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ABSTRACT

This report provides testimony on results of a General Accounting Office (GAO) study of Chapter 1 Compensatory Education programs, Chapter 2 Education Block Grant programs, and dropout prevention programs. The report covers the following: (1) Chapter 1 student selection; (2) Chapter 1 fiscal provisions; (3) Chapter 2 data collection and administration costs; and (4) local dropout prevention and reentry programs. The report also includes charts showing the following: (1) comparison of compatibility requirements under Title 1 and Chapter 1; (2) requirements for assuring comparability for responding states; (3) documentation used to show comparability in 44 states requiring recordkeeping; (4) characteristics of dropout program participants; (5) percentage of dropout youth having social, psychological, or academic problems; (6) factors reported by program administrators as having influenced program effectiveness; (7) services provided to dropout program participants; and (8) characteristics of selected dropout programs. (PS)

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EDUCATION'S CHAPTER 1 AND 2
PROGRAMS AND LOCAL DROPOUT
PREVENTION AND REENTRY PROGRAMS

Statement of
William J. Gainer, Associate Director
Human Resources Division

Before the
Subcommittee on Elementary, Secondary,
and Vocational Education
Committee on Education and Labor
House of Representatives



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**SUMMARY OF GAO TESTIMONY BY WILLIAM J. GAINER ON
ELEMENTARY AND SECONDARY EDUCATION**

GAO testimony covered recent work on the Chapter 1 Compensatory Education program, the Chapter 2 Education Block Grant program, and an analysis of nearly 500 local dropout prevention programs.

Chapter 1 Student Selection. A review of student selection decisions for 8,200 children in 58 schools and 17 school districts revealed few selection errors for participants in Chapter 1 reading programs. As permitted by law, districts develop their own selection criteria for educationally disadvantaged students and these criteria vary significantly. Most districts use nationally normed tests but cut-off scores for eligibility vary from the 20th to the 50th percentile. Other districts rely more on teachers' professional judgments. As a result, in one district only students who scored below the 20th percentile were served, while in another district students who scored at or well above the 50th percentile received help. This variation means that some of the nation's needier children are not being served.

Chapter 1 Fiscal Provisions. GAO found that 44 states continue to require school districts to maintain the same type of documentation to demonstrate comparability of services between Chapter 1 and non-Chapter 1 schools as required under Title I. However, in measuring comparability 30 states currently permit their school districts to exceed a 5 percent variance, which was the maximum allowed under Title I, and monitoring of compliance at the state level is generally limited and infrequent.

Chapter 2 Data Collection and Administrative Costs. The Education Block Grant is the only block grant which does not require submission of state program reports. Thus, timely and comprehensive information on how states use federal funds is not available. If statutory changes were made, the Department of Education could work with organizations representing state grantees to identify data needs. The lack of national reporting standards and the difficulty of defining administrative costs also make it difficult to analyze or control the use of funds for program administration. In an earlier report GAO developed options for tracking and controlling administrative costs.

Local Dropout Programs. The majority of those being served are minority youth from low socio-economic status households. Three quarters are potential dropouts and the remainder have already dropped out. Local dropout program officials identified factors they perceive as critical to effective programs. These factors were (1) caring and committed staff, (2) secure classroom environments, (3) personalized instruction, (4) flexible curricula and school hours and, (5) links to social service agencies and the employer community. This strong consensus among practitioners is buttressed by the literature on helping "at risk" youth, thus providing a much clearer picture of how dropout programs should be structured.

Mr. Chairman and members of the Subcommittee:

I am pleased to be here today to discuss GAO work¹ related to the reauthorization of the elementary and secondary education programs. As you know, much of this work was requested by this Subcommittee.

My testimony will briefly summarize the most important findings from our work on:

- Chapter 1 compensatory education student selection process and program fiscal provisions.
- Chapter 2 education block grant data collection activities and administrative costs.
- Local dropout programs including preliminary results of our analysis of nearly 500 local dropout programs.

I have attached some materials to my written statement which elaborate on these topics where we thought it would be helpful, and ask that these be included in the record. At the conclusion of my testimony, a panel of GAO staff and I will answer any questions the Subcommittee may have.

CHAPTER 1 STUDENT SELECTION CRITERIA

According to Chapter 1 of the Education Consolidation and Improvement Act, a school district must (1) identify schools with the greatest concentration of poor children, (2) identify educationally needy students in these schools, and (3) ultimately select the neediest students to receive services. Since no specific federal criteria exist, we used state or local selection criteria employed by the 17 school districts in the 8 states we visited to determine compliance with legislative selection principles. Our data indicate that, for the most part, school officials followed their established guidelines.

