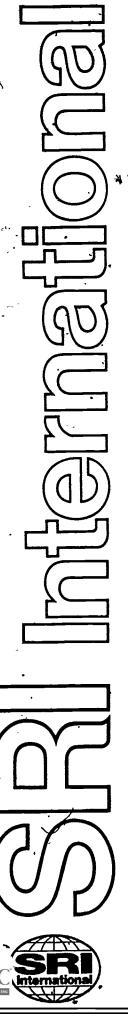ABSTRACT
        The results of a study on the way federal government
guidelines influenced the administration of 132 Teacher Corps
projects at the local level are reported. Research was oriented
primarily toward determining those guideline provisions that seemed
to have the most powerful impact on local actions during the early
years of a project. Major findings apply to federal or state agency
policymakers who construct or revise policy guidelines. This volume
of the final report on the study is divided into three parts. Part
One contains chapters that summarize the findings and conclusions and
discuss the issues that are now facing educational policymakers. Part
Two gives the background of the Teacher Corps program and presents
evidence supporting the report's major findings, focusing on three
provisions in the Teacher Corps Rules and Regulations: (1) the
five-year time horizon and designated planning year; (2) the
requirement for collaboration with local institutions and community
agencies; and (3) the provision for local specifications of
objectives. Research methods used in the study are discussed in Part
Three. The appendices contain Teacher Corps Rules and Regulations,
reprinted from the Federal Register, and excerpts from guidelines
used to define research techniques at the local sites. (FG)

SRI International

POLICY FRAMEWORKS FOR LOCAL ACTION
Lessons from Implementing the Teacher Corps Guidelines

Volume 1

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CONTENTS

3

FOREWORD

This foreword gives an overview of the Teacher Corps program and of the Teacher Corps Program National Evaluation conducted over the past 3 years by the Education and Human Services Research Center of SRI International. This report is one of a series of reports resulting from the SRI study.

The Teacher Corps Program

In November 1965, Congress enacted the Higher Education Act (PL 89-329), Title V of which authorized the Teacher Corps program. This program was an outgrowth of similar social programs initiated during the Kennedy and Johnson presidencies. Its purpose was primarily to train teachers to be more effective in teaching children in low-income areas of our country. In October 1976, the authorization for the Teacher Corps program was amended. The statement of purpose for the Teacher Corps program under this authorization states:

> The purpose of this part [the Teacher Corps program] is to strengthen the educational opportunities available to children in areas having concentrations of low-income families and to encourage colleges and universities to broaden their programs of teacher preparation and to encourage institutions of higher education and local education agencies to improve programs of training and retraining for teachers, teacher aides, and other educational personnel--
>
> (1) attracting and training qualified teachers who will be made available to local educational agencies for teaching in such areas;
>
> (2) attracting and training inexperienced teacher-interns who will be made available for teaching and inservice training to local educational agencies in such areas in teams led by an experienced teacher;

(3) attracting volunteers to serve as part-time tutors or full-time instructional assistants in programs carried out by local educational agencies and institutions of higher education serving such areas;

(4) attracting and training educational personnel to provide relevant remedial, basic, and secondary educational training, including literacy and communication skills for juvenile delinquents, youth offenders, and adult criminal offenders;

(5) supporting demonstration projects for retraining experienced teachers and teacher aides, and other educational personnel serving in local educational agencies. [PL 94-482, Title V, Part A, Sec. 511 (a)]

With this modified statement of purpose in mind, Teacher Corps officials amended the federal regulations governing Teacher Corps and published these in the Federal Register in February 1978. These new regulations specified four outcomes that Teacher Corps projects were to achieve with the grant money they received from the federal government:

(a) An improved school climate which fosters the learning of children from low-income families.

(b) An improved educational personnel development system for persons who serve or who are preparing to serve in schools for children of low-income families.

(c) The continuation of educational improvements (including products, processes, and practices) made as a result of the project, after federal funding ends.

(d) The adoption or adaptation of those educational improvements by other educational agencies and institutions.

In addition to these four outcomes of the Teacher Corps program, the new Rules and Regulations also stated a number of key program features that, it was thought, would enhance the ability of the projects to achieve the four outcomes. Some of these key features were:

(1) Education that is multicultural.

(2) Diagnostic/prescriptive teaching.

(3) Integrated pre- and inservice training designs.

(4) Community-based education.

(5) An elected community council.

(6) A representative policy board.

(7) A collaborative mode of operation involving the associated institutions, communities, and other vested-interest groups.

In a further analysis of these Rules and Regulations, the evaluation team at SRI found many more key features than the seven listed above. The perspective taken by SRI during this evaluation was that, as a whole, the Rules and Regulations could be viewed as a strategy for implementing a Teacher Corps project. The particular key features making up the strategy could be interpreted as tactics to be used by the projects to achieve the four outcomes.

The new Rules and Regulations modified the Teacher Corps program substantially. Some of the differences between the old program and the new program are listed below.

New Program	Old Program
Five-year project duration	Two-year project duration
Funding of $1.2 million per project	Funding $0.25 million per project
Incorporates a full feeder system of schools	Used only one school
Concerned with training of all school personnel	Concerned with training of teachers and interns only
Includes the community along with the local education agency (LEA) and an institution of higher education (IHE) in the planning and operation of the project	Only IHE and LEA involved in planning and operation of the project

New Program	Old Program
The program is service oriented, but includes demonstration/dissemination and institutionalization as additional outcomes	Was mainly a service-oriented program directed toward teacher education

The changes in the federal Rules and Regulations governing Teacher Corps caused the program at the local level to be quite different from what it had been in previous cycles. A typical Teacher Corps project funded under the new Rules and Regulations spent its first year in planning its particular program. During this first year, a community council was elected, collaborative arrangements were established between the LEA, IHE, and community, and the four major goals of Teacher Corps were restated in terms of local conditions and local needs. About 8 months into the first year, projects were required to submit their continuation proposals for the second year of operation. These proposals were to contain the specific objectives, a description of the community council elections, and other activities that occurred during the planning year. Soon after the submission of the continuation proposal, many projects recruited a teacher-intern team leader and four interns to receive training. The team leader was the person who generally was in charge of monitoring and setting up the program for the training of the interns. The project then sent these people to the Corps Member Training Institute (CMTI).

Starting with the second year of the Teacher Corps project, training was conducted for all educational personnel in the feeder system of schools selected to participate in the project. The training programs planned during the first year were put into action during the second and third years, which are termed the operational phase of the project. In addition, the preservice training for the Teacher Corps interns was also begun at the beginning of the second year. The intern training consisted primarily of coursework taken at the IHE, classroom experience in the Teacher Corps

schools, and a community component that required the interns to become more aware of the importance of the community in the education process. The training for educational personnel in the Teacher Corps schools (including principals, teachers, aides, and others who deal with children in the schools) generally involved the assessment of the needs within the schools (conducted during the first year), the translation of these needs into objectives and goals for training, and the implementation of training sessions designed to achieve these objectives and goals. The training program for the interns was to have been finished by the end of the third year, at which point the interns would have received a master's degree and would also have been certified.

· The SRI study covers only the first 3 years of the 5-year program. The fourth and fifth years of each project's life were to have been devoted to dissemination of project products and to the institutionalization of successful practices developed by the project. Because of federal funding termination, the program ends in July 1982. Program 78 thus ends after only 4 years of the intended 5-year cycle, and Program 79, after 3 years.

The administrative structure of a Teacher Corps project did not change much over 3 years. A policy board was established at the beginning of the planning year to oversee all project activities. This policy board consisted of the superintendent of schools from the LEA, the dean of the school of education in the IHE, and the elected community council chairperson. The typical project included other persons on this policy board (e.g., the project director and the team leader) to keep the board informed of project activities and to make recommendations for future courses of action. The elected community council was consulted on all community activities that were planned under the project. The ultimate responsibility for carrying out the Teacher Corps project rested with the project director, who frequently consulted with the policy board members on decisions regarding project direction and expenditure of project funds.

ix

9

Specifications for the National Evaluation

Concurrent with the development of new Rules and Regulations for Teacher Corps, the specifications for a national evaluation of this new program were being created. In the summer of 1977, an evaluation task force was charged with developing a design for such an evaluation. The results of this task force report set the direction for the preparation of a request for-proposal issued in June 1978.

The task force recommended that an 8-year evaluation be conducted by an independent evaluator selected through a competitive RFP. Subsequently, this requirement was modified to a 5-year period, which included three phases of the evaluation. The first phase covered the first year of the evaluation and was considered a planning phase, wherein the study design would be finalized and instruments created to collect baseline information. The second phase covered the next 2 years of the evaluation and was basically considered a data collection phase, in which intensive cross-site observations and local documentation would be collected in the local projects. An option was provided for the funding of phase three (for Years 4 and 5 of the evaluation), which would allow some additional data collection and analysis, synthesis, and reporting of the major results of the study.

In addition to this basic study schedule, two additional special studies were requested in the RFP. Special Study 1, to be conducted within the first 18 months of the contract, was focused on the issues of collaboration and multicultural education. Special Study II, also to be conducted within the first 18 months of the project, focused its efforts on institutionalization of project practices in the institutions associated with the Teacher Corps program.

The SRI Evaluation Design

The evaluation design proposed by SRI in the summer of 1978 consisted of multiple substudies of different aspects of the Teacher Corps program, a special policy monitoring activity, and the two special studies on collaboration and multicultural education and on institutionalization. There were three overarching goals of the evaluation:

(1) To describe the Teacher Corps program as it existed in the field and describe the strategies used by local projects to implement the Teacher Corps guidelines.

(2) To assess program outcomes in a time-series fashion over the course of the project's life--referred to in the analysis plan as assessing the "impacts" of Teacher Corps.

(3) To describe and assess the efficacy of the processes used to achieve the outcomes--in other words, the implementation practices associated with particular program outcomes or impacts.

Multiple methodologies were employed to study the issues described in the evaluation's RFP. Both quantitative and qualitative methods were used to collect data on Teacher Corps processes and outcomes. Qualitative data sources included local project documentation, case-study interviews, open-ended questionnaires, and structured interviews. Quantitative data sources included self-report questionnaires mailed to local project participants, structured observations of Teacher Corps training activities and the physical environment of Teacher Corps schools, and demographic questionnaires mailed to IHEs, LEAs, and local schools.

In the summer of 1978, 79 Teacher Corps projects were funded for the new Program 78 5-year cycle. In addition, in the summer of 1979, 53 Program 79 projects were funded. The scope of the evaluation was to include all 132 Teacher Corps projects funded in the two cohorts. Using a stratified random sampling procedure, SRI selected 30 projects for in-depth study. Additionally, smaller case-study samples were selected for special purposes.

As a result of the first year of the program evaluation, a Project. Guide to the Teacher Corps Program Evaluation was prepared by SRI. This guide summarized the design activities that took place during that first year. These guides were distributed to all Teacher Corps project directors, deans, superintendents, and principals of local schools. The Project Guide described the operational plans for the evaluation over the remaining 4 years (given that the additional 2-year option would be exercised); it also described the instrumentation, sampling designs, and evaluation issues to be addressed. A reaction panel (REAP) was also formed during the first year to act as an advisory group to the evaluation team.

During the second and third years of the evaluation, SRI conducted site visits to collect information for the substudies described above, administered questionnaires to various role groups within each project, and conducted case-study visits to selected projects. An interim annual report, submitted in October 1980, presented the evaluation's initial descriptive information on the Teacher Corps program.

The interim annual report summarized information collected during the planning year in Program 78 projects. This included the bringing together of the IHE and the LEA, and the involvement of school personnel and the community. A chapter on the initial description of staff development activities was also included.

The final report was prepared in the fall of 1981 and submitted in January 1982. The final report included three pieces of work: a study of how the Teacher Corps guidelines were implemented in the local projects, a study of the degree to which Teacher Corps practices were institutionalized in the IHEs, and a preliminary report on the characteristics and effectiveness of the staff development programs created in the Teacher Corps projects.

During the course of the evaluation, certain changes in the Teacher Corps program made it necessary for SRI to have the flexibility to adapt to the changing conditions. For example, our initial conception of the effects of a staff development program was observable behavior change on the part of the teachers. After our first round of site visits, we found that many projects did not emphasize behavior change, but rather attitude change which may or may not be apparent in the teachers' observed behavior. Because of this initial finding, we had to modify our design to reflect more what was occurring in the projects. In the summer of 1980, a new director of Teacher Corps was named, Dr. John Minor. Dr. Minor had felt that more emphasis should be given to exceptionality, multicultural, and community-based education. As a result, SRI modified some aspects of the evaluation design to be more sensitive to these issues.

Throughout the course of the evaluation, SRI monitored congressional policy concerns. One issue was repeatedly mentioned by congressional staffers, and that was whether Teacher Corps was duplicating the efforts of other education programs. In an attempt to shed light on this issue, SRI modified the interview and documentaton procedures to collect information about other education programs existing at the local site, and their relationship to the Teacher Corps project.

These adaptations to changing conditions and concerns were accomplished through a continual monitoring of evaluation issues and through interactions with the project officer, the Teacher Corps Washington staff, and the evaluation's reaction panel. Although SRI received much useful advice and many suggestions for the design of the evaluation, the results and recommendations provided in the final report are the sole responsibility of SRI and no official endorsement by any agency in the Department of Educaton is implied or should be inferred.

Acknowledgments

PREFACE

Acknowledgments

Evaluators of a program of the scope, diversity, and complexity of
Teacher Corps depend critically on the cooperation and patience of local and
regional program personnel. The implementation study team is grateful for
the excellent assistance and hospitality we received throughout the 3 years
of the study. This research effort has been truly collaborative, and we
have enjoyed the opportunities to share work and ideas. We are aware of the
demands made on educational personnel; parents, and other community members,
and so we especially appreciate that the Teacher Corps project participants
were most generous with their time and ideas during our visits to local
sites and regional network meetings, and were such gracious hosts to us as
outside observers.

We are particularly grateful to the local project documenters who gave
us insights into project operations through the quarterly essays submitted
to SRI. Those persons in the field with responsibilities for documenting
local experiences had opportunities to observe and reflect on implementation
processes and the impacts they produced over time. Such an in-depth
perspective on each project was not available to SRI's implementation study
team members, who were able to visit only a few·Teacher Corps sites for
short periods of time. The contribution of the documenters through the
quarterly essays has been invaluable. Their work has produced the central
data source for this report.

We also would like to thank the consultants to SRI's evaluation of the
Teacher Corps program, who have given excellent assistance to the
implementation study team. Dr. Robert N. Bush and Dr. Andrew Porter have

been available when we needed them and have contributed in crucial ways to the planning of the study and the analysis and interpretation of the data. Outside reviewers and critics also have been most helpful. Among these persons, David Florio deserves special mention.

We have appreciated the excellent management support provided by Nicholas G. Stayrook, the present project director for the Teacher Corps National Evaluation, and his predecessor, Richard A. Marciano. The SRI project supervisors and the staff of the U.S. Department of Education associated with this project who are acknowledged in the Foreword deserve special recognition from us here as well.

Study Participants

C. David Beers has been the principal investigator for the implementation study. Four people made key contributions to various aspects of the study: James L. Deslonde in his role as assistant study director, especially in the planning phases; Christine R. Finnan, especially in her writing on the second-year report (Volume 2 of this report); Dorothy E. Stewart, especially in work with interview and essay data; and Michael S. Knapp in his key role in the local documentation task and in writing for both Volumes 1 and 2 of this report. The other members of the implementation study team likewise have been valuable contributors: Daniel G. Broussard, James S. Fairweather, and Mary A. Wilcox. All these team members conducted site visits and analyzed documentation essays.

Across the 3 years of the implementation study, other SRI staff have participated for various specific purposes and for various lengths of time. During the first year of the study, Jay Cross and Anne Fitzmaurice were involved in preparations for and processing of documentation submissions from Teacher Corps projects. Other members of the SRI national evaluation staff have made contributions to the implementation study when their counsel

has been sought. Among them have been Rhonda Cooperstein, Douglas Hall, James Marver, Teresa Middleton, and John Bock. Finally, there were those who patiently helped process data, type manuscripts, and attend to the multitude of other details necessary to our study operations and report preparation, especially Shelia Warrington, Linda Burr, Marion Collins, and Rhondda Dennis.

PART ONE

I. INTRODUCTION

This report is about the way government-defined guidelines influence government-supported project activity at the local level. In the study, we tracked the implementation of policy guidelines formulated by a federal agency to govern the activities of a broad-focus educational program (Teacher Corps). From this descriptive research base, we drew inferences about the way agency guidelines affect local project development. Our research was oriented primarily toward determining those guideline provisions that seemed to have the most powerful impacts on local action during the early years of a project's life cycle.

The major findings of the study apply most directly to the agency-level policymaker in either federal or state government who constructs or revises program guidelines. The implications of the study have particular relevance to state education agencies, as responsibility for educational matters shifts increasingly from the federal government to other levels in the system. Our findings suggest answers to four issues that have confronted policymakers for more than a decade:

(1) Over what period of time should government support be provided?

(2) Should an explicit planning period be required during the period of government support? If so, how long should it be?

(3) Should separate institutions and groups at the local level be expected to work together within the project? How complex a collaborative arrangement is desirable and feasible?

(4) How much local discretion should be exercised in the design of projects? Can a workable balance be struck between local discretion and government initiative?

'Our answers to these questions derive from the study of one federal program (Teacher Corps) as it operated over a 3-year period. The findings apply to a wide range of educational and other social programs, because (1) the broad focus of the program took many different forms in school districts and training institutions across the nation, and (2) key guideline provisions were generic requirements related more to the process of project activity than to program-specific content.

Our basic conclusion is that the Teacher Corps guidelines stimulated a constructive series of responses across the diversity of sites served by the program. They set up a flexible framework within which collaborative local action took place to solve educational problems confronting schools serving low-income children.

The overall message for policymakers at the federal or state level is a hopeful one, extending beyond the specific focus of Teacher Corps to other government initiatives. It appears that "wise" guidelines are possible, and that a flexible interplay between local initiative/resources and government intervention/support can be achieved. In an era when government regulations may too quickly be regarded as unnecessarily constraining or counterproductive, our findings may contribute to a more reasoned rethinking of the roles of federal and state governments in relation to local projects.

The report is organized as follows: Volume 1 of Policy Frameworks for Local Action is divided into three main sections. Part One presents a summary of major findings and conclusions (Chapter II), a discussion of the related issues facing policymakers (Chapter III), and a brief discussion of the way these apply to issues now under debate in educational policy circles (Chapter IV). Part Two presents a review of the evidence supporting the major findings. The section begins by describing the Teacher Corps program in more detail (Chapter V), followed by three chapters, each of which concentrates on a key provision in the Teacher Corps Rules and Regulations: the 5-year time horizon and designated planning year (Chapter VI), the

2

requirement for collaboration of local institutions and community
(Chapter VII), and the provision for local specification of objectives
(Chapter VIII). Part Three (Chapter IX) explains the methods used in the
research, with emphasis on the qualitative "local documentation" data base.

Volume 2 of this report provides additional perspective on the
implementation process through a more detailed description of the various
components of the Teacher Corps program during the planning period and first
year of training activities. Several differences in point of view between
the two volumes should be noted. Volume 2 was written a year earlier (in
1980) as an interim report to the study's sponsor, with the intention of
describing the implementation process for both policymakers and local
practitioners (especially those involved in the Teacher Corps program).
Volume 1 which draws on an additional year of data collection and analysis,
aims at a broader audience of state and federal agency policymakers beyond
Teacher Corps.

II MAJOR FINDINGS: CRUCIAL PROVISIONS
IN THE TEACHER CORPS GUIDELINES

In this chapter we review the major findings of the Teacher Corps implementation study. The findings are organized around the provisions of the Teacher Corps Rules and Regulations that seemed to have the most influence on project activity at the local level. Before we present the major findings, however, a brief review of the research strategy we employed will help to clarify the basis for our conclusions.

The Strategy of Research

The Teacher Corps implementation study sought to answer one basic question: how did the federal Rules and Regulations that define the program get translated into action in diverse project settings? We arrived at answers to the question by listening carefully to what project participants said about the Rules and Regulations (principally through narrative documentation essays and field interviews) and by observing what they did through periodic field visits.

Teacher Corps is a national demonstration program designed to use innovative staff development activities to improve educational practices in schools serving low-income families. The program has a history extending back to the mid-1960s. In 1978 new Rules and Regulations were promulgated, reflecting the previous decade's experiences in Teacher Corps and an increasingly sophisticated view of the implementation process held by government and the research community." Concurrently, SRI International was awarded a contract to evaluate the national Teacher Corps program. This report deals with the question of how the Rules and Regulations were put into action by the local Teacher Corps projects starting in 1978.

5

22

For the purposes of our study, we viewed the whole set of provisions in the 1978 Teacher Corps Rules and Regulations as comprising a government-defined "strategy" for program implementation, and we sought to understand how that strategy worked in practice. (See Appendix A for a copy of the Rules and Regulations.) We use the term "program implementation" or "policy implementation" in its broadest sense to refer to the process through which an agency policy embodied in guidelines takes form or is put into action in local settings (see boxed note and Figure II-1 on page 7). The policy was thus a given, the starting point, consisting of an allocation of funds and the official language that defined how the funds were to be used. In this case, the policy formulated by the Teacher Corps agency allocated grant funds to 132 Teacher Corps projects throughout the country, and it specified the uses of these funds through its Rules and Regulations.

The provisions of the Teacher Corps policy were examined by SRI to determine its major dimensions. From this analysis we derived a list of key features (see Table II-I). These elements serve as a short description of the policy and of the program. Each of the key features could be viewed as a "tactic" within that strategic policy. We were interested to learn how the Rules and Regulations were interpreted as a full "strategy" for improving schools and, within that strategy, which of the tactics were most and least effective.

Throughout our report we distinguish the use of the term "policy implementa-
tion" from a second, more narrow meaning of the word "implementation" which
refers to a stage of project activity in a sequence that would include
planning, implementation, and dissemination, for example. To avoid
confusion, we use the term "operations stage" to refer to this narrow
meaning of a stage in project development. We consider it important to be
explicit about this distinction because many who hear the term
"implementation" assume that a detailed program design already exists and
that implementation is the process of putting that design into operation.
In the case of Teacher Corps, the thing to be implemented was a general
policy that provided for local projects to design the specifics of the
program in light of fairly broad conceptual guidelines. Thus, policy
implementation does not divide into precise segments along a linear time
line. It includes the planning stage, the operations stage, and the
institutionalization stage. We have indicated this distinction in
Figure II-I.

POLICY TIMELINE	(POLICY FORMULATION)	POLICY IMPLEMENTATION		

LOCAL PROJECT TIMELINE — (LOCAL HISTORY RELEVANT TO PROJECT) — PROJECT DEVELOPMENT — PROJECT OPERATIONS[†] — PROJECT INSTITUTIONALIZATION

TEACHER CORPS CHRONOLOGY — (PROPOSAL PREPARATION) — YEAR 1 PLANNING/DEVELOPMENTAL YEAR — YEARS 2 and 3 OPERATIONAL YEARS[†] — YEARS 4 and 5 INSTITUTIONALIZATION/DISSEMINATION YEARS

| | 1978 | 1979 | 1980 | 1981 | 1982 | 1983 |

*Chronology presented for projects funded in 1978.

†Sometimes referred to as "project implementation stage"
in other discussions or research studies.

HA-7702-1

FIGURE II-1   POLICY IMPLEMENTATION PROCESS

7

24

Table II-I

KEY FEATURES DERIVED FROM TEACHER CORPS RULES AND REGULATIONS

	Rules and Regulations Section No.
Program Focus/Timelines	
1. Program focus on schools serving low-income families	172.60
2. A 5-year funding cycle for projects	172.30
3. An initial developmental year with emphasis on project development, organization, and planning	172.40
4. A waiting period of 3 years before grantees may apply for a new project after the end of their 5-year cycle	172.33
Objectives/Outcomes	
5. Local design of objectives to achieve the improved school climate outcome	172.62
6. Local design objectives to achieve the outcome for an improved personnel development system	172.63
7. Local design of objectives to achieve the institutionalization outcome	172.64
8. Local design of objectives to achieve the dissemination outcome	172.65
Training/Teaching	
9. Field-based and community-based training	172.50
10. Integrated preservice and inservice training	172.63
11. Multicultural education	172.62
12. Diagnostic-prescriptive teaching	172.62
Project Governance/Operations	
13. Collaborative mode of operation	172.10
14. Joint participation of institutions of higher education, local education agencies, and community councils	172.10
15. Teacher-intern teams	172.83
16. Elected community councils	172.14
17. Representative policy boards	172.15
18. Coordination with state education agencies	172.17
19. Documentation of project experiences	172.52

8

Our research methods, as in most studies of implementation, draw primarily on qualitative research traditions. We relied heavily on reports from people in the local projects who had had direct experience with trying to translate the Rules and Regulations into action. In our analysis we combined data from two primary sources: (1) site visits by SRI staff to a sample of projects and (2) narrative essays from all 132 projects across the nation. These essays were prepared by local documenters, in-house research specialists employed by each Teacher Corps project, who wrote quarterly essay reports following instructions provided by SRI. Documenters were invited to report in an open-ended way on how the key features of the Rules and Regulations and unanticipated events had influenced the implementation process in each project. We were thus able to compare the findings from a small number of sites that we had personally visited with findings from documentation that came from across the whole national program. We analyzed these data in light of their implications for policy.

This analysis is particularly timely because the roles of state and federal agencies in American education are being fundamentally reconsidered. As block grants go into effect, many of the policy concerns that have resided at the federal level will shift to the state and local level. State and local education agencies, for example, will find themselves increasingly responsible for drafting guidelines for disbursing educational funds. In such activities, one of the major aims of local, state, and federal policymakers is to construct program guidelines that can operate effectively in real-world settings. The lessons learned from the local implementation of the Teacher Corps guidelines should prove especially useful in this present policymaking climate.

The data base we amassed pertains to the first 3 years of the 5-year Teacher Corps funding cycle, which includes project start-up activity and operational phases. This is the time in a program's life cycle when government action probably has its greatest effect.

9

The Major Findings

We found that the existing Teacher Corps Rules and Regulations, considered as a whole strategy, were too lengthy, too detailed, and too complex to serve as a model for drafting future agency policy. But within the Rules and Regulations we found that a number of provisions particularly facilitated project implementation and, in fact, accounted for the positive view of the Rules and Regulations that most project participants had. Our analysis indicates that four primary provisions explicitly recognize the realities of what local projects face when they try to implement agency guidelines:

- An extended time horizon (5 years of federal support).

- A designated lengthy period in the beginning for planning and development.

- Required collaboration of an institution of higher education (IHE), a local education agency (LEA), and the associated low-income community.

- Local specification of project objectives and program strategies.

These four provisions collectively generated or supported project activity perceived to be "effective" by local participants in a majority of cases. Their conceptions of effectiveness varied considerably, as did their programs. In most cases, informal measures, such as the enthusiasm of teachers or community people, were cited as indicators of effectiveness; in other cases, the accomplishment of specified organizational milestones was cited; in a few cases, improvements in teacher or student classroom performance were cited.

These four are generic provisions, which could be incorporated in some fashion into a wide variety of government-sponsored education programs, not just those concentrating on school improvement or staff development. For this reason, coupled with the fact that the Teacher Corps program is in reality many different kinds of programs built around locally defined goals, our findings have broad applicability.

10

27

Time Horizon

.We found that the time horizon provided by the policy was critically important. The 1978 Rules and Regulations departed from the practice of Teacher Corps' previous 13-year history in this respect: the total length of the project was extended from 2 years to 5 years, and the time was. segmented into various stages, including an initial planning and development stage. For Teacher Corps, providing a 5-year time horizon contributed to project efforts in the early years of project activity primarily by increasing the willingness of teachers, community members, and others to commit themselves to the project and by allowing realistic schedules for developing genuinely collaborative needs-assessment and goal-setting processes that were in tune with local conditions, which vary enormously from place to place.

We also found that prior experience in Teacher Corps or similar projects facilitated implementation efforts; some projects had conscientiously continued to build their capabilities over periods as long as 10 years. This finding represents an important perspective on what agency policymakers can expect from placing money tied to guidelines into an ongoing educational system that has its own standard operating procedures. For example, in one Native American project the present Teacher Corps IHE staff started coming together in the mid-1960s under the auspices of another federal program whose mission was to train low-income teacher aides at the lower-division college level. When Teacher Corps funds were later secured, the professional staff and the pool of interns both were drawn from the operation of the aide training program. Over the years, an increasing proportion of the professional education curriculum at this IHE has been adapted to a cross-cultural field-based approach until now this approach is offered as an alternative path to a full 4-year B.A. and teaching credential program. The development of this new 4-year field-based degree program could not have happened without long-term financial support.

11

Unanticipated events were frequent occurrences across the total pool of 132 projects, though some projects reported none. Sometimes this difference was an accident of geography. One project was slowed by the "snow storm of the century" in one year and by the Mt. St. Helens volcano ash fall in another year. Such unanticipated events can be handled with relative composure within a long time frame, whereas they could utterly derail a project conducted within a shorter time frame.

Designated Planning Period

An explicit and lengthy planning period was viewed by most local participants as a necessary stage in the project life cycle, especially in retrospect. Although problems often surfaced in carrying out the planning process itself, almost all projects reported that it was valuable. Unanticipated events had significant impacts on planning in many projects, delaying proposed actions and altering project directions in mid-course. The most extreme examples were seen in a handful of projects where one or more policy board members refused to sign off on the plans as proposed, with such consequences as cancellation of the project or a change in the IHE. Most unanticipated events related to planning were, of course, not quite so dramatic.

Again, the prior experience of the project with Teacher Corps influenced how the planning period was utilized. For new projects, initial start-up considerations were dominant and typically a longer period was needed for planning. For experienced projects, plans were formulated for such activities as expanding existing programs into new schools, refining ongoing working procedures, or developing new program components, such as multicultural education. Both types of projects reported that they learned much from their participation in planning, even though some (especially experienced sites) had originally thought the planning period would not be useful. The struggle many projects had in carrying out the planning function suggests that planning is still an emerging art among educators.

The time taken by different projects to accomplish similar planning tasks varied considerably, suggesting that a fixed period of time is probably less useful than a policy framework that establishes milestones to be completed before entering the operations stage. Such milestones might include forming various groups, like a community council, policy board, and various planning task forces, and having these groups develop and authorize an agreed-on set of local objectives for the operations stage.

Required Collaboration

In addition to time and planning, a third important component of the Teacher Corps Rules and Regulations is the requirement that various stakeholder organizations collaboratively plan and carry out project objectives. The 1978 regulation called for an institute of higher education, a local education agency, and an elected community council to work together in translating the terms of the regulation into action.

Four basic findings emerged from our study of collaboration in Teacher Corps:

(1) Most projects said that collaboration was difficult. A wide spectrum of people were brought together, and they brought with them different goals and experiences.

(2) Most project participants grew to appreciate the importance of collaboration. Originally, they may have agreed to collaborate because the Rules and Regulations said that they must, but they developed a commitment to it as a process and realized that they could achieve their own objectives as well as those of others by working together.

(3) Collaborative arrangements were usually unbalanced. It proved difficult to achieve parity among the participants in collaborative planning and action. In most Teacher Corps projects, the IHE and the LEA have learned to work together quite well, but typically one or the other tends to lead in terms of control over financial and other resources, work distribution, and priority given to competing goals and objectives.

13

30

Most often it was the community component that was "odd man out," but this was seldom from lack of trying. In some intriguing projects, the community component was given much prominence, with results that went far beyond a narrow definition of "improving schools." For example, in some Native American projects, Teacher Corps has been used to encourage Native Americans themselves to get teaching credentials and work as teachers in the communities in which they live. This has had an important economic impact in bringing these rural Native Americans from low-income to middle-income status. In one project, for example, 14 of 17 elementary school teachers are local Native Americans who have gained B.A.s and teaching credentials through Teacher Corps.

(4) The requirement to collaborate stimulated new working relationships. Some relationships were between peers, such as between teachers at different grade levels. Other relationships developed between insiders to educational practice (teachers) and outsiders (such as IHE faculty or community persons).

Stated more conceptually, increasing the complexity of the local project by requiring collaboration appears to enhance the chance of effective local action in several ways. The synergistic effect of combining resources from various organizations appears to be one major reason. Substantial change in an institution seems to be more likely where there is an outside stimulus or source of expertise combined with an inside willingness to accept that an outsider's expertise could be useful. In most cases we observed, this perception developed slowly over time and thus is unlikely to occur in more temporary consulting arrangements. Also, increased complexity decreased the vulnerability of the project to unanticipated events that might affect one or another of the collaborating partners more powerfully. For example, the IHE "held down the fort" in one project while the LEA went through the throes of a severe teachers' strike. When the strike was over, the IHE had certain things ready to go that helped the project get quickly back on track.

Local Definition of Objectives

The fourth important component of the Teacher Corps guidelines is their heavy emphasis on local definition of project objectives and activities within a framework of broad goals defined by the federal agency. A

14   31

mechanism for developing these local objectives was provided by designating the first year of funding as a time for planning and development and by requiring collaborative efforts. The emphasis on local program definition contrasts sharply with former versions of Teacher Corps and the practices of a number of other federal programs.

In the 1978 Rules and Regulations, the provisions for local specification of project objectives made a positive contribution to local action in three principal ways:

(1) By orienting project efforts toward particular local needs.

(2) By building "ownership" of project activity among local participants.

(3) By accepting the great diversity in local needs and contexts.

This provision did not, however, exempt local projects from numerous other requirements in the Rules and Regulations, and there was considerable tension in certain sites when locally specified objectives were in conflict with other requirements. This tension was usually resolved by projects' implementing the Rules and Regulations selectively with the concurrence--through flexible monitoring--of project officers.* However, a few projects reported severe problems in trying to adapt local and federal agency definitions to one another.

The process of specifying local objectives turned out to be as important as the product (a list of objectives); it was a mechanism for participants to discover what they truly wanted to accomplish in their projects. The commitment to project activities that developed out of this process was a key to project effectiveness, for specifying local objectives combined a powerful learning process with genuine collaborative commitment.

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* It should be noted that all comments about monitoring and the Washington, D.C., Teacher Corps office are from the local projects, no interviews were conducted with the Washington staff.

15

32

Guidelines and the Implementation Process

The experience of the Teacher Corps practitioners working with the 1978 Rules and Regulations largely confirmed the major findings of implementation research conducted elsewhere. The following themes* are one way of highlighting what we have learned in conducting the Teacher Corps implementation study:

(1) Local-level actors "make policy," in effect, by the way they interpret and carry out directives from agency guidelines. It is particularly important to recognize that this happens at the point of service delivery, where teachers and principals face demanding work loads and have considerable discretion in the way they meet those demands. The behavior of people at the point of service delivery becomes the "policy put into practice."

(2) The particular features of each local setting are the factors that most profoundly shape government policy. In Teacher Corps we found that local demography and institutional standard operating procedures, for example, put far more pressure on local service deliverers, such as teachers and principals, than did the more abstract words on paper that embodied the agency guidelines. This means that state or federal agency policy, in comparison with local context, has less immediacy and relatively less impact in most cases. The Teacher Corps projects, like most educational intervention efforts, tended to be small, peripheral entities, operating in the margins around a large, complicated, and powerful set of local institutional and community influences. As organizations, such projects are typically fragile, relatively ineffective at moving the larger institutions, and, at least in the beginning, considered quite expendable by most people on the local scene.

(3) Changes in local educational practices are slow to occur, if they occur at all. Persistent efforts over a long time seem to be necessary for the practices of local institutions to change significantly. The path of change in any given setting is, for all the reasons outlined above, highly complex as well as vulnerable to unanticipated events. Only over the long term are such forces and events likely to accommodate to each other and permit a new way of doing things to take root and become the standard operating procedure.

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*These themes are congruent with the major findings from Williams (1980), and Berman and McLaughlin (1978), for example.

