

**Hearing
Before the
United States
Commission on Civil Rights**

**HEARING HELD IN
CHICAGO,
ILLINOIS**

VOLUME III: Exhibits 1-39

**JUNE 17-19, 1974; JULY 25, 1974; AUGUST 22, 1974;
NOVEMBER 22-23, 1974**

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U.S. COMMISSION ON CIVIL RIGHTS

The U.S. Commission on Civil Rights is a temporary, independent, bipartisan agency established by Congress in 1957 and directed to:

- Investigate complaints alleging that citizens are being deprived of their right to vote by reason of their race, color, religion, sex, or national origin, or by reason of fraudulent practices;
- Study and collect information concerning legal developments constituting a denial of equal protection of the laws under the Constitution because of race, color, religion, sex, or national origin, or in the administration of justice;
- Appraise Federal laws and policies with respect to equal protection of the laws because of race, color, religion, sex, or national origin, or in the administration of justice;
- Serve as a national clearinghouse for information in respect to denials of equal protection of the laws because of race, color, religion, sex, or national origin;
- Submit reports, findings, and recommendations to the President and Congress.

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Exhibit No. 1

COMMISSION ON CIVIL RIGHTS
ILLINOIS

Notice of Hearing

Notice is hereby given, pursuant to the provisions of the Civil Rights Act of 1957, 71 Stat. 634, as amended, that a public hearing of the U.S. Commission on Civil Rights will commence on June 17, 1974, and that an executive session, if appropriate, will be convened on June 16, 1974, to be held at the University of Illinois, Circle Campus Center, 750 South Halstead, Chicago, Illinois.

The purposes of the hearing is to collect information concerning legal developments constituting a denial of equal protection of the laws under the Constitution because of sex which affect the economic status of women, particularly concerning public assistance, employment in job training programs and low paying jobs, child care, and the income security of retired women; to appraise the laws and policies of the Federal Government with respect to denials of equal protection of the laws under the Constitution because of sex which affect the economic status of women, particularly concerning public assistance, employment in job training programs and low paying jobs, child care, and the income security of retired women; and to disseminate information with respect to denials of equal protection of the laws because of sex in the fields of public assistance, job training, employment in low paying jobs, child care, and pensions and social security.

Dated at Washington, D.C., May 14, 1974.

ARTHUR S. FLEMMING,
Chairman.

[FR Doc.74-11346 Filed 5-15-74;8:45 am]

Exhibit No. 2

Women and Poverty, staff report of the U.S. Commission on Civil Rights, June 1974, is available separately from the Commission.

Exhibit No. 3

DHEW Publication No. (SRS) 75-03200
NCSS Report D-2 (7/74)

AID TO FAMILIES WITH DEPENDENT CHILDREN:
STANDARDS FOR BASIC NEEDS,
JULY 1974

U. S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service
Office of Information Sciences
National Center for Social Statistics
January 1975

AID TO FAMILIES WITH DEPENDENT CHILDREN:
STANDARDS FOR BASIC NEEDS,
JULY 1974

INTRODUCTION

The Social Security Act provides for Federal financial participation in money payments under the program of aid to families with dependent children (AFDC) to specified types of "needy" children deprived of parental support or care. The Act requires that income and resources must be considered in determining need 1/ but does not specify a standard or level of living to be used by a State in administering its assistance program. Consequently, each State is responsible for defining the level of living that is used to determine who is eligible in relation to the amounts of payments families are to receive.

States generally define requirements of applicants and recipients under their assistance program in terms of number, kind, and cost of specified consumption items to be included in assistance budgets. These standards, as well as policies governing consideration of a family's income and resources other than assistance, must be applied uniformly throughout the State or uniformly in areas with local price differentials to all families in similar circumstances. The difference between the total cost of the requirements defined as necessary by a State to maintain its assistance standard of living and the amount of income and other available resources is the amount of the family's need.

All States recognize food, clothing, shelter, and fuel and utilities as "basic" consumption items--that is, items needed by everyone. Most States also include such items as personal care, medicine chest supplies, and household supplies, and some States consider additional items to be needed by all persons. In addition to basic needs, many States recognize "special" needs that arise for some persons under specified circumstances, e.g., needs for special diets. To some extent, a State's fiscal ability to support needy persons is reflected by the consumption items included in its standard for requirements and by the amounts established as costs of these items.

1/ Certain exceptions to this general requirement are defined in the Social Security Act.

*This report was prepared by Maurice Ellis with the assistance of Helen M. Wells, National Center for Social Statistics.

In some States, money payments to families are made below the amounts of determined need due to insufficient funds. Assistance payments in these States are limited by maximums or other methods of reduction. ^{2/} Each of the tables shows for the specified type of family, "Full standard" (column 1); the "Payment standard" (column 2), defined below; and the "largest amount paid for basic needs" (column 5).

It should be noted that evaluation of State percentages and comparisons of individual States should take account of the fact that a State meeting less than need in full but having a high cost standard may provide a substantially higher level of assistance than a State meeting need in full with a lower standard.

Past annual releases for July have included cost standards under public assistance programs that provided aid to aged and disabled persons -- Old Age Assistance, Aid to the Blind, and Aid to the Permanently and Totally disabled. For all States and the District of Columbia, these programs were transferred in January 1974 to the new Federal Supplemental Security Income Program administered by the Social Security Administration.

^{2/} See NCSS series of reports D-3 "Aid to Families with dependent children: State maximums and other methods of limiting money payments."

DEFINITIONS AND REPORTING PROCEDURES

The attached tables were derived from annual reports submitted by State public assistance agencies on the standards for basic needs that were in effect as of July 1974. For each State, the monthly amounts shown relate mainly to the largest urban or highest cost area within the State. These monthly amounts represent:

- 1) The full standard is the amount of money recognized by a State as the level required monthly for meeting basic needs (including shelter) for a family of specified size. It is this amount with which income from all sources, after application of income allowances and disregards provided by law, is compared to determine initial financial eligibility for AFDC. Use of a full standard for determining eligibility is mandatory upon the States.
- 2) The payment standard is the amount of money from which is deducted the "income available for basic needs" (total income less income allowances and disregards provided by law) to determine the amount of the AFDC payment for a family of specified size. The payment standard may be equal to or less than the full standard.
- 3) The largest amount paid for basic needs:
This is the largest monthly amount that can be paid under State law or agency regulations to the specified assistance family. For a family with no other income, this is the total payment to meet basic needs.

Information on the full standard for basic needs, where this is different from the payment standard, was reported for the first time in July 1970.

Reporting procedures

States reported their standards for basic needs and the largest monthly amount that can be paid for basic needs for the specified types of assistance families. The assistance families covered in this release are: (1) a family of two and (2) a family of four. The amounts reported assume that the families are living alone in rented quarters and need an amount for rent that is at least as large as the highest amount the State allows for this item.

Cost of rented shelter.--The great variation among and within States in the availability and cost of rented shelter for assistance recipients continues to be the most important limitation on the comparability of data on assistance cost standards from one point in time to another.

As in the past, instructions to States for reporting rent allowances in effect as of July 1974 specified that the amounts reported should be the maximum amounts allowed if the State defines such amounts, or the fixed amounts allowed if such amounts have been established. The instructions provided further that if neither maximums nor fixed amounts for rent have been defined by the State, actual or estimated average amounts included in budgets for the specified types of assistance groups were to be reported. The tables indicate which States reported rent allowances on an "average" basis. As indicated previously, data shown in this release relate mainly to the largest urban or highest cost area within the State, i.e., New York City, New York; Philadelphia, Pennsylvania; etc.

The data are summarized in two tables as follows:

Table 1.--Aid to families with dependent children: Monthly amount for basic needs under full standard and payment standard and largest amount paid for basic needs for a family consisting of two recipients, by State, July 1974.

Table 2.--Aid to families with dependent children: Monthly amount for basic needs under full standard and payment standard and largest amount paid for basic needs for a family consisting of four recipients, by State, July 1974.

Also attached is a chart (listed below) concerning the full standard and largest amount that can be paid to a family including four recipients.

Aid to families with dependent children: Full monthly standard for basic needs for a family consisting of four recipients and largest amount that can be paid to such family, by State, July 1974.

Table 1.--Aid to families with dependent children: Monthly amount for basic needs under full standard and payment standard and largest amount paid for basic needs for a family consisting of two recipients, by State, July 1974

State	Monthly amount for basic needs				Largest amount paid for basic needs	
	Full standard	Payment standard <u>1/</u>			Amount	Percent of full standard for basic needs in column (1)
		Total	Other than rent	Rent		
(1)	(2)	(3)	(4)	(5)	(6)	
*Alabama.....	\$133	\$73	\$57	\$16	\$73	55
*Alaska.....	300	300	(2/)	(2/)	300	100
Arizona.....	180	180	124	56	117	65
Arkansas.....	195	195	155	40	105	54
*California.....	232	232	(2/)	(2/)	212	91
*Colorado <u>3/</u>	164	164	86	<u>5/</u> 78	164	100
*Connecticut <u>5/</u>	223	223	(2/)	(2/)	223	100
Delaware.....	181	181	133	<u>6/</u> 48	145	80
*District of Columbia.....	226	181	(2/)	(2/)	181	80
Florida.....	143	143	81	62	98	68
*Georgia.....	161	161	121	40	85	53
Guam.....	(2/)	(2/)	(2/)	(2/)	(2/)	(2/)
*Hawaii.....	311	311	131	<u>5/</u> <u>6/</u> 180	311	100
Idaho.....	229	217	145	72	217	95
*Illinois.....	196	196	(2/)	(2/)	196	100
Indiana.....	247	247	147	100	150	61
Iowa.....	234	234	174	60	184	79
Kansas.....	260	254	129	125	254	98
*Kentucky.....	146	146	110	36	107	73
*Louisiana.....	118	71	(2/)	(2/)	71	60
Maine.....	205	205	137	68	98	48
Maryland.....	192	148	102	46	148	77
Massachusetts <u>7/</u>	215	215	131	84	215	100
Michigan.....	286	286	131	155	286	100
*Minnesota <u>5/</u>	262	262	(2/)	(2/)	262	100
Mississippi.....	205	205	155	50	30	15
Missouri.....	247	247	193	<u>6/</u> 54	120	49
*Montana <u>3/</u>	223	223	153	70	223	100
Nebraska.....	217	217	(2/)	(2/)	210	97
*Nevada.....	229	140	(2/)	(2/)	140	61

