Unfortunately, data on the number of small LEAs significantly impacted by a given rule are not readily available. As a result, of the first 55 rules reviewed, none were declared by ED to be a candidate for allowing exemptions for small entities. A 1980 initiative to reduce burden through "Innovative Regulatory Techniques" resulted in suggestions by the Assistant Secretary for Elementary and Secondary Education to apply a "tiering technique" which would exempt small LEAs (under 500 enrollment) from certain criteria and reporting requirements. The Outlaying Areas Consolidation Act was also cited as a model for allowing small districts to submit one application for all eligible grants. These suggestions could be pursued.

5. Efforts should be made to assure small and rural school participation in State and Federal technical assistance activities.

Discussion:

A major component of the ED's 1982 Rural Education Network budget proposal was authorization for a rural outreach office in each SEA. The purposes of such a office would be to assist small LEAs with applications, evaluation, reports, locating resources and generally be an advocate for rural districts. The State-level approach to technical assistance would provide the flexibility needed to accomodate the various rural regional definitions and conditions. At the ED level, technical assistance programs presently authorized need to be reviewed to determine what factors prevent adequate rural participation.

6. Efforts should be made to incease the quality and comprehensiveness of the data base on rural education

Discussion:

Most of the tables published by NCES on the condition of education do not include breakdowns by enrollment sizes or other indications of rural characteristics. Fortunately, the Department of Agriculture has conducted studies showing educational status by region, size, and minority populations.These include The Education Status of Non-Metro Hispanics, (1981); The Education of Non-Metro Blacks, (1980); The Education Level of Farm Residents and Workers, (1979); Rural Education and the Rural Labor Force in the Seventies, (1978); and "Problems and Strengths of Rural Education", 1980. These data have been useful in assessing the extend to minority disadvantagement in rural areas. NIE has also conducted several studies that describe the rural condition, i.e., A Portrait of Rural America: Conditions Affecting Vocational Education Policy, (1981); Economy, Efficiency, and Equality: The Myths of Rural School and District Consolidation, (1976); Imaginary Gardens"; Rural Problems, (1979) (ERIC); Improving Rural Schools, (1980); The Rural Experience with Federal Aid, (1980); and Impacts of the Rural Turn-around on Rural Education , (1979) (ERIC). Other offices in ED have published materials highlighting rural problems and needs. The National Advisory Council on Women's Educational Programs published Educational Needs of Rural Women and Girls(1977). The National Rural Project, funded by the Office of Special Education and Rehabilitation, publishes rural problem-oriented reports regularly. Working with all agencies concerned, ED should consider developing a research and information collection agenda that would address the condition of education in rural America.

7. Efforts should be made to identify and validate educational and school business practices that are rural based or adaptable.

Discussion:

Most of the validated practices are in urban areas and large school districts. Only five of the 85 Developer/ Demonstrator projects of the National Diffusion Network are in rural school districts. ED's School Business Success project has identified no rural-based practices.

Federal policy inadvertently has promoted "urban solutions to rural problems" which is counter to most rural desires and interests. The National Diffusion Network has established a rural concerns committee to encourage identification of rural sites. This effort deserves Department-wide cooperation.

8. ED may wish to recommend legislation that would compensate areas for the extra costs necessary to assure a quality education for rural children due to the special characteristics of rural schools.

Discussion:
These extra costs have been named by rural constituents as follows:

1. Allowances (sparsity factor) in formulas and discretionary grant budgets for energy costs due to transportation distances.
2. Incentives to recruit and retain teachers, administrators, and particularly professionals in areas such as special education, sciences, math, foreign languages, and communications and computer technology.
3. Special grants for communications and educational technology to beam TV and radio into remote rural classroooms, possibly through present authorizations.
4. Grants through present authorizations to address the educationally disadvantaged needs of minorities in remote and isolated areas. Such a program is already authorized in the Education Amendment of 1978(P.L. 95-561) Sec. 1522, which specifies $1,200,000 annually for LEAs that are "racially isolated as a result of geographic location..." ED has never requested appropriation for this section which expires in fiscal year 1982.
5. The education of migrant children is a special rural problem that the Federal government has addressed through the ESEA Title I Migrant Education Program, the High School Equivalency Program (HEP) and College Assistance Migrant Program (CAMP) of the Higher Education Act, Title IV. This program could be the centerpiece for a more comprehensive legislative approach to rural problems.

Summary and Conclusion:
The Federal government has addressed, to varying degrees, several of the problems described by rural constituents. But a more systematic amd comprehensive approach to the problem is proposed through the establishment of an Office of Rural Education as suggested by Senate sponsors of the Department of Education's Organization Act and by rural advocates. In addition to being an ombudsman for rural education needs, this office might undertake an initiative to study and make recommendations on:

1. formulas and criteria effects
2. rural set-asides
3. direct rural communication
4. paperwork burden reduction
5. technical assistance participation
6. improving the data based
7. validating successful rural practices
8. special characteristics legislation