16

In conclusion, it is important to keep what we have been saying in perspective. Agency guidelines are only one part of the complicated process by which government initiatives are implemented. Our research and that of others establish the primary influence of local conditions on implementation, especially the skills and commitment of the people and their previous history with this kind of program. In our view, however, guidelines are the most important component of the process that rests within the control of government agencies. Funding decisions and broad legislative mandates are handed down from higher levels of government; the actual work supported by funding takes place out in the field and is thus in many respects beyond the control of the government agency.

Our overall message is this: policy in the form of agency guidelines can contribute to improved practices at the local level, but guidelines must be adapted to the local context in order to do so. Because a temporary project can be easily ignored, local personnel will carry it out only to the extent that they feel that they "own it," a sense that develops over time as different people contribute to project design and decisionmaking. However, in shaping the project around local needs, their efforts and attention can be directed through judicious guidelines toward goals and activities, favored in the original policy formulated by the agency. This process of "mutual adaptation" (Berman and McLaughlin, 1978, p. 16) appears to be a key element in understanding how local projects translate agency guidelines into action.

17

III   ISSUES FACING AGENCY POLICYMAKERS

In this chapter we discuss the meaning of our findings for the agency-level policymaker in federal or state government. The major findings suggest some answers to issues facing the policymaker who is responsible for constructing guidelines for future educational programs of various kinds. Underlying these more specific suggestions is a fundamental message: government-constructed guidelines that are based on an understanding of policy implementation dynamics have a better chance of generating constructive responses at the local level than guidelines which ignore these dynamics.

Four important issues facing the agency staff responsible for constructing guidelines can be addressed on the basis of the findings of the Teacher Corps implementation study:

(1) Over what period of time should government support be provided?

(2) Should an explicit planning period be required during the period of government support? If so, how long should it be?

(3) Should separate institutions and groups at the local level be expected to work together within the project? How complex a collaborative arrangement is desirable and feasible?

(4) How much local discretion should be exercised in the design of projects? Can a workable balance be struck between local discretion and government initiative?

Although these do not exhaust the many facets of program design that the agency policymaker must consider, they capture basic dimensions of the relationship between the government agency and the local project. In the past two decades of federal aid to education, these issues have proven particularly hard to resolve.

The importance of implementation issues for the policymaker has been emphasized in the literature. The title of an earlier implementation study hinted at the message that has emerged across the decade of the 1970s: Implementation: How Great Expectations in Washington Are Dashed in Oakland; or, Why It's Amazing That Federal Programs Work at All (Pressman and Wildavsky, 1973). The authors pointed out:

> Implementation in recent years has been much discussed but rarely studied. Presidents and their advisers, department secretaries and their subordinates, local officials and groups in their communities complain that good ideas are dissipated in the process of execution. (p. xiii)

> People now appear to think that implementation should be easy; they are, therefore, upset when expected events do not occur or turn out badly. We would consider our effort a success if more people began with the understanding that implementation, under the best of circumstances, is exceedingly difficult. (pp. xii-xiii)

This is a perspective on implementation that we at SRI have come to appreciate even more as we have analyzed the data from the Teacher Corps implementation study. People in the field trying to make Teacher Corps projects work in accordance with the federal Rules and Regulations fully appreciate that implementation is "exceedingly difficult," especially because circumstances are often far from the best in settings that receive Teacher Corps funding.

Once legislation has been enacted and funds allocated for educational or other social programs, the hard work of defining more specifically the uses of those funds begins. Although it is always an option for government agencies to distribute funds by formula with no strings attached, much of government aid to education has been and will most likely continue to be more targeted, even under the present political conditions. Defining the use of funds in the form of guidelines or rules and regulations presents the agency-level policymaker with difficult decisions, which have to be based on assumptions about the way guidelines will be implemented in the field. These assumptions may be only implicit, but our study design is intended to

20

36

help the policymaker think about these issues with more explicit research-based data.

The lessons learned from the Teacher Corps implementation study with respect to each issue apply not only to federal policymakers but also to their counterparts at the state level. Many states have already developed programs parallel to those of the federal government, and a number of federal programs are already administered by state agencies. Under present block grant proposals, much of the existing federal program structure will be dismantled and the funding will move to state education agencies, with little restriction from the federal level on the uses to which the funds can be put. Thus, issues that have been debated for a long time among federal agency personnel will arise once again at the state level (if they haven't already).

Issue 1: Time Frame for Government Support

The Teacher Corps experience points to the critical importance of an extended time horizon for program support. Without adequate time to develop a program at the local level, almost nothing else intended by legislation, guidelines, or local people for that matter, has much chance of working. With adequate time, many alternative solutions to local problems can be developed. Thus, though not a "sufficient condition" for effective project activity at the local level, an extended span of time is clearly a "necessary condition".

The reasons for the importance of a long period of support are not unique to Teacher Corps. Unanticipated events crop up with great regularity in many kinds of programs. The interactive nature of most social programs prolongs the period necessary to gear up and settle into a productive working relationship. A decade of implementation research has established the point across a range of different kinds of programs, as is well summarized in a recent synthesis:

21

A long time horizon is needed for implementing major institutional changes because organizations generally exhibit both strong resistance to such changes and high susceptibility to prolonged disturbances when experiencing significant changes. (Williams, 1980, p. 13)

How much time to allow is an open question. Beyond a certain minimum period, the answer most likely varies with the type of program in question. At least for educational programs, it is likely to be a number of years. The 1978 Teacher Corps Rules and Regulations provided 5 years for all phases of project activity, from initial planning through institutionalization and dissemination of improvements by host organizations. Many of the recipients of Teacher Corps grants had also participated in earlier cycles of Teacher Corps, and some had benefited from extended federal support for periods beyond 10 years. The most impressive accomplishments among Teacher Corps projects (in our opinion) nearly always occurred in those that had several years of operational experience behind them when they started the current cycle. This suggests that extended periods of outside support (a decade or more) can be put to good use by conscientious local projects. One staff member in a project with a long history of outside support put the matter this way in an interview:

I don't see any way that a new project could even attempt the kind of inservice we offer. It has taken us years of hard work to develop our present capability, and this has been a supportive environment with no major breakdowns. What we could do after 1 or 2 years was really shallow compared to what we can do now.

The optimal length of time for project funding can, of course, be debated; it certainly varies by project. We can say that the 1- or 2-year time periods that have characterized much of federal funding, including early cycles of Teacher Corps, were perceived by practitioners as much too short; on the basis of what we observed, 10 years may not be too much time. The challenges of improving the schools are indeed immense.

Time requirements, of course, have implications for government funding and support, which need to be recognized. A longer time frame requires more money or, at least, an amount of support that can be depended on over a

22

period of years. This assurance is politically more difficult to give; and, in an era of belt-tightening, a long-term project is always subject to the charge that other, more immediate social problems deserve the limited resources. A longer time frame also means a longer period of sustained government agency attention, and may lead to a more binding commitment of the state or federal government to situations that may be in fact "disasters," from which it might be politically easier to retreat und̶e̶ short-term funding arrangements.

Fears of a binding agency commitment to disastrous projects do not seem well founded, based on our experience. Five-year funding in Teacher Corps required continuation proposals and reports at annual intervals, with the implied threat of discontinuation of federal support where projects did not demonstrate "continued effectiveness." More important, the time period provided an opportunity for a more extended supportive relationship to develop between government agencies and local projects. Making such a relationship supportive is not easy in practical terms, and Teacher Corps appears to have had mixed success with this matter. Many projects reported that monitoring recognized the local autonomy inherent in the project, but others reported friction between federal agency and local persons. Although our research remains inconclusive on this matter, we can point out that a long time horizon potentially allows mutually supportive government and local relationships to develop in the same way that it enhances the chances of effective relationships at the local level.

Issue 2: Local Project Planning Period

In Teacher Corps the 5-year funding cycle started with an explicit planning and development phase. Most local participants viewed this as a valuable requirement, especially in retrospect. A few projects reported that initially they had questioned the need for extended planning beyond the proposal, especially those that had prior experience in Teacher Corps. But there was strong support across virtually all kinds of projects for the planning requirement after it had been directly experienced.

23

Other research literature on implementation points to the importance of
planning across a wide variety of government programs, and how problematic
it can be for the agency sponsor. For example, one of the major findings
from the Experimental Schools evaluation was that an inappropriate federal
monitoring process during the start-up phase undermined the local projects'
own planning called for in the funding guidelines (Cowden and Cohen, 1979).
The Rand Change Agent study pointed out that patterns of support developed
among participants during project start-up or "mobilization" activities
"deserve close attention from policymakers. They are crucial to the
project's implementation and continuation..." (Berman and McLaughlin,
1978, p. 15).

Most Teacher Corps projects interpreted the Rules and Regulations to
mandate a full year for planning. Many projects thought that was too long,
and many others thought the full year was necessary. Some projects planned
more quickly than others, especially where prior experience had built some
basis for it. Although the Rules and Regulations permitted shorter time
periods for planning and development, some projects complained about
"spinning wheels" during the latter part of the year, when continuation
proposals had been submitted to Washington and they were waiting for
authorization to proceed with training. In other projects, "planning" was
seen as part of "operations": the two phases interpenetrated and questions
about the length of time became moot. It seems that, on balance, more
rather than less time was valuable for planning. Most projects seemed to
believe that a planning requirement between 6 months and a year was useful.
The exact length of time may be less important than providing a set of
milestones to be met through the planning process and making the start-up
of operations contingent on completing the planning milestones.

Providing an explicit planning and development period in the agency
guidelines recognizes certain facts of life about setting a project in
motion. If a lengthy time period is to be used effectively, participants
have to take stock of their needs and resources. Even more important, they
have to build a mutual understanding of the common ground between them and

develop ongoing communication channels. Most of all, they need to develop a flexible basis for responding to the numerous unanticipated events that crop up in even the most orderly institutional and community settings.

In the case of Teacher Corps we questioned whether planning would have happened anyway, at least as an extension of proposal development. Local project personnel were, after all, intelligent, experienced, and aware of the need for careful preparation to lead into complicated programs. To this we can only say that we were struck by how many participants reported having little or no experience with complex, collaborative planning processes, and how grateful they were in retrospect, for having been required to go through the exercise. From this point of view, a government requirement for a formal extended period of preparation seems a wise investment. It appears that effective planning skills are not now part of most practicing educators' repertoires. Our findings suggest that the development of skills during the mandated planning process was an important unplanned outcome in Teacher Corps.

Issue 3: Collaborative Arrangements Within Local Projects

The Teacher Corps experience provides many examples of productive collaboration between diverse local groups and institutions. The requirement that a training institution, a school district, and the community served by the schools come together within each project appeared to generate, in most cases, new kinds of working relationships and joint action to solve particular educational problems. Though not easy, the arrangements seemed to pay off in the long run.

Not all program situations are similar to Teacher Corps, but we would argue that, in many cases, local institutions with expertise for training or supplying other specialized services exist alongside institutions serving social needs without having developed a mutually supportive relationship.

Furthermore, the client population is frequently not consulted or otherwise included in the design and delivery of services. Even though there are clear obstacles to bringing these elements together, it is probably possible in many if not most cases. Government discretionary funding appears to be one important incentive. Certainly it worked this way in Teacher Corps.

Is it necessary to require collaboration? It was clear that some of the Teacher Corps projects would have sought collaborative relationships on their own or already had done so prior to federal funding. Although many recognized a need for this, we were often told that such arrangements would not have happened without the nudge from outside the local setting. One project reported this view:

> In our experience, without regulations mandating a collaborative mode of operation, each component would probably veer off in its own direction. Even after two full years in operation, it tends to happen--not intentionally, but out of long-time habits. The IHE is committed to developing a process for a field-based, site-specific master's degree program which can be institutionalized within the three graduate degree programs of the college. Without this collaborative structure with the LEA, it would have been more difficult to develop the process. However, our project still has some distance to go before the community council's role fits into the design.

It is perhaps easier to sit down together as potential collaborators when an external incentive (grant funds) defines an easily recognized mutual interest. Also, as a voluntary grant program, Teacher Corps did not "arrange the marriage": institutions found each other in the process of seeking federal funding and, along the way, found at least some basis for joining forces.

If collaboration is to be required, what agencies or groups should be included? That depends, of course, on the particular program and on the degree to which potential collaborators can perceive a common interest. Teacher Corps' experience leaves it an open question whether all three of the collaborating partners needed to play equally central roles in the project. Flexibly interpreted, the Rules and Regulations permitted

26

alternative arrangements dominated by one partner, as described in Chapter VII, with supporting or even minor roles played by the other two. And, as noted in the quote above, most projects found it difficult or impossible to involve the low-income community as a full partner in the collaboration.

Requiring collaboration does have implications for funding and government support. On the surface, more complex projects might appear to cost more: there are more stakeholders interested in the funds (three in the case of Teacher Corps), and the collaborative process takes longer to set in motion. But by bringing together different sets of local resources, the full cost of project activity need not be borne by the government. This was an explicit intention of Teacher Corps, which proclaimed "institutionalization" as one of its four major goals. Monitoring, as well, takes on an added complexity with multiple partners. Government project officers or some other outsider had to function, in some cases, as a "marriage counselor." A delicate judgment had to be made at various stages (original selection of projects, yearly grant renewal, monitoring visits) about whether each project adequately met the collaborative requirement, especially since the provision for local specification of objectives and activities was also part of the Teacher Corps regulation. Flexible interpretation, once again, seemed more facilitative than strict adherence to the letter of the law.

Issue 4: Balancing Government Initiative and Local Discretion

The Teacher Corps experience points to the possibility of striking a workable balance between government initiative and local discretion. The Teacher Corps Rules and Regulations did set out explicitly many detailed requirements, but at the same time left considerable room for local projects to define their purposes in ways that suited their needs. The balance struck in this way was on the whole workable, largely because local responsibilities were in fact given priority in the monitoring process; but the balance was not always smoothly achieved.

As with the planning issue, one can ask whether local projects might
have gone their own way regardless of government intentions. Implementation
research suggests that, in one way or another, this is usually the case
(see, for example, Berman and McLaughlin, 1978, p. 16; Williams, 1980,
p. 3). Government influence over local activity is only indirect, and the
dynamics of local project activity are such that, regardless of the type of
program, local actors have considerable control over what ultimately gets
done. But in the Teacher Corps case, this process was facilitated by making
the exercise of local discretion—particularly in the form of development of
local objectives—part of the terms for funding. The general effect in
Teacher Corps was to shift responsibility for project activities toward
local institutions and persons close to the point of service delivery, such
as teachers in low-income schools. It is important for the policymaker to
recognize explicitly this fact of life, as noted in a recent literature
review:

> Increasingly we are coming to recognize the crucial place in
> implementation of the front line professional staff, labeled
> "street-level bureaucrats," who man the point of service
> delivery. The discretionary judgments by front line
> professionals about particular services and how they will be
> delivered to those served are among the most powerful
> determinants of government policy. (Williams, 1980, p. 17)

The requirement for local development of objectives has implications
for government funding and technical assistance. Local objectives take time
to develop, especially where many groups are represented in the planning
process; time is money (though, as we have argued in a preceding section, in
this respect it is a valuable investment). Furthermore, some projects need
help in formulating their objectives and often turn to the government or
some other outside group for assistance. That can mean technical assistance
arrangements, such as those provided by Teacher Corps regional networks (at
additional expense), or more active support by government project officers,
or both. We found certain projects more likely to search for outside
assistance: those in areas with few local resources, such as in rural
areas, or projects without prior experience in Teacher Corps or similar

28

44

government-sponsored programs. In this way, placing responsibility for program definition on local shoulders does not remove responsibility entirely from the government. Projects did not desire only autonomy; many wanted and needed guidance as well.

The issue of technical assistance was problematic in Teacher Corps, as it has been in other programs (e.g., Williams, 1980, p. 94). In a few cases, we heard reports of excellent technical assistance being found and delivered, but more often the projects reported disappointment. It appears that technical assistance is both hard to give and hard to receive. We also have evidence to suggest that a major consideration in judging the effectiveness of technical assistance is its match with specific local project conditions. For example, we had mixed reports in interviews and documentation regarding the usefulness of the same technical assistance offered to different projects. The regional networks that provided technical assistance to numerous projects in a geographic area would get high praise from some projects and low ratings from others for the same services. The major lesson here for policymakers is that there is no such thing as "good technical assistance" taken by itself. There needs to be a two-way matching process between the providers and the receivers. Setting up this kind of mutual relationship was difficult for most Teacher Corps projects, and some turned inward almost altogether in the face of the difficulties. For the few that found useful technical assistance relationships, the rewards were great, however. For example, in one project that received high praise from local school participants, an opinion-leading teacher said:

> I have respect for the Teacher Corps project staff, partly because they were quick to learn from their mistakes. They started out trying to lead teacher inservice sessions themselves, but soon saw that they needed to find "real pros" to do this specialized work. Much to their credit, they have been able to find excellent people from around the country to lead inservice sessions, while the project staff serves well as facilitators and coordinators.

Relationships Among the Four Issues

Our discussion of these four issues is intended to suggest not principles to be blindly followed, but rather perspectives on policymaking to be applied with sensitivity to the specifics of each new policy problem. We view these issues as interrelated elements of agency guidelines that operate in a reciprocal fashion. Successful guidelines can probably be constructed taking into account only one or two of the issues, but the positive effects from the interrelations of the four need to be kept in mind.

Adequate time we view as the most important. Other elements of any set of guidelines or rules and regulations ultimately depend on the time framework. The requirement that time be structured to provide a planning period is not necessarily so fundamental, but we would argue that it comes close, particularly if program objectives are to be locally defined. Locally defined programs, given adequate time, may create large or small opportunities for collaboration among participants. Collaboration can evolve naturally over time, although as we have been told by some Teacher Corps projects, this might not happen unless the agency requires it. Finally, the issue of local autonomy is likewise important. In some form or other, local program objectives will be developed anyway, particularly if adequate time is available, but it is better for the sponsoring agency to recognize that fact and provide for it explicitly.

This report deals with an area of research characterized in these words in a recent major synthesis of implementation research: "The importance of regulations and guidelines, written by middle or lower echelon staff to explicate legislation, has seldom been recognized. Brown and Frieden (1976) point out: '...the guideline process constitutes the cutting edge of administrative power...'" (Williams, 1980, p. 54). Elsewhere in the same book the author states, "I consider implementation problems to be the major substantive, as opposed to purely monetary or political, obstacles to the improvement of social service delivery programs" (Williams, 1980, p. 4).

These two quotes reinforce our own sense of why this study has importance
beyond the Teacher Corps program, for our larger subject of inquiry is the
implementation of guidelines written by agency staff. The Teacher Corps
experience embodies a hopeful message for agency policymakers as well as
educators at the local level: it is possible to achieve a mutually
supportive balance between government initiative and local discretion.

31

47

IV APPLICATIONS TO THE CURRENT POLICY DEBATE

What we have learned from the study of Teacher Corps implementation bears on matters currently debated by policymakers at both the federal and state levels of government. At the heart of the debate are questions of the appropriate role for government in support of local educational efforts. Many people question whether government has any useful or legitimate role to play. Others call for more modest efforts by government, marked by a shift from an interventionist philosophy to one emphasizing noninterference and support. We believe that the findings of the Teacher Corps implementation study provide useful information that bears on these questions and give grounds for some optimism about the contribution of government to local action.

We discuss below four issues that have been central to recent debate over the changing role of federal government aid to education. Two of these issues--deregulation and program consolidation--are concerned with the process of government action. The other two--school/staff improvement and equity--have more to do with the substance of government action. These issues are generic. What has been learned about Teacher Corps has something of general value to contribute to each.

Although these issues have been raised principally at the federal level and most visibly debated there, they apply to state government as well. In those states that have developed categorical programs parallel to the federal program array, similar questions have long been under discussion anyway. Given the present climate of opinion in national policy circles, our message has even more relevance to state and local education agencies, which will be struggling with decisions about targeting and accounting for

funds shifted to state and local authority under current block grant measures. The problems that led to the creation of government categorical programs will not go away, and state government increasingly will be called on to assist where local institutions feel unable to cope. Categorical programs are not the only strategy, but, if wisely done, they can make important contributions to solving local problems, as we believe the Teacher Corps findings demonstrate. At the least, our findings may help state and local education agencies avoid some of the mistakes made at the federal level; at best, states can pick up where the federal government left off, with full awareness of the positive lessons learned from federal programs such as Teacher Corps.

Deregulation

Reducing the number and complexity of regulations, along with associated burdens (e.g., paperwork), is a high priority throughout government. The underlying theme of this movement is to reduce government and "get it off the backs" of local institutions, particularly in areas such as education, which are thought to be largely the province of local government. The goal is to encourage local problem solving while reducing the size and intrusiveness of the federal government. An easy implication is often drawn: that regulations are inherently "bad" in the sense that they intrude on local activities and unnecessarily constrain them.

Our findings suggest otherwise. The Teacher Corps Rules and Regulations serve as an example of workable government guidelines. For one thing, they generally were interpreted as "guidelines," even though they technically had the force of law. At the same time, they were taken seriously by most projects. As a result, the Rules and Regulations operated as a flexible yet powerful instrument to promote local action addressing the intent of the Teacher Corps legislation. This achievement can be attributed in part to the broad language used to define the use of funds (e.g., project efforts devoted to "school climate improvement"), in part to specific provisions that increased local discretion (e.g., local specification of objectives), and in part to sensible federal monitoring and program support

34

efforts. These three elements made selective implementation of specific
provisions, such as diagnostic/prescriptive teaching, both possible and
highly likely as projects tailored their activities to particular local
priorities. At the same time, the major provisions defining program process
(e.g., the planning year, collaboration) were, on the whole, well
implemented in all but a few projects. As a result, the Rules and
Regulations appear to have generated and/or supported a range of approaches
to school improvement and staff development problems along lines most
appropriate to diverse local contexts. We saw relatively little evidence
that projects felt constrained by the government guidelines.

One can, of course, debate whether Teacher Corps policy was
appropriately cast as "regulations" in the formal sense, as opposed to the
more permissive form of "guidelines." Our evidence suggests that at least
some important features of the program took place because they were required
(e.g., an extended planning period, collaborative arrangement of
institutions and community) and that, through the experience of complying,
project participants formed new working relationships and developed
constructive approaches to educational problems. The patterns suggest that
a balance between requirement and flexibility can be struck by government
agencies in their efforts to assist localities. From this point of view,
agency guidelines may be an important stimulus to local action. As the
federal government strips away regulations as part of its effort to reduce
its role, state agencies would do well to consider the constructive uses
such guidelines can play.

Program Consolidation

Related to the concern over excessive regulations are fears about
program proliferation and overlap. Despite good intentions regarding each
program supported by government funds, the effect is often seen as
unmanageable complexity at the local level. The problem, as many see it, is
that programs targeted to specific populations or needs interfere with one
another in schools and school districts, causing needless administrative

burdens for local school officials and fragmented instructional efforts. A parallel concern has to do with costs: the existence of many separate government programs requires large outlays of resources.

The basic solution advocated by many is to dissolve, in varying degrees, the categories that define the uses of funds. Current federal block grant schemes do essentially that by combining funds and purposes into "blocks" and shifting responsibility for distributing and targeting funds to other levels, particularly the states. At the state level, similar consolidation schemes have been proposed--and in a few cases enacted--for state-generated categorical programs. But short of revenue-sharing approaches, which funnel resources to LEAs through general aid formulas, the problem of prescribing to some degree the use of government funds cannot be avoided at some level of government. The question becomes particularly appropriate for state agencies, which face decisions about what to do with federal block grants as well as their own categorical programs.

Our study of the Teacher Corps experience suggests one approach for broad-purpose categorical aid to schools. Technically, the program is "categorical," with numerous provisions specifying how government funds should be spent. But the program's targets are very broad--school improvement and staff development--and the program's framework of regulations is flexible, as previously explained. In most projects, Teacher Corps created a process in which local problems were defined and solved locally. The process typically took into account the variety of existing local programs and created around these programs a staff development and support system that could, in principle, enhance all these efforts. In some local settings, Teacher Corps was described as an "umbrella program," which merged separate program thrusts into a more integrated whole. In reality, the program acted in most projects like a mini block grant at the local level, only with some strings and broad goals attached. Taken as a whole, the 1978 Teacher Corps Rules and Regulations are too long and complex to serve as a model; however, the selected provisions we have highlighted in this report seem to provide a viable and flexible framework for federal or state support to local educational institutions.

Improving Schools and School Staffs

There is much public concern over the apparent deterioration of public schools, with particular emphasis on the quality of the teaching force. Many of the roots of the problem are well recognized, among them the fiscal squeeze stemming from declining enrollments and the need for renewal of an aging teacher force. Improved inservice training has grown to be an essential element in the process of renewal.

Although this report does not undertake to analyze the quality of Teacher Corps staff development per se, the implementation story it tells points to several promising patterns. The collaborative nature of the program appears to have brought together underutilized training resources represented by IHEs with the increased demand for training services represented by LEAs. In certain projects, the low-income community has been brought into constructive interplay with one or both of the other institutions, as well.

Improving the quality of schools and school staffs is likely to be a matter of concern to government at the state level (if not at the federal level) in the future. The forces of demography and retrenchment that contribute so centrally to lower school quality are often larger than individual schools' or school districts' abilities to cope. The consequences of an inadequately educated citizenry are felt far beyond the boundaries of a given LEA, and are hence not just a local concern. In this context, Teacher Corps presents one way for government to invest in the solution of these problems without prescribing remedies that may not fit local circumstances.

Equal Educational Opportunity

People still worry about the degree to which equal opportunity for the nation's children is being provided. That goal has been the central

justification for most federal intervention in education, including Teacher
Corps. But today some express concern on at least three fronts: first,
that the efforts to improve equity have failed; second, that they cost too
much; and third, that they have diverted attention from other valuable goals
(such as academic excellence). At the same time, others fear that the
federal government appears to be moving away from vigorous efforts to meet
equity goals.

The patterns we observed in the implementation of Teacher-Corps bear on
the attainment of equity goals. First, by emphasizing local program
definition, Teacher Corps ran the risk that projects would downplay or
ignore the thrust of the national program toward improving the education of
low-income children. In a few cases, some deemphasis on serving low-income
children seemed to occur, but they represent a distinct minority among
projects as a whole. For reasons probably related to the broad-based
constituencies involved in the planning process, low-income children and the
classrooms in which they were taught most often were an important focus of
project activity. Whether these activities significantly improved the
performance of the children in question lies beyond the scope of an
implementation study such as this, but the Teacher Corps' efforts
represented at least visible progress toward that goal. This kind of
program does not, then, mean that the interests of low-income children get
shortchanged.

Second, through its requirement of bringing the community into formal
collaboration with education institutions, the program strove to achieve a
kind of higher-level equity goal (which would also contribute to the goal of
improving the education of low-income children): that of sharing control
over school improvement or staff development programs with those whose
children were the intended beneficiaries. Teacher Corps has demonstrated,
as other programs have found, that this kind of collaboration is not easily
achieved. More often than not, the flexibility of the program and the
inertial forces that separate professional and lay people resulted in an
unequal distribution of power within most projects, such that the

38

53

representatives of the community were excluded from a large or meaningful role in program design and operations. There were some striking exceptions, as noted elsewhere in this report; perhaps to have achieved those few arrangements that can serve as examples for others justifies the investment in shared responsibility with community members. But by allowing flexible collaboration among unlike partners, the Teacher Corps program in effect favored the more dominant educational institutions. This issue, of course, cannot be resolved without reference to strongly held values; but there is at least the possibility that the experience represented by Teacher Corps does not on the whole provide much useful guidance for future government action in obtaining for low-income adults a substantial role in the efforts of educational institutions.

*   *   *   *   *

Other issues on the current federal agenda also may be addressed as the story of Teacher Corps implementation continues to evolve, among them the concern for dissemination of successful practices and the institutionalization of improvements in participating educational organizations (see Bush and Bock 1981, for a study of IHE institutionalization). But much of that story lies in the future, as Teacher Corps programs originally conceived as 5-year efforts adjust to federal block grant decisions and perhaps settle for less than they originally hoped for. At present, we can conclude with only partial answers about the processes of implementation in Teacher Corps. As far as we have been able to observe, the Rules and Regulations have worked well, in the sense that certain provisions have stimulated constructive responses at the local level, addressing important local needs, with a minimum of the counter productive side-effects often associated with government programs. As of this writing, a collaborative foundation for program efforts seems to have been built in most local sites, and staff development activities are well under way. Accomplishing that makes Teacher Corps an example from which other programs can learn much.

PART TWO

V THE TEACHER CORPS PROGRAM.

The Teacher Corps program was authorized by the Higher Education Act of
1965 to strengthen the educational opportunities available to children in
schools in areas having concentrations of low-income families and to
encourage colleges and universities to broaden their programs of teacher
education. The original concept for the program was to improve schools by
attracting talented young college graduates to teaching, especially those
from minority groups, and to bring colleges and public schools closer
together in providing a practical, field-based training that went beyond
traditional practice teaching and on-campus courses. To achieve this goal
and to meet the requirements of the legislation, the Teacher Corps program
has awarded grants through a competitive process to institutions of higher
education and local education agencies to cooperatively develop and
implement local Teacher Corps projects.

In the early years of the program, when school enrollment was still
rising, Teacher Corps emphasized a program of attracting and training novice
teachers. During the 1970s, however, as enrollments declined, the emphasis
shifted to providing inservice education to practicing teachers in schools
serving low-income neighborhoods and to encouraging the use of aides and
volunteers in the schools. Also, Teacher Corps became increasingly
concerned with the training of all school personnel and with the involvement
of parents and community members as informed partners in the educational
process.

The growing maturity of the Teacher Corps program culminated in
broadened legislation and rules and regulations, commencing in 1978 with
Program 78 (the 13th cycle of Teacher Corps). Primary emphasis within the

program was shifted from a service orientation to a demonstration orientation. There were other changes as well, starting with Program 78 operations:

- The length of the grant period was extended from 2 to 5 years to accommodate new requirements for institutionalization and demonstration and to provide for a planning year in which to initiate and implement the project. Funding is on an annual basis, renewable each year of the project.

- A third party--the community--was included as an active and collaborative partner in planning and operations.

- The program was built on a full feeder school system: elementary, junior high or middle, and secondary.

- Inservice and preservice training were tied more closely together.

- Training was extended to include inservice for all school personnel and for parents and other community members.

- Mechanisms were established to promote collaboration and equal participation by all stakeholders (e.g., a policy board with representation from the institution of higher education, the local education agency, and the community).

- An elected community council was required.

There were changes in the internal content of the program also. For example, emphasis was placed on individualization of instruction, concern for school climate, attention to the exceptional child, and multicultural education.

All these changes were meant to facilitate achievement of the four basic outcomes for the program that are specified in the Teacher Corps Rules and Regulations:

- Improved school climate which fosters the learning of children from low-income families.

- An improved educational personnel development system for persons who serve or who are preparing to serve in schools for children of low-income families.

- The continuation of educational improvements (including products, processes, and practices) made as a result of the project after federal funding ends.

- The adoption or adaptation of those educational improvements by other educational agencies and institutions.

Organization of a Local Teacher Corps Project

Each of the five years of a Teacher Corps project has been designated for certain primary activities by the national Teacher Corps program office:

Year 1:   Planning/Development

Years 2 and 3:   Operations

Year 4:   Institutionalization

Year 5:   Dissemination.

Table V-1 shows the chronology of project events from the grant application stage through the fifth year.

At the local project level, the Teacher Corps Rules and Regulations require that a collaborative arrangement be entered into by a university, a school district, and the community served by the target schools. One of the three collaborating entities usually took the initiative in preparing the grant application and organizing for the project, typically under the direction of the person who became the project director. Often this was the IHE, but a small number have been initiated by the LEA or by a balanced combination of two or three stakeholder groups.

Two official groups are mandated to guide the project, share information, and provide community-based support. One is a community council that is representative of the community served; it is elected early

43

Table V-1

CHRONOLOGY OF MAJOR EVENTS IN A 5-YEAR TEACHER CORPS PROJECT

Prior to Project Initiation		Year 1	Year 2	Year 3	Year 4	Year 5
Prior Experience	Grant Application	PLANNING/ DEVELOPMENT	OPERATIONS		INSTITUTIONALIZATION and DISSEMINATION	
Local history relevant to project such as participation in a prior Teacher Corps project or similar program	Proposal preparation Temporary community council Preliminary needs assessment Grant award	Organize project staff Elect community council Establish policy board Set up collaborative mechanisms Develop specific plans Update needs assessment Select interns and team leader Prepare continuation proposal	Conduct preservice training for interns Offer inservice training to school personnel Offer community education and training activities Continue collaborative mechanisms Continue project planning Start preparations for institutionalization and dissemination Prepare continuation proposal (each year)		Integrate project processes, procedures, and products into the normal organizational routines of the IHE and the project schools Demonstrate and disseminate Teacher Corps products and practices outside the project Continue training for teachers and other educational personnel Continue education and training for community Prepare continuation proposal (year 4)	

in the first year of the project. The other, the project policy board, includes the dean of the school of education at the IHE, the superintendent of the LEA, and the community council chairperson as the required nucleus group. Additional members can be added to the policy board at the discretion of the local project.

A team of persons is assembled to carry out the day-to-day operations of the project. The typical Teacher Corps project staff consists of the equivalent of three to four full-time persons, spread over these roles: a project director, a documenter/evaluator, a local community coordinator, an inservice program director, and a team leader whose responsibilities include the organization and supervision of the teacher-intern training program. (Each project is required to recruit and train at least four interns.) Other project staff members are added as needed to successfully achieve project goals. Typically, there are a number of part-time staff members who also have other responsibilities as graduate students, IHE faculty, LEA central office administrators, etc.

The organization of a typical Teacher Corps project also includes at least one school from each of the three levels in the feeder system: elementary, junior high or middle school, and secondary. The elementary schools must be eligible for ESEA Title I funding, and these are in low-income neighborhoods.

Figure V-1 shows the skeleton organization and the participants for a typical Teacher Corps project. Because local conditions and objectives dictate the configuration in each project, no attempt has been made to show adjunct institutions or agencies that may be involved (correctional institutions, teacher organizations, professional associations, social service agencies, etc.).

It should be clear from this description that there is a host of participants, each with a concept of what a Teacher Corps project is and what it should be. All Teacher Corps projects involve a college dean, college faculty (actively or indirectly involved with Teacher Corps), a

45·

PROJECT MEMBERSHIP

IHE | LEA | Community

Teacher Corps Project

PROJECT ORGANIZATIONAL STRUCTURE

Policy Board
Dean
Superintendent
CC Chairperson

Community Council

Project Director

Project Staff

IHE
Dean
Department Chairpersons
Faculty

LEA
School Board Members
District Office
  Superintendent
  Federal Project
    Administrator
Assistant Super-
  intendent for
  Special Programs
Target Schools
  Principals
  Teachers
  Students
  Paraprofessionals
  Volunteers

Community
Parents
Community
  Agencies
Active Citizens

Various Task Groups

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FIGURE V-1   ORGANIZATION OF A TYPICAL TEACHER CORPS PROJECT

46

62

school superintendent, district staff, principals, teachers, parents, interested community members, and several teacher-interns training to become teachers through involvement in Teacher Corps.

Each of the people mentioned above may see Teacher Corps projects differently, according to their degree of involvement, personal interests, and role position. It is likely that, instead of one "objective truth" about the Teacher Corps, there are many truths; and we consider it our responsibility to attend to these in a systematic way. To capture these varied perceptions, we needed to develop an evaluation methodology sensitive to different "constructions of reality" (Berger and Luckmann, 1966) and capable of capturing these perceptions in the participants' own words. These needs and the following basic assumptions shaped the direction we took with this study.

A beginning assumption is that people with direct experience in a program's operation are in a position to perceive and understand aspects of that program that may not be captured by outsiders. A second assumption is that people who have lived with a program over time have gathered a tremendous amount of information that researchers can usefully record, with appropriate safeguards for respondent bias and the distortion of memory. Another assumption is that people learn much about the world by talking with others—through questions, discussions, and dialogue. This "oral history" perspective opens up the possibility of utilizing conversation and dialogue in direct ways to create data and to write reports. This perspective underlies our open-ended interview strategy for site visits made by SRI staff and our use of local documentation "essays" written by in-house research specialists employed by each project.