(continued)

Table 1 (continued)

*New Hampshire.....	263	263	138	125	263	100
*New Jersey.....	235	235	(2/)	(2/)	235	100
New Mexico.....	160	160	113	47	138	86
*New York.....	268	268	150	6/ 118	268	100
North Carolina.....	147	147	75	4/ 72	147	100
*North Dakota 5/.....	200	200	(2/)	(2/)	200	100
*Ohio.....	204	141	(2/)	(2/)	141	69
*Oklahoma.....	155	155	(2/)	(2/)	155	100
Oregon.....	229	212	114	4/ 98	212	93
*Pennsylvania.....	243	243	157	86	243	100
Puerto Rico.....	78	78	58	20	31	40
*Rhode Island.....	226	226	148	6/ 78	226	100
*South Carolina.....	138	138	94	44	75	54
South Dakota.....	248	248	145	103	248	100
Tennessee.....	142	142	109	33	99	70
*Texas.....	115	86	(2/)	(2/)	86	75
*Utah.....	231	178	124	54	178	77
Vermont.....	292	263	154	109	263	90
Virgin Islands.....	92	92	(2/)	(2/)	92	100
*Virginia.....	248	223	(2/)	(2/)	223	90
*Washington.....	236	236	(2/)	(2/)	236	100
West Virginia.....	188	156	111	45	156	83
*Wisconsin.....	323	292	162	130	292	90
*Wyoming.....	200	200	90	110	193	97

*Denotes State has wholly or partially consolidated its full standard.

1/ Payment standard for the specified type of family living by itself in rented quarters for which monthly rental, unless otherwise indicated, is at least as large as the maximum amount allowed by the State for this item.

2/ Data not reported.

3/ Allowance for summer months; winter allowance higher.

4/ Utilities included in rent.

5/ Includes recurrent special needs.

6/ Estimated average.

7/ Excludes grant for special needs. This grant was included in the data published for July 1973. See monthly report NCSS-A2.

Note: The full standard is the amount of money recognized by a State as the level required monthly for meeting basic needs (including shelter) for a family of specified size. It is this amount with which income from all sources, after application of income allowances and disregards provided by law, is compared to determine initial financial eligibility for AFDC. Use of a full standard for determining eligibility is mandatory upon the States.

The payment standard is the amount of money from which is deducted the "income available for basic needs" (total income less income allowances and disregards provided by law) to determine the amount of the AFDC payment for a family of specified size. The payment standard may be equal to or less than the full standard.

The largest amount paid is the total monthly payment for basic needs made under State law or agency regulations to families with no other income.

Table 2.--Aid to families with dependent children: Monthly amount for basic needs under full standard and payment standard and largest amount paid for basic needs for a family consisting of four recipients, by State, July 1974

State	Monthly amount for basic needs				Largest amount paid for basic needs	
	Full standard	Payment standard <u>1/</u>			Amount	Percent of full standard for basic needs in column (1)
		Total	Other than rent	Rent		
(1)	(2)	(3)	(4)	(5)	(6)	
*Alabama.....	\$225	\$124	\$102	22	\$124	55
*Alaska.....	400	400	(2/)	(2/)	400	100
Arizona.....	282	282	201	81	184	65
Arkansas.....	275	275	235	40	125	45
*California.....	347	347	(2/)	(2/)	311	90
*Colorado <u>3/</u>	262	262	171	<u>4/</u> 91	262	100
*Connecticut <u>5/</u>	332	332	(2/)	(2/)	332	100
Delaware.....	287	287	226	<u>6/</u> 61	230	80
*District of Columbia....	349	279	(2/)	(2/)	279	80
Florida.....	223	223	142	81	151	68
*Georgia.....	227	227	181	46	160	70
Gum.....	(2/)	(2/)	(2/)	(2/)	(2/)	(2/)
*Hawaii.....	399	399	201	<u>4/</u> <u>6/</u> 198	399	100
Idaho.....	314	298	226	72	298	95
*Illinois.....	288	288	(2/)	(2/)	288	100
Indiana.....	363	363	263	100	250	69
Iowa.....	376	376	288	88	296	79
Kansas.....	343	332	207	125	332	97
*Kentucky.....	234	234	182	52	171	73
*Louisiana.....	203	122	(2/)	(2/)	122	60
Maine.....	349	349	234	115	168	48
Maryland.....	316	226	180	46	226	72
Massachusetts <u>2/</u>	304	304	220	84	304	100
Michigan.....	400	400	245	155	400	100
*Minnesota <u>5/</u>	370	370	(2/)	(2/)	370	100
Mississippi.....	277	277	227	50	60	22
Missouri.....	337	337	283	<u>6/</u> 54	183	54
*Montana <u>3/</u>	274	274	207	67	274	100
*Nebraska.....	307	307	(2/)	(2/)	280	91
*Nevada.....	329	201	(2/)	(2/)	201	61

(continued)

Table 2 (continued)

*New Hampshire.....	346	346	221	125	346	100
*New Jersey.....	356	356	(2/)	(2/)	356	100
New Mexico.....	239	239	178	61	206	86
*New York.....	392	392	258	6/ 134	392	100
North Carolina.....	184	184	112	4/ 72	184	100
*North Dakota 5/.....	315	315	(2/)	(2/)	315	100
Ohio.....	389	201	(2/)	(2/)	201	52
*Oklahoma.....	236	236	(2/)	(2/)	236	100
Oregon.....	365	338	230	4/ 108	338	93
*Pennsylvania.....	349	349	256	93	349	100
Puerto Rico.....	132	132	112	20	53	40
*Rhode Island.....	311	311	233	6/ 78	311	100
*South Carolina.....	217	217	173	44	117	54
South Dakota.....	328	328	225	103	328	100
Tennessee.....	217	217	184	33	132	61
*Texas.....	187	140	(2/)	(2/)	140	75
*Utah.....	356	274	191	83	274	77
Vermont.....	400	360	251	109	360	90
Virgin Islands.....	166	166	(2/)	(2/)	166	100
*Virginia.....	346	311	(2/)	(2/)	311	90
*Washington.....	336	336	(2/)	(2/)	336	100
West Virginia.....	270	217	171	46	217	80
*Wisconsin.....	456	403	273	130	403	88
*Wyoming.....	260	260	165	95	227	87

*Denotes State has wholly or partially consolidated its full standard.

- 1/ Payment standard for the specified type of family living by itself in rented quarters for which monthly rental, unless otherwise indicated, is at least as large as the maximum amount allowed by the State for this item.
- 2/ Data not reported.
- 3/ Allowance for summer months; winter allowance higher.
- 4/ Utilities included in rent.
- 5/ Includes recurrent special needs.
- 6/ Estimated average.
- 7/ Excludes grant for special needs. This grant was included in the data published for July 1973. See monthly report NCSS-A2.

Note: The full standard is the amount of money recognized by a State as the level required monthly for meeting basic needs (including shelter) for a family of specified size. It is this amount with which income from all sources, after application of income allowances and disregards provided by law, is compared to determine initial financial eligibility for AFDC. Use of a full standard for determining eligibility is mandatory upon the States. The payment standard is the amount of money from which is deducted the "income available for basic needs" (total income less income allowances and disregards provided by law) to determine the amount of the AFDC payment for a family of specified size. The payment standard may be equal to or less than the full standard. The largest amount paid is the total monthly payment for basic needs made under State law or agency regulations to families with no other income.

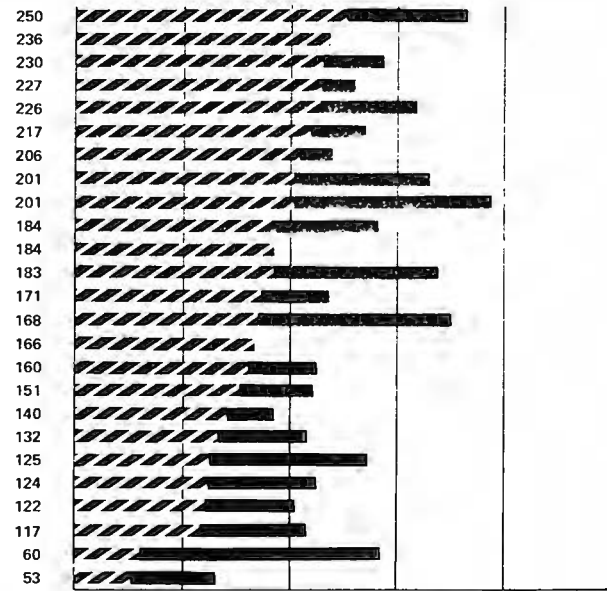
**AID TO FAMILIES WITH DEPENDENT CHILDREN: FULL MONTHLY STANDARD FOR BASIC NEEDS FOR A FAMILY
CONSISTING OF FOUR RECIPIENTS AND LARGEST AMOUNT THAT CAN BE PAID TO SUCH FAMILY, BY STATE,
JULY 1974 ^{1/}**

	FULL STANDARD	LARGEST AMOUNT PAID	DOLLARS
			0 100 200 300 400 500
WISCONSIN	\$456	\$403	
ALASKA	400	400	
MICHIGAN	400	400	
HAWAII	^{2/} 399	399	
NEW YORK	^{2/} 392	392	
MINNESOTA ^{3/}	370	370	
VERMONT	400	360	
NEW JERSEY	356	356	
PENNSYLVANIA	349	349	
NEW HAMPSHIRE	346	346	
OREGON	365	338	
WASHINGTON	336	336	
CONNECTICUT ^{3/}	332	332	
KANSAS	343	332	
SOUTH DAKOTA	328	328	
NORTH DAKOTA ^{3/}	315	315	
CALIFORNIA	347	311	
RHODE ISLAND	^{2/} 311	311	
VIRGINIA	346	311	
MASSACHUSETTES ^{4/}	304	304	
IDAHO	314	298	
ICWA	376	296	
ILLINOIS	288	288	
NEBRASKA	307	280	
DISTRICT OF COLUMBIA	349	279	
MONTANA ^{5/}	274	274	
UTAH	356	274	
COLORADO ^{5/}	262	262	

(continued)

Chart (continued)

INDIANA	363
OKLAHOMA	236
DELAWARE	2/ 287
WYOMING	260
MARYLAND	316
WEST VIRGINIA	270
NEW MEXICO	239
NEVADA	329
OHIO	389
ARIZONA	282
NORTH CAROLINA	184
MISSOURI	2/ 337
KENTUCKY	234
MAINE	349
VIRGIN ISLANDS	166
GEORGIA	227
FLORIDA	223
TEXAS	187
TENNESSEE	217
ARKANSAS	275
ALABAMA	225
LOUISIANA	203
SOUTH CAROLINA	217
MISSISSIPPI	277
PUERTO RICO	132



1/ DATA BASED ON ASSUMPTIONS THAT THE FAMILY: (1) IS LIVING BY ITSELF IN RENTED QUARTERS; (2) NEEDS AN AMOUNT FOR RENT THAT IS AT LEAST AS LARGE AS THE MAXIMUM AMOUNT ALLOWED BY THE STATE FOR THIS ITEM, AND (3) HAS NO INCOME OTHER THAN ASSISTANCE.