Our review did not consider the question of whether Chapter 1 eligibility should be tightened. However, it is important to note that the administration recently proposed that more Chapter 1 resources be directed to school districts with the highest concentrations of poor children, that funds be targeted within a school district to the poorest one-third of a district's school

¹Education Block Grant: How Funds Reserved for State Efforts in California and Washington Are Used, GAO/HRD-86-94, May 13, 1986; School Dropouts: The Extent and Nature of the Problem, GAO/HRD-86-106BR, June 23, 1986; Compensatory Education; Chapter 1-Participants Generally Meet Selection Criteria, GAO/HRD-87-26, January 30, 1987; and Block Grants: Federal Data Collection Provisions, GAO/HRD-87-59FS, February 24, 1987.

attendance areas and that those children in greatest need of remedial services be selected at the school level.

Selecting schools

We found the first step in the student selection process--selecting schools with the highest concentrations of low-income children--was done properly in each district we visited. According to questionnaire responses from 51 state agencies, the criteria for this step was furnished most often (39 states) by the state agency, and the most commonly specified criterion was the number of children receiving a free or reduced price lunch and/or from households receiving Aid to Families with Dependent Children.

Student Selection

As permitted by current law, districts used a wide variety of methods to first identify educationally deprived students in each school and then to decide which of these students had the greatest need for assistance. However, nearly all districts used standardized test scores in some way to select students. Eleven of the 17 districts we visited used standardized reading and mathematics test scores almost exclusively to select students. Cutoff test scores used to identify those eligible ranged from those scoring below the 20th percentile to the 50th percentile. Then to select the neediest children, students were ranked by test score and those with the lowest scores were selected. The remaining six districts used multiple selection criteria--test scores in combination with other factors such as teacher recommendations or classroom performance--to select the neediest children. Most used the same selection procedures they did under the prior Title I program.

The 11 school districts that relied entirely on student test scores nearly always followed their own criteria. Of the combined total of 2,156 students participating, selecting officials were unable to give a satisfactory reason for program participation for only 3 percent of the students. Similarly, the six school districts in our sample that used multiple criteria to pick a total of 604 students for Chapter 1 participation had a very low error rate for those they selected (1 percent) and those they excluded (less than 1 percent).

Variations In Who Was Served

Because of the variations in selection criteria, we also found differences among districts in the severity of need among those served. For example, in Hattiesburg, Mississippi, which used a 50th percentile cutoff, students in Chapter 1 reading had scores from well below the 20th percentile up to the 50th

percentile. In contrast, only one participant in Lansing, Michigan, which cut off participation at the 20th percentile, scored above that level.

Similar differences in students served occurred between districts using test scores only and those with more judgmental selection methods using multiple criteria. For example, Georgia's Bibb County, a multiple-criteria district, defined educationally deprived children as those who were either one or more books behind in the fourth grade reading series or who scored below the 50th percentile. Students behind in the reading series were given preference to those scoring below the cutoff. Thus the Bibb County schools in our sample served one-third of the students with percentile scores from 0 to 50 and one-fifth of the students above the 50th percentile.

CHAPTER 1 FISCAL PROVISIONS

Chapter 1 fiscal provisions are intended to ensure that children receiving federal assistance do not receive less in the way of state and local funded services than they would receive if there were no Chapter 1 program. We looked at two of these fiscal provisions--"comparability of services" and "supplement, not supplant state and local funds". (See Exhibits I and II.)

Comparability of Services

As you know, the 1981 Chapter 1 legislation sought to reduce federal control inherent in Title I and increase state and local flexibility. Under Title I, school districts could not discriminate against or among Title I funded schools in the provision of state and local resources. State and local spending per pupil had to be roughly "comparable" among all district schools. Chapter 1 (and its implementing regulations) modified the comparability provision and eliminated specific annual reporting requirements. The variance allowed between spending on Chapter 1 and non-Chapter 1 schools, which had been 5 percent under Title I, was also relaxed.

Current law requires only that school districts file a written assurance with state education agencies that they have established policies to maintain equivalency of (1) teacher salaries, (2) number of teachers, administrators, and auxiliary personnel, and (3) school materials and instructional supplies. Federal regulations do, however, require school districts to keep records that facilitate an effective audit and demonstrate compliance with Chapter 1 requirements.

Most states have continued to require districts to maintain documentation to prove comparability but with no specific reporting requirement and infrequent monitoring we cannot be sure that comparability is being maintained. At least 30 states have also relaxed the variance requirement and allow up to a 10 percent variance. To elaborate, although the requirement for

school districts to report annually to states on comparability was dropped, 44 of the 49 states, including the District of Columbia, which responded to our questionnaire continue to require school districts to collect and maintain the same comparability data required under Title I. Of the 44 states that have continued to require districts to maintain specific documentation to demonstrate comparability, 30 have taken advantage of the relaxation in the noncompliance threshold used for measuring comparability. That is, the majority of states have increased from 5 to 10 percent the variance allowed between Chapter 1 and non-Chapter 1 schools in terms of their student-staff ratios, salary expenditures per student, or other measures. Also, most states still requiring recordkeeping, do not make school districts demonstrate that comparability is being maintained during the second half of the school year, as required under Title I.