Important Features of the Teacher Corps Program

The original impetus for this approach to this implementation study came from the recognition that the people directly involved in the Teacher

47

63

Corps program would have important opportunities to learn about the difficult process of trying to implement innovative educational programs. The Teacher Corps program has a number of characteristics that make the lessons learned by people who participate in it especially valuable to document.

One of these characteristics is the diversity in educational philosophies and practices represented among participants in the nationwide Teacher Corps program. Also, the local communities involved in Teacher Corps represent different ethnic, cultural, and geographic settings. This diversity provides an important opportunity for comparing programs in order to discern general perspectives on implementation that are valid across diverse educational philosophies, practices, and local demographic circumstances.

Another important characteristic of Teacher Corps is the commitment of the federal funding agency to a 5-year program sequence that includes developmental activities, operational activities, institutionalization activities, and dissemination activities. This coherent planning sequence provides a considerably more expanded time frame for experiencing the problems and achievements of involvement in educational change than the more typical short-term funding cycle allows.

The planned time frame emphasizes the importance of an implementation process that is mutually supportive, involving the associated institutions, communities, and other vested-interest groups. The collaborative mode of operation means also that the lessons learned by Teacher Corps participants can be rooted in the pragmatic world of public schools and local communities as well as in the more scholarly traditions of educational program development and research.

The Teacher Corps program attempts directly to overcome certain problems encountered in the implementation of federally aided education programs. The 1978 federal Rules and Regulations governing the Teacher

Corps program clearly reflect lessons learned from previous implementation experiences. The key features derived from the Rules and Regulations were summarized in Table II-1 (page 8). This table serves as a brief description of the Teacher Corps program for the reader who may be unfamiliar with it.

Relative Importance of Teacher Corps Features

Although we organized our data collection around the list of key features from the Rules and Regulations that are shown in Table II-1, we also paid attention to the complete set of Teacher Corps requirements that were published in the February 23, 1978, issue of the Federal Register (see Appendix A). Since these rules provided the framework within which the local projects applied for funding and under which they are now operating, we asked Teacher Corps project staff in the local projects to comment on the complete set of Rules and Regulations as a strategy for changing staff development programs, both in the IHE and the local school, and for improving school climate. In general, projects seemed to consider the Rules and Regulations as adequately reflecting the prerequisites for establishing and operating a successful program. The absence of complaint about the requirements as a whole was a striking feature of the local response to them, although there were exceptions and individual regulations received mixed reviews.

The Rules and Regulations were generally reported to be flexible and comprehensive, allowing each project to develop local goals and objectives as well as the processes through which they, and ultimately the desired basic outcomes of the national program, would be achieved. Project staff appreciated this flexibility, which allowed each project's interpretation of the language of the rules to reflect local conditions, interests, and needs. These local interpretations resulted in selective translation of the Rules and Regulations into operational form as the projects were implemented. Those requirements that were most appropriate to local conditions became the ones considered to be most important in the project,

while those that were less pertinent received relatively less emphasis in the day-to-day operations. The succeeding chapters discuss the features of the Rules and Regulations that proved generally to be most important to project operations.

At the present time, 3 years into the 5-year funding cycle (for those receiving funds in 1978; 2 years for those starting in 1979), it is possible to comment on the relative importance and interrelationships of these features as stimuli for local-level implementation. We asked local participants about the relative importance of the key features at several times--early in the planning year, at the end of the planning year, and midway in both operational years. Data from multiple time points allowed us to detect provisions with persisting influence and those with more temporary importance, as well as those seen to have little relevance during the first 3 years. Table V-2 shows the importance of the provisions across time and across projects as perceived by project participants.

Those provisions with only distant implications for local activities were naturally given little attention. The restriction on reapplication for funding after 5 years was too far in the future for most projects to give it much thought. State education agencies were generally remote from local projects; and, although efforts at coordination beyond state-level signoff on funding applications were made, these were more often than not pro forma and inconsequential, at least during the early years of each project's funding cycle.

Provisions that seemed to be relevant in some projects and not in others have been classified as of "mixed" importance because there was great variety in their "fit" with local project conditions and priorities. In some cases, the nature of the target population made a provision more or less relevant. For example, projects in more heterogeneous communities appeared more likely to emphasize multicultural education. In other cases, ·

Table V-2

RELATIVE PERCEIVED IMPORTANCE OF KEY PROVISIONS
IN THE RULES AND REGULATIONS

Most Importance*	Mixed Importance*	Little Importance*
Five-year funding	Low-income focus	Three-year ban on reapplication for funds
Planning year	Feeder system requirement	
Local specification of objectives to meet four basic outcomes		
Field-based training	Integrated preservice and inservice training	
	Multicultural education	
	Diagnostic/prescriptive teaching	
	Intern teams	
Collaborative mode of operation	Policy board	Coordination with SEA
Joint participation of IHE, LEA, community	Elected community council	
	Local project documentation	

*"Most importance" indicates broad consensus on importance across time
points and different types of projects. All the features in this column
receive extensive attention in this report, except for field-based
training, which is a major topic in another component of the national
evaluation. "Mixed importance" indicates that the feature was important
to some projects, unimportant to others, or of temporary importance.
"Little importance" indicates wide agreement on lack of importance during
the first 3 years.

51

the nature of the participating institutions was a determining factor; for example, the policy board was often seen to be less workable in projects with large IHEs and LEAs whose deans and superintendents were less able or willing to commit time to active board participation.

These kinds of findings are neither surprising nor particularly profound. Teacher Corps projects operate in a diverse array of settings. If anything, one would expect such varied responses to the Rules and Regulations, and it is to the credit of the federal policymakers that the Teacher Corps framework is flexible enough to accommodate variety.

The most striking finding derived from the documentation essays has to do with the importance of certain of the key features across all projects and across several phases of project activity during the first 3 years of the 5-year funding cycle. It is convenient to group these most important provisions into three themes: (1) the time and planning frameworks for project operations, (2) frameworks for promoting the collaborative process, and (3) frameworks for the local development of objectives and strategies. These three themes are discussed in the subsequent three chapters.

68

VI   TIME AND PLANNING FRAMEWORKS

The Teacher Corps Rules and Regulations provided a substantial amount
of time for projects to develop: 5 years, as opposed to the 2 years
formerly allotted to Teacher Corps projects. Within this framework, some
structure was imposed on the flow of time, especially in the beginning of
each project's life cycle, through the requirement for an initial year of
planning and development. These two provisions set the stage for much of
what happened in the 3 years during which we have observed the program.
Accordingly, we have devoted this chapter to the time dynamics of Teacher
Corps implementation, especially as seen in program start-up and operations
phases.

Both of these provisions represented a departure from previous practice
in the Teacher Corps program, as demonstrated by this excerpt from the
summary of major issues preceding the Rules and Regulations:

> In §172.30 of the regulation, the term of a Teacher Corps project
> is extended from the present two years to the newly authorized five
> years. The two-year limitation was placed on projects before 1974
> when they were primarily concerned with graduate level pre-service
> training of teacher-interns in master of arts-type projects.
> Section 513(a)(1) of the statute was amended to authorize a project
> length of five years. The newly authorized five-year project
> duration will give all parties concerned with a Teacher Corps
> project (i.e., an institution of higher education, a local
> educational agency and a community council) sufficient time to plan
> a worthwhile project, carry it out, document it, and disseminate
> the results. (Federal Register, 1978, p. 7524)

The expanded framework of time made a year for development and planning a
possibility.

Our basic message about time is simply this: a long time horizon for
project activity, coupled with a designated year for planning and

development, was extremely useful, if not essential, to local project
efforts, as least during the first 3 years. Each provision required the
other. Without the framework of 5 years' funding, a long planning and
development period was meaningless. Without an extended period in the
beginning to lay the foundation for collaboration and to determine project
directions, the 5 years could easily be misspent.

Projects did, however, raise many questions about the usefulness of a
full year for planning. The long period of preparation, sometimes perceived
as a time of inactivity by local groups, was not always well used. The data
suggest that a more flexible rule might be more productive. In many cases
this would mean a somewhat shortened period--say, 6 months. In other cases,
the full year might be necessary.

A third provision, that projects could not reapply for funding until
3 years after the 5-year period had ended, further structured the flow of
time. During the early years of the grant period, most projects considered
this provision to be relatively unimportant, naturally enough. However, the
requirement guarantees the "temporary" nature of the project itself, and may
well contribute directly to institutionalization, as it was no doubt
intended to do. That issue lies beyond the scope of this report, but is
covered in another part of the SRI study (Bush and Bock, 1981).

Finally, project development over time was not linear. First the
"planning" activities often intermingled with "operations." Second,
important external and internal factors complicated project efforts over
time, in some cases enhancing local efforts and in some cases inhibiting
them. Three such factors, which have emerged from our research as
especially important, are discussed at the close of the chapter:
unanticipated events, prior project experience, and concurrent actions by
the federal government.

Five-Year Horizon for Project Activities

The following quote from a documenter's essay captures the spirit of most reactions to the 5-year time frame for federal funding:

> When local Teacher Corps participants were asked the question, "What would you want a policymaker to know about your project and the lessons you have learned when he or she is designing future educational programs?" a response heard so often was--"Fund more 5-year programs." If there is one lesson many of the Teacher Corps participants are painfully aware of, it is that change comes slowly. It is very easy for even the best teachers and administrators to become comfortable with old habits and ideas. And having anything new is usually met with resistance or indifference. This is why it often takes months and, in a few instances, years of careful prodding before a school administrator or teacher will change a strategy that he or she has used for 5, 10, or 20 years....
>
> Our team leader mentioned that one striking difference that he had noticed between the 2-year and 5-year programs was that teachers in the 5-year program were making an emotional as well as intellectual commitment to the program. They realized that Teacher Corps was making a long-term commitment to them and their schools, and so they were more likely to commit themselves to Teacher Corps goals. As far as he and many of the other Teacher Corps personnel at this IHE and LEA are concerned, long-range federal funding is essential if meaningful educational change is to take place.

The pattern is not surprising: who would complain about the prospect of long-term federal support? There was much to do in each project. Anyone with experience in such endeavors knew that extended project support provided a better chance of successfully managing the complexity of the collaborative action required.

The pattern we have observed is, of course, not a statement about 5 years of effort in retrospect. At this time, midway through the 5-year funding cycle, we can only guess at what a more inclusive appraisal of this period might look like. But we can say with certainty that this provision had a positive influence on participants' perceptions of their own project

and its future. To the extent that such perceptions are a basic determinant of future commitment, they are as good a projection of each project's health as any.

How did the prospect of long-term funding contribute to, and help shape, the implementation process? We were able to identify the following ways:

. Long-term funding communicated seriousness of purpose on the part of the federal government, thereby increasing the credibility of its part of the bargain.

. Participants were more willing to commit themselves to a project that had a longer potential lifespan. Professional people, for whom a briefer stint with the project might represent career disruption, especially appreciated and responded to the provision. But community people, who had experienced "hit-and-run" federal intervention programs in the past, also found the prospect of 5-year funding a welcome change.

. . Participants were more able to think in terms of changing systems, rather than small pieces of systems. Although some of this thinking was unrealistically ambitious, much was aimed at fundamental dimensions of local educational problems and the capacity of institutions to deal with the problems.

. Not all projects, however, tackled their task with such a global view. Many "started where the participants were," with small pieces of the problem. The 5-year time frame gave them time to achieve some small successes, which provided a foundation for further, more ambitious action.

One further theme emerged repeatedly from essays and case-study accounts. Five years allowed projects to separate their efforts into distinct phases, especially a phase of trial (and often error) and a phase of incorporating the results of these trials into more routine practice. As one documenter put it:

Support evolves in phases with differing types of client groups. There is always one group of enthusiastic risk takers who have a very positive attitude toward change and incorporate it readily. Another group gravitates toward structure and faces change with trepidation. This second group often will incorporate the change in the second phase, after the first group has tested the new

program or practice. A third phase occurs when the change has majority support and the foot-draggers accept the new practice, either as an alternative to their "out" position or as acceptance of the inevitable.

In the language of the Rules and Regulations, 5 years more realistically allowed for institutionalization (i.e., establishment as a continuing function) of project accomplishments. Whether this will happen as widely as now predicted remains to be seen; however, we can say that in many projects the prospects for substantial institutionalization appear good.

But institutionalization presumes that there is something worth continuing. That something--a successfully functioning activity deemed valuable by a spectrum of local opinion--has come about in large measure through the success of the planning year, to which we turn next.

A Year for Planning and Development

Quotes such as the following from documenters' essays expressed a widely held view regarding the provision for a year of planning and development. From a rural Northeastern project:

> The year of planning was disorienting initially, as we were all wondering what we could possibly do with all the time! We were also reacting to our public's demands of "when are you going to do something?" We have struggled to restrain our impulse to produce and have merged planning and programming into an action mode. By organizing workshops in response to identified needs in the system, we are gathering data for future program implementation and satisfying the demands-of the district.

> The year-long period is essential to developing the foundation for future programming. We are beginning to observe the benefits from slow, thoughtful planning. By interviewing a high percentage of our target population, spending a great deal of time making ourselves available to committees, councils, and individuals, and keeping an-ear close to the ground, we have increased our visibility and have defused rumors and potential misunderstandings

57

about the Teacher Corps project. Our developing trust and
understanding will be the basis of our success. The
identification of reliable support people in the community is only
possible if you have time to feel out a system informally as well
as formally. For example, we have a commitment for support from
the principals in the LEA, a previously skeptical group of
administrators, and we have a teacher representative on the policy
board, which is an indicator of the teachers' trust in our
intentions.

From a project in a Midwestern urban area:

Having been in the Teacher Corps in two previous cycles, it seemed
foolish and wasteful to have a developmental year for project
development, organization, and planning. Our experiences this
first quarter, however, would support this "tactic" as one of the
best requirements for any project.

Starting a 5-year project was very different from the previous
projects. We had three schools, rather than one, with two of the
schools new to Teacher Corps ideas and activities. The teachers
in the new schools needed time to discuss, question, propose
activities, and interact with others involved in the planning
process. While frustrating to some participants, the
"brainstorming" sessions without predetermined outcomes helped to
develop a sense of "ownership" for the plans which emerged from
the planning task forces.

The much broader community to serve also made the developmental
year a valuable tactic. New community council members, more
social agencies to contact, and many more parents to reach
required time and repeated efforts to share the Teacher Corps
message. This time helped the community council discuss
thoroughly how to improve school-home communications, how to
promote more community involvement in school activities, and how
to work collaboratively with the schools and the university in the
Teacher Corps project.

The third reason why the developmental year tactic has proved so
valuable is the "long-range outlook" that many of the teachers,
community council members, and others developed while planning
with each other. There has been a "revolution of rising
expectations" and an excitement about starting the things that
have been planned. While this feeling might have developed
without the extensive planning, it appears that this process of
looking ahead 5 years and setting goals, objectives, and programs
together has worked very well to promote the project's activities.

74

The striking thing about the pattern illustrated by these quotes was its pervasiveness. It described experiences across the full range of projects, those with and without prior Teacher Corps experience, in isolated rural areas as well as urban areas, in projects oriented toward LEA agendas as well as those oriented toward the IHE. There were very few dissenting voices. Not only was the pattern consistent across projects during the planning year, it appeared to persist over time. Responding to essay assignments a year after the planning year had ended, a majority of the Program 78 projects still viewed it as one of the most important features of the program, as can be seen in Table VI-1.

Table VI-1

IMPORTANCE OF THE PLANNING YEAR*

	Most Important	Moderately Important	Little or No Importance
Program 78	31 (58%)	16 (30%)	6 (11%)
Program 79	26 (76%)	6 (18%)	2 (6%)

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*Fifty-three of the 79 Program 78 projects submitted ratings; 34 of the 53 Program 79 projects submitted ratings. Program 78 projects completed their ratings a year after the completion of the planning year; Program 79 projects made their ratings about 4 months into the planning year.

Differences between Program 78 and Program 79 projects may be smaller than the ratings imply. The two programs were in different stages of development when the ratings were made, as noted in Table VI-1. It is not surprising that the planning year was considered very important when program development was uppermost in the minds of Program 79 participants. The fact that Program 78 projects viewed the planning year as important, even though it had occurred a year before the ratings were made, is perhaps even stronger testimony in support of that program feature.

The Importance of the Planning Year

The importance of the planning/developmental year lay with factors other than the creation of a plan or blueprint for subsequent action, even though this was the ostensible purpose of the year and its most visible product. We identified several aspects of the process of planning that can be argued to be equally, if not more, important.

Assembling the Core Staff Team--The following documenter's observation applies equally well to most projects:

> Teamwork and cooperative staff spirit are essential for implementation. Persons chosen for staff membership should demonstrate a willingness to work long and unusual hours, availability to travel frequently, and flexibility in scheduling. Staff personnel should posses a unique blend of skills to both work autonomously and collaboratively as needed. Without a dedicated, hard-working staff, project management will be ineffective.

At the heart of each project, certain key roles were created, comprising what may be called the "core staff": project director, documenter, team leader, interns, secretarial staff, and (usually) several specialized staff roles (e.g., program development specialist, community

coordinator, sometimes site school coordinator). This team was assembled in the proposal preparation stage and as the planning year progressed. Before plans had formed to any great degree, it was imperative that the members of the team know and trust each other, as well as understand the interrelationships between their roles. Though past Teacher Corps practices could be looked to as a guide, there was no way to replace the process of articulating these roles face to face. This articulation did not happen overnight and was complicated by factors such as project geography or the institutional identity of team members. Team members "learned their jobs by doing"; the planning/developmental year provided the opportunity for that learning to take place.

Developing Momentum in the Larger Participant Pool--Project design and operations required the participation of a much larger pool of people than the core staff team. Most of these people were occupied full-time in other jobs or pursuits: teachers, IHE and LEA administrators, and community people. The community council did not even exist; elections had to be organized and conducted, consuming a huge proportion of staff time during the first quarter of the planning/developmental year (the worth of this investment of time was questioned by many projects). The project had little authority over such people's activities. It could only explain, persuade, and cajole in order to elicit voluntary commitment and excitement on the other end of the line. The fact that certain members of the larger participant pool had formal leadership roles in the project (dean of the IHE, superintendent of the LEA, or chairperson of the community council) was no guarantee of their active involvement. They had to be cultivated and shown that their input was wanted and needed and that their own agendas could be realized through the vehicle of the project. The following documenter's description of rapport building between LEA and project staff was typical:

61
77

Even though project activities are on schedule and the staff is
presently working as a unit, initially there was a considerable
amount of time spent in building a relationship with the LEA
administration and staff. It was understood by the staff that
developing positive relationships takes time. It was not
anticipated that, even after the staff had been involved in staff
development activities and several staff meetings, the level of
misunderstanding concerning project operations, parameters, and
staff functions would still exist.

Even though this period of trust building did cost the project a
certain amount of time at the onset of the project, the staff feels
that the time spent in this endeavor was very worthwhile and well
spent because of the relationship that did evolve and become
established as a result of the staff meetings where concerns and
attitudes were discussed.

It was disheartening to the staff to constantly discuss the same
things, but it was not futile because once the LEA administration
understood what Teacher Corps is designed to do and that the staff
is only interested in doing those things, they gave the staff their
wholehearted support.

Teachers at project schools were, on the whole, wary of project

intentions at first; many projects encountered significant skepticism or

indifference among the potential consumers of training. Developing

participative momentum took time. Given the number and diversity of role

groups to be brought into the collaborative network, a year could easily be

productively used. In fact, many projects reported that in retrospect the

need for an extended planning period was more obvious than it had been

originally.

Learning How to Plan Collaboratively--Once assembled and in contact

with each other, the core staff and other participants had the task of

defining project directions together and detailing the plans for subsequent

operational years. Projects accomplished this in a variety of ways (e.g.,

elaborate committee or task force arrangements, retreats, teacher and

community needs analyses), but the process was generally slow and

cumbersome. There was abundant evidence that most participants in most

78

. projects did not initially know how to go about a complex planning process
together. One documenter's observations about a major planning-year problem
spoke for many:

> Dealing with inexperienced planners: We had to prepare each group
> for the planning process by training them in problem-solving
> techniques, decision-making, and communication skills (particularly
> listening). The subcommittee leaders are also receiving leadership
> and facilitation training.

Participants from different institutions or institutional levels did
not usually share priorities, problems, or styles of action. Many projects
reported that community members felt "lost at sea" among professional
educators of any kind. The whole affair required masterful choreography on
the part of organizers (chiefly, the project director) and continuing
flexibility on the part of all participants. Once again, organizers and
participants tended to learn by doing, making many errors in the process.

Most projects did not close in on a set of objectives in a rapid-fire,
orderly progression. More often, there were tentative movements back and
forth, as groups gained trust, unanticipated events were coped with, and a
refined sense of "real" needs emerged. Our conclusion is that the apparent
inefficiency of this process was entirely necessary, even desirable, as a
way of enabling the full array of potential stakeholders to build ownership
in the project.

Questions Raised About the Planning Year

It was not surprising, considering the great diversity among projects,
to find them moving through the planning/developmental period at different
rates. This fact, coupled with the fixed timing of the formal plan's
completion as a "continuation proposal" to Teacher Corps Washington,
prompted many projects to question the utility of a full year

for planning. For example, the following comments from a documenter in an isolated rural project reflect widely held opinions:

It is apparent that the process did not last a whole year and did not concern the development of the whole program. Proper planning is no doubt important; requiring a whole year for it may not always be appropriate. No amount of advance planning could take into account all the possible ramifications of decisions or all external events. Therefore, it may be better to think in terms of ongoing planning and development activities and to create a way that programs may receive funding for such short-term, limited processes when needed. Had the funding not been available the above process would not have worked out so well.

From a documenter in a large urban project:

Planning is a process, not a product, and those who are not involved in the process very seldom see anything happening. They feel the project or program isn't "doing anything." Therefore, some activities must be held during the planning year that will allow everyone to see Teacher Corps and to know that the project is doing something.

The quotes illustrate an important issue of flexible timing for the planning/developmental year. The issue included two sets of questions. First, it raised questions about the way internal planning needs and external requirements intersected. Second, it raised questions about the way plans and "planning" related to "action" or "operations." On either score, projects met major frustrations, which they resolved with varying degrees of success.

With regard to external requirements, there was a basic fact of life interpreted by many projects as unfortunate. Teacher Corps Washington required an elaborate "continuing proposal" in the spring of the planning/developmental year. This meant that many planning decisions had to be made by January or early February of that year, a tight timetable given that task force and community council machinery had been put in place only a few months before, in most cases. As was frequently pointed out to us, the

planning "year" was hardly 12 months long. Projects encountering the most
turmoil during the early months of the year felt rushed into premature
plans. The spring deadline also left projects with a gap of 2 or 3 months
following the proposal's submission in which projects had to busy themselves
before the operations phase officially began. This period was experienced
by many as a "spinning of wheels"; the frustration expressed by the
following documenter's comments was experienced by many:

A second example of the negative effects of the federal Rules and
Regulations is related to the writing of the project amendments for
continued funding. Because the amendments are due in April, much
of the planning must be completed by this date. The project staff
was comfortable with this. What concerned them was their inability
to begin the program until the following year.

Because the first year was a planning year, no training could
occur. Although many important improvements were made on the
training design after the annual deadline, everyone involved was
anxious to get to work on its implementation. The long delay
between the conclusion of the planning and the beginning of the
training resulted in a decrease in enthusiasm.

Others reported no problems and moved ahead with further planning and more
focused preparations for training. Some projects held an opening round of
training events, apparently with the blessing of Teacher Corps Washington.

With regard to the relationship between planning and action, a delicate
balance had to be struck between maintaining momentum and precise planning.
One documenter's description of the problem represents the experience of
many projects:

Although National Teacher Corps' designation of the first project
year for planning is undoubtedly wise and the product of past
experience, it creates some risks of increasing skepticism about
the project because of lack of visible accomplishment during this
period. The nature of the risk was evident in occasional
statements by teachers and administrators, who expressed doubts

about whether anything was ever really going to happen, about the possibility of bringing about change, even about the good faith of Teacher Corps (based partly on bitter past experience in the sixties when a Teacher Corps project could, in fact, be said to have failed). The staff was aware of this hazard of disenchantment throughout the year and encouraged several concrete, visible changes within the schools as reassurance rather than as significant elements of change in themselves.

Although the planning year was finally seen as a necessary period for transforming reactions into workable ideas, it is also apparent now that people in this community are holding judgment in abeyance, waiting to see if in fact the college "comes through" with technical assistance, courses, workshops, etc., and particularly if there is some match between the issues identified through the long, somewhat repetitious processes carried out the first year and progress made during the second year. It will be important for the staff to return to last year's lists and formulations as reference points for this year's planning.

This kind of experience, coupled with the "dead time" following the submission of continuation proposals, led many projects to advocate a shorter, though still substantial, planning period. Although a small minority advocated doing away with the planning year, and another small group wanted the full planning year to be retained, the following observation represented a more broadly held view:

> Thorough planning also takes time, and the development year offered the requisite time. It was a new experience for personnel in the project to be involved in a planning effort without simultaneous implementation. The year-long planning effort was valuable in terms of broadening the base for involvement. Perhaps a six-month period would allow for adequate planning time; however, condensing the planning time beyond that point would not be productive. Long-range plans are necessary if institutionalization is to occur.

External Factors Affecting Project Timelines

Certain sets of external factors had particular influence on the time dimension of project activity and, by implication, on government policy

66

intended to structure that time dimension. We describe three: unanticipated events, prior project experience, and concurrent federal actions.

Unanticipated Events

Major unanticipated events in the local setting of the project were noted by a majority of projects during the first 3 years of the grant period. A documenter described coping with the unexpected during the planning year:

> The interesting fact that emerged was that the unexpected happens much more frequently than not and that project personnel learned to cope and continue on with the goal of the project. A few examples of these unanticipated happenings that occurred during our planning year: national director changed, budget cuts, networks dissolved, local superintendent fired, director out for surgery, assistant director given grand jury duty once a week. We survived it all and one instance even proved a boon for us. The new superintendent of our local school district was the former dean of our university and IHE administrative officer for Teacher Corps. So cooperation with the LEA in the future looks better than ever.

Though the impact of such events on projects varied from nuisance-level contingencies to catastrophes, their general effect was to delay projects considerably. In a limited number of cases, the project direction was altered substantially as well.

Table VI-2 lists the most common events included in the category of unanticipated events, though in some cases project personnel had prior knowledge of them.

Table VI-2

MOST COMMONLY REPORTED UNANTICIPATED EVENTS

Internal to Project	External to Project
Staff turnover	Financial shifts, reorganization within LEA (including closing of project schools)
. Director & key staff	
. Secretarial	Local political actions (including teacher strikes)
. Interns	
Project reorganization (in response to other unanticipated events)	Community demographic shifts
	Leadership change, reorganization at the IHE
Prolonged illness of key staff	

Although unanticipated events are largely outside the control of the project, and beyond the reach of government policy, they are important to our story because of their crucial role in the activities of most projects. Although they often appeared to frustrate both the best laid plans of local people and the intentions of government policymakers, they represent in our view a basic fact of life to which projects and government guidelines must accommodate themselves.

They also provided local projects with an important kind of opportunity. The most successful projects were those that coped flexibly with the unanticipated--which meant, among other things, that objectives and management charts were constructed or interpreted with a corresponding flexibility. In this spirit, personnel in a minority of cases were able to turn unexpected adverse circumstances into opportunities for creative

action. A crippling teacher strike became in one large city a focus for training efforts aimed at teacher morale; in a community experiencing massive enrollment decline, the necessity of reorganizing schools gave the project a theme for planning-year activities: the planning of new educational programs for school buildings utilized in new ways. These are but two examples of constructive responses to unanticipated events, which underscore the fact that agency guidelines, various support mechanisms, and flexible local planning interact in creating such responses.

Prior Project Experience

Projects did not, of course, start from scratch when they received government funds. In all cases, some groundwork was laid during the proposal process, which we were not able to study directly. But we did learn by reviewing proposals and by evidence from the planning year that commitment on paper (in the proposal) and commitment in fact (during the planning process) were two separate things. The latter, not surprisingly, was much harder to achieve.

A different and more important kind of groundwork had been laid in projects with former Teacher Corps experience or other related program activity at an earlier time. This did make considerable difference during the planning year. Approximately two-thirds of the 132 sites had experience with Teacher Corps during former cycles of federal funding. Although the program in those days was more limited in scope and was targeted more specifically on certain types of activity, it still contained many of the elements included in the current version. That experience appeared in most cases to provide an important foundation on which to build the efforts in the present cycle. By contrast, cases which started from scratch had to build this foundation.

This kind of project history (or experience with similar government-sponsored programs) implied several things about time. Projects with that background tended to move more quickly through the preliminary stages toward

85

an operational stage (and such projects were more apt to be impatient with a full year of planning). Once operational activities were under way, these projects more quickly attended to efforts at institutionalization or dissemination. For example, some projects conducted community council elections by building on the efforts of past community advisory boards, thus saving considerable time and energy during the early months of the planning/developmental year. In other projects, personnel from former Teacher Corps cycles became key core staff members; their familiarity with the program and contacts with project schools, in particular, did much to establish credibility as projects were getting under way. By comparison, a number of projects new to Teacher Corps spent most of the planning/developmental year trying to "get their feet in the door."

Projects with former Teacher Corps experience also provide evidence of the effects of long-term federal funding. On the whole, we saw more evidence of continued positive growth from long-term funding than the opposite. In a sense, projects that had used several cycles of Teacher Corps funding to build and establish strong programs give some evidence that institutionalization of government-funded improvements can take place. Another SRI report (Bush and Bock, 1981) explores this matter in greater detail, with emphasis on lasting change in IHEs.

Concurrent Federal Actions

In several ways, concurrent actions and events at the federal level influenced efforts to implement the Rules and Regulations at the local level. For one thing, the Rules and Regulations projected levels of funding for each of the 5 years in the grant cycle, subject, of course, to the "availability of funds and continued effectiveness of the project." The availability of funds decreased unexpectedly twice in the 3 years we studied Teacher Corps; at present, further (and potentially drastic) cuts are possible.

Unexpected cuts in project budgets had predictable effects at the local level--loss of morale, loss of credibility, cancellation of certain project schedules--each with important implications for project timelines. First, projects experienced considerable delay as they regrouped and redirected their activities; in a phrase, it took longer to do less. Second, projects lost momentum as morale dropped and hoped-for activities were cancelled. In short, some of the benefits of the 5-year federal "promise" were undermined.

Some participants who had been willing to become a part of the project backed off, especially community people and some project school teachers. Staff cuts were necessary in most projects, with a consequent loss of accumulated expertise and manpower. The broad scope of project operations had to be narrowed somewhat. Had the cuts happened only once, they might have been readily absorbed. But the repetition of such cutbacks more seriously diminished what many projects could do. The following quotes illustrate the effect on many projects:

> By the time that the refunding proposal was sent to Washington, we had learned that we had to submit two budgets--one operating on the original amount and the second budget with a $50,000 reduction. This event was detrimental in two specific ways. First, we now had to look at the plans for the second year and decide which things had the highest priority and find ways to either cut personnel, cut programs, or reduce the amount of thrust in various areas. This was not an easy task since task force personnel had worked very hard during the planning year and were very excited about what might be accomplished during the first year of program implementation. Second, when efforts were made to cut the budget,-- they had a negative impact on the enthusiasm that personnel had for the project. It became evident that, although personnel understood intellectually the cut was going to be a reality and we could not do the things we had planned to do, it was a difficult time for many people emotionally. It was emotionally difficult because for almost a year they had given of their own time and energy to make plans for a program which they had created and felt very good about, and now because of lack of funds it had to be reduced and would not be what they hoped it would be.

Another project made these comments about budget cuts:

> Budget negotiations strained the collaborative efforts of the
> project. Amendments responding to current assessments of the
> program and suggestions from Washington about role designations and
> descriptions moved smoothly into implementation plans which were
> acceptable to all. Budget cuts, however, were not easily shared
> and agreement was not easily reached.

> Both before and after submission, many informal, off-the-record
> meetings were held by various subgroups to try to sort out budget
> supports and cuts. These were accompanied by rumors of political
> maneuvers, withdrawal threats, and attacks on one or another group
> or program element. Feelings of distrust and animosity between
> groups and individuals appeared (or resurfaced). Activity on other
> fronts slowed down, shifted focus, or became hectic. The project
> finally submitted a budget with a $25,000 cut all could agree on,
> along with a $50,000 reduced budget which all agreed was
> unacceptable. The former was turned down in Washington.

Budgetary instability at the federal level is an easy target for
complaint and a difficult contingency to accommodate. To some extent,
cutbacks in Teacher Corps funding lay outside the control of anyone directly
connected to the program and came about as a result of decisions at higher
political levels. But the government mechanisms of funding from year to
year bear some scrutiny, and deserve to be considered carefully when
long-term federal or state funding commitments are undertaken. To the
extent that safeguards that preserve local viability can be built in, the
investment and potential impact of long-term government initiatives may be
enhanced.

More within the control of the agency sponsoring Teacher Corps, its
procedures for monitoring project activities (either to verify proper use of
grant funds or to provide general assistance to projects) appeared to have
noticeable though sporadic effects on local efforts. On the positive side,
we had some reports that monitoring undid logjams encountered as projects
struggled with the problems of collaboration and became bogged down in such
issues as the location of the directorship. Outside intervention in such
cases helped speed up what otherwise could have been an interminable
process; such support was particularly helpful early in the planning/
development year. The following quote illustrates this kind of event:

The visitation and, especially, the exit interview conducted by the
Washington program specialist mark a significant "turnaround" in
many project activities, particularly in the LEA arena.

First, she was received by teachers and school officials as an
impartial "authority" figure. She was, thus, successful in
facilitating staff activities and, for example, in having such
things as workspace designated.

Second, the program specialist was able to help the community
council "rethink" important decisions, for example, its "life term
of office" provision in the council bylaws.

Third, the exit interview itself, as a medium through which all
project constituents could communicate, was an opportunity to
correct misunderstandings, air differences, and gain informal as
well as formal consensus about project activities and directions.

Fourth, the site visitation experience was a kind of on-site
orientation and training activity which gave useful additional
perspective to prior national and network conferences. The
specialist was most helpful in providing specific examples in local
terms to clarify further issues to which the project staff had
addressed itself.

On the negative side, monitoring sometimes was perceived by projects as
adhering too rigidly to the "letter" of the Rules and Regulations, and thus
as contributing to project rigidity, with particularly counterproductive
effects when projects faced difficult unanticipated events. In a few cases,
projects seemed to lose time and momentum as a result, to say nothing of
losing the all-important sense of local control proclaimed by the Rules and
Regulations.

The reports we received from documentation essays on agency monitoring
were far from systematic, so that these comments should be considered
"provocative hints" rather than substantial findings.

These three factors--unanticipated events, prior project experience,
and concurrent federal actions--had a powerful collective influence on local
projects. If one can talk about a "bottom-line" implication, it was that
more time for local action was required in order to take these factors into

account in the conduct of project affairs. The fact that Teacher Corps provided a correspondingly long time frame helped different projects cope with these factors. In that way, the federal policy provided local participants with their most critical resource: time in which to carry out their interpretations of federal goals.

Summary

The following observations summarize our findings regarding the time dimensions of local project response to the Rules and Regulations:

(1) As far as we have pursued the study (the first 3 years out of a 5-year program), the extended time frame for project activity appears to be particularly useful, if not essential, for enabling a complex collaborative program to take place.

(2) An extended period for planning and development contributed to a stronger foundation for subsequent operations. The designated year for planning was not always the most productive length of time; the data suggest that a shorter but flexible planning period would be more useful to accommodate the range of project conditions encountered.