2/ INCLUDES AN ESTIMATED AVERAGE FOR RENT.

3/ INCLUDES RECURRENT SPECIAL NEEDS.

4/ EXCLUDES GRANT FOR SPECIAL NEEDS. THIS GRANT WAS INCLUDED IN THE DATA PUBLISHED FOR JULY 1973.

5/ ALLOWANCE FOR SUMMER MONTHS; WINTER ALLOWANCE HIGHER.

DHEW Publication No. (SRS) 75-03201
HCSS Report D-3 (7/74)

**AID TO FAMILIES WITH DEPENDENT CHILDREN:
STATE MAXIMUMS AND OTHER LIMITATIONS ON MONEY PAYMENTS,
AND FEDERAL MATCHING PROVISIONS UNDER THE SOCIAL SECURITY ACT
JULY 1974**

**U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service
Office of Information Sciences
National Center for Social Statistics
January 1975**

STATE MAXIMUMS AND OTHER OTHER LIMITATIONS ON
MONEY PAYMENTS, JULY 1974

INTRODUCTION

This release provides information on State maximums and other methods of limiting money payments under aid to families with dependent children (AFDC) that were in effect in July 1974. Also included is a general discussion of Federal financial matching provisions.

DISCUSSION

State Maximums on Assistance Payments

In July 1974, 18 States had maximums on individual monthly money payments to families aided under AFDC. Some States make exceptions to their maximums when persons in families have special needs, and in some States, maximums are sufficiently high that payments are limited only in a few instances. The usual State maximums shown in table 1 relate only to money payments to families.

Other Methods of Reducing Assistance Payments

When States are unable to meet need as determined under their standards, they reduce payments on a percentage or other basis. (See table 2). These limitations may be used in the absence of, or in conjunction with, legal or administrative maximums. A maximum limits the amount of assistance that may be paid to families whose determined need exceeds that maximum, whereas other methods usually have the effect of lowering payments to most or all families to a level below that of determined need. In July 1974, such reductions were being applied to monthly payments by 24 States, the District of Columbia and Puerto Rico.

*This report was prepared by Leon Meler under the supervision of Maurice Ellis, staff members of the National Center for Social Statistics.

2.

State Differences in Levels of Assistance Standards

In those States which do not have maximums or other limitations on amounts of money payments to recipients, the amounts of assistance needy families receive are limited by the total cost of the living requirements defined by the States as necessary to maintain the assistance levels of living established for specified types of families. The Social Security Act requires, in general, that income and resources must be considered in determining need, but does not specify a standard or level of living to be used by States in administering their assistance programs. Each State, therefore, establishes its own cost standards to be used in determining eligibility and the amount of the money payment to the dependent family. These cost standards vary widely among the States. Because of these circumstances, it is possible that a State with a maximum on or a reduction in assistance payments, but having a high assistance cost standard, may provide a substantially higher level of assistance to needy persons than a State meeting determined need in full under a lower cost standard. Interstate comparisons in respect to maximums and other limitations on assistance payments must, therefore, also take account of the levels of assistance cost standards. 1/

Federal Matching Provisions

Historically, the levels of need met by the States and the maximum amount that could be paid to each person have been related to and heavily influenced by Federal matching provisions, which have been amended several times since 1935. Prior to October 1958, Federal matching for the programs 2/ was available only within a specified limit paid to each eligible recipient, and individual maximums imposed by many States (usually those with limited fiscal capacity) were at or near such Federal matching limit. Beginning in October 1958, the Federal share in assistance expenditures became available on an average maximum payment made to all eligible recipients under that program. Other liberal changes in the Federal matching provisions were subsequently made which have resulted in the elimination of maximums or substantial increases in the maximum amounts paid in relation to the Federal matching limits.

1/ For State data on allowances for basic needs of specified types of families, see NCSS series of reports under D-2.

2/ Beginning January 1, 1974, State-Federal programs for needy aged or disabled persons were replaced by a federally administered program of supplemental security income for such groups.

In July 1974, States could compute the Federal share of assistance payments by applying the formula specified in title IV of the Social Security Act; or if they were operating medical assistance programs under title XIX ^{3/}, they could apply the "Federal medical assistance percentage" to total payments (excluding only payments to recipients eligible under State but not under Federal law) to determine the Federal share. Under the formula method, the aggregate amount of expenditures subject to Federal financial participation is defined in terms of the average monthly payment per recipient, up to specified maximums, multiplied by the number of recipients. The maximum average payment per recipient subject to Federal participation is divided into two parts. For the first part, the Federal share is uniform for all States and, for the second part, varies in accordance with States' fiscal capacities. Only one type of formula for computing the Federal share may be applied to a State's expenditures for a given quarter during the fiscal year, but a State may elect to exercise its option of using an alternate method during the fiscal year. Both methods are described in greater detail below.

A. Two-Step Formula Method

Under the Public Welfare Amendments of 1965, effective January 1, 1966, the Federal share of assistance payments for AFDC is five-sixths of the first \$18 of the average monthly payment per recipient, multiplied by the number of recipients, and from 50 to 65 percent (depending on the State's fiscal capacity as measured by per capita income) of that part of the State's average assistance payment that exceeds \$18 (excluding any part of the average payment in excess of \$32), multiplied by the number of recipients. The maximum subject to Federal participation under both parts of the formula is \$32 times the number of recipients.

The aggregate of payments in excess of the average payments of \$32 must be financed entirely from State and local funds.

B. Alternate Formula Method

The 1965 amendments to the Social Security Act added title XIX (Medicaid) and specified an optional formula for determining the Federal share of money payments in those States operating medical assistance programs under approved plans for title XIX. This alternate method is simpler. It also is potentially more generous than the two-step method discussed above inasmuch as it does not place a maximum on the State expenditure in which the Federal government will share. Under the alternate method, the Federal share is computed by applying the "Federal medical assistance percentage" to

^{3/} Arizona was the only State that had not initiated a program under title XIX by July 1974.

4.

the aggregate amount spent for money payments (with no Federal maximum) for AFDC. The "Federal medical assistance percentage" varies among the States from 50 to 83 percent depending upon each State's per capita personal income.

C. Guam, Puerto Rico, and the Virgin Islands

For Guam, Puerto Rico, and the Virgin Islands, the maximum matchable average payment under the two-step formula method is \$18 per recipient, and the Federal share is 50 percent of total payments within this maximum. The "Federal medical assistance percentage," which was being applied in July 1974, is 50 percent of the aggregate amount spent in money payments for AFDC. Regardless of the method used to compute the Federal share, for the three jurisdictions, however, there is a limitation on the aggregate amount of Federal funds that can be paid annually for Federal-State programs 4/ (exclusive of costs associated with the medical assistance program administered under title XIX).

4/ PL 92-603, which transferred programs for aged and disabled persons from the 50 States and the District of Columbia, to the Federal Supplementary Security Income Program, did not apply to the programs in the three territories. Such programs continue to be administered by the territories with Federal financial participation.

Table 1.--Aid to families with dependent children: Usual maximums on money payments and exceptions to such maximums in States having maximums, July 1974

State	Usual maximum per month for--					Payments may exceed usual maximum(s) for--
	Adults		First child	Each additional child	Family	
	First	Second				
Alabama <u>1</u> /.....	---	---	\$55	\$35	\$195	Foster care per child--to \$85; if nursing required--to \$145; care for adult in cerebral palsy treatment center--to \$245 plus an amount for basic needs.
Alaska.....	\$150	---	150	50	520	---
Arkansas.....	5	\$5	100	10	170	---
California.....	---	---	212	50-49-44-45-38-39-39-38	---	Special needs if paid from local funds.
Georgia <u>1</u> /.....	38	38	47	38	199	---
Indiana.....	75	<u>2</u> / 50	75	50	---	---
Kentucky <u>1</u> /.....	---	---	---	---	<u>3</u> /320	Foster care per child--to \$100.
Maine:						
With 2 adults.....	49	49	37	33	---	---
With 1 or no adult..	49	---	49	37-33	---	---
Mississippi <u>1</u> /.....	---	---	30	18-12	108	---

(continued)

Table 1 (continued)

Missouri.....	(3/)	(3/)	(3/)	(3/)	(3/)	Caretaker completely bedfast, maximum increased by \$92; child completely bedfast, maximum increased by \$59.
New Mexico <u>1/</u>	---	---	---	---	300	---
Oklahoma.....	---	---	---	---	381	---
Tennessee.....	50	---	49	16	164	---
Texas <u>1/</u>	---	---	---	---	300	---
Utah <u>1/</u>	(3/)	(3/)	(3/)	(3/)	---	Special needs.
Virginia <u>1/</u>	---	---	---	---	392	Special needs if paid from local funds
West Virginia <u>1/</u>	---	---	---	---	217	---
Wyoming.....	(3/)	(3/)	113	(3/)	<u>3/261</u>	---

1/ See other types of limitations on table 2.

2/ Only if incapacitated.