Although the Department of Education has remained firm in its enforcement of the comparability provision, the states we visited generally did not monitor districts more than every few years. Moreover, at several of the school districts we visited we were told that state monitors check only for the existence of local policies which contain the assurances--they do not test for the implementation of such policies.

Supplement, Not Supplant

Chapter 1 legislation also modified the manner by which school districts could comply with the supplement, not supplant provision. Under Title I, school districts had to use federal compensatory education funds to supplement, that is, to increase the level of funds that would, in the absence of federal funds, be made available from state and local sources for participating Chapter 1 children. Chapter I modified this requirement by adding an "exclusion" provision under which supplement not supplant no longer applied to state and local compensatory education programs if such programs were "consistent" with the purposes of Chapter 1. As a result, Chapter 1 funds may displace state and local compensatory education funds without violating statutory requirements.

Eighteen states have their own state compensatory education programs in addition to Chapter 1. These are the states that may take advantage of the change in the supplement, not supplant provision. Seven of these states told us that their school districts were not using the exclusion provision, and thus, were continuing to distribute state compensatory education funds to schools as they did under Title I.

Although officials in the 11 other states said that their school districts use the exclusion provision, they were unable to identify the number of school districts using the provision. As a result, we were unable to get an overall sense of how extensively the exclusion provision was being used. We did,

however, visit 6 school districts with state compensatory education programs in 3 of these states. In 3 of the 6 districts we found that the method of distributing state compensatory education funds had not changed, and, in fact, the districts were distributing state funds to all Chapter 1 schools. In the other 3 school districts, state compensatory education funds were distributed to some or most of the Chapter 1 schools.

CHAPTER 2 DATA COLLECTION ACTIVITIES AND ADMINISTRATIVE COSTS

A recurring problem with this block grant program is obtaining a national perspective on how these funds are used, without unduly burdening the states with reporting requirements. While the Department of Education must report annually to the Congress on the use of Chapter 2 block grant funds, the legislation does not provide the means to collect needed information. In fact, the education block grant is the only block grant that does not require state program reports--a primary mechanism to collect information. In an attempt to provide a national picture of block grant activities, the Department contracts for special studies and analyzes voluntarily submitted state evaluation reports. This approach clearly minimizes the cost and burden to states, but, on the other hand, it does not provide data that are timely or comprehensive.

We believe national reporting standards can be an important tool for overseeing block grant activities. For several other block grants, federal agencies obtain national data with less regulatory burden by working with national organizations representing state grantees to identify what data should be collected and to develop standardized forms. This approach could also be useful for the education block grant, but statutory changes giving the Secretary of Education and the states greater authority to collect information would likely be more effective.

As we pointed out in our May 1986 report to you, the lack of standard definitions for administrative costs also affects the ability to analyze the extent to which states use their share of Chapter 2 block grant funds to subsidize their administrative costs. We noted that the development of standard definitions and mandatory reporting requirements could provide a more uniform national picture of the use of block grant funds for administration, but that imposing such requirements could also be controversial and would increase state administrative burden. Our report set forth four possible options to keep better track of funds used for administrative costs and potentially restrict states' use of funds for that purpose.

LOCAL DROPOUT PREVENTION AND REENTRY PROGRAMS

Finally, I would like to provide the subcommittee with information we have developed during our ongoing analysis of data from 465 local dropout programs. Questionnaires were sent

to officials of more than 1,000 dropout programs identified for us by various education, employment, and training related organizations. These local programs, which were in operation in 1985-86 and are still operating today, cannot necessarily be regarded as representative of all local dropout activities, but we believe that they reflect the principal patterns being followed in local programs, and the perceptions of experienced program staff who responded to our questionnaire.

Who is served and why?

Based on our questionnaire data, we estimate that roughly three-quarters of the youth in these programs were potential dropouts and one-quarter had been dropouts at some time. Problem characteristics which many of these youth share are being behind in grade level, and exhibiting chronic truancy and disruptive or withdrawn behavior. Demographically, about three-quarters of the youth served were from low socio-economic status families. Slightly over half of the youth were male, from minority groups, and age 16 or younger. About two-thirds were from urban areas, 20 percent were from suburbs, and 14 percent were from rural areas. These characteristics are consistent with those described in our earlier report as those predictive of dropping out.

The primary objectives of these programs were reported as improving youths' academic performance and attitudes. Many programs also pursue specialized objectives important for some youth: job training and placement, return to school for those who have dropped out, and pregnancy and parent support services. Most programs obtained special funding (beyond regular school districts operating funds) from federal, state, or local governments as well as corporations and foundations. Over 40 percent of these programs rely to some extent on funds from federal sources, such as the Job Training Partnership Act.

Nature of interventions

The interventions customarily involved a range of efforts rather than a single service. Basic education and personal counseling were reported by about 90 percent of the programs. Also frequently cited were career counseling (71 percent), efforts to promote parental involvement (73 percent), assistance in obtaining social services (66 percent), job skill training (60 percent), and job search assistance (65 percent). In addition, about half of the programs reported offering pregnancy/parental counseling, and about one-fifth cited child care services.