(3) Unanticipated events in the local/institutional setting of the project was a major factor for most projects, with the general result that things took longer than expected. Several types of events predominated:

. External to the project: sudden shifts in community demography, sudden changes in institutional funding or organization, unexpected political actions (e.g., teacher strikes) affecting one partner or the project as a whole.

. Internal to the project: unexpected staff turnover; project reorganization; prolonged illness of key staff.

(4) Prior history of related project activity tended to facilitate planning/development and subsequent operations, with the general result that things went more quickly. Seen in a more long-term perspective, these cases represented an extended federal commitment to Teacher Corps activity, which had a positive effect on local project capacity to establish strong training programs over time.

(5) Federal policy actions both facilitated and impeded project
    efforts during the planning and operations phases. Two aspects of
    federal action were most noticeable:

    . Federal budgetary action created instability at the local level.

    . Monitoring had both positive and negative effects, depending on
      the flexibility and style of monitoring, as well as on local
      circumstances that made a given outside intervention either
      helpful or meddlesome.

VII   FRAMEWORKS FOR COLLABORATION

.This chapter presents four lessons about the collaborative process that
we learned from the Teacher Corps experience:

- Collaboration was difficult.

- Despite the difficulties, projects persisted in their efforts to
  achieve a viable collaboration beyond minimal compliance with
  federal requirements.

- Collaborative arrangements were usually unbalanced.

- Collaboration produced working relationships that previously did not
  exist.

"Collaboration" is not explicitly defined in the Teacher Corps Rules
and Regulations, although it is specified in two provisions. Section 172.10
states that "the institutions, agencies and community council which
participate in a project shall collaborate in planning, carrying out, and
evaluating the project."   Section 172.61 requires that "project objectives
must be developed jointly by the institution of higher education, the local
educational agency, and the community council." 'Most projects interpreted
these provisions to mean that a wide array of people would participate in
the project and that collaborative arrangements formed in the beginning of
the project would continue throughout the life of the project. (Another SRI
report also deals with the topic of collaboration in Teacher Corps projects;
see Deslonde, 1980).

The Difficulty of Collaboration

.. There would be little disagreement among Teacher Corps project
participants that collaboration is difficult. As one documenter wrote:

According to Webster, collaboration can mean working jointly with others on a project or cooperating with an enemy occupying one' territory. Both definitions have been used in our project....

Four conditions in most projects appeared to make collaborative working arrangements difficult:

. The diversity of participants

. The lack of established vehicles for collaboration

. The need to agree on a single set of objectives

. Differences in definitions and expectations of collaboration.

Diversity of Participants--First, a wide range of actors were brought together to plan, carry out, and evaluate the programs. Table VII-1 lists potential recipients and providers of Teacher Corps services. Although all of these people are concerned with education, in the typical project few of them had worked together to plan and carry out an educational improvement plan before their involvement in Teacher Corps.

Vehicles for Collaboration--Second, established vehicles for collaboration did not exist in most projects. Even within institutions and individual schools, channels for joint work had to be created. Most projects quickly learned that they had to create both communication networks and collaborative working groups. For example, a documenter wrote:

. The major lesson learned was the difficulty in keeping the lines of communication open to this large, diverse group of people. I am reminded of the story regarding the feather pillow that was scattered to the wind. It is impossible to regain all the feathers that were originally there. Our communication process is a lot like this. One misstep, one forgotten person or group, and you can spend days trying to mend the broken channels--an almost impossible task.

Table VII-1

PARTICIPANTS IN A TYPICAL TEACHER CORPS PROJECT

Institute of Higher Education (IHE)

IHE President
Federal projects administrator
Dean of school of education
Department chairpersons
Selected faculty*

Project core staff*

  Director
  Specialized professional staff
  (e.g., documenter, community
  coordinator, program
  development specialist)
  Clerical staff
  Team leader
  Interns

Local Education Agency (LEA)

School board members
Federal projects administrator
Superintendent
Staff development personnel
e.g., curriculum coordinators

Project school staff

  Principal
  Other school administrators
  Teachers
  Counselors
  Aides
  (Students)

Community

Community council chairperson
Community council members
Other involved community people
(parents, representatives from service
agencies and neighborhood social, civic,
and business organizations, etc.)

*Project core staff and selected IHE faculty received payment, full- or
part-time, from project funds. Most Teacher Corps projects were based in
an IHE, though some were LEA-based.

79

All projects had to establish vehicles for collaborative action. The Teacher Corps Rules and Regulations specified that projects form a policy board with a minimal composition of the dean of the school of education, the superintendent of the LEA, and the chairperson of the community council. The policy board, thus composed, gives equal representation to the three principal groups brought together in Teacher Corps projects. Many projects added other members (e.g., teachers, union representatives, principals, students, other community members), which created a different balance on the board.

The policy board was rarely the only vehicle for collaboration. In fact, it was often seen as an ineffective vehicle, because some of its members had limited involvement in the project and were not active in the day-to-day project activities. As one documenter put it:

> In practice, however, the policy board may not be nearly as effective as it is meant to be. This is due to the fact that for at least two of its members (those representing the IHE and the LEA) and possibly for the third member (representing the community council) the board meeting may tend to be simply an additional "lay-on" in a schedule that is already overcrowded. While every effort may be made to keep members informed as the project develops, they may have insufficient personal contact with the day-to-day operations and, as a result, have only a more or less impersonal interest. The viewpoint of the community person, who usually represents the grassroots, may be quite different from the viewpoints of the IHE and LEA representatives, who are administrators. As a result, members of the policy board may tend to talk past each other when they express their opinions or to be satisfied with only surface impressions of what the project is doing.

Whether the policy board was seen as effective or ineffective, other avenues were developed for collaboration between people involved in the actual project activities. Projects developed task forces, working groups, and committees that met regularly through the planning year and into the operations years. Such committees often included teachers and administrators, community council members, and IHE staff. Some collaborative committees generated and evaluated projectwide activities; others focused on specific tasks (e.g., the needs of one school, techniques to increase parent involvement).

95

Some projects tried to encourage collaboration through retreats or special workshops. These devices were effective if held in conjunction with ongoing collaborative activities but were of limited utility as the sole vehicle for collaboration.

Agreement on Objectives--A third source of difficulty was the need to agree collaboratively on a set of objectives for the project. Often, quite divergent sets of goals and objectives were suggested by collaborating members, and priorities had to be set. The following documenter's observation illustrates this point:

> It became evident in the course of the initial year that expectations of what the project was going to accomplish for the schools, community, and college varied widely from one individual to the next, depending on his/her particular orientation, experience, and needs. Judgment about the effectiveness of Teacher Corps is, of course, directly dependent on the expectations brought to it.

> The superintendent of schools was hopeful that the project would successfully cooperate with other plans in the city to bring about a revitalized and imaginative educational system, "the LEA Learning System," as he conceived it. A second member of the policy board, the dean of the IHE, saw the project as being of benefit to the college by broadening the awareness and sense of responsibility of the college as a socially involved institute. The chairman of the community council looked to the project, generally, to improve education in the schools and, particularly, to provide greater opportunities for serious students. Teachers hoped for help with many problems, from student discipline to adequate parking facilities. One principal was quoted as seeing the project as "an instrument of assistance" to help provide training and retraining for teachers; another principal considered it a resource "to help devise strategies to confront issues." Parents also had varying hopes and expectations, from gaining advanced programs for gifted children to finding ways of participating directly in decisions affecting their children's learning.

There were several sources of problems in reaching agreement on priorities to be given to different objectives:

81

- Miscommunication. Miscommunication was easy when community members, LEA central office staff, IHE faculty, and classroom teachers tried to share ideas about education. They spoke and thought differently about the world of schools, reflecting their own involvement.

- Position in the educational hierarchy. Ideas and opinions of participants were often judged in light of their position in the education hierarchy. Many groups had difficulty overcoming status distinctions between professors, administrators, teachers, and community members.

- Time commitments to the project. The amount of time people could devote to Teacher Corps was determined by their other commitments and by project decisions on whom to include as part of the staff. Relatively few participants were centrally involved in Teacher Corps, and those centrally involved tended to influence decisions more did than other participants.

- Responsibilities outside the project. Participants' objectives for the project were usually based on problems they had outside the project. Teachers looked for help with problems in their classroom; parents wanted help for their children and for their community; while IHE faculty and LEA administrators often wanted to develop new systems for service delivery or to test innovative educational practices.

- Cultural differences. Most projects were culturally heterogeneous in makeup. Low-income communities were often minority communities, and many projects and project schools had ethnically mixed staffs. Although most project participants had previously worked in ethnically heterogeneous situations, differences in style and world view still had to be faced in order to work collaboratively.

Definitions and Expectations of Collaboration--The fourth reason collaboration was difficult was that definitions and expectations of collaboration differed. Although the term "collaboration" means to work jointly, there was an expectation among many project participants that it also implied parity or equality. Some groups farthest from project decisionmaking, such as community members and teachers, often complained because they did not receive an equal share of the budget or because they felt they did not have as much input into plans as did other participants. They also felt their goals were given a lower priority than the goals of other groups. Many of the groups that called for parity had had negative experiences with prior involvement in educational projects, where they felt

97

they had been included only to "rubber stamp" plans made by other groups; they did not want a similar role in Teacher Corps.

Other voices urging that collaboration be taken to mean "parity" came from certain project staff members, who acted as advocates for less powerful participant groups. As a documenter indicated, this kind of sentiment reflects, among other things, a deep commitment to altering power relationships embedded in the society at large that are resistant to change. These advocates, and those they tried to represent, were a strong constituency to be accommodated within many projects, which made the effort to collaborate more difficult. A number of documenters reflect this orientation, such as the following:

> It is unrealistic for Teacher Corps, or any other change mechanism, to expect a dismantling of the present system. It is also unrealistic to expect those in influential positions to slash their own power base. However, education is indeed in a state of transition, and what will make education an efficacious agent will be a commitment to a conceptual framework that will synthesize fragmented visions. Only a system which will allow educators to encompass the collective experience of IHEs, LEAs, and communities can provide a clear and rational course.

> As in other places, the educational system in our community is divided politically. Primarily, a division exists between camps in favor of advancing the interests of the oppressed or the elite groups. These groups often disagree, because they perceive an imbalance in the allocation of resources and access to power. Yet Teacher Corps has been able to breach differences by inviting participation from both camps and other independents who have offered conciliatory visions. The result has been a successful planning year consisting of an effort of a wide social base rather than a model designed by an elite few.

Developing Awareness of the Value of Collaboration

Projects started to collaborate for several reasons. First, all projects had to collaborate in order to comply with the Teacher Corps Rules and Regulations. At the least, they had to convene a representative policy board. Some projects never went beyond perfunctory collaboration. They may have held an occasional planning workshop, but they did not systematically

bring together diverse people to plan and do the work of the project.
Second, some project participants may have started collaborating before the
current cycle of Teacher Corps. Many IHEs and LEAs had been linked through
previous Teacher Corps projects, desegregation plans, and other educational
improvement efforts. Many members of community councils were active in
other community organizations and advisory boards and had previous
experience working with LEA staff. Third, some participants realized that
the mandate to collaborate gave them a vehicle to begin work on some plans
indirectly related to Teacher Corps. For example, professors were able to
test theories of learning or innovations in teachers' classrooms, IHEs could
experiment with ways to serve a new clientele (e.g., provide field-based and
community-based programs), and LEAs could use the expertise of IHE staff to
address district problems. Fourth, the strong commitment of some project
staff or community people to achieve greater parity among participant groups
kept a number of projects in active pursuit of a workable collaborative
arrangement despite the difficulties.

Once most projects started working and learned that collaboration is
not easy, they continued to juggle agendas and develop or mend communication
channels. Many projects moved from one problem to another during the early
stages of collaboration. They seemed to believe that "if we can just get
over this crisis, our problems will be over." Although no one problem was
their last, collaboration become smoother with time, and most projects began
to realize additional benefits from collaborative work.

Once collaborative arrangements were developed and people with
expertise in different areas knew each other, they began combining talents
to tackle problems. For example, by the beginning of the second year of one
Program 78 project, the district office staff and several IHE faculty had
been working together for 1 year. In September, the city superintendent
unexpectedly required that all elementary schools develop a comprehensive
reading plan within a few weeks. The schools turned to the district reading
specialists, who, in turn, called on two members of the IHE faculty for
help. Through their Teacher Corps planning experience, they knew where to
find expertise applicable to the problem.

84

99

Other projects discovered that the IHE, LEA, and community shared the same objectives and that, collectively, they could tackle a problem better than if they approached it alone. A documenter wrote about how a policy board served to coalesce ideas on how to meet a mutual objective:

> The workings of our policy board are necessarily complex. It consists of a variety of formal and informal relationships among individuals representing both defined and obscure constituents. Yet, despite this diversity, the group has functioned as a task-oriented, project-specific unit. The most recent example of the group's ability to function in a collaborative manner resulted in a series of public brainstorming sessions addressing one of the primary goals of the project: increased community involvement and participation in the schools.
>
> Policy board members individually identified this topic as a project-related concern of primary importance, each for his own set of reasons. Yet, these individual agendas reflected an understanding of and sympathy toward other positions. For example, the district superintendent was convinced, long before Teacher Corps, that community support was essential for running successful schools and school districts. Over the years, he has searched for and tried many ideas to involve the community in the schools. His premise is "involvement leads to genuine support." This involvement is perhaps one reason that the district has not lost an operation levy in many years.
>
> The community council chairperson is convinced that district policy should reflect community standards. One of the ways to ensure that the professional staff of the school district understands these standards is to get the community into the schools. He advocates opening buildings for community activities, expanding the parent-teacher conferences to include home visits, and offering continuing education courses.
>
> The IHE dean is acutely aware of the changing role of the university. His perception is that the university can no longer expect individuals to come to its campus. In order to thrive in the future, it must offer more to older learners and begin to examine their special needs. A facet of this redirection must involve working more with communities and meeting their needs in their settings.

The discovery of mutual interest took many forms. In projects such as the one just quoted from, it happened at the level of the policy board; in other cases, it happened within school-site planning groups or training sessions combining IHE and LEA personnel.

85

In their efforts to achieve workable collaborative arrangements, most projects moved far beyond minimal compliance with collaboration requirements specified by Teacher Corps. Field visits to a representative, 30-project sample suggest that this pattern of persistence occurred in as many as three-quarters of all projects. The pattern was further confirmed by documentation essays in which nearly all projects rated the collaboration requirement among the most important provisions in the Teacher Corps Rules and Regulations. This in itself is a significant finding, considering the formidable obstacles that stood in the way of effective collaboration.

Collaborative Imbalance

As mentioned above, collaboration rarely meant equal participation in project activities. There were three primary areas in which collaboration was not equal:

- Distribution of responsibility and involvement in the project

- Control over financial and resource distribution

- Priority given to goals and objectives of various groups.

Table VII-2 summarizes SRI field visitor observations about imbalance in the three areas of project activity. As the table shows, nearly three-fourths of the representative sample projects were considered unbalanced for each area of activity.

Projects were characterized by different kinds of collaborative imbalance. In some projects, one group dominated all three areas of project activity. Sometimes, this group was dominant because its members were interested primarily in furthering their own ends (e.g., an IHE that wanted to develop an off-campus program; an LEA that wanted to create an inservice staff development program). Sometimes, certain participants did not have the same level of interest in the project or experience in planning and carrying out programs (e.g., teachers or community council members who allowed the IHE or LEA to determine the objectives for the project; an LEA

86

Table VII-2

SITE VISITOR JUDGMENTS ON
DEGREE OF IMBALANCE IN PROJECT COLLABORATIVE ARRANGEMENTS

Area of Project Activity	Site Visitor Judgments*		
	Yes	Yes/No	No
Collaborative arrangements were unbalanced, either throughout the project or within given components, in terms of which group(s):			
Did the bulk of the work	79% (15)	5% (1)	16% (3)
Controlled resource distribution	76% (13)	0% (0)	24% (4)
Had primary input into defining objectives	78% (14)	5% (1)	17% (3)
Had higher priority given to its (their) needs and desires	80% (16)	0% (0)	20% (4)

Note: Percentages are based on number of cases (shown in parentheses), excluding "don't know" responses.

*Site visitors who visited projects (N=25) in the representative sample were asked to react to the summary statement in the table. Explanatory comments and field reports added substance to the ratings. Where site visitors were unable to make a judgment, they indicated "don't know."

that provided access to schools but was otherwise inactive). In a few cases, one group dominated because it had a well-defined mission to perform in the schools, and the other participants agreed to help accomplish it. For example, in one project the LEA had a sophisticated staff development center before Teacher Corps. It deliberately sought out an IHE that would support that center's initiatives rather than compete with it, and a successful collaborative relationship resulted. In the majority of projects, however, no one group dominated all activities.

The fact of imbalance within each project's collaborative arrangement raises an important question: if the arrangement permitted one group of participants to dominate others, was there, in fact, any collaboration at all? Our answer is, in most cases, yes. The degree of collaboration exhibited within a project as a whole, or within component parts of the project, could usually be placed along a continuum from "extremely unbalanced" (at which point "collaboration" ceased to be a useful description) to "extremely balanced" (at which point collaborating partners worked together jointly and relatively equally). Movement toward the more balanced end of the continuum was slow and difficult, for the reasons discussed previously in this chapter. Most cases fell somewhere in the middle. In such cases, diverse groups were productively engaged in common tasks, despite the fact that one group had a greater influence over the course of events.

Formation of New Working Relationships

A major benefit of participating in a collaborative venture was that new working relationships formed or were strengthened. Teacher Corps projects brought together a group of people concerned about education for low-income children. Although they shared a common interest, most had not worked together previously. In most projects, they discovered through working collaboratively that each had a contribution to make toward solving jointly identified problems.

New working relationships formed between and within institutions,
between individuals, and between the community and the institutions. In
some cases, relationships that had existed previously were strengthened by
Teacher Corps. In many more cases, groups that had never worked together
developed a basis for doing so. Some working relationships were horizontal,
bringing together groups with similar backgrounds and daily concerns. For
example, LEA central office staff development personnel began working with
IHE faculty on the task of providing training. IHE deans found common
ground with LEA superintendents through their interaction on Teacher Corps
policy boards. Teachers from different schools and different grade levels
formed working groups. Other working relationships were vertical, cutting
across levels of the educational hierarchy: teachers began working closely
with LEA administrators and IHE faculty. Still other relationships spanned
the boundary between educators and the community by bringing parents in
closer contact with teachers, administrators, and IHE faculty. The
following discussion provides examples of these relationships from Teacher
Corps projects.

Relationships Between the IHE and LEA--Horizontal working relationships
often developed between individual IHE faculty members and LEA staff. In
one site, for example, an IHE professor and the LEA curriculum coordinator
team-taught a course on curriculum development. The professor taught the
theory, and the curriculum coordinator related theory to practice in the
context of the district. The teachers were asked to develop a new reading
curriculum for the district as their assignment. The course was highly
praised by teachers, because it combined the expertise of the college
professor and that of the district curriculum coordinator. The professor
said that he hoped to continue working with the coordinator and to develop
similar working relationships in other districts.

Teacher Corps also provided a vehicle for IHEs and LEAs to work more
closely together as institutions. Often, IHEs needed to reach out to new
clienteles because of declining enrollments on campus; many LEAs needed to
improve their staff development capability. These goals, although

89

different, are complementary. One Teacher Corps project, for example, brought together a state university that wanted to expand its capabilities in rural education and a rural LEA that was extremely isolated. The LEA did not have an existing staff development capability. Despite complementary goals, the two institutions were very dissimilar. The IHE, a large and respected university in the state, was located in the state's largest city. The LEA, in contrast, was small and served a rural, largely Hispanic population. In addition, the IHE and LEA were separated by more than 200 miles. Although it was not easy to develop a working relationship between these institutions, most of the misunderstandings and mutual suspicion had been resolved by the end of the second operational year, and a relationship was established that met the needs of each institution. There is even some evidence that the institutions will keep their working relationship alive after Teacher Corps funds are no longer available.

Relationships Among Teachers--Many projects reported that increased communication among teachers was an unanticipated result of the Teacher Corps experience. Many projects set up planning teams that included representatives from all schools. (The Rules and Regulations encouraged projects to develop projectwide planning teams by stating that "all project schools must jointly participate in developing objectives.") In many projects, teachers said they were surprised to hear that teachers at different grade levels had similar problems. Also, inservice activities often brought together teachers from different schools. In one such project, many teachers in the project schools (and in other schools) were interested in the field-based master's degree program offered by Teacher Corps. Few teachers had advanced degrees because the LEA was not close to an IHE. Although only 14 teachers were enrolled in the master's program, nearly three times that number enrolled in each of the courses. When asked to assess the effectiveness of Teacher Corps, many teachers said exposure to their counterparts from other schools was the most valuable part of the experience. A high school teacher said she had a new respect for the demands placed on elementary school teachers. An elementary school teacher

90

105

said she hoped secondary teachers learned that elementary teachers can be a resource in dealing with reading problems.

These examples give a glimpse of a broad pattern: as teachers were brought together through a collaborative venture, their sense of isolation was diminished and their exposure to different perspectives on their jobs was broadened.

Relationships Between Design and Delivery Personnel--In many projects, working relationships formed between people responsible for designing educational programs (such as LEA central office staff or IHE faculty) and people who delivered these services to students (classroom teachers). Conventionally, the two groups tend to interact very little; but in Teacher Corps projects, the exchange between the two was typically extensive as they collaborated on planning committees.

In one project with a long history of involvement in Teacher Corps, for example, an IHE professor and a group of teachers had related interests. The professor was interested in the practical application of theories of child development to classroom organization. The teachers were interested in finding new ways to group children for instructional purposes. The professor and teachers began working together in hopes that understanding levels of child development would be of benefit to teachers and that the teachers' experience with children would make the theoretical information more useful. Through the Teacher Corps project, the professor shared ideas about child behavior and the teachers provided access to classrooms so that together they could experiment with ways to apply theory to practice. The teachers saw the relevance of the professor's theoretical interests, and they were given the opportunity to volunteer to be involved in the project. Teachers remained interested because the professor committed a great deal of time to working in the classrooms with the teachers and their students. In-classroom participation of outside experts and voluntary teacher participation seemed in this case to be the key components of a good collaborative relationship.

91

The example illustrates collaboration between insiders (teachers) and outsiders (professors), which was common in Teacher Corps. The insider knows the problems faced in the school, but often lacks perspective on how to approach these problems differently. The outsider brings a thorough knowledge of concepts of educational change, child development, or curriculum innovation, but often lacks the "feel" for how these ideas can be applied to the daily routine of teaching. Together, they can take conceptual ideas and design practical, classroom-level programs.

Relationship Between the Community and the Institutions--The community had a rather ambiguous role in most projects. Like the IHE faculty and the LEA central office staff, community members were outsiders to the day-to-day problems of service delivery in the classroom. Unlike the other outsiders, however, their potential contributions in educational matters were not often recognized by professional educators, and productive working relationships between community persons and educators formed less often than relationships among educators themselves. Problems arose because "the community" was not an established institution with a well-defined role to play in schools. As one documenter wrote:

> It is important for staff members to remember that community people are at a different place when it comes to operating within the formal system. This difference is heightened by the fact that both the superintendent and dean are administrators of institutions with vested interests. Probably, the two institutions have had a prior history of accommodation and negotiation. There are potentially strong currents or norms, which may work against the theoretically equal tripartnership of community, school system, and university.

Few projects solved the dilemma inherent in this situation. As one community council chairperson commented on an open-ended portion of the questionnaire, "The community council is required by law, but it really is segregated from the project, which is designed almost exclusively for teachers. The community feels left out and pushed out."

Although the community was more often than not excluded from an effective role as a working partner in the project, some striking exceptions

occurred. In one case, the community played a central role in project planning and delivery. The project is atypical for several reasons. First, it is one of several Native American Teacher Corps' projects, serving geographically isolated and ethnically homogeneous communities. Second, the project has a long history of involvement in Teacher Corps. Although unusual, it shows that the community can have a much more active role than was seen in most projects and that viable working relationships can form.

The primary focus of this Teacher Corps project was to train Native Americans that live in rural areas to be certified teachers. Teacher Corps staff members at the IHE decided that the key to success would lie in their ability to be responsive to the community's definition of what was needed. In most Teacher Corps projects, the community council chairperson was the only community member on the policy board. In this project, the entire 12-member community council was voted onto the policy board, to join the dean and the superintendent. The Teacher Corps project director explicitly took the position of "executive secretary" to the policy board. He served at the board's pleasure and was its agent, although in practice this did not mean that the community council got its way on every point of controversy. The community council itself wanted the teacher training program both to meet the needs of rural Native Americans and to be recognized as a legitimate credential by the world at large. Thus, the major decisions facing the policy board needed to be played off against the realities of life both in the rural Native American village and in the academic setting in which teacher training credentials are authorized. This project achieved a powerful alignment between community interests and traditional academic forces, resulting in an alternative mode of teacher preparation that has graduated far more Native Americans in a few years than the state's traditional, on-campus programs have graduated in their entire history.

This Native American project, along with a handful of others, stands in contrast to the more typical pattern in Teacher Corps, which might be summarized something like this: In most Teacher Corps projects, there are concerned, committed educators who believe in what they call "community involvement," but, somehow, the programs that have emerged from this kind of

93

108

project do not engage the project in "real work" that originates from the low-income community's definition of what is needed. The role of the community somehow seems to be cast as "understanding and appreciating what the schools are trying to do for the kids."

Many projects we observed showed the existence of a competent, well-organized educational bureaucracy that was accustomed to making school-related decisions. In a strange, paradoxical way, this very competence served to undermine the opportunity for significant input from community members. The professional educators may have worked hard to involve the community and see themselves as having devoted a great deal of sincere time, energy, and thought to the challenges of achieving good community involvement. We observed many projects in which these qualities were evident in abundance, and yet the community really was the least enfranchised of the three partners. The self-assurance and competence of the professional educators seemed inadvertently to send signals to interested low-income people that they really were not needed, because the educators had everything under control.

Summary

Four primary points were made concerning collaboration:

- Collaboration was difficult. The requirement for collaboration brought together a wide range of actors without benefit of established collaborative vehicles. Project participants had to cross a number of boundaries before agreeing on priorities, and they had to establish compatible definitions of collaboration.

- Projects persisted in their efforts to achieve a workable collaborative arrangement, beyond minimal compliance with Teacher Corps requirements. Their persistence was rewarded, and collaboration was seen as a valuable aspect of project operations. Not all projects immediately saw the value of collaboration and collaborated in order to comply with the Teacher Corps Rules and Regulations. However, in the long run, most projects developed a commitment to the collaborative mode of operation, despite its difficulties.

94

109

Collaborative arrangements were not equal. Some projects were dominated by one of the collaborative parties, while others were relatively balanced across all activities (although they were sometimes unbalanced within individual project activities). There was often imbalance in these areas: the distribution of responsibility and involvement in the project, control over financial and resource distribution, and the attention paid to the goals and objectives of different groups.

In most cases, new working relationships formed between groups that previously had had few opportunities to work together. Some relationships formed across institutions, between people occupying similar positions who began working together (e.g., IHE administrators and faculty with central office administrators and staff; teachers across different grade levels). Relationships also formed between people occupying different positions in the educational hierarchy within a single institution, especially, between design personnel and delivery personnel (e.g., LEA teachers and central office staff working together to plan training programs). In some cases, workable relationships developed between the community and the IHE and LEA, although arrangements in which the community took an other than advisory role in "setting the agenda" of the project were more the exception than the rule.

VIII FRAMEWORKS FOR LOCAL PROGRAM DEVELOPMENT

In this chapter, we discuss the influence of a third key provision of
the Teacher Corps Rules and Regulations on local project activity. Projects
were required to specify objectives so that the four broad goals of the
program--school climate improvement, staff development, system improvement,
institutionalization, and dissemination of improvements--would be met. As
set out in section 172.61 of the Rules and Regulations:

(a) Each project must include objectives that are designed to achieve
the outcomes described [in the Rules and Regulations].

(b) These project objectives must be developed jointly by the
institution of higher education, the local educational agency, and
the community council.

(c) Each project objective must be adopted by the policy board.

Although this provision may seem to require the obvious, Teacher Corps
policy had not always explicitly asked for it. The preamble to the 1978
Rules and Regulations describes this provision as one of six major
departures of the current Teacher Corps from earlier versions of the program:

Local development of objectives. Section 172.61 of the regulation
requires local educational agencies, institutions of higher education,
and community councils to jointly establish their own local
objectives. Previously published funding criteria...required a project
to adopt one of five broadly defined strategies that included:
(a) Establishment of training complexes including teacher centers;
(b) implementing competency-based teacher education; (c) training for
implementing alternative school designs; (d) inter-disciplinary
training; and (e) training for the systematic adaption of research
findings. ... It is anticipated that the commitment of people involved
in a project and the prospects of achieving lasting benefits will be
enhanced by leaving much of the substance of a project to local
determination. (Federal Register, 1978, p. 7525).

111.

In the sections that follow, we report the ways in which this change in regulation influenced the efforts and perceptions of project participants.

A theme runs through the chapter: the provision for local development of objectives made the Rules and Regulations as a whole more flexible and, in a sense, more responsive to the needs and conditions of local sites. The provision did not exempt projects from other requirements that, in certain instances, constrained them and were a source of considerable frustration. By and large, however, participants appreciated the chance to define for themselves how government funds could be used and became heavily involved in doing so.

A second theme concerns the process of developing objectives: participants gained as much from the act of defining objectives and strategies for meeting them as from the actual choices made. Plans, we have learned, are made to be changed. For a variety of reasons, project objectives were frequently changed from one year to the next. But the process of developing and changing them laid a more enduring foundation for joint action to solve local problems.

The influences of the local specification provision are, in a sense, inseparable from those of the provision discussed in the preceding chapter: collaboration between institutions and community. Part of the evidence pertinent to points made in this chapter has already been presented, and we will simply refer the reader to it. The thrust of the discussion in the following pages will be toward a more vertical dimension of "collaboration" between the local project and the federal program sponsor.

The chapter is divided into three parts. The first presents the positive contributions made by requiring local development of objectives. The second explores the tension between local objectives and federal intentions (as embodied in other requirements of the Rules and Regulations). The third examines more closely the process of developing objectives and what was gained by those who participated in that process.

112

Orienting Project Efforts Toward Local Needs and Conditions

The provision for local development of objectives was, as one might expect, implemented in virtually all projects. But the fact that objectives were developed locally by itself says very little. In one sense, it could not be avoided, because continuation proposals sent to Teacher Corps Washington had to contain statements of objectives. The more important issue is whether the objectives and strategies for meeting them reflected salient local needs, with adequate consideration of particular local conditions that might make an objective more or less appropriate. The overwhelming thrust of our evidence is that this was the case.

Match Between Project Objectives and Local Needs

Consider an example in which the project oriented itself to a salient (and unexpected) local need. The documenter described the orientation of the project as follows:

When the local board of education voted to institute middle schools starting this coming August, the emphasis of this Teacher Corps project shifted. District administration began asking how Teacher Corps could help with this change and had some suggestions for areas where assistance was needed.

The working relationship between the project and the district began to change subtly as well. Instead of concentrating on a few changes in the feeder schools with hopes for institutionalization throughout the district, the LEA started looking toward Teacher Corps to provide training. All the identified middle school administrators received training in June, provided by Teacher Corps, about the mental, physical, emotional, and social characteristics of the middle school student population. The district then asked Teacher Corps to provide training to all the district administrators at their annual conference and then to help plan the two-day Opening Institute or teachers' meetings. With these completed to satisfaction, the district turned over the inservice training of all district teachers who will teach in the middle schools to Teacher Corps. These teachers will work toward either certification or authorization to teach in middle school. It has now been decided that all 700 teachers in the district, whether or not they plan to teach in middle school, will attend the inservice sessions.

The example is only one of many unexpected opportunities encountered by projects, although opportunities of this magnitude were not common. Nonetheless, local needs considered to be important by key participants became the focus of Teacher Corps activity in most projects. Typically, training activities were built around a pressing problem in the project schools, such as concern for improving discipline in the high school or an improved math teaching capability in an elementary school. As discussed in the previous chapter, not all salient local needs were attended to. Usually, either certain groups were more successful than others in pushing their own agendas or their needs were more generally accepted as high on the project priority list.

Two patterns emerge from our data regarding the match between project objectives, local needs, and special conditions in the project setting. First, the thrust of inservice training in most cases was closely related to particular needs, as perceived by key participants at the local level. In some cases, teachers had the dominant role in defining need; in other cases, IHE members played a greater part. But whoever took the lead, the training activities were in some sense tailored to the requirements of a particular problem. Second, certain conditions in the local setting (e.g., declining student population in the inner city) were closely linked to the nature of the needs, as local people perceived them. The points may seem obvious, but they are easily forgotten in programs conceived on a national scale.

Were the needs "real" and "important"? The question is impossible to answer at a distance; "need" is a concept that resists objective definition. We do know, however, that on the whole the needs selected by projects for close attention represented some degree of consensus among project participants. We did learn that, in all but a few projects, decisions about project objectives were made collaboratively.

114

The Federal Requirement as an Influence on Local Action

The Rules and Regulations played a somewhat passive role in bringing about a match between project objectives and local needs: the provision for locally developed objectives acted more as an "enabling condition" than as a causal factor. The provision removed a potential constraint from the local planning process by not prescribing what sort of program should appear at the local level as legitimate fulfillment of the federal mandate.

Objectives for project action are, however, one step removed from actual activity. It is possible that the federal requirement succeeded only in generating appropriate-sounding objectives that did not correspond very closely with what projects ended up doing.

Our evidence points to several patterns regarding this possibility. First, objectives emerging from the collaborative planning process were not casually chosen. Typically, participants fought, negotiated, and debated for a considerable time about the objectives the project should adopt. As a result, a fairly concerted effort was made in most cases to meet the objectives. Second, as will be discussed at length later in this chapter, objectives were not immutable. Relevant circumstances changed in many cases. Certain activities failed to generate the desired response, or project members changed their minds about what was important. Sometimes, selected objectives were radically changed in midstream. But usually the change was, if anything, in the direction of another, more pressing local need. In this way, by gradual approximations, the match between project action and local needs was made closer still. One documenter's description illustrates this process:

> Initially, a needs assessment survey was administered to the project schools in order to receive feedback on the topics desired for inservice training. Inservices were then established based on this feedback. After talking informally to teachers and other professionals, as well as observing the light turnout of teachers to inservices, we realized that the needs assessment survey was too general and had not focused on the needs of the specific schools. Thus, we moved from a school-district-level approach to a specific school-level approach. From this came the Professional Development

Committees organized at each project school to serve as a coordinating body for collecting data on student and teacher needs and planning inservice activities within their schools.

One might argue that projects would have oriented their efforts to local needs anyway. The finding from past implementation research that local actors "make policy" by the way they interpret and carry out government directives suggests as much. But in Teacher Corps, this happened with relatively little interference from the federal government—in fact, with the active support of the sponsoring agency. In this way, the government guidelines played a facilitating role.

Accepting Diversity

An often-repeated theme in essay documentation is captured by this documenter's comment:

> From this project's point of view, the most important provisions in the Rules and Regulations apply more to process and structure than to content. I believe the federal government as a change agent can be most successful by mandating steps, approaches, procedures and/or methods for effecting change rather than dictating the substance of that change since needs vary considerably from region to region and school to school. Nothing flops harder or faster than a solution to a superimposed issue.

By encouraging projects to develop their own objectives, the federal government implicitly accepted the fact that "improving staff development" could mean many different things, depending on local context. As a result, the Teacher Corps program looked very different in different project sites. The full population of projects, which included a subset within Native American communities and another subset oriented toward delinquent youth problems (the "youth advocacy" projects), was more varied still. Some projects focused heavily on the training of interns; others devoted most of their attention to inservice training. Some brought well-developed training philosophies and curricula to teachers, while others let a "curriculum" emerge from specific teachers' requests. But in the vast majority of cases,

102

the diverse objectives and the strategies for meeting them were clearly related to the federal goal of improving staff development.