3/ Maximums vary by family size as follows: for Kentucky, from 1-6 persons--\$270 and \$220, 7 or more persons--\$320 and \$270 in industrial counties and "all other counties", respectively; for Missouri for caretaker and 1-14 children--\$90, \$120, \$150, \$183, \$215, \$248, \$280, \$312, \$345, \$377, \$410, \$443, \$476, \$509; for Utah, from 1-16 persons--\$129, \$178, \$226, \$274, \$336, \$393, \$420, \$447, \$474, \$501, \$527, \$554, \$581, \$608, \$635, \$662; and for Wyoming, 1--\$113, 2--\$193, 3-4--\$227, 5-7--\$244, 8 or more \$261.

6

Table 2.--Aid to families with dependent children: Method of reducing money payments to recipients in States making reductions other than by maximums, July 1974

State	Payment plus other income represents specified percent of requirement
Alabama.....	55.0
Idaho.....	95.0
Kentucky.....	73.1
Nevada.....	61.0
Oregon.....	92.5
Texas.....	75.0
Vermont.....	90.0
Wisconsin.....	<u>1/</u> 82.0
Payment represents specified percent of budget deficit (requirement minus income)	
Arizona.....	65.0
Delaware.....	80.0
District of Columbia.....	80.0
Florida.....	68.0
Georgia.....	70.2
Iowa.....	78.5
Louisiana.....	60.0
Mississippi.....	40.0
New Mexico.....	86.0
Puerto Rico.....	40.0
South Carolina.....	54.0
Utah.....	77.0
Virginia.....	90.0
Payment represents amount less than full standard -- <u>family of four recipients</u>	
Kansas.....	96.8
Maryland.....	71.5
Nebraska.....	91.2
Ohio.....	51.7
West Virginia.....	80.0

1/ Reduction not applicable to flat allowance for utilities; rent paid up to maximum in all four areas of State.

Exhibit No. 4

The data for this exhibit may be found in, Illinois Advisory Committee to the U.S. Commission on Civil Rights, Bilingual/Bicultural Education: A Privilege or a Right? (1974).

Exhibit No. 5

This exhibit was unavailable at
time of publication.

Exhibit No. 6

This exhibit was unavailable at
time of publication.

ILLINOIS DEPARTMENT OF PUBLIC AID

Form 43A

Information Needed to Review Eligibility for Public Aid

It is time for your need for public aid to be reviewed. If you do not return these pages **WITHIN TEN DAYS**, the Department will assume you no longer need aid and will begin action to stop your aid or assistance.

In this space print your correct Name _____

Address _____ Phone _____
Zip Code _____ Area Code _____

- Answer ALL of the questions.
- Give all the information asked for. It is all right to ask other people, such as friends or relatives to help you fill in these pages.
- Sign your name where you are asked to do so.
- Use the enclosed envelope to return the pages. No stamp is needed.

Do you still want public aid? Yes No

Do you still want only Medical Assistance? Yes No

If you answered NO to both of the above questions

Sign your name here _____ Print today's date _____

Do you still want food stamps? Yes No

If you answered NO to the above question

Sign your name here _____ Print today's date _____

If you answered NO to ALL three of the above questions, do not fill in any more spaces. Mail all these pages in the enclosed envelope. No stamp is needed.

If you answered YES to ANY of the above questions, READ the instructions and COMPLETE the rest of this form.

The information on these pages should be about:

- A person 65 or more years of age
- A blind or a disabled person
- A family with a child or children under 21 years of age.

Fill in this form if any of the above want public aid, medical assistance, or both.

If you wish help for other persons, you can list them on page 2.

(Please Go To The Next Page)

Do you or anyone else in your assistance unit earn money from working? YES NO

The Working Person's Name Is: _____

The Person or Company He or She Works For Is: _____

He or She is Paid Every: Day Week Two Weeks Half Month Month Other

His or Her Pay Before Deductions Is: \$ _____ (This is the Total Amount Really Earned)

His or Her Pay After Deductions Is: \$ _____ (This Amount is Received to Take Home)

How Many Hours Does He or She Work Each Week? A.M. _____ P.M. _____

Print The Amounts That Are Deducted From His or Her Earnings.

Income Tax (Federal) \$ _____

Medical/Hospital Insurance \$ _____

Income Tax (State) \$ _____

Pension or Retirement Fund \$ _____

Social Security (FICA) \$ _____

Union Dues \$ _____

Group Life Insurance \$ _____

Other (Tell What _____) \$ _____

Do you or anyone else in your assistance unit earn money from working? YES NO

The Working Person's Name Is: _____

The Person or Company He or She Works For Is: _____

He or She is Paid Every: Day Week Two Weeks Half Month Month Other

His or Her Pay Before Deductions Is: \$ _____ (This is the Total Amount Really Earned)

His or Her Pay After Deductions Is: \$ _____ (This Amount is Received to Take Home)

How Many Hours Does He or She Work Each Week? A.M. _____ P.M. _____

Print The Amounts That Are Deducted From His or Her Earnings.

Income Tax (Federal)	\$ _____	Medical/Hospital Insurance	\$ _____
Income Tax (State)	\$ _____	Pension or Retirement Fund	\$ _____
Social Security (FICA)	\$ _____	Union Dues	\$ _____
Group Life Insurance	\$ _____	Other (Tell What _____)	\$ _____

Transportation Expense . . . (Give amount and check below)

Car Payment (If buying a car) Amount each month \$ _____

Drive a car _____ miles a week

How much each week for Bus fare _____ Taxi fare _____ Pay to ride with a friend _____

Does not have any transportation expense _____

Other Expense (Tell what) _____ \$ _____

Check One Box: Buys lunch at work Takes lunch from home Has no lunch expense

Child Care Needed YES NO If YES, Why? _____

Child Care Cost Per Week \$ _____

For how many children? _____; How many hours each day? _____

How many days each week? _____ or each month? _____

Where? . . . At home Relative's Licensed Home Unlicensed Home

(Please Go To The Next Page)

Answer these questions about all the members in your assistance unit 16 years old or older and not in school:

Has any member registered for work at the Illinois State Employment Service? _____ YES _____ NO

If yes, give the name of the person or persons registered _____

What is the date of last registration for each person? _____

Has any member asked for Unemployment Compensation? _____ YES _____ NO

If yes, give the name of the person _____

When did he/she ask for Unemployment Compensation? _____

Does any member want help getting a job? _____ YES _____ NO

If yes, write the name of the person _____

Does any member want help getting training? _____ YES _____ NO

If yes, write the name of the person _____

The Work Incentive (WIN) Program is an employment counseling and placement program run by the Department of Labor for persons receiving welfare.

Is any member registered with the WIN Program? _____ YES _____ NO

If yes, write the names of all those registered _____

Does any member wish to volunteer for the WIN Program? _____ YES _____ NO

If yes, write their names here _____

re information concerning the WIN program may be obtained from your local public aid office.

Does any member have a health problem which prevents him/her from accepting work or training? _____ YES _____ NO

If yes, give the name of the person _____

Describe the illness _____

Name of Physician _____

Is any member needed in the home to care for someone who is sick or disabled? _____ YES _____ NO

If yes, give the name of the person cared for _____

Who provides the care? _____

Is there a child under the age of six in your assistance unit? _____ YES _____ NO

Write the names of all children between the ages of 16 and 21 who are not fulltime students _____

Do you or anyone in your assistance unit get any checks or money other than from Public Aid or Employment?

YES NO

Will you or anyone in your assistance unit be receiving (any time soon) any checks or money which you are not getting now? YES NO

If YES, from where? _____

When do you expect to get it? _____ MO. _____ YR.

If you answered NO to both questions above, go to the next page.

If you answered YES to either or both questions above, print the information below.

Print the name of the person who receives money from any of these places on the line beside it:

Child Support _____

Miner's benefits _____

Social Security _____

Lodges or Union _____

Unemployment Comp. _____

Workmen's compensation _____

Veteran's benefits _____

Pension, any other _____

Railroad retirement _____

Insurance _____

Relative or friend _____

Payments FROM property sold _____

Pay from Roomers/Boarders _____

Interest on investments _____

Pay for being in training _____

Farm _____

at FROM property owned _____

Military Service Allotment _____

Sick benefits _____

Railroad unemployment _____

Striker's benefit _____

Alimony _____

Trust fund _____

Local or township relief
or General Assistance _____

Other (Tell what it is) _____

Print the full name of the person getting the check or money and the other information asked for in the spaces below

Name of person it is for	How much he or she gets	How often he or she gets it	Claim or account no.	Date of first and last payment

Is any one in your assistance unit own any of these things? YES NO

Thing Owned	How much it is worth	Name of each person who owns it
Property where you live	\$ _____	_____
Land or buildings or a house other than where you live	\$ _____	_____
Money in a savings or checking or in a Safety Deposit Box or in a Credit Union	\$ _____	_____
Cash on hand-in pocket-in the house or that someone else keeps for you	\$ _____	_____
Trust Fund	\$ _____	_____
Stocks or Bonds	\$ _____	_____

^X
Mortgages or Notes

\$ _____

Prepaid Burial Plan

\$ _____

If you answered NO go to the next question.

If you answered YES print the information above.

Answer the following question and then follow the directions for the rest of the page.

I or someone else in my family has sold or transferred all or a part of land or buildings or personal property (money, stocks, bonds, mortgages, notes, etc.) we did own. YES NO

If you answered "NO" to the above question, please go on to the next page now.

If you answered "YES" to the above question, answer each of the following questions.

What kind of property was sold or transferred: Land Buildings Personal Property

When was it sold or transferred? Month: _____ Year: _____

How much were you or your family members paid for it? \$ _____

If you were not paid for it in money, why did you give it to someone else? _____

How much of what you were paid do you have left? \$ _____

(Please Go To The Next Page)

Directions: Read the following carefully and sign your name on the correct line below.

I (or We), the person(s) whose signature(s) appear below:

- say (or affirm) under the penalties of perjury that all the information contained in this statement of facts is true, correct and complete as far as I(or We) know.
- understand that I am to notify the Department of Public Aid immediately when any change(s) occur in my (and/or members of my household or family) NAME, ADDRESS, PROPERTY, NEEDS OR EXPENSES, FAMILY COMPOSITION OR PERSONS LIVING AND EATING TOGETHER, AND AMOUNT OF INCOME INCLUDING CONTRIBUTIONS AND SUPPORT FROM WHATEVER SOURCE. I understand that by State Law, penalties are provided for falsifying or withholding information which may affect eligibility.
- agree, as required, to furnish proof or help to furnish proof that the information I(or We) provide is true, correct, and complete.
- agree to furnish additional information or all or any part of the same information whenever it is necessary for the Department of Public Aid to correctly establish my (or our) need or extent of need for assistance.
- understand that deliberate misrepresentation or concealment of facts may constitute fraud for which I (or We) may be prosecuted in accord with Chapter 23 of the Illinois revised Statutes.