Program operators we surveyed overwhelmingly regarded their programs as having positive results. And the factors they highlighted as most critical to program effectiveness were similar to those highlighted in literature on educating at risk youth. In their judgment, these factors were a caring and committed staff, a nonthreatening classroom environment, individualized instruction, low student-teacher ratio, and

flexibility in curriculum and school hours. Important, too, were links with social service agencies and with employers, and the involvement of parents in students' progress. This seeming consensus of practitioners, which coincides with findings in the literature may be the most important finding in our recent work on dropouts.

Barriers to success

In our survey, we asked program operators to identify the most significant barriers to further program success and methods for overcoming such barriers. Among the problems the respondents noted are difficulties outside the school environment, such as a troubled home. Parents are sometimes apathetic, have severe problems themselves, or are unable to change youths' attitudes. Several program officials were concerned that although youth respond well to special assistance, once they return to their regular school program they may again encounter difficulty.

Budgetary constraints were frequently cited as a barrier to effectiveness. Some officials stated simply that the needs of the at-risk youth population exceed what available resources can meet. Others pointed to particular needs such as day care, smaller classes, and computers and instructional software. Some respondents expressed concern that job training and jobs for those in school interfered with youths' education. But more often, program administrators saw a need for more vocational education and work experience.

In their comments on effective methods for overcoming these barriers some respondents reiterated the importance of personalized attention and caring. Others cited specific services as important, such as readily accessible health clinics, and the availability of child care arrangements without which some teenage mothers are forced to drop out. Of particular note given the current debate on welfare reform is some respondents' sense that there is a need to intervene at younger ages--that is, before the teenage years.

In my judgment our work indicates that currently proposed dropout legislation (HR. 738) is timely and relevant to the dropout problem in its focus on addressing the special needs of high risk populations, its inclusion of coordinated activities between secondary and primary schools and with the Job Training Partnership Act and other education and training programs and in its encouragement of the use of community resources and parents to help develop and implement solutions. The provision in HR. 738 for evaluating effectiveness is particularly useful to the bill's central aim of establishing and demonstrating effective local dropout programs.

Mr. Chairman, this concludes my prepared statement. We would be pleased to respond to any questions.

FISCAL PROVISIONS OF CHAPTER 1

The September 1985 Report on Changes Under Chapter 1 of the Education Consolidation and Improvement Act¹ discussed the states' implementation of the current federally funded compensatory education program. As the report pointed out, the Chapter 1 program was intended to address the special needs of a particular population of students. However, the Congress realized that this intent would not be met if school districts spent Chapter 1 funds on other groups of children, used the money for general tax relief, or failed to provide educationally deprived children with their fair share of state and local services.

The 1981 Chapter 1 legislation sought to reduce federal control inherent in Title I and increase state and local flexibility. Accordingly, Chapter 1 and its implementing regulations modified the comparability provision by eliminating special local reporting requirements for demonstrating that Chapter 1 and non-Chapter 1 schools had comparable services. As shown in Exhibit II-1, current law requires only that local school districts meet the comparability requirements by filing with the state education agency a written assurance that it has established (1) a districtwide salary schedule, (2) a policy to ensure equivalence among schools in teachers, administrators, and auxiliary personnel, and (3) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. Federal regulations do, however, require school districts to keep records that facilitate an effective audit and show compliance with Chapter 1 requirements.

Chapter 1 also modified Title I so that school districts may exclude, for the purpose of determining compliance with the supplement, not supplant requirement, state and local compensatory education funds if those programs are consistent with the purposes of Chapter 1. This exclusion provision (Section 558(d) of Chapter 1) represented a major change in the previous supplement, not supplant requirement under Title I. That is, under Chapter 1, states and local school districts are no longer required to provide children participating in a Chapter 1 program with an equitable share of state and local compensatory education funds. Chapter 1 funds may be withheld from school districts not in compliance with Chapter 1 provisions.

¹Prepared by a congressional staff member for the Subcommittee on Elementary, Secondary, and Vocational Education, House Committee on Education and Labor.

At the request of the Chairman and Ranking Members of the House Subcommittee on Elementary, Secondary, and Vocational Education, GAO reviewed the states' implementation of the comparability and supplement, not supplant provisions of Chapter 1 legislation. Specifically, GAO's objectives were to determine the extent to which local school districts

- can support the written assurances they make to state education agencies that services provided in Chapter 1 schools are comparable to services being provided in non-Chapter 1 schools, and
- use the exclusion provision in determining compliance with the supplement, not supplant requirement and its effect on the distribution of state compensatory education funds to Chapter 1 eligible schools.

GAO requested documentation from the 50 states and the District of Columbia to ascertain (1) their policies to assure comparability of services in local school districts and (2) the extent to which school districts are excluding state compensatory education funds for purposes of determining compliance with the supplement, not supplant provision. As of February 26, 1987, 48 states and the District of Columbia had responded to our request for information. When necessary, GAO supplemented its review of this documentation with telephone interviews with state officials. GAO also obtained additional information at 4 state education agencies and 9 school districts. GAO visited California, New York, Pennsylvania, and Texas--states that either (1) significantly reduced their recordkeeping requirements under Chapter 1's comparability provision or (2) reported to GAO that their local school districts were using the exclusion provision. Pertinent information was obtained from Chapter 1 program officials at the Department of Education (ED).