Local project participants apparently appreciated this flexibility. Documenters were invited to comment on the key features of the Rules and Regulations in repeated essay assignments. Their essays rarely called for more explicit requirements. But extensive discussions of needs assessment processes, planning processes, and particular local problems addressed by the project are clear testimony to the way projects profited from the local specification provision. One documenter's comment captures the spirit of the majority of documenters:

> The total Teacher Corps thrust, with its key features or "tactics," does constitute an adequate structure for carrying out a program intended to achieve the desired outcomes. They provide goals and objectives, structure/governance, and adequate means to achieve the stated outcomes. At the same time, they allow flexibility so that local projects can meet local needs.
>
> The implementation process is left primarily to the local project to develop, but the guidelines make it clear that a process must be developed, used, and documented.

Tension Between Locally Developed Objectives and Federal Requirements

Projects were not entirely free to choose whatever objectives and strategies they pleased. The provision for locally specified objectives was only one of many requirements in the Rules and Regulations. The directions or strategies that local projects chose to pursue could run counter to other provisions in the federal guidelines. The result often was considerable frustration reflecting an underlying tension between local initiatives and government intentions. For example, prescribing the use of the first year for planning only did not fit the conditions of all projects, as the following quote emphasizes:

> An assumption made in the Rules and Regulations of Teacher Corps, that productivity is delineated into neat, annual time frames (planning year, implementation years, institutionalization year,

103

and dissemination year) does not seem to apply thus far in
Project 79. Instead, these activities parallel each other in time
frames that match the magnitude of the problem and the design for
resolving it.

Teachers, administrators, and, to some extent, university people
are oriented toward the practical--the trial-and-error method.
They generally do not understand personnel development as inquiry
in a cyclical arrangement:

> Needs assessment
> Analysis of data
> Proffering strategies to resolve problems
> Experimentation in the classroom
> Feedback evaluation

Thus, in Project 79 it would have been better to have begun with
immediate concerns, tried some things in the classroom, evaluated
them, and then moved into more complex and in-depth issues--with
the sequence repeating itself several times during the year. As it
was, a rather elaborate needs assessment process was set into
motion; the data were analyzed, with the result of only some
general impressions of need; then the project moved directly into
lists of activities that may or may not have a relevance to the
real-life problems relating to better school climate for low-income
children. More time needs to be given to the substance of the
goals and the skills to be used in creating new solutions to
problems.

Even where the problem was eventually resolved, it diverted energy away from
more productive activity and sometimes left a lingering mistrust between the
project and the agency monitor.

Areas of Conflict

The Teacher Corps Rules and Regulations contain nearly a hundred
provisions besides the one requiring local development of objectives
(172.61). Most of these are procedural, specifying the details of
governance arrangements, conditions of funding, and rules defining
legitimate project participants and their functions. A large subset of the
provisions pertains to the teacher-intern team. In principle, at least,
local decisions about project direction could be opposed to any of these.
In practice, the most significant areas of conflict between local and

federal intentions, besides the planning-year problem already discussed, occurred in the following areas:

- Overall outcomes of the program (four basic outcomes were specified in the regulation).

- Federally specified orientations for teacher training (training for competency in handling variability among children, providing multicultural education, utilizing diagnostic/prescriptive teaching approaches).

- Emphasis on both preservice and inservice training.

- Required election of community council members and the timing of the election.

- Use of funds to compensate teachers, IHE faculty, or community members.

The frequency and intensity of these conflicts across the full population of projects are not easy to estimate, but a few generalizations can reasonably be made. First, the four basic outcomes were exceedingly broad, so a wide range of local activities could be defined as legitimate fulfillment of federal funding purposes. This is what happened in most projects, though in a few cases, even the four outcomes were felt to be constraining:

> Presently, Teacher Corps regulations prescribe terminal outcomes for the program. While this makes sense from a national programmatic perspective, it does constrain the project's ability to meet inservice needs which are different from Teacher Corps goals. The result is frustration on the part of some teachers.

Second, federally prescribed orientations for training were more specific and were more frequently at odds with local purposes. Field visits during the first year of operations (Program 78), however, suggest that at least half of all projects emphasized two or more of the federal training orientations (multicultural education, diagnostic/prescriptive teaching, or training for variability) as key training objectives. A documenter's observation in one project suggests something that was probably typical: project sites that had an interest in these training areas to begin with tended to join or be selected into the national program.

105

Our inservice courses and workshops for teachers have been held in the district, and are in direct response to the needs expressed by the faculty and community. The success of this tactic depends largely on how the participants perceive their needs. If they see little relationship between Teacher Corps goals and the classroom situations they are facing, the training program will have little chance of attracting students. Fortunately, due to the nature of this LEA, the faculty has a desire for training in multicultural approaches and diagnostic/prescriptive techniques.

Third, the requirement for heavy investment in preservice intern training (widely described as a holdover from earlier versions of the Teacher Corps program) was questioned extensively. In many sites, projects indicated that they would have preferred to mount more elaborate inservice or community programs, while deemphasizing or dropping entirely the intern component. This was probably the most common area of conflict between local and federal purposes. The following quote was one of many:

> The operation of the teacher-intern teams requires a great deal from a Teacher Corps project. Twenty-five to thirty percent of financial resources are necessary to sustain the team. This does not include extra time and energy expended in training, supervision, and maintenance. Since the intern teachers themselves have little or no practical teaching experience, there is some concern regarding the "teacher entry crisis" and the support that is necessary at this time. This seems an unnecessary amount of time, money, and energy spent to train four teachers. It appears more logical to use these resources to provide training and development for experienced teachers. Teacher "burnout" is an increasing problem, as evidenced by our Cycle Twelve experience, where we did much counseling with teachers in the area of career development. A more detailed inservice program and diverse experience opportunities would certainly aid in preventing teacher "burnout" and enlighten and enrich the teaching of all involved.

On the other hand, there was a minority of projects that proclaimed the preservice intern program to be the centerpiece of the local project's efforts, a view held by most Native American projects for example.

Fourth, complaints about the elected community council were common, but more because of the difficulties of carrying out a meaningful election in the early months of the project than because of disagreement over the fundamental value of having a council. Where projects experienced

106

120

difficulties in this area, they were likely to interpret the problem as a matter of timing, as the following essay excerpt suggests:

> Several policy implications arise from this election process. First, this process, in order to be effective, had to be carefully planned. This planning required a great deal of time and energy on the part of everyone involved. The Teacher Corps Rules and Regulations in this case were a deterrent. In order to adhere to the timeline established by Teacher Corps, our planning and election had to take place at a time most inconvenient to both school and community.

A number of other projects complained about the elected nature of the council, as the following quote indicates:

> Elected community councils may cause more problems than all the energy and time spent conducting them is worth. If those who are more influential become active and support a different ethnic group other than that found in the school population, a council may be made up of all Caucasians--those living close to schools--while children who are bused, or are in a minority, may actually populate the school itself. It is very difficult to get people to vote in a presidential election, let alone a community council election. The energy it takes saps T.C. personnel. This could be used elsewhere. Volunteer or appointed councils could function just as well.

Finally, discussions of incentives were often raised by documenters. Projects felt constrained by the Rules and Regulations from using project funds to compensate teachers, IHE faculty, or community volunteers for participation in certain activities. How were certain groups of participants to be adequately motivated to assist with planning, attend training on top of demanding full-time jobs, or perform various other services necessary to project success? The answer was often "compensation," which the Rules and Regulations did not make easy to offer, except under certain circumstances (e.g., "where the LEA can demonstrate in its application that the project is [or will be] placed in jeopardy by the lack of released time [to participate in training]....". 172.92). Although never asked directly about this provision, documenters in many projects responding in Quarters 1 through 5 essays mentioned the problem, as did many persons interviewed in field visits. The following observation by a documenter typified many:

121

The need for release time at project schools to inform faculty of Teacher Corps goals and to explain the focus of the program is essential. Trying to generate interest and participation in a new program in a few minutes at the end of the school day, or during a faculty meeting, is not an ideal situation. Also, the ability to release key people in an ongoing way and to replace them with substitute teachers would greatly strengthen the program. However, this would mean more money and a change in the regulations.

Overall, it appeared that no one provision conflicted with local intentions in a majority of projects; but, at least for certain kinds of provisions (such as those just described), a sizable minority were affected.

Sources of Conflict

As one can see in the preceding quotes, there were several factors which made the conflict between local and federal intentions salient:

- Conditions in some local settings made certain provisions irrelevant or counterproductive. Beginning Teacher Corps projects, for example, had considerable difficulty conducting an adequate community council election within 90 days after receiving funds, as they were required to do; and LEAs with rapidly declining enrollments and corresponding teacher layoffs tended to place little value on intern training. Collaborative arrangements involving large institutions (e.g., big-city LEAs) sometimes rendered a policy board with top management representatives ineffectual because of excessive demands on the time of deans or superintendents.

- Certain groups of participants had no great interest in the program emphases specified by the federal guidelines. Teachers in many project schools, for example, saw little reason to learn about diagnostic/prescriptive approaches, but instead had other priorities, such as coping with burnout or managing classroom discipline. Community people in some all-white communities interpreted requirements for "training in multicultural education" as "preparation in handling black-white relations," which they perceived to be largely irrelevant to their needs.

- Certain projects (especially those less experienced with Teacher Corps or other federal programs) were less free with the language of the Rules and Regulations than others; by attempting to meet the letter of the law, they were more likely to experience conflicts between project objectives and federal requirements. For example, a too literal interpretation of the "planning year" requirement found

108

some projects frustrated late in the spring of the first year, after their continuation proposals had been submitted, because they were still "supposed to be planning." Or, because community councils had to be "elected," resigned members were often replaced through a cumbersome secondary election rather than by appointment, which might have been easier.

- In some instances, federal agency representatives who monitored project progress through site visits and/or review of project requests were reported by projects to take a literal interpretation of the Rules and Regulations, raising a red flag whenever local interpretations deviated from the letter of the law. (What seemed to happen in such cases, in fact, was that the monitor insisted on his/her interpretation of ambiguous guideline provisions rather than the project's.) For example, in one extreme case, a monitor's visit resulted in a mass resignation of project staff, leaving much confusion around the issue of which provisions in the Rules and Regulations had been properly implemented and which had not. More often, projects were told that their requests for specific exceptions were not valid, which simply fueled resentment and often resulted in a less effectively organized project. In one case, a request that the intern team be allowed to be split between two geographically distant LEAs was refused, with the consequence that one LEA had no interns for a year and lost interest in the project, while the other had the full set of interns.

Resolving Conflict

Resolution of conflicts required flexibility on one or both sides. The problem was most successfully dealt with where both sides treated the Rules and Regulations as "guidelines," even though, in technical terms, they have the force of law. To do so, both sides had to recognize the fact that many of the contested provisions had unclear or many meanings. Because of that fact, granting wide latitude in their interpretation was probably healthy. A case in point was the requirement for "preservice and inservice training as an integral process" (§172.63). Many projects struggled over the meaning of this provision, and its interpretation eventually took a wide variety of forms. In some projects it was argued that the integration happened within the classroom experiences of the intern component itself; others said it happened within the IHE curriculum as newly sensitized faculty revised their courses to make them more "field-based." Under a literal (and narrow) interpretation (e.g., that preservice and inservice trainees must somehow

109

123

share experiences within project activities), both cases would be considered out of compliance. Fortunately, this kind of literal interpretation was not often forced on projects. However, other provisions were more clear-cut, like the requirement for an intern team, and projects that sought to avoid meeting them were typically called to account.

The Process of Local Objectives Development: Building Commitment

So far, the discussion has focused on the content of project objectives—their fit with local needs and conditions on the one hand and their conflicts with federal provisions on the other. We now examine more closely the process of developing objectives. As we will shortly show, the process by itself made important contributions to effective local action, chiefly by building strong local commitment to the project (and to each other) among participants.

The process of defining a project at the local level proceeded through a series of stages. Although in practice the stages overlapped considerably, they can be analytically separated into a rough sequence.

Our data suggest six stages:

. Assembling stakeholders

. Brainstorming ideas, problems, and possible solutions

. Assessing needs

. Stating objectives

. Negotiating priorities

. Adjusting objectives and priorities to accommodate:

   - Unanticipated events
   - Operational activities.

The process was not neatly chronological or particularly well ordered, in the sense that the participants tackled each task in a straightforward or

self-conscious way. On the contrary, participants typically struggled through the process, as different parts of the collaborating whole gradually coalesced. The struggle over collaboration described in the preceding chapter documents the difficulties in the interaction and the frequent imbalances that resulted. Participants learned, as they went along, about the process itself.

The process generally took place throughout the planning year, spilling over into subsequent operational years as circumstances required (they often did). Objectives were rarely fixed at one point in time, though a stated form of project objectives typically went to Teacher Corps Washington in March. or April of the planning year. Projects·moved through the stages at different speeds, depending on a host of variables, among them prior experience with Teacher Corps, geographic distance between ·institutions, project school morale, and LEA retrenchment conditions (see Chapter V for more detail on chronology).

Effects of the Local Specification Process

The activity of defining the project locally had three important effects. First, project participants from various groups became familiar with each other. This may sound like an automatic outcome of any project, but it cannot be taken for granted, especially in a program like Teacher Corps that involves so many different groups. Familiarity could usually be assumed among members of the core project staff, but not among the many other participants who had full-time jobs apart from Teacher Corps. The project had to attract such people and provide tangible incentive for their participation.

The problem with getting people's attention and interest is familiar enough to those who have tried to run a project in schools. Initially, the "local project" was not a reality. A "local setting" comprised separate institutions, a relatively undefined community, and a geographic area ranging up to hundreds of square miles. By calling for local definition of

the program, government regulations called, in effect, for a structure to be created. Consider, for example, the problem encountered in one community, where the Teacher Corps project was confused with a federally sponsored magnet school program being developed at the same time:

> During the first months of the academic year, 1979-80, plans for establishing magnet schools in the city were running parallel to the initial organizational processes of the Teacher Corps project in the three feeder schools. Local education authorities moved in the direction of establishing close ties between the magnet and Teacher Corps projects, to the extent that the Teacher Corps project director was, for a short period, appointed to direct both projects.

> We were aware of confusion, not only among the Teacher Corps staff members but also among teachers and parents, about the precise aims of the magnet project and whether or not it duplicated those of Teacher Corps. Indeed, a multiplicity of meetings, particularly those designed to outline planning processes, elicited from a few teachers and administrators such comments as, "There is so much talk-talk-talk--is anything ever going to happen?" Gradually this desire for accelerated activity was channeled into an appreciation for the need of planning techniques. However, if the same persons (either teachers, administrators, or parents) had been involved simultaneously in the magnet planning processes, it is not difficult to imagine that , confusion, duplication, and eventual lack of involvement might have resulted.

In this case, project staff successfully established in people's minds what Teacher Corps was and what their role in it might be only by repeated explanation.

A second effect of the local definition process was that it simultaneously built local "ownership" of the project and defused the image of government intrusion so prevalent in the communities served by Teacher Corps. Negative perceptions of government "lay-ons" among community members and project school staffs were frequently reported by documenters. In a few projects, local suspicions of government intrusion were a strong element that consumed much energy during the planning year. However, most projects handled this problem relatively smoothly, while recognizing its importance, as noted in the following excerpt from an essay:

> The biggest obstacle to implementation in this project is the attitudes of the LEA and community council members to what they see as outside

112

intervention and forced change. Most members of groups are accustomed
to being told what to do, with little stress or value given to their
ideas, and they see the larger organization as something they belong
to, but they are not (in their estimation) really a part of the process
of change.

Since most organizations are managed in the classical style, especially
large government bureaucracies, the socially managed style of Teacher
Corps is foreign to most people. The elimination of people's erroneous
impression of Teacher Corps was the first and foremost obstacle that
had to be overcome in carrying out the implementation of our project.

The opening up of avenues for discussion at all levels and the request
for input and ideas from all people in the project created a more
favorable attitude towards the project and demonstrated that they were,
in fact, in the project.

In such cases, it was necessary for what initially appeared to be a
"government" program to be seen as a "local" program and, ultimately, "our"
program. This development of "ownership" did appear to happen in most
projects, particularly among those most intimately involved with the
collaboration process. But it did not happen overnight and generally
required repeated efforts by project staff and many meetings with
participant groups before the image of a government outsider intervening in
local affairs faded.

As the image of government intervention faded, participants' commitment
to the project increased. This commitment did not necessarily mean that
everyone agreed on the value of each objective. Participants became
committed to at least three ideas: that the problems addressed by the
project were important, that joint efforts to solve these problems were
valuable, and that some decisions had to be made on which problems (and
solutions) to pursue. As we have seen in the preceding section, this could
mean that local directions ran counter to those intended by the federal
government, but this tension was for the most part successfully resolved.

The following excerpts from one project's essay documentation tell an
often-repeated story:

At the project staff's first meeting with one project principal and
his faculty, several questions were consistently repeated:

113

1. Is this going to be just another federal project?

2. What's in it for me?

3. Are we going to have some feds coming here and trying to tell us what to do?

4. Are we going to have more things laid on us when we're already overburdened?

But following an extensive and patient needs assessment and planning process, the documenter observed that:

> All participants developed some sense of ownership in all project activities. Now, instead of saying your project, participants are using the phrase, "our Teacher Corps project," in both the IHE and LEA. Also, with needs carefully identified, IHE faculty members were able to meet project needs with greater success. This success has built a certain momentum within the project and some close working relationships between IHE and LEA corpsmembers. Successful participation by LEA educational personnel has increased their willingness to participate in project activities. Likewise, after IHE faculty witnessed the enthusiasm and interest of the LEA personnel, they responded with equal enthusiasm and vigor. Success by one group has equated to success by all groups. In the project staff's view, all of these successes and the resultant momentum can be linked to successful needs assessment and collaborative planning models.

A third effect of the local definition process was that it provided direction to local efforts. Having reached a point where objectives were established, participants had built a tentative framework around their own subsequent actions. This framework could, and did, change. But at least there was an expressed point of view on what needed changing and how to go about it. In many cases, objectives acted as a benchmark against which future activities could be measured, as indicated by the following example, in which a documenter describes the specifying of school climate objectives as one of the most important features of the program.

> Shortly after our project began working with the county public schools, it became apparent that this particular school system faced serious problems. Some problems affected every school in the system; other problems were found just within one particular school. And it soon became clear that a challenge for everyone in our project was to decide which problems were the most critical and, from there, to formulate a

list of objectives that would act as the backbone or blueprint of the project.

The experience of our project has shown that the formulation of such a blueprint was both difficult and essential. It was difficult because it is not easy to get people to agree on a common set of goals, especially when those people (the IHE, the LEA, and the community council) represent so many different viewpoints. But the formulation of such a blueprint was also essential, because these objectives have given direction and guidance to everyone in the project. For the past year and a half, whenever a suggestion was made or an established policy reexamined, it was always measured against one of the stated objectives. And the question was asked, "Will this or does this help us accomplish our goals?"

In addition, other worthwhile benefits were gained by involving key Teacher Corps participants in the formulation of school climate objectives. Anxieties and expectations that arise from any new project were verbalized; the role of each participant was clarified, and a bond of understanding and trust established between the various participants. In addition, these objectives also act as brakes, providing the LEA and the IHE with a basis for saying no when no is the appropriate answer. Particularly when money is involved, the natural tendency is to ask for something, and then feel hurt if your request is denied. Fortunately, these objectives provide IHE and LEA administrators with a sound excuse for saying no and thereby help to ensure that funds are given to only the most worthwhile projects.

These three effects of the local definition process--increasing familiarity among participants, defusing the image of government intrusion while building participant ownership of project activity, and providing direction for activities--resulted in more vigorous collective efforts to make the project happen and, in more resilience to overcome the numerous obstacles and roadblocks along the way. The process was a powerful learning experience for those who took an active part in it. They learned about each other's strengths, weaknesses, and priorities. They learned about particular local problems and they learned about ways to tackle these problems.

Flexibility and Direction

The "blueprint" for action referred to in the preceding quote was often a more flexible concept than the term implies. In a large number of cases,

major external events disrupted the carefully laid plans of the planning year. In other cases, the initial activities in the first operational year did not work, once again with the result that projects returned to the drawing board.

The net effect was that plans often had to be changed, and in fundamental ways. As a result, participants took part in further planning. The process endured while the content of the program changed.

Across projects, evidence of the importance of the process relative to the content can be found in Table VIII-1. Documenters were asked to rate the relative importance of selected provisions in the Rules and Regulations. Those provisions relevant to the <u>process</u> of developing specific objectives and those relevant to the <u>content</u> of the program are displayed in the table.

The pattern in the table is not surprising. The process of developing objectives was as highly valued as any particular set of objectives emerging from the process. After all, if one disagreed with the results of the process, there was always a possibility of amending decisions later as the process continued.

External unanticipated events made flexible planning necessary in a large proportion of the projects. An example of the positive opportunities created by unanticipated events has already been given.

116

Table VIII-1

RELATIVE IMPORTANCE OF TEACHER CORPS REQUIREMENTS
RELATED TO THE PROCESS OF DEVELOPING OBJECTIVES VS.
THE CONTENT OF THE OBJECTIVES

	Most Important	
	Number	Percent
Provisions related to process of developing objectives		
Planning year	31	58
Collaborative mode of operation	33	66
Provisions related to content of objectives		
School climate objectives	27	54
Staff development objectives	33	66
Institutionalization objectives	27	54
Dissemination objectives	20	40

Note: Fifty of the 79 Program 78 projects submitted ratings,
except for the "planning year" feature, where 53 projects
submitted ratings.

117

Consider the following excerpt from an essay describing the unexpected
closing of a key project school.

Much to everyone's surprise, summer activities have been necessarily
adjusted in response to a major unanticipated event. Our project
junior high was closed in May, after the fire marshall declared it to
be a firetrap. Following a school board decision not to renovate the
school, organized resistance emerged in the community, charging that
the decision was a political move to prevent the locating of a magnet
program at this junior high. The community was organized to stop the
school closing, an effort actively supported by students at the junior
high. As a result of 2 months of controversy and anxiety, hostility
and distrust characterized the relationship between the community and
the school district. In the wake of the difficulties, we have
maintained a low level of visibility in the community. It has become
our policy not to take sides on the issue publicly. In an effort to
remain supportive of the junior high teachers and the innovations being
implemented in the classroom, we are continuing to offer some
professional development options, although the teachers are scattered
among eight schools.

The closing of the junior high has been a disappointment to the project
staff and was possibly a hindrance to achieving overall project goals,
although it is much too early to know. As the impact of the closing
began to "sink in," staff collaboration began with a renewed vigor.
The contrast between the amount of collaboration before and after the
school closing was striking to me. The staff was very busy this
spring--finding it difficult to maintain contact and adequate levels of
information exchange. The various programs, though characterized by
collaboration between university, community, and school district, were
operating fairly independently by this time. The event forced staff to
regroup, reclarify goals, shift emphases, and design and expand
programs, with an emphasis on the two remaining project schools. Of
the two remaining schools, the high school had been particularly
difficult to impact. Now project focus has been shifted to the high
school with renewed determination.

This was but one of many kinds of conditions in the LEA that could
alter the direction of project activity drastically, as noted in the
Chapter VI discussion of commonly reported kinds of unanticipated events.
Besides school closings, other events like teacher strikes, local budget
cutbacks, LEA reorganizations and leadership turnover, or project school
administrative turnover occurred with surprising frequency among the
population of LEAs as a whole. All of these factors had the potential for
altering project directions considerably. Only through a replanning process

did projects adequately accommodate these events and reorient activities in a productive direction.

Factors pertaining to the project itself--especially feedback from early activities that things were not going well--could also contribute to a shift in direction. In one case already mentioned, the failure of first-year training activities to arouse interest among teachers caused the planning process itself to be revamped, by shifting from a district-based needs assessment and planning approach to one based on individual schools and more directly responsive to these schools' needs. In other cases, individual courses or workshops, for example, were dropped, with a corresponding shift in project objectives.

What is significant about these patterns is that projects were able, in most cases, to adjust to changed conditions and participant response as smoothly as they did. The key to doing so, in our judgment, was the process some projects used to build this responsive capability into the LEA's staff development system. A documenter from a project in a medium-sized city pointed to the collaborative planning process as one of the major contributions to staff development improvement:

> The Teacher Corps project has provided the district with--as opposed to altering or expanding--a personnel development system. The components of that system are:
>
> 1. The Inservice Council, a group that represents district teachers and administrators, university persons, and community people, and oversees staff development.
>
> 2. Ongoing identification of needs through written needs assessment surveys, oral communication with all the populations in the district, PAP observations, written and oral evaluations of all staff development offerings.
>
> 3. Planning how to meet needs.
>
> 4. Delivering inservice education.
>
> 5. Monitoring application of the inservice education in the classroom.
>
> 6. Recycle items 2 - 5 (above) with the Inservice Council overseeing the process.

119

Previous to Teacher, Corps, the district had no system of organized inservice; inservice training consisted basically of individual teachers taking coursework, attending some conferences, and participating in workshops. Now teachers and administrators are going through programs, involving themselves voluntarily over periods of time (as opposed to one-time offerings), and concentrating on areas which they have indicated as needs/interests.

Moreover, teachers, administrators, and parents are all participating in various aspects of the planning, delivering, and evaluating of staff development activities.

Across the full set of projects responding to an essay on contributions to improved staff development, many mentioned the collaborative planning process as one of the project's major achievements.

Planning as Action

Some projects recognized that the process of developing a staff development program was itself "staff development" of a powerful kind for those who participated in it. From this perspective, projects fulfilled their overall objective (of staff development improvement), whether or not they achieved any of the specific subobjectives (e.g., training for increased competency in diagnostic/prescriptive approaches). Not all projects took this view of the planning process, and there is no real way that such a view can be legislated by the federal government. But the provision for local project development provided an opportunity for people at the local level to make that discovery.

Summary

The federal provision for local development of project objectives and strategies appeared to influence local-level action in the following ways:

(1) It helped orient local project efforts toward salient local needs
     while taking account of the differing characteristics of
     localities.

     • Locally developed objectives were closely matched to selected
        local needs.

     • The federal requirement acted more as an "enabling condition"
        than a "cause" of this close matching.

     • The federal requirement permitted considerable di███████among
        projects.

(2) By emphasizing locally developed objectives and programs, federal
     requirements risked conflict where project goals ran counter to
     other provisions of the Rules and Regulations. The conflict was
     most pronounced where:

     • Conditions in the local setting made certain provisions
        irrelevant or counterproductive.

     • Local participants had no interest in the goals or objectives
        specified by federal funding.

     • Projects attempted to meet the "letter of the law" in the Rules
        and Regulations.

     • Federal monitors insisted on strict conformity to the Rules and
        Regulations.

     The conflict was successfully resolved where projects or monitors
     (or both) flexibly interpreted the language of the Rules and
     Regulations.

(3) The process of developing objectives locally (brought about
     through the provision for a planning year) had important effects
     on local action: project members became familiar with each other,
     the image of government intrusion was diffused, local program
     "ownership" was built, and local efforts became focused on a few
     targets. Projects, on the whole, appeared to attach as much
     importance to this process as to the specific objectives produced
     by it (which often changed in response to unanticipated events or
     feedback from program activities).

PART THREE

IX METHODOLOGICAL NOTES

Overview of the Research Methods

These notes provide a description of how this study of the
implementation of the Teacher Corps guidelines was conducted. Our research
methods, like those of most implementation studies, draw on qualitative
research traditions. In particular, we adapted methods and perspectives
from anthropology and oral history to the special conditions of large-scale
contract research. In our analysis, we combined data from three primary
sources:

(1) Site visits made by SRI staff to a specially drawn sample of
30 Teacher Corps projects representative of the total pool of
132 projects along such dimensions as, prior experience in Teacher
Corps, community size from urban to rural, ethnicity of the
student population, and geographic location.

(2) Site visits made by SRI staff who are primary authors of the
implementation study report. The 10 sites in this group are not
representative of the total pool but are widely divergent on the
same kinds of dimensions as the 30-project sample.

(3) Narrative essays from all 132 projects across the nation. Local
documenters, in-house research specialists employed by each
Teacher Corps project, wrote quarterly essay reports following SRI
instructions. Documenters were invited to report in an
open-ended way on how key features of the Rules and Regulations
and unanticipated events influenced the implementation process in
each project.

Data were collected concurrently with project development, starting in
the 1978-79 school year, when the first projects operating under the 1978
Rules and Regulations received funding, until the 1980-81 school year. From
these three data sources, an extensive data file has been developed,
combining local perceptions of project development over time with
observations by SRI researchers in the site visits. We were thus able to

123

.compare findings from a small number of sites we had personally visited with findings from documenters across the whole national program.

In our research, we felt it important to recognize that human qualities like trust, cooperation, ambition, enthusiasm, and commitment underlie the formal organizational structure of any educational enterprise. In short, people make programs work. This is a perspective that is impossible to ignore when one is actually in the field doing site visits as a researcher; but, since it is difficult to write about in the language of social science, this human perspective often becomes submerged in the analysis and write-up of the data. In our reports, we have tried to tell the story of how such human qualities act to influence the implementation process and how, in turn, they interact with the frameworks provided by agency guidelines.

In the following section of these methodological notes, we describe the process we developed for incorporating local documentation data into the national evaluation of Teacher Corps. We begin by setting the context of implementation research and qualitative case study research and some of the problems that have been confronted in adapting these to large-scale contract research settings. We then discuss the use of local project documentation essays as a response to these problems.

This chapter is not intended to be a technical discussion that describes in detail what we did, but rather is intended quite literally to serve as a series of method notes that should help other researchers think about the data we have presented in this report and help policy-oriented readers judge for themselves how the findings were built out of our research approach. We think it is important to say more about the rationale and method of our approach to using local documentation because it is an unconventional (but we believe promising) tool for policy research. (More information about our research methods may be found in various papers we prepared for annual meetings of professional organizations: Beers and Finnan, 1979; Beers, 1980; Beers and Knapp, 1980; Beers and Knapp, 1981; Finnan, 1981.)

Studying Implementation: The Research Problem Addressed by Local Documentation Essays

The federal policy community has learned that a complicated story of implementation comes between a government mandate and program outcomes. It has learned this lesson partly through in-depth case studies, which have shown how federal directives and resources filter through layers of authority, interact with local conditions and unanticipated events, and are transformed into diverse variations on the original policy theme (summarized in Williams, 1980). The qualities of case-study approaches, exemplified by ethnographic case studies, make them well suited to the task: focus on a single site, sensitivity to local events and nuances of meaning, and a holistic interpretive perspective. Despite difficulties much discussed in the literature, qualitative case studies are rightfully advocated as part of the methodological tool kit for federal policy research (e.g., Patton, 1980; Cronbach, et al., 1980).

Two substantial issues complicate the contribution of ethnographic case studies to large-scale federal policy research. One problem with case-study accounts of program implementation is that of extracting policy statements from their mass of detail. Describing a series of interrelated events may satisfy the need to know whether the program actually took place, in what form, with what ramifications, and so on, but this descriptive and interpretive richness tends to obscure the relevance of this information for the formulation of government policy.

> In reviewing what policy makers say they need from the world of
> research and what it is ethnography provides, there is an obvious
> disparity or "mismatch" (Mulhauser, 1975). Policy makers want
> quick and simple information on variables that can survive the
> administrative-legislative process. Ethnographers provide broad
> and dense studies on areas which may or may not be considered to
> be policy issues. In looking at criticisms of ethnography and its
> effect on the making of public policy, I am struck by the emphasis
> on expedience and pragmatics adopted by those in policy circles.
> This is certainly understandable, for in the world of action and
> getting things done, long-term gains are usually surrendered and
> compromised for short-term effects. (Everhart, 1976, p. 20)

Only some aspects of any implementation story are potentially
susceptible to the influence of government resources and requirements.
Similarly, only a subset of the story's events fall legitimately within the
scope of governmental action--a scope that changes with the political
climate but will always remain circumscribed. The analyst faces a challenge
of telling a story that captures the nuances of program implementation in
the site, while still giving the policy community timely information it can
act on.

In a large and diverse program that operates simultaneously in many
sites, a second and more serious problem arises: a limited number of case
studies can be done with any degree of detail because of the high costs of
intensive field research. Multiple-case-study designs can and are done in
large studies of complex programs. But even if cost were not an issue, the
task of distilling the mass of case details into a useful aggregated form
poses a formidable challenge: This is clearly a situation where more
information is not necessarily the answer, at least not for the policy
community. In a fundamental way, the details of program operations in any
given site are not, and should not be, the policy formulator's primary
concern. The policy problem is to grasp the range of interpretations given
to a policy by practitioners in the field and to judge the social worth of
these interpretations in light of other imaginable alternatives. One could
put the matter this way: the policy's operation is more than the sum of its
translations in all sites to which the policy applies. The contribution of
a limited number of case studies to this task is unlikely to capture the
whole picture, unless the range of important variation in local conditions,
program design, etc., is represented in those cases studied. Our use of
local project documentation essays is a response to these considerations.

In the national study of the Teacher Corps program, the challenges just
discussed are manifested in a particularly complex way. The Teacher Corps
program itself is exceptionally diverse. Its Rules and Regulations were
intentionally written so that responsibility for developing innovative
teacher education programs rests with each local project. Each teacher
training program is designed to address the needs of schools serving

126

low-income families by involving an institute of higher education (IHE), a local education agency (LEA), and the local community in a collaborative venture to accomplish four major outcomes: (1) an improved school climate, (2) an improved staff development system, and (3) institutionalization and (4) dissemination of successful practices. Add to that ambitious charge the large number of project sites (132 funded across the country), including urban and rural school districts, ethnically diverse and ethnically homogeneous communities, major universities and small teaching colleges, etc. The result is an incredibly broad array of projects differing from one another in many ways.

The freedom of local projects to develop their own objectives and implementation processes presents the evaluator with a challenging design problem: to conduct an evaluation of a program comprising many projects, where no two may be alike and differences among projects are not known in advance. To compound the problem, the evaluation, to be useful, must cover conditions that do not exist at the time the evaluation is designed and planned and must also take into account events and happenings that cannot be anticipated. Our research design for the Teacher Corps implementation study attempts to address this problem through an innovative approach: the use of qualitative essay data generated by local documenters (in-house specialists hired by local projects).

Development of SRI's Essay Approach to Local Documentation

The essay approach to securing useful local documentation grew out of our experiences with an even more open-ended approach used in the first year of our contract (1978-79) with documenters from Program 78 projects. This first year was designated as a planning and development year for the local projects and, in parallel fashion, for the national evaluation contractor. We at SRI started from the position that local documentation that would prove useful in projects would also prove useful to the national evaluation, so we provided very flexible guidelines for 1978-79 that essentially

encouraged local documenters to submit to the national evaluation copies of what they produced locally.

We learned in the course of the first year that there is, in fact, an enormous diversity among Teacher Corps projects, and this diversity was richly expressed through the incredible array of documentation submissions our open-ended approach invited. This diversity is something the Teacher Corps Rules and Regulations encourage, but it underlined the classic research problem that systematic analysis requires some kind of structure to data collection. Our challenge thus became: how do we respect the diversity and yet shape some coherent form out of it? One of the important questions a researcher asks in planning a study is: out of that whole "buzzing universe," to what does one pay attention? The guidelines SRI prepared for local documenters for the second and third years of our contract (1979-81) are one kind of answer to that question (see Appendixes B through E for excerpts).

The planning year proved invaluable for the national evaluation in that major changes were made in our thinking about the role of local documentation, and much credit for whatever virtues the present system has should be given to the opportunities provided by that year for interaction with local documenters, in person and through their documentation.

The national evaluation staff persons responsible for reading and analyzing the data from local project documentation were those who also conducted field visits in the 30-project sample. This way of organizing the task meant that people with hands-on experience with case-study methodology and direct on-site contact with Teacher Corps projects were responsible for handling local documentation essays. The findings from the projects visited by SRI staff thus could be compared directly with the findings from the local documentation from all 132 projects. Both the fieldwork and the analysis of documentation benefited from this arrangement, for the local project documenter could be viewed as a kind of "case-study worker" based in

128

each local project, and the essays each submitted to the national evaluation, could be treated analytically as a form of relatively open-ended case-study data.