Sign your Name or
make your mark here . . . _____ Date: _____
Your written signature Mo. Day Year

For AFDC only if spouse
is in the home _____ Date: _____
Your husband or wife's written signature Mo. Day Year

If you have made your mark instead of signing your name, one witness must sign here:
_____ Date: _____
Signature of Witness Relationship Mo. Day Year

If someone is doing all or part of this for you, he or she must sign here:
_____ _____ _____ Date: _____
Signature Relationship Address Mo. Day Year

QUALITY CONTROL

AFDC ERROR RATES BY STATE, April-September 1973*

State	Cases with errors as a percent of total cases			Amount of payment errors as a percent of total payments		
	Ineligible	Eligible but	Eligible but	Ineligible	Overpaid	Underpaid
		Overpaid	Underpaid			
National average	10.2	22.8	8.1	8.9	7.1	1.4
Alabama.....	10.5	15.1	8.4	9.2	5.9	2.4
Alaska.....	14.2	13.5	5.8	12.3	6.1	0.8
Arizona.....	9.3	23.6	7.3	8.0	7.4	1.3
Arkansas.....	2.2	7.1	7.3	1.8	1.8	1.9
California.....	8.4	17.8	7.9	6.9	5.4	1.3
Colorado.....	4.4	15.9	6.5	2.6	4.7	0.9
Connecticut....	6.5	16.2	5.4	5.5	4.5	1.1
Delaware.....	14.1	29.6	9.7	10.1	8.5	1.6
Dist. of Col...	10.9	24.5	3.8	9.9	7.6	0.6
Florida.....	11.0	27.1	9.3	10.1	11.4	2.3
Georgia.....	7.0	24.9	10.5/	5.2	9.1	2.7
Hawaii.....	4.6	19.9	5.6	4.6	5.3	1.5
Idaho.....	5.8	13.0	1.9	6.0	3.0	0.2
Illinois.....	11.7	37.6	10.6	9.6	11.4	1.2
Indiana.....	8.0	19.5	4.4	6.8	5.8	0.9
Iowa.....	9.7	20.0	7.3	7.7	7.0	1.4
Kansas.....	10.3	26.0	9.2	8.5	6.7	1.7
Kentucky.....	10.1	29.4	7.7	7.8	9.6	1.0
Louisiana.....	14.8	21.1	5.4	13.7	7.7	1.2
Maine.....	3.7	7.2	1.8	3.1	2.7	0.6
Maryland.....	14.7	28.5	10.3	13.1	9.8	1.9
Massachusetts..	9.6	29.7	13.5	8.0	7.1	0.9
Michigan.....	5.7	20.3	4.9	5.2	4.9	0.5
Minnesota.....	6.0	28.1	12.9	5.3	4.7	1.2
Mississippi....	2.3	8.6	5.2	1.7	3.0	1.3
Missouri.....	7.1	14.2	4.4	6.2	5.4	1.4

(continued)

Montana.....	10.3	18.6	4.2	7.2	8.2	1.2
Nebraska.....	6.5	10.3	2.7	5.4	2.5	0.2
Nevada.....	2.6	7.8	4.6	1.5	1.8	0.7
New Hampshire..	11.9	40.9	7.5	9.2	10.8	1.2
New Jersey.....	4.3	18.3	4.4	3.4	5.2	0.8
New Mexico.....	5.0	13.2	4.2	3.5	4.7	1.0
New York.....	17.5	31.9	11.1	16.7	9.3	1.7
North Carolina.	7.7	21.3	19.2	6.5	6.6	3.9
North Dakota...	1.9	8.4	1.9	0.8	1.8	0.1
Ohio.....	13.7	27.0	8.3	12.2	9.5	1.0
Oklahoma.....	4.1	13.5	2.9	3.1	5.1	0.6
Oregon.....	6.3	16.2	3.5	6.4	4.3	0.7
Pennsylvania...	16.7	24.8	8.1	14.7	7.5	1.1
Puerto Rico....	16.4	19.9	7.7	14.6	8.4	2.7
Rhode Island...	4.5	21.3	3.5	3.1	6.3	0.3
South Carolina.	10.1	27.3	10.0	9.1	8.3	2.6
South Dakota...	2.5	14.5	4.4	2.0	5.4	0.9
Tennessee.....	9.1	12.8	6.3	7.6	4.5	1.6
Texas.....	10.4	16.3	3.5	8.8	6.3	1.2
Utah.....	5.9	14.7	3.9	5.3	3.2	0.9
Vermont.....	10.3	27.2	6.0	11.3	7.9	0.6
Virgin Islands.	5.8	15.2	14.5	4.2	5.2	1.7
Virginia.....	5.3	27.4	13.3	3.8	8.2	2.2
Washington.....	4.5	10.2	2.8	4.3	2.7	0.4
West Virginia..	5.6	10.7	4.3	4.7	3.3	1.0
Wisconsin.....	4.7	14.5	16.5	3.8	2.3	1.9
Wyoming.....	8.0	14.2	8.6	6.5	3.5	1.8

* These error rates for Aid to Families with Dependent Children (AFDC) programs are based on State Quality Control reviews of 44,000 cases selected in accordance with established sampling procedures from an average monthly national caseload of over 3 million families. On January 1, 1974, all States begin an intensive 18-month effort to implement corrective action plans designed to reduce ineligible case rates to no more than 3 percent and eligible overpaid case rates to no more than 5 percent by June 30, 1975. Underpayment rates will also be reduced by this effort.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

James S. Wright, Jr., Administrator, SES
Attn: Office of Field Operations

July 6, 1973

Acting Regional Commissioner, Region V

Region V - Quarterly Compliance Report (Quarter ending June 30, 1973)

- A. The following issues have been resolved since our last report of April 6, 1973 (for quarter ending March 31, 1973):

ILLINOIS

45 CFR 234.60

Protective and Vendor Payments
State plan revised to eliminate questioned provisions.

Exhibit No. 9

* * *
B. The following are issues newly added for this reporting period:

ILLINOIS

45 CFR 205.40(e)5

Reporting requirements were not met for the six-month reporting period July - December 1972.

* * *
C. The following are issues reported for the second time:

ILLINOIS

45 CFR 205.10(16)

Summaries of Fair Hearings Practice Issue. Periodic summaries required by Federal Regulations have not been submitted by the State since 3/1/71.

45 CFR 233.11(e)

WIN Registrations
As of last available report date (5/15/73) only 53.4 per cent of registrations had been accomplished. State reports it will not be able to complete registrations by end of fiscal year.

* * *

D. The following are issues being reported for six months or longer:

ILLINOIS

45 CFR 205.10(a)(21)

Fair Hearings - Practice Issue.
Sixty-day standard of prompt action is not met.

45 CFR 245.10(a)(3)(III)

Early and Periodic Screening, Diagnosis and Treatment of Eligible Individuals Under Age 21 - Survey for available resources and make arrangements and agreements for participation.

45 CFR 250.23(a)(2)(I) & (II)

Periodic Medical Review
(I) Review team to be composed of the one or more physicians and other appropriate health personnel and
(II) function under the supervision of a physician on the team.

45 CFR 220.5

Adequacy of Staff. Practice Issue.
Number of employees precludes State from meeting requirements for delivery of services.

TABULATION OF ISSUES, BY PROGRAM, BY STATE
 REGION V

	Ill.	Ind.	Mich.	Minn.	Ohio	Wisc.	Total
APA	4	5	4	6	5	1	25
CSA	0	2	0	0	0	1	3
HBT	1	1	0	0	0	0	2
HSA	2	1	2	2	3	5	15
PSA	0	0	0	2	0	0	2
NCSS							0
Finance							0
Total	7	9	6	10	8	7	47

TABULATION OF RECOMMENDED ACTION, BY STATE
REGION V

State	Action by Administrator	Continued Negotiation	Other	Legislation Needed	Total
Illinois	2	4	1	0	7
Indiana	7	2	0	0	9
Michigan	0	6	0	0	6
Minnesota	0	10	0	0	10
Ohio	0	8	0	0	8
Wisconsin	1	6	0	0	7
Total	10	36	1	0	47

TABULATION OF ISSUES, BY STATE, BY TIME PENDING
 REGION V

State	Total Issues	New Issues	Issues Reported		Issues Resolved During Quarter
			Second Time	6 mos. or longer	
Illinois	7	1	2	4	1
Indiana	9	1	0	8	0
Michigan	6	1	2	3	1
Minnesota	10	0	3	7	2
Ohio	6	0	0	6	3
Wisconsin	7	1	1	5	1
Total	47	4	6	35	8

July 1, 1973

ILLINOIS

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

ASSISTANCE PAYMENTS PROGRAM

45 CFR 205.40 (a)5

Reporting requirements were not met for the six-month reporting period, July - December, 1972.

45 CFR 205.10 (16)

Summaries of Fair Hearings Practice Issue. Periodic Summaries required by Federal Regulations have not been submitted by the State since 3/1/71.

45 CFR 233.11 (a)

WIN Registrations
As of last available report date (5/15/73) only 53.4 percent of registrations had been accomplished. State reports it will not be able to complete registrations by end of fiscal year.

45 CFR 205.10 (a) (ii)

Fair Hearings - Practice Issue.
Sixty-day standard of prompt action is not met.

MEDICAL SERVICES PROGRAM

45 CFR 249.10 (a)(3)(iii)

Early and Periodic Screening, Diagnosis and Treatment of Eligible Individuals Under Age 21 - Survey for available resources and make arrangements and agreements for participation.

45 CFR 250.23 (a)(2)(i) & (ii)

Periodic Medical Review
(i) Review team to be composed of the one or more physicians and other appropriate health personnel and

(ii) function under the supervision of a physician on the team.