COMPARABILITY

Although Chapter 1 provisions no longer require school districts to determine and annually report on comparability to their states, GAO found most states are continuing to require school districts, at a minimum, to collect and maintain the same type of documentation demonstrating comparability that was required under Title I. For example, as shown in Exhibit II-2, 21 state agencies require local school districts to compare

Chapter 1 and non-Chapter 1 schools in terms of the student-staff ratio; 16 states require school districts to use student-staff and salary expenditures per student ratios; 4 states permit the use of either the student-staff or salary expenditures per student ratio; and 3 states require school districts to use other quantifiable data to demonstrate comparability. The remaining 5 states require their school districts to implement the policies contained in their assurances, but make no specific recordkeeping requirements.

Of the 44 states that have continued to require school districts to maintain specific documentation to demonstrate comparability, 30 have taken advantage of the relaxation in the noncompliance threshold used for measuring comparability. That is, most states' Chapter 1 requirements now exceed the 5 percent variance allowed under Title I between project and nonproject schools in terms of their student-staff ratios, salary expenditures per student ratios, or other measures. Also, most states still requiring specific recordkeeping do not require school districts to demonstrate that comparability is being maintained at a later point in the school year, as required under Title I.

GAO visited 7 school districts in 3 of the 5 states that reported no specific recordkeeping requirements. One school district has continued to complete the comparability calculations required under Title I. In the other 6 districts, GAO was able to demonstrate comparability within a 10 percent variance using the student-teacher ratio. However, student enrollment reports and necessary staffing information were not always readily available and required various adjustments. Also, GAO was not able to calculate the salary expenditures per student ratio because the necessary salary information was frequently not broken out by school and/or did not exclude that portion of salary costs brought about by years of service.

GAO also visited 2 school districts in one state that continues to require districts to complete comparability reports. In these districts, GAO observed that the comparability reports were not completed in a timely manner. That is, as of February 1987, comparability for school year 1986-87 had not yet been determined.

Three of the 4 states GAO visited monitor each of their school districts for compliance with comparability and other Chapter 1 requirements once every 3 years, and the other state monitors each of its districts once every 5 years. At 5 of the 9 local school districts visited, officials told GAO that state monitors check only for the existence of local policies contained in the assurances, and do not test for the implementation of these policies.

ED routinely monitors each state for compliance with Chapter 1 requirements every other year. During its state visits, ED program officials visit the state education agency and usually 2 school districts in each state. In school years 1984-85 and 1985-86, ED found irregularities in compliance with comparability requirements in 7 and 3 states, respectively. Specifically, in 1985-86, ED found an absence of specific criteria for demonstrating comparability at 3 school districts. In each case, ED requested the state education agency to ensure that comparability standards are established or maintained in the local districts.

EXCLUSION OF STATE COMPENSATORY
EDUCATION FUNDS IN DETERMINING
COMPLIANCE WITH SUPPLEMENT, NOT
SUPPLANT PROVISION

Under Title I, school districts had to use federal compensatory education funds to supplement, that is, to increase the level of funds that would, in the absence of federal funds, be made available from state and local sources for participating Chapter 1 children. The funds could not be used to supplant state and local funds. Chapter 1 modified Title I so that, in determining compliance with the supplement, not supplant requirement, a school district could exclude state and local compensatory education funds, if such compensatory education programs were "consistent" with the purposes of Chapter 1. As a result, school districts are no longer required to provide Chapter 1 eligible schools with an equitable share of state compensatory education funds.

Officials in 7 of the 18 states² that have state compensatory education programs told GAO that their school districts were not using the exclusion provision, and thus, were continuing to distribute state compensatory funds to schools in the manner used under Title I. Although officials in the 11 remaining states with state compensatory education funds said that their school districts use the exclusion provision, they were unable to identify the number of school districts using the provision. As a result, GAO was unable to determine the overall effect on the distribution of state funds to Chapter 1 eligible schools in these states.

²As identified in a May 3, 1985, report prepared for ED by the Decision Resources Corporation.

GAO visited 6 school districts with state compensatory education programs in 3 states that reported using the exclusion provision. However, 3 of the 6 school districts had not changed the method of distributing state compensatory education funds, and, in fact, distributed state compensatory education funds to all Chapter 1 schools. The other 3 school districts distributed state compensatory education funds to some or most of the Chapter 1 schools.