The analysis of local documentation essays received each quarter occurred in several stages. In the initial data processing, records were made of essays received and projects that needed follow-up for late submissions. Working copies of original essays were distributed, and the master files for the documentation task were set up and maintained. In the next stage, each of the six to eight case-study team members did a primary reading and content analysis of a specified set of 15 to 20 project submissions. (The numbers varied over the 3 years of the study.) The purposes of this primary reading were: (1) to determine what, if any, additional information would be useful from the project (occasionally, phone contacts were made with the project documenters to clarify or amplify issues addressed in the essays); (2) to highlight important issues with notes in the margin and on a summary worksheet for each project; and (3) to identify and make separate copies of especially significant passages that could be edited to protect confidentiality and used in national evaluation reports as quotes from local project documentation sources.

After all the projects in an SRI reader's set of essays had been summarized, the reader created an internal memo that synthesized the findings from the set by pointing out such things as major patterns of comparison and contrast and preliminary reactions to guide further thinking. The individual readers' memos were in turn integrated into a single memo that provided an analytic overview of each quarter's findings from local documentation.

Fine-Tuning the Essay Documentation Approach

During the 3 years of the Teacher Corps national study, the essay documentation approach evolved an increasing focus on specific matters of

national policy. The cumulative periodic nature of the technique gave it an important flexibility for addressing particular issues as these became more salient for the program as a whole and as the backlog of experience in each project grew.

Several refinements to the technique have occurred during the most recent year (1980-81 school year). First, essay assignments were directed toward more specific issues. Where earlier assignments had invited comment on the full set of Teacher Corps Rules and Regulations (e.g., "Relative Importance of Implementation Tactics"--see Appendix B), topics in the third year were targeted on specific provisions in the Rules and Regulations (e.g., "Teacher Corps Contributions to Improved School Climates"--see Appendix C) or on specific factors in the implementation process (e.g., "Developing Support Systems for Project Planning and Implementation"--see Appendix D).

Second, the overall population was divided into a larger number of subgroups, with different topics assigned to each group. This regrouping was justified by the specialized nature of certain projects, such as youth advocacy projects, and by data indicating that not all projects needed to respond to a particular assignment to capture the range of local conditions and responses. The essay topic grid for Quarters 5 and 6 (the first two quarters in Year 3), are shown in Table IX-1, which illustrates the more focused array of groups and topics in the third year.

Third, the analysis of essays was amended to streamline the reading and summarizing process while guarding against possible distortions created by analysts. In essence, the analytic task was seen as one of extracting valuable minerals from ore. Initial reading of the essays produced an outline of topic sentences (written by the analyst) that reflected the main points of the essay, selected passages that were, in the judgment of the reader, particularly insightful or vivid descriptions, and perceptive

130

144

Table IX-1

ESSAY TOPICS FOR QUARTERS 5 AND 6

	Group	Number of Projects	Quarter 5 Topic*	Quarter 6 Topic*
1.	A sample of projects that represents the national program on selected demographic characteristics (including the "30-project sample")	49	Inservice Training for Local School Teachers	Project Contributions to Improved School Climates
2.	A second representative sample of projects	50	Developing Support Systems for Project Planning and Implementation	The Role of the Community in a Teacher Corps Project
3.	Native American projects	8	Impacts of Teacher Corps in Native American Communities	Lessons Learned About Native American Leadership in Teacher Corps Projects
4.	Youth advocacy projects	10	Inservice Training in Youth Advocacy Projects	Four Components of Youth Advocacy Projects
5.	Projects for intensive study of dissemination	15	Examples of Successful Dissemination	Factors Contributing to Successful Dissemination

* In addition to the designated topic essay, each project submitted each quarter an essay on "Unanticipated Events, Local Problems, Solutions, and Insights."

131

145   146

comments relating to policy issues. Clearly, the process involved considerable judgment on the part of the reader, especially in the choice of quoted passages, but broad criteria for making such judgments had been developed (see Appendix E--"Characteristics of Useful Essays"). The topic sentence outline also provided a more systematic review of points made by all documenters, against which the broader applicability of quotes could be judged.

Essays were read and summarized with key provisions of the Teacher Corps Rules and Regulations in mind. These provisions are the basis of the analytic category system that has guided analysis from the beginning. This category scheme was refined during the past year, paralleling the increasing focus of essay assignments and a growing sense of what information was and was not important.

Initially, essays were read with reference to the category scheme shown in Table IX-2, consisting of 19 key provisions from Teacher Corps legislation plus a dozen broad categories of implementation activity. On the basis of the first three quarters' essay submissions, a few of these categories were dropped. For the remaining ones, subcategories were suggested, each connected with emerging policy themes. The code categories made it possible to link quotes with all pertinent topic sentences. For example, Table IX-3 presents the subdivisions of one category. These categories are in important ways open-ended; they could become increasingly focused as the issues became further clarified. The categories are not mutually exclusive, nor are they intended to be, because neither the phenomenon being studied nor our present understanding of it always subdivides neatly.

Table IX-2

CATEGORY SCHEME FOR ANALYSIS OF LOCAL DOCUMENTATION ESSAYS*

1. Low-Income Focus
2. Five-Year Funding
3. Initial Development Year
4. 3-Year Ban on Reapplication for Funds
5. School Climate
6. Staff Development
7. Institutionalization
8. Dissemination
9. Field-Based and Community-Based Training
10. Integrated Pre/Inservice
11. Multicultural Education
12. Diagnostic/Prescriptive Teaching
13. Collaborative Mode of Operation
14. Joint Participation: IHE, LEA, and Community
15. Teacher-Intern Teams
16. Elected Community Councils: Role of Community Component
17. Representative Policy Board

18. Coordination with SEA
19. Documentation
20. Feeder System Mandate
21. Incentives for Increased Involvement
22. Staffing the Teacher Corps Project
23. Relationship with Other Programs or Agencies at Local Levels
24. Relations with Teacher Corps Washington
25. Mechanics and Logistic Problems
26. Teacher Corps in Rural Areas
27. Inter-Ethnic Relations
28. Impact of Specialized Local Conditions and Events on the Teacher Corps Project
29. Teacher Unions, Teacher Centers, and Teacher Involvement in Policymaking
30. Additions/Amendments to Key Features: Overall Strategy
31. Budget Problems
32. Miscellaneous

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* Categories 1 through 19 represent key provisions in the Rules and Regulations.

133

148

Table IX-3

SUBDIVISIONS OF CATEGORY 9:
FIELD-BASED AND COMMUNITY-BASED TRAINING

Summary

In these methodological notes, we have outlined an approach for addressing certain persistent problems in large-scale federally funded research in education. In the 3-year national evaluation of Teacher Corps, local documenters—in-house research specialists employed by each Teacher Corps project—have written essays following guidelines provided by the national evaluation staff. These essays provide data that strike a balance between quantitative and qualitative considerations. From all 132 Teacher Corps projects across the country, we obtained information about which sections of the Rules and Regulations facilitate project implementation and which sections hinder it—important information for state and federal policymakers who are responsible for designing new programs and refining existing ones.

The essay guidelines were designed so that we could efficiently construct summary checklists that could be treated as standard questionnaire data, but we could go beyond the checklists into the essays for additional information to elaborate and explain the checklist responses and for case-specific information that probably never could be captured by questionnaire items alone. Since essays were read and analyzed by a team of SRI researchers, each of whom has fieldwork experience in Teacher Corps projects, the data from local documenters could also be extended by SRI's own site-specific case-study data.

The essay format invited each locally based documenter to think about and report on how the federally defined Rules and Regulations have influenced the implementation process in each individual project. Through the essay process, then, we were soliciting answers to questions we never thought to ask; and since we kept the door open by our quarterly requests, we obtained information on issues that people at the local projects likewise did not at first think to tell us about (through the essays on unanticipated events and unintended consequences, for example).

135

The essays for us have been an especially rich source of descriptive information about the real-life contextual setting that interacts with the abstractions expressed in the Rules and Regulations. One of the major aims of state and federal policymakers is to construct program guidelines that can operate effectively in real-world settings, and one of the major responsibilities of local documentation in the national evaluation of the Teacher Corps has been to express the lessons learned about the implementation process by those who can speak for themselves out of their close association with day-to-day program operation in the field.

151

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137

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153

APPENDICES

APPENDIX A

TEACHER CORPS RULES AND REGULATIONS

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Office of Education

TEACHER CORPS PROJECT

PROJECT

Development and Operation

[4110-02]

Title 45—Public Welfare

CHAPTER I—OFFICE OF EDUCATION, DEPART-
MENT OF HEALTH, EDUCATION, AND WEL-
FARE

PART 172—TEACHER CORPS

Grants

AGENCY: Office of Education, HEW.

ACTION: Final regulation.

SUMMARY: This regulation imple-
ments Title V-A of the Higher Educa-
tion Act of 1965, as amended, and gov-
erns grants to institutions of higher
education, local educational agencies,
and State educational agencies to de-
velop and operate Teacher Corps pro-
jects. The purpose of Teacher Corps
projects is to, strengthen the educa-
tional opportunities available to chil-
dren in areas having concentrations of
low-income families and to encourage
colleges and universities to broaden
their programs of teacher preparation
and to encourage institutions of
higher education and local educational
agencies to improve programs of train-
ing and retraining for teachers and
teacher aides. This regulation clarifies
the new directions established for
Teacher Corps by the Education
Amendments of 1976. In general this
regulation reflects: (1) Increased at-
tention to improving the school/learn-
ing climate through Teacher Corps
projects, (2) emphasis on reforming
the training and retraining of educa-
tional personnel through Teacher
Corps projects, and (3) a greater focus
on demonstration, documentation,
institutionalization, and dissemination
of the results of Teacher Corps pro-
jects. Major program changes which
resulted from the Education Amend-
ments of 1976 include: (1) Increasing
the project length from two to five
years, (2) increasing the collaboration
among local educational agencies, in-
stitutions of higher education, and
communities in the development and
carrying out of projects, and (3) great-
er emphasis on local determination of
project objectives and design.

EFFECTIVE DATE: Under section
431(d) of the General Education Provi-
sions Act, as amended (20 U.S.C.
1232(d)), this regulation has been
transmitted to the Congress concur-
rently with its publication in the FED-
ERAL REGISTER. Section 431(d) provides
that regulations subject to that sec-
tion shall become effective on the 45th
day following the date of transmission
to the Congress, subject to the provi-
sions in the section concerning Con-
gressional action and adjournment.

FOR FURTHER INFORMATION
CONTACT:

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Teacher Corps, Office of Education,
400 Maryland Avenue SW., Washing-
ton, D.C. 20202. Telephone: 202-245-
8224.

SUPPLEMENTARY INFORMATION:
Section 503 of the Education Amend-
ments of 1973 requires the Commis-
sioner to study all rules, regulations,
guidelines, or other published inter-
pretations or orders issued by the
Commissioner or the Secretary after
June 30, 1965 in connection with, or
affecting the administration of Office
of Education programs; to report to
the Committee on Labor and Public
Welfare of the Senate and the Com-
mittee on Education and Labor of the
House of Representatives, concerning
this study; and to publish in the FED-
ERAL REGISTER these rules, regulations,
guidelines, interpretations, and orders
with an opportunity for public hearing
on the matters published. This regula-
tion reflects the results of this study
as it relates to the Teacher Corps.
Upon publication of Part 172, all pre-
ceding rules, regulations, guidelines
and other published interpretation
and orders issued in connection with
or affecting the program (except for
12th cycle continuation grants) will be
superseded. This regulation does not
apply to 12th Cycle Teacher Corps
Projects because first year grants for
these projects were made for fiscal
year 1977 under previously published
funding criteria. Continuation grants
for the second (final year) of these
12th cycle projects, which will be
awarded for fiscal year 1978, are not
subject to this regulation.

*Overview of the program and regula-
tion.* This regulation contains rules
and criteria governing grant awards by
the Commissioner to institutions of
higher education, local educational
agencies and State educational agen-
cies. These grants are designed to: (a)
Strengthen the educational opportuni-
ties available to children in areas
having concentrations of low-income
families; (b) encourage colleges and
universities to broaden their programs
of teacher preparation, and (c) encour-
age institutions of higher education
and local educational agencies to im-
prove programs of training and re-
training for teachers, teacher aides,
and other educational personnel. Part
172 applies to all grant awards (except
12th cycle continuation grants) made
after its effective date with funds ap-
propriated to carry out the "Teacher
Corps" program.

Summary of major issues. This regu-
lation implements significant changes
in the Teacher Corps program. The
following changes are particularly sig-
nificant and stem primarily from the
Education Amendments of 1976 (Pub.
L. 94-482):

(1) *Project length.* In § 172.30 of the
regulation, the term of a Teacher
Corps project is extended from the

present two years to the newly autho-
rized five years. The two-year limita-
tion was placed on projects before
1974 when they were primarily con-
cerned with graduate level pre-service
training of teacher-interns in master
of arts-type projects. Section 513(a)(1)
of the statute was amended to autho-
rize a project length of five years. The
newly authorized five-year project du-
ration will give all parties concerned
with a Teacher Corps project (i.e., an
institution of higher education, a local
educational agency and a community
council) sufficient time to plan a
worthwhile project, carry it out, docu-
ment it, and disseminate the results.

(2) *Community council.* Section
513(e) of the statute requires the full
participation of an elected community
council in planning, carrying out, and
evaluating a Teacher Corps project.
Section 172.14(c) of the regulation per-
mits the temporary use of a communi-
ty council elected for purposes other
than the Teacher Corps project (e.g.,
community council elected to partici-
pate in a Title I, ESEA or a bilingual
education project) to serve as a Teach-
er Corps project council for a maxi-
mum of three months after the date
of the initial grant award. Thus,
§ 172.14 provides for useful community
contributions to early project plan-
ning, without requiring a special com-
munity election before the award of a
project grant. Past experience shows
that only one out of every two or
three project applications is finally ap-
proved for funding. Therefore, post-
poning the election of a permanent
community council minimizes the cre-
ation of unwarranted expectations on
the part of communities that are seek-
ing projects. At the same time, a
Teacher Corps community council
must be elected early in the planning
year (the first year of every project) so
as to participate in designing the pro-
ject in collaboration with the partici-
pating local educational agency and
institution of higher education.

Section 172.104 of the regulation re-
quires that the community council for
youth advocacy projects must include
representation of the parents of juve-
nile delinquents and youth offenders
who are participating in the project.

(3) *Reduction of Federal support.*
Under § 172.31 of the regulation, Fed-
eral support of a Teacher Corps pro-
ject is reduced during the fourth and
fifth years of the project term. One
persistent criticism of Federal project
grant programs is that the effects
rarely last after Federal project fund-
ing terminates. The reduction of Fed-
eral funding during the latter project
years is designed to encourage an or-
derly assumption of funding responsi-
bility by the institutions of higher
education, local educational agencies,
and other agencies participating in the
project.

(4) *Released time compensation.* Section 514(f) of the statute permits, in limited circumstances, the use of grant funds to compensate local educational agencies, for the cost of the time educational personnel are released from their duties during the regular school day to participate in Teacher Corps project training. Under § 172.92 of the regulation, released time compensation is only paid with grant funds in cases where the continuation of the project is jeopardized without such payment. Thus, § 172.92 directly implements the intent of Congress that, "* * * the Commissioner will use the authority in a limited way only when he determines that a particular local educational agency is confronted with unusual financial difficulties such that the continuation of the Teacher Corps program would be jeopardized without Federal compensation. The managers further expect that compensation will be necessary for only a few days per month during the school year." (p. 204, Conference Report 94-1701, U.S. House of Representatives, September 27, 1976).

(5) *Number of teacher-interns.* Section 172.81 of the regulation requires at least four teacher-interns in each project. This continues the Teacher Corps practice of requiring teacher-interns in each project. The requirement ensures that a project will be able to integrate the pre-service training of new teachers with the inservice training of existing staff and, thus, broaden programs of teacher preparation.

However, if a participating local educational agency provides an assurance (§ 172.81) that it will employ all teacher-interns who successfully complete their internship, the project may include a ratio of up to one teacher-intern for each five teachers in the Teacher Corps project. Thus, § 172.81 responds to sec. 513(f) of the statute which requires the Teacher Corps to work toward "a nationwide Teacher Corps membership ratio of approximately five teachers to each individual not yet employed as a teacher. Section 513(f) also authorizes the Commissioner to waive this goal if there is an insufficient number of qualified teacher applicants, or if there are insufficient employment opportunities for the teacher-interns.

(6) *Local development of objectives.* Section 172.61 of the regulation requires local educational agencies, institutions of higher education, and community councils to jointly establish their own local objectives. Previously published funding criteria for the Teacher Corps (see FEDERAL REGISTER, vol. 42, No. 1, January 3, 1977, p. 77) required a project to adopt one of five broadly defined strategies which included: (a) Establishment of training complexes including teacher centers; (b) implementing competency-based

teacher education; (c) training for implementing alternative school designs; (d) inter-disciplinary training; and (e) training for the systematic adaption of research findings. While these strategies remain useful, they are not required by the regulation. It is anticipated that the commitment of people involved in a project and the prospects of achieving lasting benefits will be enhanced by leaving much of the substance of a project to local determination.

(7) The Trust Territory of the Pacific is eligible under section 513(c)(2) of the statute for allocations of Teacher Corps members, but is not defined as a "State" in the general provisions regulations of the Office of Education. Therefore, in this regulation the Trust Territory of the Pacific is specifically included in the definition of "State."

(8) Sections 172.82(c) and 172.113(b) of the regulation urge grantees to give consideration to persons who are broadly representative of the ethnic and cultural characteristics of the community served by the project in recruiting Teacher Corps members and staff. This is consistent with Congressional intent as expressed in Senate Report No. 94-882, 94th Cong., 2nd Sess. (1976).

Summary of comments and responses. A notice of proposed rulemaking for the Teacher Corps program, inviting public comment, was published in the FEDERAL REGISTER on September 20, 1977, and a public hearing was held on October 5, 1977 in Washington, D.C. During the 30-day period of public comment, over 120 written suggestions and recommendations were received from interested persons and organizations. The comments were generally very favorable and supportive of the proposed regulation. The following is a summary of the comments which requested changes in, or clarification of, the regulation and responses to those comments (comments which requested changes that are not authorized by the Teacher Corps statute are not included). The comments and responses are identified with the section number of the regulation to which they refer and are presented in the numerical sequence of the regulation.

§ 172.11 INSTITUTION OF HIGHER EDUCATION

Comment. One commenter suggested that the regulation be changed to clarify that the participating institution of higher education must offer teacher preparation programs at both the elementary and secondary education level.

Response. While most projects will include teachers and teacher-interns serving in both elementary and secondary schools, some may include only one of these levels. Therefore, § 172.11

of the regulation is not changed to require that the institution of higher education offer teacher preparation at both levels.

§ 172.12 PROJECT SCHOOLS

Comment. Many commenters requested revision or clarification of § 172.12 of the regulation concerning the number of participating schools required in each Teacher Corps project and clarification of the definition of a "feeder system."

Response. Section 172.12 of the proposed regulation was ambiguous and therefore, is changed to clarify and further define project schools. Section 172.12(a) requires that each project include two to four complete schools which together include all grade levels provided by the local educational agency. In order to enhance the institutional impact of a project, the schools included in the project should be a feeder system. A feeder system is one or more schools that together include all grade levels from pre-school, where such programs are provided, through grade twelve. Furthermore, to be a feeder system the majority of pupils enrolled in the elementary school or schools must progress to the high school or to the intermediate school. If an intermediate school is included, the majority of pupils from the intermediate school must progress to the high school. However if the local educational agency does not have a feeder system as described above, the following are acceptable alternatives:

(1) A single school if that school includes grades one through twelve;

(2) More than four schools where additional schools are needed to include all grade levels in the feeder system;

(3) More than four schools where one or more schools in the feeder system employ twelve or fewer teachers; or

(4) Two to four schools in a feeder system which does not include a high school (grades eight or nine through twelve) if the high school is in a separate local educational agency.

If the alternatives do not meet local needs, the local educational agency may propose another arrangement provided that the entire educational staffs of schools serving a definable low income community are included.

§ 172.14 COMMUNITY COUNCIL

Comment. One person suggested that the regulation be changed to limit each community council to a maximum of 12 members.

Response. The maximum size of each community council is left as a local decision, so that it may best reflect local circumstances.

Comment. One commenter asked whether a local school board could serve as a Teacher Corps project community council.

Response. The statute and regulation require that a community council be elected specifically to serve as the Teacher Corps community council. However, individual members of a school board may serve on a community council specifically elected for that purpose under § 172.14(d).

Comment. Two commenters suggested that the regulation be changed to permit a Title I Elementary and Secondary Education Act council or similar council to be the permanent Teacher Corps community council.

Response. No change is made in the regulation. Section 172.14 is based on section 513(e) of the statute which requires an elected community council that is representative of the community in which the project is located and the parents of the students in the elementary or secondary schools participating in the project. A community council elected for another purpose could not serve as a permanent Teacher Corps community council unless this representation requirement is met.

Comment. One commenter questioned the feasibility of community wide elections where the attendance area of the participating schools is geographically very large.

Response. Community wide elections are required by the representation requirements in section 513(e) of the statute. After initial grant awards are made, the Teacher Corps program will provide technical assistance to the local projects concerning how to conduct community wide elections.

§ 172.15 POLICY BOARD

Comment. Some commenters stated that potential conflicts existed between the policy board and the elected local school board, because the local school board has responsibility for school policy under State law.

Response. These conflicts should not occur because a Teacher Corps project must be carried out within all established State and local laws, regulations and policies. The policy board will operate within this framework.

Comment. One commenter suggested that the regulation be changed by eliminating principals' organizations from the list of suggested representatives on the policy board. The commenter felt that principal's organizations should not be highlighted as a suggested additional group.

Response. No change is made in the regulation. Principals, who were not eligible for Teacher Corps training until the Education Amendments of 1976, are now regarded as key elements in a Teacher Corps project.

Comment. One commenter asked whether inclusion of teacher-interns on the policy board is required under § 172.15(b)(4).

Response. Section 172.15(b)(4) of the regulation was typographically inaccu-

rate as published in the proposed regulation. The typographical error in § 172.15(b)(4) is corrected in the final regulation and teacher-interns may be included on the policy board at local option.

Comment. One commenter requested that the regulation be changed to permit the dean of the school of education to designate a substitute representative on the policy board.

Response. No change is made in the regulation. The effectiveness of the policy board depends upon the inclusion of key education decision makers, such as deans of schools of education.

§ 172.17 INVOLVEMENT OF STATE EDUCATIONAL AGENCY

Comment. One commenter suggested that the regulation be changed to specify a role for State educational agencies in project dissemination.

Response. No change is made in the regulation. While Teacher Corps endorses a State educational agency role in this function, the role is not specified in the regulation since the details of each project should be worked out at the local level in cooperation with the State educational agency. However, a State educational agency may not receive a grant under § 172.32 to disseminate project experience.

§ 172.30 PROJECT DURATION

Comment. One commenter requested that the regulation be changed to permit projects of shorter than five years' duration.

Response. The regulation is changed to permit projects shorter than five years' duration. Experience with other Federal education programs shows that five years is the optimum project length. However, if the applicant institutions and agencies can demonstrate in their applications that their objectives can be met in a shorter time, then a shorter time period may be used.

Comment. One commenter suggested that the regulation be changed by eliminating the requirement for annual applications and that funding be made automatically for years after the first year.

Response. No change is made in the regulation. Automatic continuation funding is prohibited under 31 U.S.C. 665(a). In addition, applications for continuation grants provide a necessary opportunity for review of project experience and effectiveness.

§ 172.31 SIZE OF GRANTS

Comment. Several commenters requested that the regulation be changed to increase, or provide more flexibility in the size of grants.

Response. The limitation on grant size for the initial developmental year is clarified to provide "not more than"

$150,000. The amounts stated for the other project years are approximate limitations and local projects may apply for smaller sums. The approximate limitation for the amount awarded to a project for the last project year is increased to $150,000. The amounts are based on past project experience and the belief that significantly larger sums would impair the demonstration aspect of the project.

Comment. One commenter suggested that the regulation be changed to base the grant size limitations on the number of individuals who participate in the project.

Response. No change is made in the regulation. The limitations in § 172.31 are intended to ensure that project costs do not become so high that the demonstration aspects of the project are jeopardized.

Comment. One commenter suggested an increase in the limitation on the total amount awarded to grantees under a project for the first project year if a State educational agency grant is included in the project.

Response. No change is made in the regulation. The limitations in § 172.31 are intended to cover all project activities regardless of the number of agencies and institutions involved and whether or not a State educational agency is a grantee.

§ 172.32 SEPARATE GRANTS

Comment. A State educational agency asked if it could set its own approval criteria and require that each application for a project in its State must include the participation of the State educational agency as a grantee.

Response. Under § 172.135 of the regulation, the State educational agency must approve all applications that are in conformance with applicable State laws, rules, and regulations and consistent with overall plans for teacher education in that State. A State educational agency may establish its own criteria for determining whether project applications are consistent with overall State plans for teacher education, including requiring the participation of the State educational agency as a joint grantee. However, the Commissioner will not approve any application which does not conform to the Teacher Corps statute and this regulation. The State educational agency must keep in mind that, to the extent an application addresses State educational agency criteria which are inconsistent with the criteria in Subpart F of this regulation, the application would receive a lower evaluation by the Commissioner.

§ 172.33 TIME PERIOD BEFORE AGENCIES OR INSTITUTIONS MAY APPLY FOR A NEW PROJECT

Comment. Several commenters requested that the regulation be

changed to reduce the five-year moratorium between the time of project completion and application for a new Teacher Corps project.

Response. The moratorium in §172.33 is designed to enhance the institutionalization of Teacher Corps experience by involving new institutions rather than making additional grants to institutions which have participated. However, to allow more flexibility, §172.33 is changed to reduce the moratorium to three years.

Comment. Several commenters asked whether the moratorium in §172.33 applies to the Teacher Corps 12th cycle grantees.

Response. The moratorium does not apply to 12th cycle grantees since they are not covered by the regulation (see explanation set forth above). Nevertheless, applications from grantees currently participating in 12th cycle projects would probably receive lower evaluations in the grant competition since there would be more limited institutional impact if Teacher Corps programs operated simultaneously or consecutively in the same institution.

§172.40 INITIAL DEVELOPMENTAL YEAR

Comment. One commenter suggested that the regulation be changed to reduce the developmental year to a period of three months.

Response. The regulation is changed to permit a developmental period of less than a year if the applicant can demonstrate that the full year is not needed. Experience with similar Federal programs indicates that a year is usually necessary for project development.

§172.42 FUNCTIONS OF EACH PARTICIPANT

Comment. One commenter suggested that the regulation be changed to provide that institutions of higher education be compensated for the cost of released time necessary for higher education staff serving in the project.

Response. No change is made in the regulation. The cost of released time for institution of higher education staff may be a legitimate part of the cost of providing training to Teacher Corps members for which institutions of higher education may be compensated.

§172.45 TRAINING BY INSTITUTIONS OF HIGHER EDUCATION

Comment. Two commenters requested that the regulation be changed to permit institutions of higher education to train their own instructional staff as part of the Teacher Corps project.

Response. No change is made in the regulation. The statute does not specifically authorize training of higher education personnel, as such. Howev-

er, training of higher education staff who are staff members of the Teacher Corps project is acceptable as a regular administrative function, as long as the training is for their responsibilities in the project.

Comment. One commenter asked if training for teacher aides is possible.

Response. Section 172.45(b) of the regulation permits this training.

§172.47 TRAINING PROGRAM FOR TEACHER INTERNS

Comment. A commenter suggested that the regulation allow more flexibility to local projects in assigning practical classroom experience for teacher-interns.

Response. Section 172.47 of the regulation already permits local flexibility in assigning teacher-interns classroom experience. However, §172.47(c) is changed to make the one-half day school experience requirement an average over the two year internship (permitting fewer classroom hours during the first school year and more hours during the second school year).

§172.48 GRADUATE LEVEL TRAINING FOR TEACHERS AND TEACHER INTERNS

Comment. Several commenters requested that the regulation be changed to permit persons who do not have bachelors degrees to serve as teacher-interns and to permit these persons to receive undergraduate training. The commenters requested this change because of the unavailability of teacher-intern candidates with bachelors degrees in some localities.

Response. Teacher Corps recognizes that there may be local situations where there are not enough teacher-intern candidates with bachelors degrees. Therefore, the definition of "teacher-intern" is changed to permit a person who has completed two or more years of a program for which credit was given toward a bachelors degree to serve as a teacher-intern if there are not enough teacher-intern candidates who have a bachelors degree. If a project seeks to include persons who do not have bachelors degrees as teacher-interns, the local educational agency must provide a certification under §172.124(f). Section 174.48 of the regulation has been changed to permit teacher-interns who do not have a bachelors degree to receive undergraduate training.

§172.49 DEGREE AND CERTIFICATION FOR TEACHER-INTERNS

Comment. Several commenters suggested that team leaders and teacher-interns be employed before the start of the second project year, to provide more preservice training for teacher-interns.

Response. Under §172.40 team leaders must be hired and teacher-interns

recruited and selected during the initial developmental year. However, to provide for a preservice training period, §172.49 is changed to require that teacher-interns begin their internships three months before the start of the second school year of the project.

Comment. One commenter suggested that advance State educational agency approval be required for the training program to assure consistency with State certification standards.

Response. No change is made in the regulation. State educational agency approval of project applications is required under §172.135.

Comment. One commenter suggested that the regulation be changed to substantially reduce the period of time for teacher-intern training.

Response. No change is made in the regulation. The two-year training period is essential to achieve institutional change, particularly the integration of pre-service and in-service training. Another reason for the two year period is to provide teacher-interns with experience in a variety of schools and grade levels.

§172.60 BASIC OUTCOMES

Comment. One commenter suggested that the regulation be changed to de-emphasize basic outcomes and substitute the term "activities" in place of "outcomes."

Response. No change is made in the regulation. The four basic outcomes were developed as a result of an extensive planning process and are the structure around which the entire project must be designed.

Comment. One commenter suggested that the regulation be more specific about expected learner outcomes.

Response. No change is made in the regulation. Teacher Corps believes that the specificity of expected learner outcomes, as a result of Teacher Corps projects, is a matter for local determination.

Comment. One commenter suggested that a project not be held accountable for the adoption, or adaptation, of educational improvements by other agencies and institutions.

Response. No change is made in the regulation. A project is not held accountable for adoption of educational improvements beyond the legal jurisdiction of the grantees. This means, for example, that a local educational agency is accountable for the adoption and adaptation of educational improvements only in schools within its jurisdiction. However, each project must make efforts to demonstrate and disseminate its experience beyond local educational agency boundaries.

§172.82 SCHOOL OBJECTIVES

Comment. One commenter suggested that the regulation be changed to em-

phasize the coordination of school outcomes among all project schools.

Response. This suggestion is accepted and § 172.62 is changed to require that all project schools must be involved in the development of these specific objectives. This involvement of all project schools is designed to add continuity and provide greater impact at various levels of the educational system.

Comment. One commenter suggested that the regulation be changed to specifically include undergraduates in a definition of volunteer.

Response. No change is made in the regulation. Undergraduates and other persons who volunteer to serve as part-time tutors or full-time instructional assistants in project schools are volunteers under § 172.80(b) of the regulation. It should be noted that training for volunteers is limited under section 513(a)(5)(B) of the statute to "training to prepare tutors and instructional assistants for service" in Teacher Corps projects.

§ 172.81 NUMBER OF TEACHER-INTERNS

Comment. Several commenters asked for clarification of the provision in § 172.81(b) which permits each project to include up to one teacher-intern for each five teachers in the project schools if the local educational agency will employ all teacher-interns who complete their internships.

Response. Section 172.81 of the regulation is based on section 513(f) of the statute which provided that: "The Commissioner shall establish procedures seeking with respect to the Teacher Corps members enrolled after the date of enactment of the Education Amendments of 1976 a goal of having approximately 5 individuals who are at the time of enrollment, or who previously have been, employed as teachers by local education agencies to one individual who has not been so employed. The Commissioner may waive the procedure established under this subsection if he makes a determination that there are insufficient qualified applicants to maintain the goal sought by this subsection, or that there are insufficient employment opportunities for individuals who are not so employed, and submits a report to Congress of such a determination."

If the assurance required in § 172.124(e) is not given, this is evidence that there are "insufficient employment opportunities" for the teacher-interns and the requirement of four teacher-interns per project under § 172.81(a) will then apply.

Comment. One commenter suggested the regulation be changed to permit less than four teacher-interns in each project at local option.

Response. No change is made in the regulation. A minimum number of four teacher-interns is required in

each project so that there will be sufficient opportunity for the integration of pre-service and in-service training. Past project experience has shown that four is the minimum number that constitutes an effective teacher-intern team.

§ 172.83 TEACHER-INTERN TEAMS

Comment. One commenter asked if team leaders must be employed full-time by the project.

Response. Team leaders will normally be employed by the project on a full-time basis, since they are expected to participate fully in project activities including supervising teacher-interns. However, there may be exceptional local circumstances in which this is not possible, so employment on less than a full time basis is permitted.

Comment. One commenter asked whether each team must spend a portion of the internship in each project school where there are multiple teacher-intern teams in the project.

Response. Section 172.83 of the regulation requires teacher-intern rotation so that each teacher-intern will have experience in all educational levels represented in the project schools.

§ 172.87 COMPENSATION OF TEAM LEADERS

Comment. One commenter suggested that the regulation be changed to make faculty in institutions of higher education eligible to serve as team leaders.

Response. No change is made in the regulation. Under the present language, any qualified individuals are eligible and may be hired by the local educational agency as team leaders.

§ 172.88 TEACHER-INTERN COMPENSATION DURING THEIR TERM OF SERVICE WITH THE PROJECT

Comment. One commenter suggested that the regulation be changed to limit the total compensation paid to teacher-interns to the salary of a beginning teacher.

Response. In order to recognize locally established salary policy, § 172.88 is changed to limit total teacher-intern compensation (including stipend and dependent allowance) to not exceed the salary of a full-time beginning teacher.

Comment. Several commenters requested clarification of the responsibility for paying stipends and compensation to the teacher-interns.

Response. It is intended that teacher-interns receive continuous stipend payment or compensation from the time of entry into the project to the time of completion of the internship. The stipend must be paid during both summers during the internship.

Comment. One commenter asked if the local educational agency's contri-

bution (10%) to teacher-intern compensation under § 172.88 may be "in kind" rather than in money.

Response. It is the intent of § 172.88 that teacher-interns be compensated in money. This has been the continuing policy of Teacher Corps.

§ 172.90 TEACHER-INTERN AND TEAM LEADER MEDICAL INSURANCE

Comment. One commenter asked whether teacher-interns and team leaders should receive fringe benefits in addition to medical insurance.

Response. No change is made in the regulation. In order to recognize locally established policies and circumstances, this is left for determination at the local level.

§ 172.91 TRAINING STIPENDS FOR TEACHERS AND OTHER EDUCATIONAL PERSONNEL

Comment. One commenter suggested that the decision of whether to pay training stipends to teachers and other educational personnel (as well as the size of such stipends if paid) be left to local option.

Response. This suggestion is adopted. Section 172.91 of the regulation is changed to permit, rather than require, the payment of these stipends and the upper limit is set at $100 per individual per week. Thus, local projects have more flexibility to recognize local needs and priorities.

§ 172.92 RELEASED TIME FOR EDUCATIONAL PERSONNEL

Comment. One commenter asked that the regulation be changed to assure applicants that project applications will not be penalized for requesting funds for released time.

Response. Under the evaluation criteria in Subpart F, no application will be penalized merely for proposing that a portion of grant funds be used for released time if such use is fully justified in the application. However, in reviewing applications the Commissioner considers whether the activities are likely to accomplish the project objectives. An application which proposes to use a large amount of its budget for the costs of released time, may not have activities adequate to achieve its objectives, and therefore might not score as well under the criteria in Subpart F.