OMDT

45 CFR 220.5

Adequacy of Staff, Practice Issue. Number of employees precludes State from meeting requirements for delivery of services

APA
 CSA
 IASA
 NCSS

AOA
 YDDPA
 NDT
 RSA
 Finance

REGION V

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6/30/73

DATE PREPARED 6/20/73	DATE STATE 1st ADVISED OF ISSUE February 22, 1972	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE ILLINOIS	STATE AGENCY Department of Public Aid	

2. FEDERAL REQUIREMENT: (Be specific)

A. Subject Fair Hearings - 60 day standard of prompt action

B. Program Regulation 10-2(c-3)

C. Federal Register Citation 45 CFR 205.10 (a)(ii) D. Federal Statutory Citation 402(a)(4) 1902(a)(4) 1402(a)(4)

3. STATUS OF PLAN ITEM:

- A Submitted { 1 Regional Review not Completed 2 Regional Staff Negotiating with State 3 Awaiting Central Office Action
- B Not Submitted { 4 Other (Describe)

4. ISSUE (Do NOT complete if JAI is checked; if item 1C is checked, complete item 10 on reverse side)

State agency's semi-annual statistical reports from period ending 6/30/71 through 12/31/72 show that for most hearing requests the 60 day standard was exceeded.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3/31/72

7. EFFECTIVE DATE OF AMENDMENT

Not In Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Accessible to State

F. Court Case Pending

G. Other (describe)

Sufficient numbers of state staff

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) 6/30/73

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

Await report for 6 month period ending
6/30/73

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

1
 2

B. Source of information:

NCSS Form 105

Unofficial State summary of appeals October 68/December 72

C. Extent of deviation from requirements

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

Items 4 and 8

NCSS Form 105 for six months ended December 31, 1972, reports no follows regarding time elapsed.

Item

Time Elapsed Between Request & Hearing:

Item	Total No.	%
a. Less than 1 month	365	68.7
b. 1 month but less than 2 months	126	23.7
c. 2 months but less than 3 months	29	5.5
d. 3 months or more	11	2.1

Time Elapsed Between Request & Notification of Final Hearing Authority Decisions

a. Less than 1 month	5	0.9
b. 1 month but less than 2 months	100	18.8
c. 2 months but less than 3 months	277	52.2
d. 3 months or more	149	28.1

The NCSS Form 105 Quarterly Statistical Report on Fair Hearings submitted by the State for the period ending 12/31/72 does not indicate overall improvement, but some improvement is indicated in 6 - Time elapsed between request and hearing: a reduction is noted in c. 2 months but less than 3 months - from 13.5% to 5.5% and d. 3 months or more from 7.8% to 2.1%. In item 7, Time Elapsed Between Request and notification of Final Hearing Authority Decisions: Item 6, c. 2 months but less than 3 months a rise was noted from 12.4% to 52.2%. For d. 3 months or more from 85.4% to 28.1%. The State indicates that future reports should reflect a continued trend toward remedying the situation, particularly as backlogs of appeals are disposed of. Discussion with State staff indicates substantial improvement this quarter. Statistics for 5 month period January 1, 1973--May 31, 1973 show that 91 per cent of cases were acted on within the 60 day standard.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION V

APA
 CSA
 MSA
 RCSS

AOA
 YDDPA
 HDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6/30/73

DATE PREPARED 6/20/73	DATE STATE 1st ADVISED OF ISSUE 10/27/72	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE ILLINOIS	STATE AGENCY Department of Public Aid	

2. FEDERAL REQUIREMENT: (Do specific)

A. Subject WIN Registration

B. Program Regulation 20-7 (c-4)

C. Federal Register Citation 45 CFR 233.11(a)

D. Federal Statutory Citation 402(a)(19)(a)

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

{ 1 Regional Review not Completed
2 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Central Office Action

4. ISSUE (Do NOT complete if 3A1 is checked; if item 1C is checked, complete item 1D on reverse side)

Illinois has not completed the mandatory WIN Registration of the AFDC Regular Recipient caseload, as required under Public Law 92-223 and CSA 72-7 and APA 72-9.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

Now This Quarter

Reported Last Quarter Date First Reported 3/31/73

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Halted

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

None

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) _____

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

State has indicated that it will not be able to complete necessary mandatory Registration by end of fiscal year 1973.

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

IX

D. Source of information:

Region V IIR problems and Variance analysis for the month of
May 1973

C. Extent of deviation from requirement:

- ① State-wide
2. Selected counties

(a) Number _____
(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolutions:

The Region V established annual goal for the Registration in Illinois is 88,493.

On March 31, 1973 the actual number of registrations was 40,224, 40.2% of the goal. On May 15, 1973 the actual number of registrations was 59,597, 53.4% of the established goal. The State has shown some improvement in reaching its mandatory registration, but still remains considerably below the requirement.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
 Social and Rehabilitation Service

REGION V

APA
 CSA
 MSA
 NCSS

AoA
 YDDPA
 NDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6/30/73

DATE PREPARED <u>6/20/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>2/22/72</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>ILLINOIS</u>	STATE AGENCY <u>Department of Public Aid</u>	

2. FEDERAL REQUIREMENT: (Do specific)

A. Subject Fair Hearings - Summaries of Fair Hearings

B. Program Regulation 10-2 (c-3)

C. Federal Register Citation 45 CFR 205.10 (16)

D. Federal Statutory Citation 1402 (a)(4); 402 (a)(4)
1902 (a)(4)

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

1 Regional Review not Completed
 4 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Central Office Action

4. ISSUE (Do NOT complete if 3A1 is checked; if Item 1C is checked, complete Item 10 on reverse side)

Summaries of hearing decisions have not been issued periodically as required.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Control Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3/31/73

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Available to State

F. Court Case Pending

G. Other (describe)

Sufficient numbers at State staff.

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continuing Negotiations until (date) 6/30/73

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

Proposed revised regulation will eliminate this requirement.

10. PRACTICE III QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: semi-annual statistical reports

C. Extent of deviation from requirement?

- ① State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

Periodic summaries required by Federal Regulations have not been submitted by the State since 3/1/71. The State agreed, during discussions 1/10/73 and 2/28/73, to issue summaries in a concise and clear format for the period beginning 1/1/73. As of 6/30/73 none have been received.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION V

APA
 CSA
 MSA
 HCSS

AoA
 YDDPA
 HDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6/30/73

DATE PREPARED <u>6/27/73</u>	DATE STATE let ADVISED OF ISSUE <u>May 16, 1973</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*

A. Subject Quality Control

B. Program Regulation PR 10-3 PR10-11(c-6)

C. Federal Register Citation 45 CFR 205.40 (a)5

D. Federal Statutory Citation 402(a)(5)(A)

3. STATUS OF PLAN ITEM:

A Submitted

1 Regional Review not Completed

2 Regional Staff Negotiating with State

3 Awaiting Cent Office Action

B Not Submitted

4 Other (Describe)

4. ISSUE (Do NOT complete if 3A is checked; if item 1C is checked, complete item 1D on reverse side)

Reporting requirements not met for the six-month reporting period July - December 1972. State agency has not submitted the narrative report for this period which was due in the Regional Office on 4/30/73.

3. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

8. OBSTACLES TO RESOLUTION OF ISSUE:

- A. State Legislation Needed
- B. Non-federal funds not available to implement
- C. Lack of State Staff to Develop Plan Material
- D. Lack of Clarity in Federal Requirement
- E. Federal Requirement Not Acceptable to State

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

- A. Formal Action by Administrator
- B. Concurrence Between Administrator and Representatives of State
- C. Regional Office Continue Negotiations until (date) 9/1/73
- D. No Further Action Pending State Legislation to be sought (date) _____

6. REPORTING STATUS

- Now This Quarter
- Reported Last Quarter Date First Reported _____

7. EFFECTIVE DATE OF AMENDMENT

- Not in Effect
- Proposed Date: _____
- In Effect Since: _____

F. Court Case Pending

G. Other (describe)

State staff is in process of developing narrative report. Regional Office has been unable to determine why this was not done earlier.

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: State staff

C. Extent of deviation from requirements:

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

State had submitted the statistical section of the report for the current six months with a statement that the narrative would be submitted in a two-week period. No specific reason for the delay is known. However, responsible State staff have advised that the narrative is currently in typing after several reviews and is expected to be mailed to the Regional Office the week of July 2nd. It should be noted that the report for the prior period was submitted on a timely basis.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION V

- | | |
|---|----------------------------------|
| <input type="checkbox"/> APA | <input type="checkbox"/> AoA |
| <input type="checkbox"/> CSA | <input type="checkbox"/> YDDPA |
| <input checked="" type="checkbox"/> MSA | <input type="checkbox"/> RDT |
| <input type="checkbox"/> HCSS | <input type="checkbox"/> RSA |
| | <input type="checkbox"/> Finance |

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6/30/73

DATE PREPARED <u>6/22/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>10/4/72</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Illinois Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(No specific)*

A. Subject EPSD&T - Agreements with providers for EPSD&T

B. Program Regulation 40-11 (c-4)

C. Federal Register Citation 45 CFR 249.10(a)(3)(iii) D. Federal Statutory Citation 1905(a)(4)(B)

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

1 Regional Review
not Completed

4 Other (Describe)

2 Regional Staff
Negotiating with State

3 Awaiting Central
Office Action

4. ISSUE *(Do NOT complete if 3A1 is checked; if item 1C is checked, complete item 10 on reverse side)*

The State has not established agreements to assure maximum utilization of existing screening diagnostic and treatment services provided by other public voluntary agencies.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 9/30/72

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement - Definition of "agreements" in cited regulation.

E. Federal Requirement Not Applicable to State

F. Court Case Pending

G. Other (describe)

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) 9/30/73

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: Status reports and conferences with State staff.

C. Extent of deviation from requirement:

1) State-wide

2. Selected counties

(a) Number _____

(b) Percent of State case load in those counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

State agency has not established agreements definitively relating to EPSDT to assure maximum utilization of existing resources. It has agreements through the sign-off's on claim forms for all other items but not specifically EPSDT function.