COMPARISON OF COMPARABILITY REQUIREMENT UNDER TITLE I AND CHAPTER 1

	TITLE I	CHAPTER 1
COMPARABILITY REQUIREMENT	State and locally funded services in Title I areas to be at least comparable to services in non-Title I areas.	Same requirement
ASSURING COMPARABILITY	School districts assured comparability through a set of specified calculations reported to state (see below)	School districts deemed to meet comparability by giving the state assurances that they have: <ul style="list-style-type: none"> ● District wide salary schedule ● Policy ensuring equivalence among schools in personnel ● Policy ensuring equivalence among schools in curriculum materials and instructional supplies
DETERMINING COMPARABILITY	School districts had to show that the ratios of pupils per instructional staff and salary expenditures per pupil at each Title I school were at least 95 percent of the average for non-Title I schools	Regulations do not specify how to determine comparability. ED's guidance suggests that school districts use Title I standards but indicates that states may develop their own standards
MAINTAINING COMPARABILITY	Districts had to recalculate comparability during the school year	Unpredictable changes in student enrollment or personnel assignments shall not be included as a factor in determining comparability
DOCUMENTING COMPARABILITY	Districts sent the state an annual report and maintained records from which comparability calculations were based	No reporting requirement. Other than a general recordkeeping requirement, no specific recordkeeping for comparability
EXCLUDING CERTAIN FUNDS FROM COMPARABILITY	Exclusion of certain state and local funds from comparability: <ul style="list-style-type: none"> ● Bilingual education ● Special education ● Certain state phase-in programs ● Certain compensatory ed. programs 	Similar exclusion provision

REQUIREMENTS FOR ASSURING COMPARABILITY FOR RESPONDING STATES

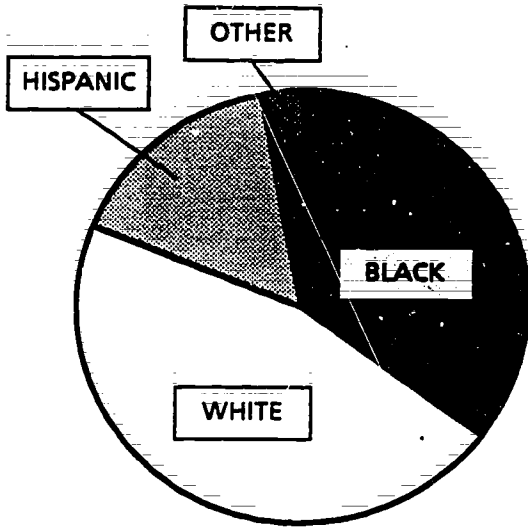
REQUIREMENTS	REQUIRED	NOT REQUIRED
File written assurances with state agency	45	4
Maintain records demonstrating comparability	44	5
Submit to state agency an annual report demonstrating comparability	13	36

DOCUMENTATION USED TO SHOW COMPARABILITY IN 44 STATES THAT REQUIRE RECORDKEEPING

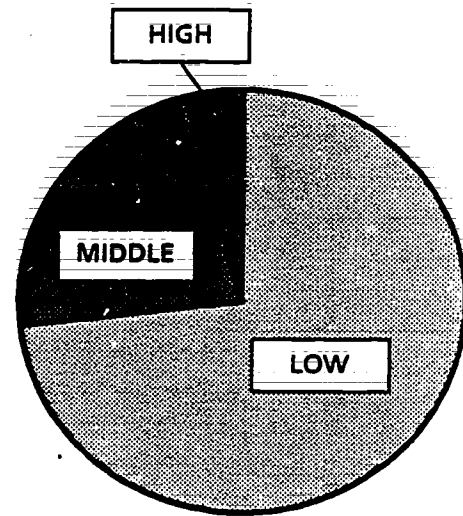
ELEMENTS OF COMPARABILITY	NUMBER OF STATES
RATIOS USED TO DETERMINE COMPARABILITY	
Pupil to instructional staff only	21
Salary expenditures to pupil only	0
Both ratios	16
Either ratio	4
Other/optional ratios	3
VARIANCE PERMITTED TO SHOW EQUIVALENCE	
Five percent variance	14
Ten percent variance	30
SECOND CALCULATION OF COMPARABILITY	
Required	12
Not required	32