Comment. One commenter requested clarification of the term "jeopardy" as used in § 172.92(b) of the regulation.

Response. The term jeopardy was used in the Conference Report on the Education Amendments of 1976 cited above. It was the intent of Congress that grant funds should be used to pay for released time only in extremely limited circumstances, where the project is unlikely to succeed without that payment.

§ 172.93 COMPENSATION OF VOLUNTEERS

Comment. One commenter suggested that volunteers be paid stipends for participation in summer training.

Response. No change is made in the regulation. In order to reflect local circumstances, § 172.93 provides that volunteers may be paid or not paid according to local policy.

§ 172.94 TRAVEL EXPENSES OF TEACHER CORPS MEMBERS

Comment. One commenter suggested that the regulation be changed to permit travel and transportation payments only to teacher-interns rather than all Teacher Corps members.

Response. No change is made in the regulation. Travel expenses for any Teacher Corps members, including regular teachers, may be necessary.

Comment. One commenter suggested reducing the 11,000 pound restriction under § 172.94(b)(2)(ii) to 6,000 pounds.

Response. This suggestion is not adopted since the 11,000 pound allowance is used in similar Federal programs.

§ 172.102 YOUTH ADVOCACY PROJECT JOINT PARTICIPATION

Comment. One commenter asked whether a traditional penal institution must be part of a youth advocacy project.

Response. A project is not required to include an incarceratory institution. Section 172.102(b)(4) of the regulation indicates that one, or more, of four types of correctional facilities must be part of a youth advocacy project.

Comment. Two commenters suggested including State educational agencies as eligible participants in youth advocacy projects.

Response. State educational agency participation is authorized by the statute and the suggestion is adopted. Section 172.102 of the regulation is changed to permit State educational agencies to participate in youth advocacy projects.

Comment. One commenter asked whether a regular Teacher Corps project may be combined with a youth advocacy project, and if this is permissible whether the funding limitation is increased.

Response. A regular Teacher Corps project cannot be combined with a youth advocacy project. Under the regulation, a youth advocacy project must contain most of the same elements as a regular Teacher Corps project and therefore combination with a regular project is unnecessary.

§ 172.104 YOUTH ADVOCACY PROJECT COMMUNITY COUNCIL

Comment. One commenter asked if the community council must be representative of both parents and residents in youth advocacy projects.

Response. Under § 172.104 of the regulation, procedures must be developed at the local level for an election that includes both the parents of the youths participating in the project and the residents of the area served by the project schools.

§ 172.108 CORRECTIONAL FACILITY FUNCTIONS

Comment. One commenter asked what purpose grants to correctional institutions may serve in youth advocacy projects.

Response. The functions of a participating correctional facility are described in § 172.108

§ 172.110 MANAGEMENT PLAN

Comment. One commenter asked how much detail is required in the management plan required in the initial project application.

Response. The management plan must address all project years, although the activities and objectives may change as a result of project experience. The proposed budget for all project years, except the first year, may be in locally determined outline form.

Comment. One commenter suggested that the regulation be changed to describe which indirect costs grantees may be compensated for.

Response. No change is made in the regulation because indirect costs are covered by the applicable cost principles referenced in 45 CFR 100a.81.

Comment. One commenter suggested the establishment of a Teacher Corps management plan on a national level.

Response. A national management plan for the Teacher Corps is being developed as a result of detailed planning processes now in progress. However, this plan is part of national program management and not appropriately covered in the regulation.

Comment. One commenter suggested that the regulation be changed to specify a set amount for the secretarial and administrative expenses of the community council.

Response. No change is made in the regulation. So that these expenses can reflect the needs of each project, Teacher Corps chooses not to specify a set amount. However, the secretarial and administrative expenses of the community council, which may include training expenses for the council members themselves, must be a distinctly identifiable category in the project budget required under § 172.110.

§ 172.113 EMPLOYMENT OF PROJECT ADMINISTRATIVE STAFF

Comment. One commenter asked that equal treatment of the sexes be required under § 172.113.

Response. This is not covered by the regulation. Title IX of the Education Amendments of 1972 (20 U.S.C. 1681) prohibits sex discrimination in any education program or activity receiving Federal financial assistance and every applicant must file an assurance of compliance.

Comment. One commenter asked that the regulation be changed to specify that project staff in addition to the director, may be hired during the initial project year.

Response. No change is made in the regulation. Specific designation of project staff is not included in the regulation. Local projects may hire staff as appropriate for the functions to be carried out in the initial project year.

§ 172.125 COMMUNITY COUNCIL

Comment. One commenter suggested that the regulation be changed to require more specificity in the assurance concerning the role of the community council.

Response. No change is made in the regulation. The language in § 172.125(c) of the regulation is based on section 513(e) of the statute. So that local circumstances and situations can be reflected, additional details are left to local determination.

Comment. One commenter suggested that the regulation be changed to clarify how an applicant should describe the community council.

Response. No change is made in the regulation. The initial project application can describe the permanent community council in prospective terms and not as much detail is expected in the initial application as in the second year application.

(UNNUMBERED) TRAINING, COMMUNITY COUNCIL EXPENSES

Comment. One commenter asked whether a separate budget for the community council's secretarial and administrative expenses must be included in the project application.

Response. A separate budget for the secretarial and administrative expenses of the community council is required.

§ 172.135 APPROVAL OF APPLICATIONS BY THE STATE EDUCATIONAL AGENCY

Comment. One commenter suggested that the regulation be changed to specify a 15 day period for State educational agency approval of applications.

Response. No change is made in the regulation. The length of the approval period is left to State educational agency determination. However, it should be noted that the more time a State educational agency requires, the less time applicants will have for project application development, which could affect their ability to compete successfully for a project.

Comment. One commenter suggested that the regulation be changed to be more specific about requiring competency-based teacher training and similar approaches.

Response. No change is made in the regulation. So that each project may reflect local circumstances. much of the substance and approaches of the Teacher Corps training is left to local discretion.

CITATIONS OF LEGAL AUTHORITY

As required by section 431(a) of the General Education Provisions Act (20 U.S.C. 1232(a)), a citation of statutory authority for each section of the regulation has been placed in parentheses on the line following the text of the section. Reference to "Sec." in the citations of authority following provisions of the regulation refer to sections of the Higher Education Act of 1965, as amended.

Authority. This regulation is issued under the authority of Title V-A of the Higher Education Act of 1965 (Pub. L. 89-329). as amended by Pub. L. 90-35, Pub. L. 90-575. Pub. L. 91-230, Pub. L. 92-318, Pub. L. 93-380, and Pub. L. 94-482.

(20 U.S.C. 1101 et seq.)

NOTE.—The Office of Education has determined that this document does not contain a major proposal requiring preparation of an Inflation Impact Statement under Executive Order 11621 and OMB Circular A-107.

(Catalog of Federal Domestic Assistance No. 13.489, Teacher Corps).

Dated: December 13, 1977.

ERNEST L. BOYER.
U.S. Commissioner of Education.

Approved: February 13, 1978.

JOSEPH A. CALIFANO, Jr.,
Secretary of Health,
Education, and Welfare.

Title 45 of the Code of Federal Regulations is amended by adding a new Part 172 to read as follows:

PART 172—TEACHER CORPS

Subpart A—General

AUTHORITY: Title V-A of the Higher Education Act of 1965 (Pub L. 89-329). as amended by Pub. L. 90-35 in 1967: Pub. L. 90-575 in 1968: Pub. L. 91-230 in 1970; Pub. L. 92-318 in 1972: Pub. L. 93-380 in 1974: and Pub. L. 94-482 in 1976 (20 U.S.C. 1101 et seq.), unless otherwise noted.

Subpart A—General

§ 172.1   Scope

(a) This regulation applies to the Teacher Corps program. The statute that applies to the Teacher Corps program is Title V-A of the Higher Education Act of 1965. as amended. A copy of the statute is included as an appendix to this part.

(b) Each grant under this part is subject to the general provisions regulations of the Office of Education (Parts 100 and 100a of this chapter).

(Secs. 511 et seq.; 20 U.S.C. 1101 et seq.)

§ 172.2   Purpose.

The purpose of the Teacher Corps program is to strengthen the educational opportunities available to children in areas having concentrations of low income families, to encourage colleges and universities to broaden their programs of teacher preparation. and to encourage institutions of higher education and local educational agen-

163

cles to improve programs of training and retraining for teachers, teacher aides, and other educational personnel.

(Secs. 511(a); 20 U.S.C. 1101(a).)

§ 172.3 Definitions.

As used in this part: "Institution of higher education" means an institution of higher education as defined in Section 1201(a) of the Higher Education Act of 1965, as amended.

(Secs. 1201(a); 20 U.S.C. 1141(a).)

"Local educational agency" means a local educational agency as defined in section 1201(g) of the Higher Education Act of 1965, as amended. The term includes a State educational agency or other public or private non-profit agency which provides a program or project designed to meet the special educational needs of migratory children of migratory agricultural workers.

(Sec. 1201(g), 20 U.S.C. 1141(g); Secs. 517A; 20 U.S.C. 1107a.)

"Low-income family" means a family with a child whom the local educational agency may count under Section 103 of Title I of the Elementary and Secondary Education Act of 1965, as amended.

(Sec. 513(a)(3); 20 U.S.C. 1103(a)(3).)

"Other educational personnel" means administrators, supervisors, and other specialized educational personnel.

(Sec. 513(a)(1); 20 U.S.C. 1103(a)(1).)

"State" means the several States of the Union, the Commonwealth of Puerto Rico, the District of Columbia, Guam, American Samoa, the Virgin Islands, and the Trust Territory of the Pacific Islands.

(Sec. 513(c)(2); 20 U.S.C. 1103(c)(2); Sec. 1201(b); 20 U.S.C. 1141(b).)

"State educational agency" means the State board of education or other agency or officer primarily responsible for the State supervision of public elementary and secondary schools, or, if there is no such officer or agency, an officer or agency designated by the Governor or by State law.

(Sec. 1201(h); 20 U.S.C. 1141(h).)

"Teacher" means a person who has a teaching certificate valid in the State in which the Teacher Corps project is located, and who has had full-time paid teaching experience.

(Sec. 513(a)(1), 20 U.S.C. 1103(a)(1).)

"Teacher aide" means a person employed as a paraprofessional in a school or correctional facility who assists a teacher in performing educational duties. The term does not include teacher-interns or non-educational personnel. State and local rules

determine whether certification is required for a teacher aide.

(Sec. 513(a)(1); 20 U.S.C. 1103(a)(1).)

"Teacher-intern" means a person recruited to serve in a Teacher Corps project who has a bachelors degree or its equivalent, with or without a teaching certificate, but who has not had fulltime paid teaching experience. However, a person who has completed two or more years of a program for which credit was given toward a bachelors degree may serve as a teacher-intern if there are not enough teacher-interns candidates who have a bachelors degree.

(Sec. 513(a)(1); 20 U.S.C. 1103(a)(1).)

Subpart B—Elements of a Teacher Corps Project

PARTICIPANTS

§ 172.10 Joint Participants.

(a) Each project must be carried out jointly by:

(1) One or more institutions of higher education;

(2) One or more local educational agencies; and

(3) A community council established under § 172.14.

(b) A project may also include participation by a State educational agency. The State educational agency may participate by providing training to the Teacher Corps members.

(c) The institutions, agencies and community council which participate in a project shall collaborate in planning, carrying out, and evaluating the project.

(Sec. 513 (a), (e), (g); 20 U.S.C. 1103 (a), (e), (g).)

§ 172.11 Institution of higher education.

Each project must include at least one institution of higher education which offers academic course work at the graduate level leading to a graduate degree in the field of education, unless none of the teacher-interns has a bachelors degree.

(Sec. 513(a)(2), (b); 20 U.S.C. 1103 (a)(2), (b).)

§ 172.12 Project schools.

(a) Each project must include two to four complete schools which together include all grade levels provided by the local educational agency. This must include at least grades one through twelve. The schools selected must be a feeder system. This means that a majority of pupils enrolled in the elementary school progress to the high school or to the intermediate school, if an intermediate school is included, and that a majority of pupils from the intermediate school progress to the high school. If the applicant local educational agency does not have

a feeder system as described in this paragraph, the following are acceptable alternatives.

(1) A single school if that school includes grades one through twelve; or

(2) More than four schools where additional schools are needed to include all grade levels in the feeder system; or

(3) More than four schools where one or more schools in the feeder system employ twelve or fewer teachers; or

(4) Two to four schools in a feeder system which does not include a high school (grades eight or nine through twelve) if the high school is in a separate local educational agency.

(b) If the alternatives in (a) do not meet the needs of the applicant local educational agency, it may propose another arrangement provided that the entire educational staffs of schools serving a definable low income community are included.

(c) Each school included in the project which includes elementary grades must be eligible for a project under Title I of the Elementary and Secondary Education Act of 1965.

(Sec. 513(a)(3), 20 U.S.C. 1103(a)(3).)

§ 172.13 Involvement of all educational school personnel in the project.

All educational personnel employed by a project school must be involved in planning and carrying out the project in that school.

(Sec. 513(a)(3); 20 U.S.C. 1103(a)(3).)

§ 172.14 Community council.

(a) Each project must include an elected community council of at least seven members.

(b) The community council must be representative of:

(1) Parents of the children attending the project schools; and

(2) Other residents of the areas served by the project schools.

(c) An existing elected council which is broadly representative of the community in which the project is located may serve as the community council under this part for up to three months after the date of the initial grant award.

(d) A community-wide election must be held to elect a community council for the project within the three months after the date of the initial grant award (community-wide means within the attendance boundaries of the project schools).

(Sec. 513 (e)(1), (g); 20 U.S.C. 1103 (e)(1)(g).)

§ 172.15 Policy board.

(a) Each project must be planned and operated under the supervision of a policy board.

(b) The policy board must include the following members:

(1) The dean of the school of education, or other component that offers graduate training, in the institution of higher education;

(2) The superintendent of the local educational agency; and

(3) The chairperson of the community council.

(c) The policy board members listed in paragraph (b) of this section may agree to add members to the board who represent:

(1) Organizations which represent teachers in the local educational agency;

(2) Organizations which represent principals in the local educational agency;

(3) Students;

(4) Teacher-interns; or

(5) Other persons or organizations which the three board members determine would be appropriate.

(d) Each policy board decides its own voting procedures.

(Sec. 513 (a), (e), (g); 20 U.S.C. 1103 (a), (e), (g).)

§ 172.16 Other participating groups.

A project may include the participation of other groups, such as teacher organizations, professional associations, students, and teacher-interns.

(Sec. 513 (a), (g); 20 U.S.C. 1103 (a), (g).)

§ 172.17 Involvement of State educational agency.

(a) The State educational agency must be kept informed of the progress and experience of the project, including

(b) Project matters which would contribute to the improvement of State teacher certification requirements.

(Sec. 512(a) (2), (3), (5); 20 U.S.C. 1103(a) (2), (3), (5).)

GRANTS

§ 172.30 Project duration.

(a) Each application must be for up to a five year project duration. The Commissioner awards separate grants for each of those five years, subject to the availability of funds and continued effectiveness of the project.

(b) The Commissioner's assistance to a project may not continue after the fifth year.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.31 Size of grants.

The total amount which the Commissioner awards to the grantees under a project is limited to:

(a) Not more than $150,000 for the first year;

(b) Approximately $300,000 for each of the second and third years if the project is for five years;

(c) Approximately $200,000 for the next to last year; and

(d) Approximately $150,000 for the last year;

(Sec.513(g); 20 U.S.C. 1103(g).)

§ 172.32 Separate grants.

(a) If an application is selected for assistance under this part the Commissioner awards a grant to the institution of higher education and a grant to the local educational agency. If a State educational agency participates in a project under § 172.10(b), the Commissioner awards a separate grant to the State educational agency.

(b) If the application includes more than one institution of higher education or more than one local educational agency, the Commissioner may award a grant to one or more of those institutions or agencies.

(Sec. 513 (a), (g); 20 U.S.C. 1103 (a), (g).)

§ 172.33 Time period before agencies or institutions may apply for a new project.

If an institution of higher education or a local educational agency participates in a project it may not apply for a new project until three years after the end of that participation. If a local educational agency is subdivided into districts, this restriction applies only to the district within the local educational agency which participates in the project.

(Sec. 513(g); 20 U.S.C. 1103(g).)

PROJECT PROGRAM

§ 172.40 Initial developmental year.

During the first year of a project:

(a) The project must be developed and organized;

(b) The community council must be elected;

(c) The team leader must be hired;

(d) The teacher-interns must be recruited; and

(e) Any revisions of the objectives adopted under §§ 172.61-172.65 must be planned and developed.

This period may be less than a year if these functions can be completed in a shorter time.

§ 172.41 Achievement of objectives during the remaining four years.

(a) During the remaining four years of a project, activities must be carried out which are designed to achieve the objectives adopted under §§ 172.61-172.66.

(b) Activities during this period must consist primarily of training.

(Sec. 513 (a)(1), (g); 20 U.S.C. 1103 (a)(1), (g).)

§ 172.42 Functions of each participant.

The applicants must agree to the functions each will perform, subject to §§ 172.43-172.45.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.43 Institution of higher education functions.

An institution of higher education may perform the following functions under its grant:

(a) Recruiting, selecting, and enrolling Teacher Corps members.

(b) Training Teacher Corps members.

(c) Paying the administrative and secretarial costs of the community council.

(d) Paying the costs of project administration, including planning, documentation, evaluation, and dissemination.

(Sec. 513 (a), (e); 20 U.S.C. 1103 (a), (e).)

§ 172.44 Local educational agency functions.

A local educational agency may perform the following functions under its grant:

(a) Recruiting, selecting and enrolling Teacher Corps members.

(b) Training Teacher Corps members.

(c) Paying the compensation of Teacher Corps members.

(d) Paying the compensation for released time for educational personnel while in training, within the limitations in § 172.92.

(e) Paying the administrative and secretarial costs of the community council.

(f) Paying the costs of project administration, including planning, documentation, evaluation, and dissemination.

(Sec. 513 (a), (e); 20 U.S.C. 1103 (a), (e); Sec. 541(f); 20 U.S.C. 1104(f).)

§ 172.45 Training by institutions of higher education.

(a) Each institution of higher education which receives a grant under this part shall provide training to Teacher Corps members. This must include training designed to achieve the objectives adopted under §172.62(b) (improvement of competency of educational personnel).

(b) An institution of higher education which does not offer academic course-work beyond the bachelor's degree level may provide training for volunteers and teacher aides, if this type of training is designed to achieve the objectives adopted under § 172.62.

(Sec. 513 (a)(2), (5), (b), (g); 20 U.S.C. 1103(a) (2), (5), (b), (g).)

§ 172.46 Pre-service and in-service training.

Training under this part must include pre-service training for teacher-interns and in-service training for other educational personnel employed by the project schools.

(Sec. 513(a)(2); 20 U.S.C. 1103(a)(2).)

165

§ 172.47 Training program for teacher-interns.

(a) The training program for a teacher-intern must be developed by the project director, in consultation with the team leader and the institution of higher education which provides the training.

(b) The training must include:

(1) Practical classroom experience in each of the project schools;

(2) Academic study: and

(3) Practical experiences and training in the community served by the project.

(c) The practical classroom experience of a teacher-intern may not average more than one half of each school day during the period of his or her internship.

(d) Training may also be provided in a pre-school early childhood setting if that training is consistent with the objectives adopted under §§ 172.61-172.65.

(Sec. 513(a)(2), (g); 20 U.S.C. 1103(a)(2), (g).)

§ 172.48 Graduate Level training for teachers and teacher-interns.

Training for teachers and teacher-interns who have a bachelor's degree must be at the graduate level. Training for teacher-interns who do not have a bachelor's degree may be at the undergraduate level.

(Sec. 513(a) (1), (b), (g); 20 U.S.C. 1103(a) (1), (b), (g).)

§ 172.49 Degree and certification for teacher-interns.

Training must be designed so that a teacher-intern begins his or her internship three months before the beginning of the second school year of the project and has the opportunity to complete the internship; and receive a degree and a teaching certification by the end of the third school year of the project.

(Sec. 513(a) (b), (b); 20 U.S.C. 1103(a) (2), (b).)

§ 172.50 Field and community based training.

Training of Teacher Corps members must be primarily field based and carried out in the community served by the project.

(Sec. 513(a)(2); 20 U.S.C. 1103(a)(2).)

§ 172.51 Training for volunteers.

A grantee may provide training to volunteers to prepare them for service in the project.

(Sec. 513 (a)(5), (b); 20 U.S.C. 1103(a)(5), (b).)

§ 172.52 Documentation of project experience.

(a) Each project must include documentation of all significant factors which influence project experience and results, including:

(1) The characteristics and condition of the local setting; and

(2) The usefulness of project processes, practices, and products in the project schools.

(b) The documentation under paragraph (a) of this section must be used to:

(1) Review progress in accomplishing the objectives developed under §§ 172.61-172.65; and

(2) Revise those objectives if necessary.

(Sec. 511: 20 U.S.C. 1101; Sec. 513(g); 20 U.S.C. 1103(g).)

BASIC OUTCOMES AND PROJECT OBJECTIVES

§ 172.60 Basic outcomes.

Each project must be designed to achieve the following outcomes:

(a) An improved school climate which fosters the learning of children of low-income families.

(b) An improved educational personnel development system for persons who serve or who are preparing to serve in schools for children of low-income families.

(c) The continuation of educational improvements (including products, processes, and practices) made as a result of the project, after Federal funding ends.

(d) The adoption or adaptation of those educational improvements by other educational agencies and institutions.

(Sec. 511: 20 U.S.C. 1101: Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.61 Project objectives.

(a) Each project must include objectives which are designed to achieve the outcomes described in § 172.60.

(b) These project objectives must be developed jointly by the institution of higher education, the local educational agency, and the community council.

(c) Each project objective must be adopted by the policy board.

(Sec. 511: 20 U.S.C. 1101; Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.62 School objectives.

(a) Each project must include specific objectives designed to achieve the outcome under § 172.60(a) (improved school climate) in each of the project schools. These objectives may include curriculum, organizational, or other changes that affect an entire school. All project schools must jointly participate in the development of these specific objectives.

(b) In addition to the objectives under paragraph (a) of this section, each project school must have objectives designed to:

(1) Improve the competency of all educational personnel employed by the project schools (and the teacher-interns) to provide education that is multicultural and to be knowledgeable of and sensitive to the needs of diverse cultures, regardless of the pupil population served by the project;

(2) Improve the competency of these educational personnel, the teacher interns, and the project schools, to deal with a wide range of variability in children; and

(3) Provide all educational personnel employed by the project schools (and the teacher-interns) with the opportunity to improve their competency to identify children with learning and behavioral problems, diagnose the special needs of those children, and prescribe learning activities to meet those needs.

(Sec. 511(a); 20 U.S.C. 1101(a); Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.63 Educational personnel development system objectives.

Each project must include specific objectives designed to achieve the outcome under § 172.60(b) (improved educational personnel development system), including objectives to achieve:

(a) Basic and systemic improvements in the methods used by the institution of higher education and the local educational agency to train educational personnel;

(b) The development of the capacity of the institution of higher education to provide training that will achieve the objectives under § 172.63(b); and

(c) Provision of pre-service and in-service training as an integral process.

(Sec. 511(a) 20 U.S.C. 1101(a); sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.64 Institutionalization objectives.

Each project must include specific objectives designed to achieve the outcome under § 172.60(c) (continuation of educational improvements).

(Sec. 511(a); 20 U.S.C. 1101(a); sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.65 Demonstration and dissemination objectives.

Each project must include specific objectives designed to achieve the outcome under § 172.60(d) (adaptation of educational improvements by other agencies) by demonstrating and disseminating project processes, practices, and products found useful in the project schools to:

(a) Persons involved in the project;

(b) Schools of the local educational agency and components of the institution of higher education which are not involved in the project;

(c) Other local educational agencies, institutions of higher education, and communities; and

(d) Others interested in educational policy.

(Sec. 511(a); 20 U.S.C. 1101(a); sec., 513(g); 20 U.S.C. 1103(g).)

TEACHER CORPS MEMBERS

§ 172.80 Educational personnel, teacher-interns, and volunteers.

The following persons are Teacher Corps members:

(a) Teachers and other educational personnel who are employed by a project school;

(b) Volunteers who serve as part-time tutors of full-time instructional assistants in project schools; and

(c) Teacher-interns.

(Sec. 513(a)(1); 20 U.S.C. 1103(a)(1).)

§ 172.81 Number of teacher-interns.

(a) Each project must include at least four teacher-interns.

(b) Each project may include up to one teacher-intern for each five teachers in the project schools if the local educational agency will employ all teacher-interns who complete their internships.

(Sec. 513(f); 20 U.S.C. 1103(g).)

§ 172.82 Recruiting teacher-interns.

(a) The Commissioner provides each grantee with a national listing of qualified applicants for teacher-internships.

(b) A grantee may recruit teacher-interns from the national listing of qualified applicants, but is not required to do so.

(c) A grantee must design its recruitment of teacher-interns so that it gives consideration to persons who are broadly representative of the ethnic and cultural characteristics of the community served by the project.

(d) The Commissioner Publishes a notice annually in the FEDERAL REGISTER that explains how to apply for teacher-internships.

(Sec. 513(a) (1), (3); 20 U.S.C. 1103(a) (1), (3).)

§ 172.83 Teacher-intern teams.

Teacher-interns must be organized into teams that include at least four teacher-interns and one experienced teacher who serves as leader of the team. Each team must spend a portion of the internship in each project school.

(Sec. 513(a)(3); 20 U.S.C. 1103(a)(3).)

§ 172.84 Teacher-interns may not replace teachers.

(a) A grantee may not use a teacher-intern to replace, or carry out the functions of a teacher who is or would otherwise have been employed in a project school.

(b) A teacher-intern may not be used as a substitute-teacher.

(Sec. 517; 20 U.S.C. 1107.)

§ 172.85 Federal employees.

Members of the Teacher Corps are not considered Federal employees except for the purposes of the Federal tort claims provisions of Title 28 of the United States Code.

(Sec. 515 (a)-(c); 20 U.S.C. 1104 (a)-(c).)

§ 172.86 Other Federal student assistance programs.

Members of the Teacher Corps may not receive a loan under the National Direct Student Loan Program authorized by Title IV-E of the Higher Education Act of 1965 (20 U.S.C. 1087-aa-1087-ff), or a grant under the Supplemental Educational Opportunity Grant Program authorized by Title IV-A-2 of the Higher Education Act of 1965 (20 U.S.C. 1070b-1070b-3).

(Sec. 515(d)-20 U.S.C. 1105 (d).)

§ 172.87 Compensation of team leaders.

(a) The local educational agency shall employ each teacher-intern team leader.

(b) The local educational agency shall compensate a team leader at a rate comparable to that being paid to other personnel in the same agency who perform similar work.

(c) A local educational agency shall use funds under its grant to pay up to 90 percent of the compensation paid under paragraph (b) of this section.

(Sec. 513(a)(3); 20 U.S.C. 1103(a)(3); sec. 514(a)(1); 20 U.S.C. 1104(a)(1).)

§ 172.88 Teacher-intern compensation during their term of service with the project.

(a) The local educational agency shall compensate a teacher-intern during each period he or she serves in the project schools at a rate of $150 per week, subject to paragraph (c) of this section.

(b) This compensation must include an additional $15 per week for each dependent who receives more than half of his or her support from the teacher-intern, subject to paragraph (c) of this section.

(c) The total compensation paid to a teacher-intern under paragraphs (a) and (b) of this section may not exceed the compensation paid to a beginning teacher employed by the local educational agency for comparable periods of time.

(d) A local educational agency shall use funds under its grant to pay up to 90 percent of the compensation paid under this section.

(Sec. 513(a)(3); 20 U.S.C. 1103(a)(3); sec. 514(a)(2); 20 U.S.C. 1104(a)(2).)

§ 172.89 Teacher-intern training stipends.

(a) The institution of higher education shall pay a training stipend at $150 per week to each teacher-intern during each period he or she receives training at that institution. The institution of higher education may not pay this stipend during the periods when the teacher-intern serves in the project schools.

(b) The training stipend must include an additional $15 per week for each dependent who receives more than one-half of his or her support from the teacher-intern.

(c) An institution of higher education shall use funds under its grant to pay up to 100 percent of the cost of the amounts paid under paragraphs (a) and (b) of this section.

(Sec. 514(b); 20 U.S.C. 1104(b).)

§ 172.90 Teacher-intern and team leader medical insurance.

(a) The grantees shall provide teacher-interns and team leaders with medical insurance coverage (including hospitalization) during their participation in a project.

(b) Dependents who receive more than one half of their support from a teacher-intern must be included in this insurance coverage.

(c) A grantee which provides this medical insurance coverage shall use funds under its grant to pay up to 100 percent of the cost of the insurance.

(Sec. 514 (d), (e); 20 U.S.C. 1104 (d), (e).)

§ 172.91 Training stipends for teachers and other educational personnel.

(a) The institution of higher education or local educational agency may pay a training stipend to each of the teachers and other educational personnel employed by a project school who participate in training under this part during a period of the year (if any) not covered by a local employment contract.

(b) The training stipend may be at a rate of not more than $100 per individual per week, prorated if the training is part-time.

(c) A local educational agency shall use funds under its grant to pay up to 100 percent of the cost of stipends paid under this section.

(Sec. 514(b); 20 U.S.C. 1104(b).)

§ 172.92 Released time for educational personnel.

(a) If authorized by the Commissioner, the local educational agency may use funds under its grant to pay the cost of releasing educational personnel from their regular duties in a project school to participate in training under this part.

(b) The Commissioner may authorize a local educational agency to use funds under paragraph (a) of this section if the local educational agency demonstrates in its application that the project is or will be placed in jeopardy by the lack of compensation for released time.

(Sec. 514(f); 20 U.S.C. 1104(f).)

§ 172.93 Compensation of volunteers.

(a) Volunteers who serve as part-time tutors or full-time instructional aides in project schools are paid or unpaid, according to local policy.

(b) If volunteers are paid, they must be compensated at a rate equal to that being paid other volunteers for similar work.

(c) A grantee which pays any compensation under this section shall use funds under its grant to pay up to 90 percent of that compensation.

(Sec. 513(a)(5); 20 U.S.C. 1103(a)(5); sec. 514(a)(3); 20 U.S.C. 1104(a)(3).)

§ 172.94 Travel expenses of Teacher Corps members.

(a) The grantees shall pay, subject to paragraph (b) of this section:

(1) The necessary travel expenses of Teacher Corps members and their dependents;

(2) The necessary expenses for transportation of the household goods and personal effects of Teacher Corps members and their dependents; and

(3) Other necessary expenses of Teacher Corps members and their dependents which are directly related to their service in the project, including readjustment allowances proportionate to that service.

(b) A teacher-intern whose last permanent address before coming to a project is outside the community served by the project, shall be paid:

(1) By the institution of higher education for his or her necessary travel expenses to the project (by the least expensive common carrier or by private automobile subject to any institutional rules on reimbursement for mileage); and

(2) By the local educational agency for:

(i) The necessary travel expenses of teacher-intern dependents to the project (by the least expensive common carrier or by private automobile subject to any agency limits on reimbursement for mileage); and

(ii) The necessary expenses for shipment to the project of up to 11,000 pounds of household goods and personal effects owned by the teacher-intern or his or her dependents.

(Sec. 514(c); 20 U.S.C. 1104(c).)

Subpart C—Youth Advocacy Projects

§ 172.100 Purpose and project design.

(a) *Purpose.* Under this subpart, the Commissioner provides assistance to projects designed to attract and train educational personnel who provide remedial, basic, and secondary educational training (including literacy and communication skill training) to juvenile delinquents or youth offenders.

(b) *Project design.* A youth advocacy project must be designed to meet the special educational needs of juvenile delinquents or youth offenders.

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

§ 172.101 Other sections in this part apply to youth advocacy projects.

Subject to any exceptions specifically listed in this subpart, all of the sections in this part apply to youth advocacy projects.

(Secs. 551 et seq.; 20 U.S.C. 1103 et seq.)

§ 172.102 Youth advocacy project joint participation.

(a) Section 172.10 (Joint participants) does not apply to youth advocacy projects.

(b) Each project assisted under this subpart must be carried out jointly by:

(1) One or more institutions of higher education;

(2) One or more local educational agencies;

(3) A community council established under § 172.104; and

(4) One or more of the following correctional facilities:

(i) A detention center;

(ii) An incarceratory institution;

(iii) A public or private non-profit alternative school for delinquent youth; or

(iv) A special center, within a public school, which serves the special needs of juvenile delinquents or youth offenders, or both.

(c) The correctional facility must participate equally under each section of the regulation in this part that requires joint participation or collaboration.

(d) A project assisted under this subpart may also include participation by a State educational agency.

(Sec. 513(a)(6)(e); 20 U.S.C. 1103 (a)(6)(e).)

§ 172.103 Project schools.

(a) Section 172.12 (Project schools) does not apply to youth advocacy projects.

(b) A youth advocacy project must include one or more junior high schools or senior high schools, or both, of the local educational agency.

(c) A youth advocacy project may include one or more schools of the correctional facility.

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

§ 172.104 Youth advocacy project community council.

(a) Each youth advocacy project must include an elected community council of at least seven members.

(b) The community council must be representative of:

(1) The parents of the juvenile delinquents or youth offenders participating in the project; and

(2) The residents of the areas served by the project schools.

(Sec. 513(e)(1), (g); 20 U.S.C. 1103(e)(1), (g).)

§ 172.105 Policy board.

The policy board under § 172.15 must include as a member the director of the correctional facility (or his or her equivalent).

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

§ 172.106 Youth advocacy projects—separate grants.

(a) If an application is selected for assistance under this subpart, the Commissioner awards a grant to the institution of higher education, a grant to the local educational agency, and a grant to the correctional facility.

(b) If the application includes more than one institution of higher education, more than one local educational agency or more than one correctional facility, the Commissioner may award grants to one or more of those institutions, agencies, or facilities.

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

§ 172.107 Time period before correctional facility may apply for a new project.

If a correctional facility participates in a project, it may not apply for a new project until three years after the end of that participation.

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

§ 172.108 Correctional facility functions.

A correctional facility may perform the following functions under its grant:

(a) Recruiting, selecting, and enrolling Teacher Corps members.

(b) Training Teacher Corps members.

(c) Paying the compensation of Teacher Corps members.

(d) Paying compensation for released time for educational personnel while in training, within the limitations in § 172.92.

(e) Paying the administrative and secretarial costs of the community council.

(f) Project administration, including planning, documentation, evaluation, and dissemination.

§ 172.109 Youth advocacy teacher-intern training.

In addition to the training required under § 172.47 (training program for teacher-interns), a youth advocacy project must include teacher-intern training in a correctional facility where youths are:

(a) Incarcerated; or

(b) Having problems adjusting to traditional educational programs; or

(c) Preparing to return to the school-community environment.

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

Subpart D—Project Administration

§ 172.110 Management plan.

(a) Each project must have a management plan for the project years, which includes:

(1) A description of the activities to be carried out;

(2) A description of the sequence and timing of the activities;

(3) The assignment of responsibilities;

(4) A description of the resources to be used for each activity;

(5) A detailed budget for the initial project year (which must be updated in each succeeding year);

(6) A budget for later project years in outline form: and

(7) An analysis of how the activities contribute to achieving the objectives adopted under §§ 172.61–172.65.

(b) The management plan must be revised at least annually.

(c) The management plan must show in detail how it contributes to meeting each of the objectives adopted under §§ 172.61–172.65.

§ 172.111 Project director.

(a) Each project must have a project director.

(b) A temporary project director may be appointed at the beginning of the initial project year.

(c) A permanent project director must be appointed before the end of the initial project year.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.112 Compensation of project director and staff.

(a) The project director and other project administrative staff are not Teacher Corps members. They must be employed by a grantee.