The comprehensive system for EPSDT called "Medicheck" which should resolve this issue has been tabled pending consideration, approval and direction by the new Governor and new State Director of Public Aid.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
 Special and Rehabilitation Service

REGION V

- APA
- CSA
- MSA
- NCSS

- AOA
- YDDPA
- HDT
- RSA
- Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6/30/73

DATE PREPARED <u>6/22/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>3/30/72</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Illinois Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: (Do specific)

- A. Subject Periodic Medical Review
40-21
- B. Program Regulation 45 CFR 250.23(a)(2)(i)&(ii)
- C. Federal Register Citation _____ D. Federal Statutory Citation 1902(a)(26)

3. STATUS OF PLAN ITEM:

- A Submitted 1 Regional Review not Completed 2 Regional Staff Negotiating with State 3 Awaiting Central Office Action
- B Not Submitted 4 Other (Describe) _____

4. ISSUE (Do NOT complete if 3A is checked; if item 1C is checked, complete item 10 on reverse side)

A physician is not on-site with the Medical Review Team.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

Now This Quarter

Reported Last Quarter Date First Reported 3/31/70

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) _____

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

X.

B. Source of information: Description of State Methodology in Periodic Medical Review

C. Extent of deviation from requirement:

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

A physician is not on-site with the Medical Review team.

Thirty percent of patients in skilled nursing homes are reviewed quarterly throughout the year by a registered nurse. Physicians are not on-site during each review. A physician reviews only those cases flagged as deviant or cases that fall within a representative group used for sampling. On-site visits by a physician for medical review are done to resolve "exceptional" problems or where the sample reviews by physician incipient problems.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION: V

APA
 CSA
 MSA
 NCSS

AoA
 YDDPA
 IDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 6-30-73

DATE PREPARED <u>6-29-73</u>	DATE STATE 1st ADVISED OF ISSUE <u>1-17-71</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>ILLINOIS</u>	STATE AGENCY <u>Illinois Department of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(No specific)*

A. Subject Adequacy of Staff

B. Program Regulation SRS P.R. 30-1

C. Federal Register Citation 45 CFR 220.5

D. Federal Statutory Citation

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

1 Regional Review not Completed

4 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Central Office Action

4. ISSUE (Do NOT complete if 3A1 is checked; if Item 1C is checked, complete Item 10 on reverse side)

Number of employees precludes State from meeting requirements for delivery of services.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Control Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3-31-71

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) _____

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe) Program of technical assistance directed to deployment of staff in separate system continues to be provided by the Regional Office (See Item 10D)

of observation of the operational staffing planning for the assistance payments system will be required before we can be assured that the issue has been completely resolved. Because of the State's preoccupation in planning for the assistance payments system, planning for the deployment of personnel in the social services system has lagged.

A change in the administration of the Illinois Department of Public Aid occurred following the election of a new Governor. The new Director of the Illinois Department of Public Aid, Mr. Joel Edelman, is taking a somewhat different approach to the organization of a social service system than that undertaken by his predecessor. As a result, a number of different models for delivery of social service are being developed and will be tested during the coming months. The foregoing has been reported to the Federal District Court on several occasions during the 3rd quarter of FY 73. The Federal District Court has shown some inclination to provide the additional time needed by the new Director of the Illinois Department of Public Aid in arriving at a conclusion concerning a desirable model for social service delivery. It is our current belief that the planning for deployment of personnel in the social service system will probably not be resolved until a considerable period of testing has taken place and that this is not likely to occur until the close of the 2nd quarter in FY 74.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

James S. Dwight, Jr., Administrator
Attention: Mr. Warren Whitted, Special
Assistant to the Administrator
AMH, Social & Rehabilitation Service

October 18, 1973

Acting Regional Commissioner, SRS

Region V - Quarterly Compliance Report (Quarter ending September 30, 1973)

Region V is submitting a total of 39 pending compliance issues this quarter. During the quarter 11 issues have been resolved and 3 new issues have been added.

We believe that the reports themselves are clearly identifiable on the form and require no additional clarification in this memorandum. Please feel free, however, to call the Regional office should you have any questions concerning the report.

The following issues have been resolved during the quarter:

<u>Program</u>	<u>State</u>	<u>Citation</u>	<u>Description</u>
QC	Illinois	45 CFR 205.40(a)(5)	Agency has now submitted required narrative.
		* * *	
AP	Illinois	45 CFR 233.11(a)	WIN Registration Illinois has completed the mandatory WIN Registration of the AFDC regular recipient caseload.
		* * *	
MS	Illinois	45 CFR 249.10(a) (3)(iii)	State has implemented EPSDT
		* * *	

The following issues are reported for the first time this quarter:

<u>Program</u>	<u>State</u>	<u>Citation</u>	<u>Description</u>
MS	Illinois	45 CFR 252.10(b)(3)	Nursing home licensure State board not constituted as per regulations.
		* * *	

October 1, 1973

ILLINOIS

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

ASSISTANCE PAYMENTS PROGRAM

45 CFR 205.10(a)(ii)

Fair Hearings - Practice Issue.
Sixty-day standard of prompt action
is not met.

45 CFR 205.10(16)

Fair Hearings - Practice Issue.
Summaries of hearing decisions have
not been issued periodically as
required.

MEDICAL SERVICES PROGRAM

45 CFR 252.10(b)(3)

Nursing home licensure - Practice Issue.
State board not constituted as per
regulations.

45 CFR 250.23(a)(2)(i)&(ii)

Periodic Medical Review - Practice Issue.

(i) Review team to be composed of the one or more physicians and other appropriate health personnel and

(ii) function under the supervision of a physician on the team.

HDT

45 CFR 220.5

Adequacy of Staff - Practice Issue.
Number of employees precludes State from meeting requirements for delivery of services.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
 Social and Rehabilitation Service

REGION AP

APA
 CSA
 MSA
 NCSS

AoA
 YDDPA
 HDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 9/30/73

DATE PREPARED <u>10/15/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>2/22/72</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement. B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>ILLINOIS</u>	STATE AGENCY <u>Department of Public Aid</u>	

2. FEDERAL REQUIREMENT: (Be specific)

A. Subject Fair Hearings - 60 Day standard of prompt action

B. Program Regulation 10-2 (C-3)

C. Federal Register Citation 45 CFR 205.10(a) (11) D. Federal Statutory Citation 402(a)(4), 1602(a)(4)

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

1 Regional Review not Completed
 4 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Case Office Action

4. ISSUE (Do NOT complete if 3A1 is checked; if item 1C is checked, complete item 10 on reverse side)

State-agency's semi-annual statistical reports from period ending 6/30/71 through 6/30/73 show that in 19 percent of the request the 60 day standard for hearing request was exceeded.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3/31/72

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

None

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until date 6/30/74

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

Await report for 6 month period ending 12/30/73 and agency implementation of revised fair hearing regulation.

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to a "approved" State plan that does NOT meet Federal requirements

B. Source of information:

NCSS Form 105

C. Extent of deviation from requirement:

1. State-wide
2. Selected counties
 - (a) Number _____
 - (b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

Items 4 and 8

NCSS Form 105 for six months ended June 30, 1973 reports as follows regarding time elapsed.

Item	Total	%
Time Elapsed Between Request and Hearing	537	88.3
a. Less than 1 month	61	10.0
b. 1 month but less than 2 months	7	1.2
c. 2 months but less than 3 months	3	.5
d. 3 months or more		

Time Elapsed Between Request and Notification of Final Hearing Authority Decisions

a. Less than 1 month	133	22.0
b. 1 month but less than 2 months	359	59.0
c. 2 months but less than 3 months	79	13.0
d. 3 months or more	37	6.0

The NCSS Form 105 submitted by the State for the period ending 6/30/73 indicates overall improvement. The State indicates that future reports should reflect a continued trend toward remedying the situation. Statistics for the six month period ended June 30, 1973 show that 98% of cases were acted on within the 60 day standard.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
 Social and Rehabilitation Services

REGION V

APA
 CSA
 MSA
 HCSS

AOA
 YDDPA
 HDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 9/30/73

DATE PREPARED <u>10/15/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>2/22/72</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>ILLINOIS</u>	STATE AGENCY <u>Department of Public Aid</u>	

2. FEDERAL REQUIREMENT: (No specific)

A. Subject Fair Hearings - Summaries of Fair Hearings

B. Program Regulation 10-2 (C-3)

C. Federal Register Citation 45 CFR 205.10(16)

D. Federal Statutory Citation 402(a)(4); 1602(a)(4)

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

1 Regional Review not Completed
 4 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Co-Office Action

4. ISSUE (Do NOT complete if 3A is checked; if item 1C is checked, complete item 10 on reverse side)

Summaries of hearing decisions have not been issued periodically as required.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Control Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3/31/73

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

Sufficient numbers at State staff

8

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Sent to Negotiations until (date) 12/30/73

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

Revised regulation will eliminate this requirement since this summary is not required. State has not yet submitted pre-print.

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: Semi-annual reports

C. Extent of deviation from requirement:

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

Periodic summaries required by Federal Regulations have not been submitted by the State since 3/1/71. The State agreed, having discussions 1/10/73, 2/28/73 and 7/23/73 to issue summaries in a concise and clear format for the period beginning 1/1/73. As of 9/30/73 none have been received.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Social and Rehabilitation Service

REGION V
 APA
 CSA
 MSA
 HCSS

 AoA
 YDDPA
 HDT
 RSA
 Finance
SRS COMPLIANCE REPORT FOR QUARTER ENDING 9/30/73

DATE PREPARED <u>10/9/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>June 21, 1973</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement IB <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Illinois Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*A. Subject Nursing Home Administration; Licensing; Training & Instruction ProgramsB. Program Regulation PR 40-16(C-1)C. Federal Register Citation 45 CFR 252.10(b)(3)D. Federal Statutory Citation 1902(a)(29), 1908 (P.L.)

3. STATUS OF PLAN ITEM:

A Submitted1 Regional Review not Completed2 Regional Staff Negotiating with State3 Awaiting Central Office ActionB Not Submitted4 Other (Describe)

4. ISSUE (Do NOT complete if 3A1 is checked; if Item 1C is checked, complete Item 10 on reverse side)

The State board for licensure of nursing homes administrators is not constituted properly as per Federal regulations; representatives of a single profession are in the majority.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported _____

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

A bill has been introduced in the State Legislature to correct the situation.