CHARACTERISTICS OF DROPOUT PROGRAM PARTICIPANTS

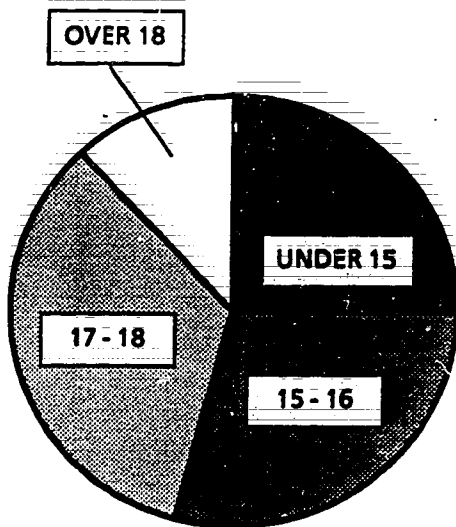
RACE / ETHNIC ORIGIN



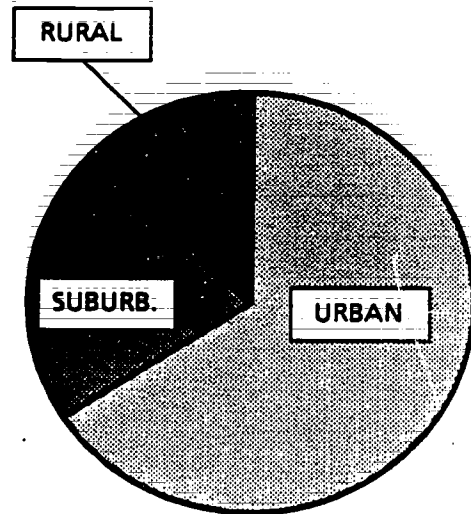
SOCIO-ECONOMIC STATUS



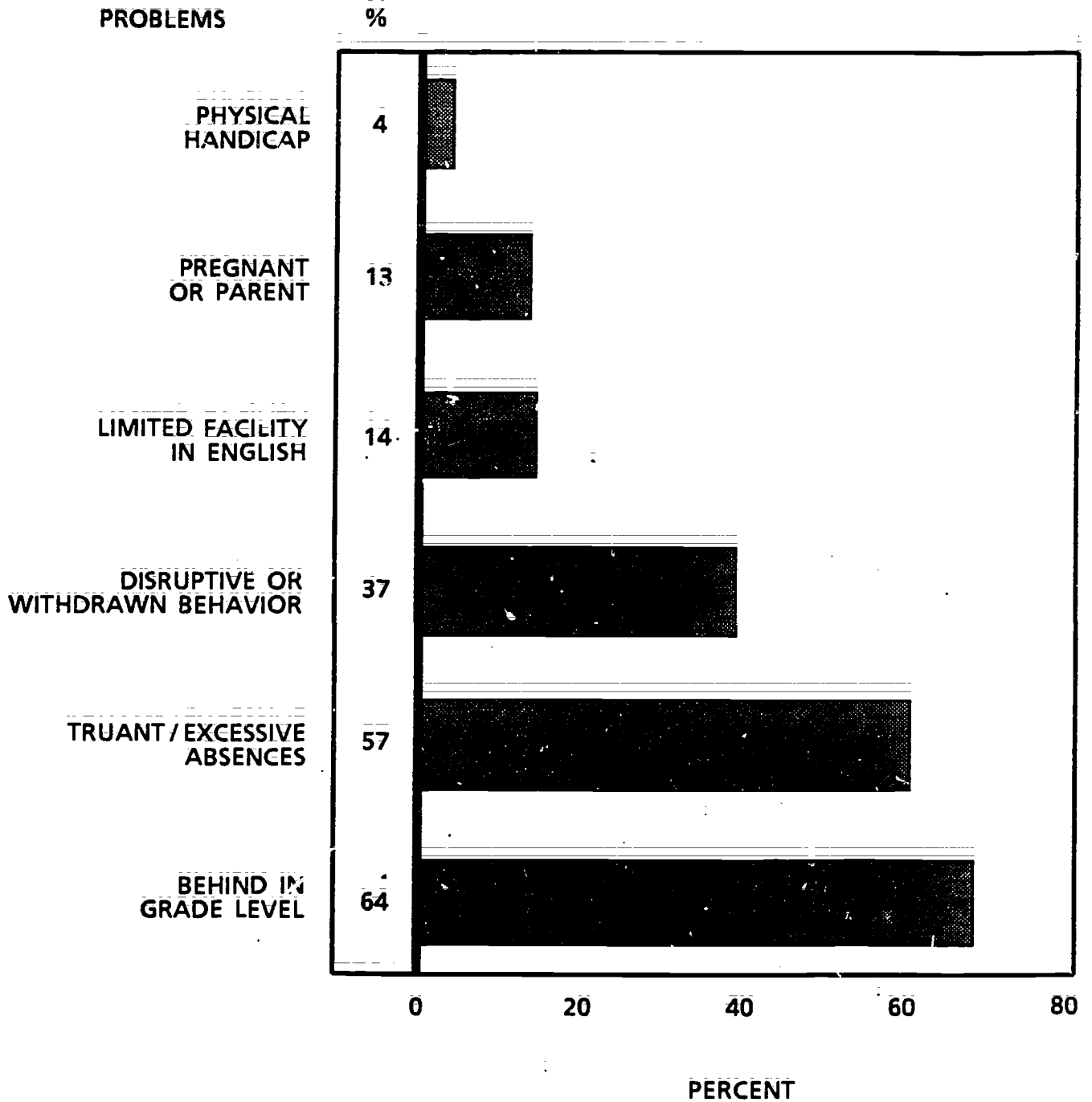
YEARS OF AGE



LOCATION



PERCENTAGE OF DROPOUT YOUTH HAVING PROBLEMS



**FACTORS REPORTED BY PROGRAM ADMINISTRATORS
THAT HAD A GREAT OR VERY GREAT INFLUENCE
ON PROGRAM EFFECTIVENESS**

FACTORS	NUMBER	PERCENT
Caring and Committed Staff	436	94
Non-threatening Environment for Learning	411	88
Low Student-Teacher Ratio	372	80
Individualized Instruction	357	77
Program Flexibility (e.g., curriculum, program hours)	330	71
Links with Social Service Agencies	152	33
Involvement of Parents in Students' Development	140	30
Links with Employers	118	25