(b) A grantee may use funds under its grant to pay the salaries of the project director and project staff.

(Sec. 513(a); 20 U.S.C. 1103(a).)

§ 172.113 Employment of project administrative staff.

(a) The project administrative staff must be hired from the grantees' regular employees whenever possible.

(b) A grantee must design its hiring of project administrative staff so that it gives consideration to persons who are broadly representative of the ethnic and cultural characteristics of the community served by the project.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.114 Supervision of Teacher Corps members.

(a) Teacher Corps members are under the direct supervision of the local educational agency to which they are assigned.

(b) Subject to the requirements in §§ 172.81–172.84. (regarding teacher-in-

terns), the local educational agency retains the authority to:

(1) Assign Teacher Corps members, within its system;

(2) Transfer Teacher Corps members within its system;

(3) Determine the terms and continuance of the assignment of Teacher Corps members within its system.

(Sec. 516; 20 U.S.C. 1106.)

Subpart E—Applications

§ 172.122 Policy board.

An application must include a description of the members, method of selection, and operating procedures of the policy board.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.123 Institution of higher education.

(a) An application must include a description of each institution of higher education, including:

(1) Its degree offerings in education; and

(2) Its pre-service and in-service graduate training program.

(b) An application must also include a description of past and current efforts by the institution of higher education to improve its educational personnel training and retraining programs, and the way those efforts relate to the project.

(Sec. 511(a); 20 U.S.C. 1101(a); Sec. 513(b); 20 U.S.C. 1103(b).)

§ 172.124 Project schools.

An application must include: (a) A brief description of each project school. including the size of the educational staff and the relationships among the schools in the feeder system;

(b) A description of past and current efforts to improve each project school. and the way those efforts relate to the projects;

(c) A statement that each project school meets the low-income criterion in § 172.12(b);

(d) A statement that all educational personnel employed by the project schools will be involved in planning and carrying out the project in that school: and

(e) If the project includes more than four teacher-interns. an assurance that the local educational agency will employ all of the teacher-interns who complete their internships.

(f) If the project includes as teacher-interns persons who do not have bachelors degrees, a certification by the local education agency that there are not enough teacher-intern candidates who have bachelors degrees available locally or through use of the national listing of qualified applicants.

(Sec. 511(a); 20 U.S.C. 1101(a); Sec. 513(a) (3); 20 U.S.C. 1103(a) (3).)

§ 172.125 Community council.

An application must include:

(a) A description of the temporary community council. including:

(1) The purpose for which the council was originally established;

(2) The boundaries and compositions of the community represented by the council;

(3) The terms of the council members:

(4) The date and methods of election of the council members: and

(5) The number of council members.

(b) A description of the permanent community council. including:

(1) The boundaries and composition of the community represented by the council:

(2) The number of council members;

(3) The terms of the council members:

(4) The date and method of election of the council members: and

(5) The activities to be carried out by the council.

(c) An assurance that the community council participates with the other applicants in planning, carrying out, and evaluating the project.

(Sec. 513(e); 20 U.S.C. 1103(e).)

§ 172.126 Correctional facility.

An application for a youth advocacy project must include a description of each correctional facility.

(Sec. 513(e); 20 U.S.C. 1103(e).)

§ 172.127 Project objectives.

An application must include a description of each project objective adopted under §§ 172.61–172.65, including the basis for each objective in research. theory, or practical experience.

(Sec. 511(a); 20 U.S.C. 1101(a); Sec. 513(a); 20 U.S.C. 1103(g).)

§ 172.128 Management and staffing plans.

An application must include the management plan required under § 172.110 and a staffing plan.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.130 Released time.

A local educational agency which wishes to use grant funds under § 172.92 (released time for educational personnel) must demonstrate in the application that the project is or will be placed in jeopardy by the lack of compensation for released time.

(Sec. 514(f); 20 U.S.C. 1104(f).)

§ 172.132 Project activities.

An application must include a description of: (a) The teacher-intern recruitment methods;

(b) The organization of each teacher-intern team in each project school;

(c) The training program for teacher-interns;

(d) The training program for volunteers, teachers, and other educational personnel:

(e) The project plans and methods for achieving each of the objectives adopted under §§ 172.61-172.65: and

(f) Project evaluation to date.

(Sec. 513: 20 U.S.C. 1103.)

§ 172.133 Youth advocacy projects.

In addition to the other requirements in this subpart, an application for a youth advocacy project must describe:

(a) The persons receiving training in the project in remedial, basic, and secondary education:

(b) The special educational needs of the persons described under paragraph (a) of this section:

(c) How the project is designed to:

(1) Meet the needs of those persons; and

(2) Attract and train educational personnel who provide educational training to juvenile delinquents or youth offenders.

(Sec. 513(a)(6); 20 U.S.C. 1103(a)(6).)

§ 172.134 Information responding to evaluation criteria.

An application must include information which provides a basis for evaluating it under each of the criteria in Subpart F.

(Sec 513(g): 20 U.S.C. 1103(g).)

§ 172.135 Approval of applications by the State educational agency.

(a) The Commissioner may not approve an application submitted under this part unless the State educational agency of the State in which the project is located has approved the application.

(b) The approval by the State educational agency must be:

(1) In writing and signed by the chief State school officer; and

(2) Attached to the application before the application is submitted to the Commissioner.

(c) The State educational agency shall approve an application that is:

(1) In conformance with all applicable State laws, rules, and regulations; and

(2) Consistent with overall plans for teacher education in that State.

(Sec. 512 (a)(2), (3), (5): 20 U.S.C. 1103 (a) (2), (3), (5).)

§ 172.136 Continuation grant application.

In addition to meeting all of the other requirements of this subpart, an application for a continuation grant must include a description of:

(a) Planning done during the initial project year;

(b) Project experience to date: and

(c) Any revisions of or additions to the project objectives.

(Sec. 512(a) (2), (3), (5): 20 U.S.C. 1103(a); 20 U.S.C. 1103(g).)

§ 172.137 Annual publication of application submission date.

The Commissioner publishes the date and place to submit project applications annually in the FEDERAL REGISTER.

(Sec. 513(g); 20 U.S.C. 1103(g).)

Subpart F—Evaluation Criteria

§ 172.150 Evaluation procedure.

(a) Applications for grants under this part are evaluated by the Commissioner on the basis of the criteria in this subpart. The criteria in § 100a.26(b) of this chapter do not apply.

(b) Each application for initial project funding is evaluated in competition with all other applications for initial project funding.

(c) Each application for a continuation grant is evaluated noncompetitively based on the effectiveness of the project and the availability of appropriations.

(d) The evaluation of applications for initial project funding is based on a point system. Each criterion is weighted as indicated. The highest possible score under these criteria is 100 points.

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.151 School learning climate criterion (25 points).

In evaluating an application the Commissioner considers the extent to which:

(a) The objectives developed under § 172.62 (school objectives) (improved school climate) are likely to achieve the outcomes in § 172.60(a) (8 points);

(b) The project activities are likely to accomplish the objectives developed under § 172.62 (9 points); and

(c) The management plan for accomplishing the objectives developed under § 172.62 is realistic and economical. (8 points).

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.152 Educational personnel development system criterion (36 points).

In evaluating an application, the Commissioner considers the extent to which:

(a) The objectives developed under § 172.63 (educational personnel development) are likely to achieve the outcome in § 172.60(b) (improved educational personnel development system) (9 points);

(b) The project training activities are likely to accomplish the objectives developed under § 172.63 (b) (improved educational personnel development system) (9 points);

(c) The project activities are likely to accomplish the objectives developed

under § 172.63(a) and (c) (9 points); and

(d) The management plan for accomplishing the objectives developed under § 172.63 is realistic and economical (9 points).

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.153 Institutionalization criterion (21 points).

In evaluating an application, the Commissioner considers the extent to which:

(a) The objectives developed under § 172.64 (institutionalization) are likely to achieve the outcome in § 172.60(c) (continuation of educational improvements) (7 points):

(b) The project activities are likely to accomplish the objectives developed under § 172.64 (8 points); and

(c) The management plan for accomplishing the objectives developed under § 172.64 is realistic and economical (6 points).

(Sec. 513(g); 20 U.S.C. 1103(g).)

§ 172.154 Adaptation of educational improvements criterion (18 points).

In evaluating an application, the Commissioner considers the extent to which:

(a) The objectives developed under § 172.65 (demonstration and dissemination) are likely to achieve the outcome in § 172.60(d) (adaptation of educational improvements) (6 points);

(b) The project activities are likely to accomplish the objectives developed under § 172.65 (6 points); and

(c) The management plan for achieving the objectives developed under § 172.65 is realistic and economical (6 points).

(Sec. 513(g); 20 U.S.C. 1103(g).)

APPENDIX—PART A OF TITLE V OF THE HIGHER EDUCATION ACT OF 1965, AS AMENDED—TEACHER CORPS PROGRAM STATEMENT OF PURPOSE AND AUTHORIZATION OF APPROPRIATIONS

SEC. 511. (a) The purpose of this part is to strengthen the educational opportunities available to children in areas having concentrations of low-income families and to encourage colleges and universities to broaden their programs of teacher preparation and to encourage institutions of higher education and local educational agencies to improve programs of training and retraining for teachers, teacher aides, and other educational personnel by—

(1) Attracting and training qualified teachers who will be made available to local educational agencies for teaching in such areas;

(2) Attracting and training inexperienced teacher-interns who will be made available for teaching and in-service training to local educational agencies in such areas in teams led by an experienced teacher;

(3) Attracting volunteers to serve as part-time tutors or full-time instructional assistants in programs carried out by local educational agencies and institutions of higher education serving such areas;

(4) Attracting and training educational personnel to provide relevant remedial, basic, and secondary educational training, including literacy and communications skills, for juvenile delinquents, youth offenders, and adult criminal offenders;

(5) Supporting demonstration projects for retraining experienced teachers, teacher aides, and other educational personnel serving in local educational agencies.

(b) For the purpose of carrying out the provisions of this part there are authorized to be appropriated $50,000,000 for the fiscal year 1977, $75,000,000 for the fiscal year 1978. and $100,000,000 for the fiscal year 1979.

ESTABLISHMENT OF TEACHER CORPS

Sec. 512. In order to carry out the purposes of this part, there is hereby established in the Office of Education a Teacher Corps. The Teacher Corps shall be headed by a Director who shall be compensated at the rate prescribed for grade 17 of the General Schedule of the Classification Act of 1949, and a Deputy Director who shall be compensated at the rate prescribed for grade 16 of such General Schedule. The Director and the Deputy Director shall perform such duties as are delegated to them by the Commissioner: except that (1) the Commissioner may delegate his functions under this part only to the Director. and (2) the Director, and Deputy Director shall not be given any function authorized by law other than that granted by this part.

TEACHER CORPS PROGRAM

Sec. 513. (a) For the purpose of carrying out this part, the Commissioner is authorized to—

(1) Enter into contracts or other arrangements with institutions of higher education or local educational agencies under which they will recruit, select, and enroll in the Teacher Corps for periods of up to five years, experienced teachers, teacher aides, and other educational personnel, persons who have a bachelor's degree or its equivalent, and persons who have successfully completed two years of a program for which credit is given toward a baccalaureate degree and, for such periods as the Commissioner may prescribe by regulation, persons who volunteer to serve as part-time tutors or full time instructional assistants;

(2) Enter into arrangements, through grants or contracts, with institutions of higher education or local educational agencies (upon approval in either case by the appropriate State educational agency) or with State educational agencies to provide members of the Teacher Corps with such training as the Commissioner may deem appropriate to carry out the purpose of this part, including not more than three months of training for members before they undertake their teaching duties under this part;

(3) Enter into arrangements (including the payment of the cost of such arrangements) with local educational agencies upon approval by the appropriate State educational agency and, after consultation in appropriate cases with institutions of higher education, to furnish to local educational agencies, for service during regular or summer sessions, or both, in the schools of such agencies in areas having concentrations of children from low-income families, Teacher Corps programs each of which shall include teacher-interns teams lead by experienced teachers, and may include additional experienced teachers, teacher aides,

and other educational personnel, who may be afforded time by the local educational agency for a training program carried out in cooperation with an institution of higher education:

(4) Pay to local educational agencies such part of the amount of the compensation which such agencies pay to/or on behalf of members of the Teacher Corps assigned to them pursuant to arrangements made pursuant to the preceding clause as may be agreed upon after consideration of their ability to pay such compensation, but not in excess of 90 per centum thereof, except that, in exceptional cases, the Commissioner may provide more than 90 per centum of such compensation during the first year of any agency's participation in the program;

(5) Enter into contracts or other arrangements with local educational agencies or institutions of higher education, upon approval by the appropriate State educational agency, under which provisions (including payment of the cost of such arrangements) will be made (A) to carry out programs serving disadvantaged areas in which volunteers (including high school and college students) serve as part-time tutors or full-time instructional assistants in teams with other Teacher Corps members, under the guidance of experienced teachers, but not in excess of 90 per centum of the cost of compensation for such tutors and instructional assistants may be paid from federal funds, and (B) to provide appropriate training to prepare tutors and instructional assistants for service in such programs;

(6) Enter into arrangements, through grants or contracts, with State and local educational agencies, and with institutions of higher education, and such other agencies or institutions approved by the Commissioner according to criteria which shall be established by him to carry out the purposes of this paragraph, under which provisions (including payments of the cost of such arrangements) will be made to furnish to such agencies members of the Teacher Corps to carry out projects designed to meet the special educational needs of juvenile delinquents, youth offenders, and adult criminal offenders, and persons who have been determined by a State or local educational agency, court of law, law enforcement agency or any other State or local public agency to be predelinquent juveniles, but not in excess of 90 per centum of the cost of compensation for Teacher Corps members serving in such projects may be paid from Federal funds;

(7) (A) Make available technical assistance to State and local educational agencies and institutions of higher education for carrying out arrangements entered into under this title; and

(B) Provide planning, technical assistance, monitoring, documenting, dissemination, and evaluation services for arrangements made under this title;

(8) Acquaint qualified persons of teaching opportunities and needs in disadvantaged areas and encourage qualified persons to apply to appropriate educational agencies or institutions for enrollment in the Teacher Corps; and

(9) Accept and employ in the furtherance of the purposes of this subpart (A) voluntary and uncompensated services notwithstanding the provisions of section 3679(b) of the Revised Statutes, as amended (31 U.S.C. 665(b)), and (B) any money or property (real, personal, or mixed, tangible or intangible) received by gift, device [sic.] bequest, or otherwise.

(b) Arrangements with institutions of higher education to provide training for Teacher Corps members while serving in schools for local educational agencies under the provisions of this part shall provide, wherever possible. for training leading to an appropriate degree.

(c) (1) Whenever the Commissioner determines that the demand for the services of members of the Teacher Corps exceeds the number available. he shall, to the extent practicable, allocate the number of members of the Teacher Corps who are available among the States in accordance with paragraph (2).

(2) Not to exceed 5 per centum of the number of members of the Teacher Corps who are available shall be allocated to Puerto Rico. the Virgin Islands, Guam, American Samoa, and the Trust Territory of the Pacific Islands and not to exceed 5 per centum of such members shall be allocated to the elementary, and secondary schools operated for Indian children by the Department of Interior, according to their respective needs. The remainder of such number of Teacher Corps members shall be allocated among, the States so that the number of members available to any State shall bear the same ratio to the number being allocated as the number of children enrolled in the public and private elementary and secondary schools of that State bears to the total number of children so enrolled in all of the States. The number of children so enrolled shall be determined by the Commissioner on the basis of the most recent satisfactory data available to him. For purposes of this subsection, the term "State" shall not include Puerto Rico. the Virgin Islands. Guam, American Samoa, or the Trust Territory of the Pacific Islands.

(3) If the Commissioner determines that a State will not require the number of Teacher Corps members allocated to it under paragraph (2). he shall, from time to time, reallot the number not required, on such dates as he may fix, to other States in proportion to the original allocation to such States under paragraph (2), but with such proportionate number for any of such other States being reduced to the extent it exceeds the number the Commissioner determines such State needs and will be able to use for such year; and the total of such reductions shall be similarly reallocated among the States whose proportionate numbers were not so reduced.

(d) A local educational agency may utilize members of the Teacher Corps assigned to it in providing, in the manner described in section 205(a) (2) of Pub. L. 874, Eighty first Congress, as amended, educational services in which children enrolled in private elementary and secondary schools can participate.

(e) (1) No arrangement may be entered into under the provisions of paragraph (1), (2), (3), (5), or (6) of subsection (a) of this section unless that arrangement is prepared with the participation of an elected council which shall be representative of the community in which the project subject to that arrangement is located and of the parents of the students of the elementary or secondary schools or both, to be served by such project.

(2) Each council selected pursuant to this subsection shall participate with the local educational agency or institution of higher education, or both, in the planning, carrying out, and evaluation of projects subject to arrangements under paragraphs (1), (2), (3), (5), and (6) of subsection (a) of this section.

(3) The Commissioner is authorized in each fiscal year to arrange for the payment of necessary secretarial and administration expenses of each council elected pursuant to the provisions of this subsection for the purposes of carrying out its functions under this subsection.

(f) The Commissioner shall establish procedures seeking, with respect to the Teacher Corps members enrolled after the date of enactment of the Education Amendments of 1976, [a] goal of having approximately five individuals who are at the time of enrollment, or who previously have been, employed as teachers by local educational agencies to one individual who has not been so employed. The Commissioner may waive the procedure established under this subsection if he makes a determination that there are insufficient qualified applicants to maintain the goal sought by this subsection, or that there are insufficient employment opportunities for individuals who are not so employed, and submits a report to the Congress of such a determination.

(g) Notwithstanding any other provision of law, the Commissioner shall develop and establish specific criteria for entering into arrangements under this part in order to assist applicants for assistance under this part to develop proposals to be submitted. Criteria established under this subsection shall be used by the Commissioner in selecting proposals under this title.

COMPENSATION

SEC. 514. (a) An arrangement made with a local educational agency pursuant to paragraph (3) of section 513 (a) or arrangement with a local educational agency or institution of higher education pursuant to paragraph (5) of section 513(a), or an arrangement with any agency pursuant to paragraph (6) of section 513(a), shall provide for compensation by such agency of Teacher Corps member during the period of their assignment to it at the following rates:

(1) An experienced teacher who is leading a teaching team shall be compensated at a rate agreed to by such agency and the Commissioner.

(2) A teacher intern shall be compensated at such rates as the Commissioner may determine to be consistent with the nature of the program and with prevailing practices under comparable federally supported programs or local projects, not to exceed $150 per week plus $15 per week for each dependent; and

(3) Tutors and instructional assistants shall be compensated at such rates as the

Commissioner may determine to be consistent with prevailing practices under comparable federally supported work-study programs.

(b) For any period of training under this part the Commissioner shall pay to members of the Teacher Corps such stipends (including allowances for subsistence and other expenses for such members and their dependents) as he may determine to be consistent with prevailing practices under comparable federally supported training programs.

(c) The Commissioner shall pay the necessary travel expenses of members of the Teacher Corps and their dependents and necessary expenses for the transportation of the household goods and personnel effects of such members and their dependents, and such other necessary expenses of such members as are directly related to their services in the Corps, including readjustment allowances proportionate to service.

(d) The Commissioner is authorized to make such arrangements as may be possible, including the payment of any costs incident thereto, to protect the tenure, retirement rights, participation in a medical insurance program, and such other similar employee benefits as the Commissioner deems appropriate, of a member of the Teacher Corps who participates in any program under this part and who indicates his intention to return to the local educational agency or institution of higher education by which he was employed immediately prior to his service under this part.

(e) The Commissioner is authorized to provide medical (including hospitalization) insurance for members of the Teacher Corps who do not otherwise obtain such insurance coverage either under an arrangement made pursuant to subsection (d) of this section or as an incident of an arrangement between the Commissioner and an institution or a State or local educational agency pursuant to section 513.

(f) The Commissioner is authorized to compensate local educational agencies for released time for educational personnel of the agency who are being trained in Teacher Corps projects assisted under this title.

APPLICATION OF PROVISIONS OF FEDERAL LAW

SEC. 515. (a) Except as otherwise specifically provided in this section, a member of the Teacher Corps shall be deemed not to be a Federal employee and shall not be subject to the provisions of laws relating to Federal employment, including those relating to hours of work, rates of compensation.

leave, unemployment compensation, and Federal employee benefits.

NOTE.—Subsection (b) was repealed by Pub. L. 90-83.

(c) Such members shall be deemed to be employees of the Government for the purposes of the Federal tort claims provisions of title 28, United States Code.

(d) Members of the Teacher Corps shall not be eligible to receive payment of a student loan under title II of the National Defense Education Act of 1958 or of an educational opportunity grant under title IV of this Act.

LOCAL CONTROL PRESERVED

SEC. 516. Members of the Teacher Corps shall be under the direct supervision of the appropriate officials of the local educational agencies to which they are assigned. Except as otherwise provided in clause (3) of section 513(a), such agencies shall retain the authority to—

(1) Assign such members within their systems;

(2) Make transfers within their systems;

(3) Determine the subject matter to be taught;

(4) Determine the terms and continuance of the assignment of such members within their systems.

MAINTENANCE OF EFFORT

SEC. 517. No member of the Teacher Corps shall be furnished to any local educational agency under the provisions of this part if such agency will use such member to replace any teacher who is or would otherwise be employed by such agency.

TEACHING CHILDREN OF MIGRATORY AGRICULTURE WORKERS

SEC. 517A. For purposes of this part the term "local educational agency" includes any State educational agency or other public or private nonprofit agency which provides a program or project designed to meet the special educational needs of migratory children of migratory agricultural workers, and any reference in this part to (1) teaching in the schools of a local educational agency includes teaching in any such program or project and (2) "migratory children of migratory agricultural workers" shall be deemed to continue to refer to such children for a period, not in excess of five years, during which they reside in the area served by the local educational agency.

(PR Doc. 78-4356 Filed 2-22-78; 8:45 am]

APPENDIX B

GUIDELINES FOR THE ESSAY ON
THE RELATIVE IMPORTANCE OF IMPLEMENTATION TACTICS

The essay on the Relative Importance of Implementation Tactics will
divided into three sections. Each of these sections should start at the
top of a page under its appropriate heading; each section should be one
to two pages in length. The headings for the three sections of the essay,
along with some guiding questions that are designed to aid in developing
discussions around the basic theme are as follows:

1) The Most Important Implementation Tactics

We are interested in your judgement as a local documentor
regarding the one or two tactics drawn from the Teacher Corps
Rules and Regulations that are most important in the implementa-
tion process. Here are the guiding questions for this section of
the essay:

o Which of the Teacher Corps tactics are the most effective for
achieving the four basic outcomes, or, which tactics are
absolutely essential to successful implementation?

o For each of the most important tactics you identify, please
explain why you think that feature is important and illustrate
with one specific example drawn from your project's experience
so far in Teacher Corps.

2) The Less Important Implementation Tactics

Some of the Teacher Corps tactics are probably more important
than others in the implementation process. We are interested
in your views as a project documentor about the one or two least
important tactics, considering the experiences of your project
so far. Here are the probing questions for this section of the
essay:

● Which of the Teacher Corps tactics are the least effective
for achieving the four basic outcomes?

● Could any of the tactics be taken away and yet preserve a
viable educational program intended to achieve the four
basic outcomes?

- Would you characterize any of the tactics as being obstacles to implementation?

- For each of the one or two least important tactics you identify, please explain why you think that tactic is less important and illustrate your explanation with one specific example or anecdote drawn from your project's experience.

3) <u>The List of Implementation Tactics Viewed as a Strategy for Educational Change</u>

Each of the tactics taken alone can be viewed as relatively important or unimportant within the overall strategy for implementing an educational program aimed at achieving the four basic outcomes. However, the implementation process cannot be fully understood by looking at one or two components of the system at a time. The list of tactics needs to be examined as an integrated strategy as well. We are interested in your views as a local documentor regarding the Teacher Corps Rules and Regulations considered as a strategy for program implementation. Here are the probing questions for this section of the essay:

- Do you think the tactics taken together constitute an adequate strategy for carrying out a program intended to achieve the Teacher Corps four basic outcomes? Please explain your answer.

- Are the major forces that influence the implementation process identified among the tactics in SRI's list? Explain your answer.

- Are there implementation tactics that should be added to the list to make it a more adequate strategy? Please list any you think apply.

- Are there provisions specified in the Rules and Regulations that do not really operate as implementation tactics, or that are obstacles to implementation? Should these be dropped from the list of implementation tactics? List any that apply.

160

174

SUMMARY WORKSHEET ON THE ESSAY ON

THE RELATIVE IMPORTANCE OF IMPLEMENTATION TACTICS

Some of the provisions of the Teacher Corps Rules and Regulations are probably more important than others. Considering the experiences of your project so far, how important is each of the tactics in the list below in accomplishing your projects goals? Please complete this question AFTER you have written your essay. Indicate your answer by placing the number "1" in front of the several tactics that you think are most important; place the number "2" in front of the tactics that you think have moderate importance; place the number "3" in front of the tactics that you think have little or no importance. Please rank each tactic with a single number: 1, 2, or 3.

These are the major "implementation tactics" SRI has identified from the Teacher Corps Rules and Regulations for Program '78 and '79:

_____ Program focus on schools serving low-income families. (172.60)

_____ A five-year funding cycle for projects. (172.30)

_____ An initial developmental year with emphasis on project development, organization, and planning. (172.40)

_____ Grantees may not apply for a new project until three years after the end of their five-year cycle. (172.33)

_____ Specific objectives be designed to achieve the improved school climate outcome. (172.62)

_____ Specific objectives be designed to achieve the outcome for an improved educational development system. (172.63)

_____ Specific objectives be designed to achieve the institution-alization outcome. (172.64)

_____ Specific objectives be designed to achieve the demonstration and dissemination outcome. (172.65) .

_____ Field-based and community-based training. (172.50)

_____ Integrated preservice and inservice training. (172.63)

_____ Multicultural education. (172.62)

_____ Diagnostic/prescriptive teaching. (172.62)

_____ Collaborative mode of operation. (172.10)

_____ Joint participation of institutions of higher education, local education agencies, and community councils. (172.10)

_____ Teacher intern teams. (172.83)

_____ Elected community councils. (172.14)

_____ Representative policy boards. (172.15)

_____ Coordination with State Education Agencies. (172.17)

_____ Documentation of project experience. (172.52)

APPENDIX C

GUIDELINES FOR THE ESSAY ON
PROJECT CONTRIBUTIONS TO IMPROVED SCHOOL CLIMATES

One of the four basic outcomes intended for the Teacher Corps program is to improve "school climate," as stated in the Rules and Regulations:

> "...Each project must be designed to achieve the following outcomes:
>
> (a) an improved school climate which fosters the learning of children of low-income families..." (172.60)

By now, your project has had time to begin to see evidence of its impaction the school climates within participating feeder schools. The basic guiding question to be answered by this essay is this: In what ways has your project contributed to the improvement of school climate in the project schools? In your 4- to 6-page essay response, please address each of the following four aspects of the basic question.

Section 1: Definition of "Improved School Climate" and Differences Among Schools Within the Feeder System

At present, no single widely accepted definition of improved school climates exists; therefore, we are interested in knowing how your project has chosen to define the concept of "improved school climate." Put another way, to what aspects of school operations has your project been paying the most attention? Considering the fact that your project includes schools at different educational levels, are there important differences between them in terms of the perceived school climate and how conducive each school is to the learning of students from low-income families?

163

Section 2: <u>Teacher Corps Program Components with Greatest Impact</u>
<u>on Improved School Climates to Date</u>

Keeping the full range of program activities in mind—from the be-
ginning of the project planning year to the present—describe the activi-
ties or program features that have, in your view, contributed most to
the improvement of school climate in the project schools. State in brief
the kinds of evidence or observations on which your impressions are based.
Have certain program features or activities appeared to have greater ef-
fect in certain schools than in others? How do you account for any dif-
ferences noted?

Section 3: <u>Other Conditions Affecting School Climates</u>

Teacher Corps project activities are of course only one of many in-
teracting influences on the climate for learning in each of the project
schools. Are there special local conditions in your LEA as a whole, or
in the individual project schools in particular, that you feel have an
important influence on school climate, either in support of project ef-
forts or acting as an obstacle to them? Are there important differences
in factors affecting each school's climate? Where these conditions stand
in the way of project success, what realistic expectations would you sug-
gest for Teacher Corps' ability to counteract their effects in the short
term and over the longer term?

Section 4: <u>Advice to Policymakers</u>

Each local documenter has had opportunities to observe and reflect
on the efforts of the project to contribute to improving school climates.
The lessons learned from these experiences are a potentially valuable
resource for planning federally funded education programs. Based on your
experiences so far, what suggestions would you make to a federal policy-
maker who asked about the implications of your project's efforts to
improve school climates for planning other federal education programs?
For example, in what areas of school climate are the impacts of an inter-
vention like Teacher Corps most likely to be felt? What conditions do you

consider essential to support a project's efforts to improve school climate? What conditions do you consider obstacles to improving school climates? What would you do the same if you had it to do over again because it worked so well? What would you avoid because it caused more problems than it solved?

165

GUIDELINES FOR THE ESSAY ON
DEVELOPING SUPPORT SYSTEMS FOR PROJECT PLANNING AND IMPLEMENTATION

Bringing a Teacher Corps project into being requires support from groups and agencies beyond the immediate participants. The local community may contain resources needed for the emerging training programs, and departments in the institute of higher education (IHE) and local education agency (LEA) not formally linked to Teacher Corps may possess important expertise. Regional, state, or other federal programs can be resources as well. A primary task of the developing Teacher Corps project is to enlist the support of relevant groups, with the aid of the LEA and IHE, state education agencies, or the federal government (including Teacher Corps/Washington).

The basic question for this essay is how your Teacher Corps project coordinates diverse resources and services to meet its legislative mandate. In this essay, please address the following two sections, each of which concerns a dimension of this topic. Probing questions have been added in each section; you need not answer each, but they have been posed to help in guiding your thinking. Your response to the first section should be 1 to 2 pages; your response to the second section should be 4 to 5 pages.

Section 1: What Have Been the Most Useful Sources of Support to Your Project So Far?

To answer this question, consider the following:

- What resources (information, specific expertise, liaison, materials, training, etc.) has the community (individuals, businesses, organizations) provided to your Teacher Corps project?

- What resources (information, specific expertise, liaison, materials, training, etc.) has the LEA made available to your project beyond those which are provided for in the basic grant?

167

- What resources (information, specific expertise, liaison, materials, training, etc.) has the IHE made available to your project beyond those which are provided for in the basic grant?

- Were Teacher Corps funded support services of particular use (e.g., CMTI, RCTRC, SSTA, Networks, and the like)? Which ones have been most critically missed since funding for these services stopped?

- To meet the project's needs, were special organizational or political arrangements necessary? If so, what were they?

- Are there resources not available to your project but that would significantly enhance its capabilities to accomplish its objectives?

Section 2: What is the Nature of Your Project's Relationship With Other Specially Funded Federal or State Programs Operating at Your Local Site?

This essay should be divided into three parts, as follows:

(1) Consider the other federal and state programs in operation at the <u>local education agency</u> (LEA) or at the <u>local project schools</u>.

(2) Consider the other federal and state programs in operation at the <u>institute of higher education</u> (IHE).

(3) Consider the other federal and state programs in operation <u>in the community</u>.

In each part, write about the nature of your project's relationship with these other programs. To answer each section, consider the following:

- Has your Teacher Corps project acted in some sense as an "umbrella," coordinating services or resources from diverse sources? If Teacher Corps has not acted as an umbrella, what type of relationship has it had with other programs?

- Does any problems with duplication of effort exist?; if so, how has the problem of duplication been solved? What kinds of special coordinating arrangements have emerged?

168

150

- Does your Teacher Corps project compete with other programs in any way for staff, clients, materials, or facilities?; if so, how has this competition been handled?

- Are there federal or state funded programs which if they were not present would seriously detract from your project's capabilities to accomplish its objectives? Describe the nature of this dependency.

- Are those programs also dependent upon Teacher Corps to accomplish their mission? What is the nature of that dependence?

Characteristics of Useful Essays

Last year, we found that certain characteristics in the essays we received made them especially useful for our evaluation. They are offered here only as suggestions, not prescriptions. Our intention is to allow each of you the flexibility, within our overall guidelines, to choose what to report and how to do it.

The characteristics that help make the information useful to the national evaluation include the following:

- Description in sufficient detail to help us understand the activity or event being described and the context in which it occurred. How much description is enough? Your first assumption probably should be that we really do not know very much about what is happening in your project (even though we may in fact know something through site visits, for example). If you keep in mind also that we want to be able to use excerpts from your essays to illustrate points in our reports to the Department of Education, you can see that we need enough description so that someone not familiar with your project can understand how and why the activity or event occurred and the consequences that followed. (We emphasize again that any excerpts drawn from your essays will be edited to remove any words that would allow your project or anyone in it to be identified.)

- Examples and illustrations from your own project experiences. The descriptive detail in your essays helps put flesh on the bones of general statements and provides the context for analyses and interpretation. If Teacher Corps/Washington and other federal agencies and legislative bodies are to understand what the Teacher Corps Program is, we have to be able to describe what is happening in the name of the program across all sites. The diversity is great and we think it is important to capture that diversity. Let us know what you are doing by giving examples from your project operations.

- Interpretation and analysis of consequences, relationships among factors, lessons learned, etc., that are based on your experiences. This characteristic is perhaps the most important to us, but good analysis and interpretation are not likely to appear in an essay that does not also include good description and illustration. Interpretations based on project experiences will express unusual, interesting, and important relationships among factors. Your essays will help us to explain patterns that emerge as we analyze data from other sources, such as self-report questionnaires.

When we look at your analyses and interpretations, we keep in mind the drawbacks in the use of essay data that were mentioned earlier. For example, in most cases we are unable to corroborate or validate your statements and must take them at face value. Cross-site aggregation of qualitative data from multiple sites does present pitfalls for an analyst. However, our guidelines for essay topics provide a framework within which we can search for general patterns and within which we can categorize the information drawn from your essays.

- Implications and suggestions for policymakers that can be drawn from the description of the activity or event and its consequences. This is in a sense the bottom line of the evaluation. If the results of the evaluation are to help shape the design of future federal intervention programs, as well as of Teacher Corps operations, we have to be able to draw implications for federal policy from the description of how the Teacher Corps Rules and Regulations have been translated into implementation processes and the impacts these processes have produced. Your suggestions, from the perspective of someone on the "firing line," will help us in this important task.

- Generalizations or overall statements about Teacher Corps policy and program operations. This point may seem to conflict with our request for examples and illustrations. However, we know there will be instances where this type of information will provide us with insight helpful in understanding the Teacher Corps implementation processes in general and in developing recommendations useful to policymakers. You can judge when this kind of writing is appropriate.

These are some of the characteristics of essays that we consider important. In addition, of course, we enjoy especially those essays that are clearly and concisely written in a lively style, whether the style be formal or informal. The choice of style should be your own--what you feel comfortable with. We have given you general suggestions on length of essays-- always brief (4 to 6 pages) so as to keep down the paperwork requirement-- but we recognize that length will be determined at least in part by the topic on which you are writing and your own writing style. Here again, you choose the appropriate length.

We feel we should also mention characteristics of essays that we did not find as useful. We do emphasize, however, that in only very rare cases could we not derive some information or indication of relationships from essays submitted. Even a brief outline type of statement tells us something about project operations, although this is far less helpful than a statement that includes detailed description and interpretation.

Some of the style characteristics we would prefer that you avoid are
(1) repeating information that is readily available from another source,
such as your original grant or continuation proposal; (2) giving generaliza-
tions if they are not supported by specifics; (3) giving a personal opinion
that is unlikely to be shared by anyone else in the project; and (4) using
program rhetoric and jargon. We realize that there will be situations in
which an unsupported generalization, a personal opinion, or a repeat of in-
formation will be appropriate, and you should include them in your essay if
you really think they are important. We would like you to identify personal
opinion as such, however.