**PROGRAM MANAGERS REPORTING PRIMARY
OBJECTIVES OF THEIR DROPOUT PROGRAMS**

PRIMARY OBJECTIVE	NUMBER	PERCENT
Attitudinal Change	357	78
Improve Academic Performance	355	77
Reduce Absenteeism	310	67
Placement Back in School	150	33
Job Training / Placement	120	26
Pre-natal Care / Parenting Support Services	56	12

SERVICES PROVIDED TO DROPOUT PROGRAM PARTICIPANTS

SERVICES	PROGRAMS THAT PROVIDED SERVICES		PERCENT SERVED
	NUMBER	PERCENT	
Personal Counseling	434	94	73
Basic Education	412	90	77
Career Counseling	339	74	70
Parental Involvement	338	73	58
Assistance in Obtaining Social Services	305	66	45
Job Search Assistance	301	65	47
Job Skills Training	278	60	54
Part-Time Employment Placement	248	54	34
Pregnancy / Parental Counseling	236	51	29
GED Preparation	197	43	23
Day Care	95	21	15
English As a Second Language	64	14	12

SELECTED DROPOUT PROGRAMS

TITLE	Middle College High School
LOCATION	Long Island City, New York
THRUST	Alternative high school for potential dropouts
UNIQUE ASPECTS	<ul style="list-style-type: none">● Youth enroll directly after Junior High School● School located on Community College campus● Small classes with self-paced instruction● Intensive group counseling● Some Community College courses available● Community College facilities available
SERVICES	<ul style="list-style-type: none">● High School curriculum● Counseling● Internships
TARGET	Primarily youth age 16 with absentee rates greater than 20 percent in the ninth grade.
COST	<ul style="list-style-type: none">● About \$5,400 per student● Same cost as regular NYC school of similar size

TITLE	North Education Center
LOCATION	Columbus, Ohio
THRUST	Alternative high school for potential dropouts and dropouts
UNIQUE ASPECTS	<ul style="list-style-type: none">● Youth and adults in same classes● School hours 8 AM to 9:30 PM● 1.5 - 2 hours per class● 5 terms per year● No "frills" (e.g., no extracurricular activities)● Attendance outreach (e.g., wake-up calls)
SERVICES	<ul style="list-style-type: none">● High School curriculum● Counseling
TARGET	Youth at risk of dropping out and dropouts
COST	About \$1,600 per student

SELECTED DROPOUT PROGRAMS

TITLE	Teenage Pregnancy And Parenting Project (TAPP)
LOCATION	Mill Valley, California
THRUST	Comprehensive services for pregnant teens and teen parents
UNIQUE ASPECTS	<ul style="list-style-type: none"> ● Continuous teen / counselor relationship for up to 3 years ● Counselor conducts a broad range of services
SERVICES	<ul style="list-style-type: none"> ● Personal counseling ● Pregnancy / parental counseling ● Counselor identifies needed services ● Counselor assists in attaining services ● Counselor conducts followup
TARGET	Pregnant teenagers and teen parents
COST	\$1,200 per person for case management

TITLE	Project COFFEE (Cooperative Federation For Educational Experiences)
LOCATION	Oxford, Massachusetts
THRUST	Training program for potential dropouts and dropouts
UNIQUE ASPECTS	<ul style="list-style-type: none"> ● Regional, largely rural program ● "Hands-on" occupational training ● Training includes student operated businesses ● Strong school / industry partnership ● Individualized education linked to occupational training ● Flexible hours
SERVICES	<ul style="list-style-type: none"> ● Academic skills training ● Occupational training ● Counseling ● Pre-employment activities ● Physical education
TARGET	Youth at risk of dropping out and dropouts
COST	About \$3,500 per student

SELECTED DROPOUT PROGRAMS

TITLE	Attendance Improvement Dropout Prevention Program (AIDP) Dropout Prevention Program (DPP)
LOCATION	New York City
THRUST	Programs for potential dropouts aimed at improving school attendance, in order to reduce dropout rates
UNIQUE ASPECTS	<ul style="list-style-type: none">● Small classes in a "mini-school" setting● Intensive attendance outreach● Experimental service delivery techniques● Middle school to high school transition activities● Ties with business community● Ties with social service agencies● Special incentive awards● Use of paraprofessionals from community● Job training / services by community based organizations
SERVICES	<ul style="list-style-type: none">● Regular school curriculum● Job training● Counseling● Remedial education● Health care● Educational enrichment program
TARGET	Youth at risk of dropping out
COST	About \$1,200 per student for AIDP or DPP