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) 12/31/53

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

A. Deviation from Federal Requirement Elements:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: _____

C. Extent of deviation from requirement:

① State-wide

2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

The State Board membership has a majority of a single profession, thus not complying with Federal statutes and regulations. The State needs new legislation and has introduced a Bill to correct the situation.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Social and Rehabilitation Service

REGION V

- APA
- CSA
- MSA
- NCSS

- AOH
- YDOPA
- HDT
- RSA
- Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 9/30/73

DATE PREPARED <u>10/9/73</u>	DATE STATE 1st ADVISED OF ISSUE <u>3/30/72</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Illinois Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*

A. Subject Periodic Medical Review

B. Program Regulation 40-21

C. Federal Register Citation 45 CFR 250.23(a)(2)(i) & (j) Federal Statutory Citation 1902(a)(26)

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

- 1 Regional Review not Completed
- 4 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Central Office Action

4. ISSUE (Do NOT complete if 3A is checked; if item 1C is checked, complete item 1C on reverse side)

A physician is not on-site with the Medical Review Team

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3/31/72

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) _____

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

X

B. Source of information: Description of State Methodology in Periodic Medical Review

C. Extent of deviation from requirement:

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

A physician is not on-site with the Medical Review team.

Thirty percent of patients in skilled nursing homes are reviewed quarterly throughout the year by a registered nurse. Physicians are not on-site during each review. A physician reviews only those cases flagged as deviant or cases that fall within a representative group used for sampling. On-site visits by a physician for medical review are done to resolve "exceptional" problems or where the sample reviews by physician reveal incipient problems.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION V

APA
 CSA
 MSA
 HCSS

AoA
 YDDPA
 HDT
 RSA
 Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 9-30-73

DATE PREPARED <u>9-28-73</u>	DATE STATE 1st ADVISED OF ISSUE <u>1-17-71</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>ILLINOIS</u>	STATE AGENCY <u>Illinois Department of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*

A. Subject Adequacy of Staff

B. Program Regulation SRS P.R. 30-1

C. Federal Register Citation 45 CFR 220.5

D. Federal Statutory Citation

3. STATUS OF PLAN ITEM:

A Submitted

B Not Submitted

1 Regional Review not Completed

4 Other (Describe)

2 Regional Staff Negotiating with State

3 Awaiting Central Office Action

4. ISSUE (Do NOT complete if 3A is checked; if item 1C is checked, complete item 1D on reverse side)

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3-31-71

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator
and Representatives of State

C. Regional Office Continue Negotiations
until (date) _____

D. No Further Action Pending State Legislation
to be sought (date) _____

E. No Further Action Pending Clarification of
Federal Requirement

F. Other (describe) Program of technical
Assistance directed to deployment of
staff in separate system continues to
be provided by the Regional Office.

10. PRACTICE IN QUESTION:

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: WRO

C. Extent of deviation from requirements:

1. State-wide

2. Selected counties

(a) Number Mainly in Cook County.

(b) Percent of State cases lead in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

During the 3rd quarter of FY 1972 it was decided, with Central office concurrence, that resolution of this issue could be more readily resolved through a program of technical assistance directed to action which must be taken by the State for deployment of personnel in order to achieve a separated assistance payments system on the one hand and a separate social services system on the other. While there were some delays in organizing the program of technical assistance, this has been reasonably fully underway for the past year with the active consultation of Technical Assistance Program, Incorporated as well as with contractors employed directly by the State agency. Substantial progress has been made in identifying the numbers and kinds of personnel required to adequately staff the income main-

tenance system at least at the local level, but a significant period of observation of the operational staffing planning for the assistance payments system will be required before we can be assured that the issue has been completely resolved. Because of the State's preoccupation in planning for the assistance payments system, planning for the deployment of personnel in the social services system has lagged.

A change in the administration of the Illinois Department of Public Aid occurred following the election of a new Governor. The new Director of the Illinois Department of Public Aid, Mr. Joel Edelman, is taking a somewhat different approach to the organization of a social service system than that undertaken by his predecessor. As a result, a number of different models for delivery of social service are being developed and will be tested during the coming months. The foregoing has been reported to the Federal District Court on several occasions. The Federal District Court has shown some inclination to provide the additional time needed by the new Director of the Illinois Department of Public Aid in arriving at a conclusion concerning a desirable model for social service delivery. It is our current belief that the planning for deployment of personnel in the social service system will probably not be resolved until a considerable period of testing has taken place.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

James S. Dwight, Jr., Administrator
Attention: Warren Whitted, Special
Assistant to the Administrator
DHEW, Social and Rehabilitation Service

January 10, 1974

Acting Regional Commissioner, SRS

Region V - Quarterly Compliance Report (Quarter ending December 31, 1973)

Region V is submitting a total of 23 pending compliance issues for the above quarter. During the quarter 16 issues have been resolved and no new issues have been added. This compares to a total of 39 pending issues submitted for the previous quarter. (Please note that of the 16 issues shown as resolved, one results from combining 2 previously reported AP issues in Ohio into one issue in this report.)

We believe that the issues are clearly identifiable on the forms and require no additional clarification in this memorandum. Please feel free, however, to contact the Regional Office should you have any questions concerning the report.

We are attaching a tabulation of issues, by program, by State, which we believe you will find helpful.

The following issues have been resolved during the quarter:

<u>Program</u>	<u>State</u>	<u>Citation</u>	<u>Description</u>
AD	Illinois	45 CFR 205.10(a)(19) (formerly in 205.10(a)(16)	Fair hearings, practice issue. Periodic summaries of fair hearing decisions are no longer required.
		45 CFR 205.10(a)(11)	Fair hearings - 60 day standard (issue mooted by P.L. 92-603)
		* * *	
MS	Illinois	45 CFR 259.23(a)(2) (f) and (if)	State has implemented Periodic Medical Review with physician on-site.
		* * *	

TABULATION OF ISSUES, BY PROGRAM, BY STATE
 REGION V

SRS UNIT	Ill.	Ind.	Mich.	Minn.	Ohio	Wisc.	Total
APA	0	2	2	1	3	1	9
CSA	0	2	0	0	0	1	3
MSA	1	1	0	2	0	2	6
RSA	0	0	0	2	0	0	2
TMD	1	1	0	1	0	0	3
Finance	0	0	0	0	0	0	0
HCSS	0	0	0	0	0	0	0
QC	0	0	0	0	0	0	0
Total	2	6	2	6	3	4	23

January 1, 1974

ILLINOIS

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

MEDICAL SERVICES PROGRAM

45 CFR 252.10(b)(3)

Nursing home licensure - Practice issue.
State board not constituted as per
regulations.

96

TMD

45 CFR 220.5

Adequacy of Staff - Practice issue.
Number of employees precludes State
from meeting requirements for delivery
of services.

EL PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: WRU

C. Extent of deviation from requirements

1. State-wide

2. Selected counties

(a) Number Mainly in Cook County

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

During the 3rd quarter of FY 1972 it was decided, with Central office concurrence, that resolution of this issue could be more readily resolved through a program of technical assistance directed to action which must be taken by the State for deployment of personnel in order to achieve a separated assistance payments system on the one hand and a separate social services system on the other. While there were some delays in organizing the program of technical assistance, this has been reasonably fully underway for the past year with the active consultation of Technical Assistance Program, Incorporated as well as with contractors employed directly by the State agency. Substantial progress has been made in identifying

the numbers and kinds of personnel required to adequately staff the income maintenance system at least at the local level, but a significant period of observation of the operational staffing planning for the assistance payments system will be required before we can be assured that the issue has been completely resolved. Because of the State's preoccupation in planning for the assistance payments system, planning for the deployment of personnel in the social services system has lagged.

A change in the administration of the Illinois Department of Public Aid occurred following the election of a new Governor. The new Director of the Illinois Department of Public Aid, Mr. Joel Edelman, is taking a somewhat different approach to the organization of a social service system than that undertaken by his predecessor. As a result, a number of different models for delivery of social service are being developed and will be tested during the coming months. The foregoing has been reported to the Federal District Court on several occasions. The Federal District Court has shown some inclination to provide the additional time needed by the new Director of the Illinois Department of Public Aid in arriving at a conclusion concerning a desirable model for social service delivery. It is our current belief that the planning for deployment of personnel in the social service system will probably not be resolved until a considerable period of testing has taken place.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Social and Rehabilitation Service

REGION V

- APA
- CSA
- MSA
- HCSS

- AoA
- YDDPA
- HDT
- RSA
- Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 3/31/74

DATE PREPARED <u>3/27/74</u>	DATE STATE NOT ADVISED OF ISSUE <u>2/25/74</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>ILLINOIS</u>	STATE AGENCY <u>Illinois Department of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*

A. Subject Amount, Duration and Scope of Medical Assistance

B. Program Regulation 40-11

C. Federal Register Citation 45 CFR 249.10(a)(7)

D. Federal Statutory Citation 1905(a)(4)(B)

3. STATUS OF PLAN ITEM:

- | | | | |
|--|--|--|---|
| A <input type="checkbox"/> Submitted | } 1 <input type="checkbox"/> Regional Review not Completed | 2 <input type="checkbox"/> Regional Staff Negotiating with State | 3 <input type="checkbox"/> Awaiting Central Office Action |
| B <input type="checkbox"/> Not Submitted | | 4 <input type="checkbox"/> Other (Describe) | |

4. ISSUE (Do NOT complete if 3A is checked; if item 1C is checked, complete item 1D on reverse side)

Illinois EPSDT program (Medichex) does not provide screening for visual and hearing defects for all eligible children, restricting this to those in school.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Control Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

Now This Quarter

Reported Last Quarter Date First Reported _____

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

See item 10D

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) 6/30/74

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10: PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements (X)
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements ()

B. Source of information: State Manual of Medicaid Policies and Procedures; Conferences with State Staff.

C. Extent of deviation from requirement:

- (X) State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

State's program excludes payment to Medical practitioners or clinics for vision and hearing screening tests on the basis of fact that eligible children will be included in mandatory mass screening programs for school age children which is coordinated by the Illinois Department of Public Health. This rules out such screening for pre-school children and those between 16 and 21 who are not in school. State has agreed to revise plan to provide such screening to all eligibles between 0-21 and to issue appropriate information and instructions to providers. The only obstacle to resolution appears to be the time element involved in getting the revision printed and issued.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Social and Rehabilitation Service

REGION V

- APA
- CSA
- MSA
- NCSS

- AoA
- YDDPA
- HBT
- RSA
- Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 3/31/74

DATE PREPARED <u>2/14/74</u>	DATE STATE IS ADVISED OF ISSUE <u>January 28, 1974</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Illinois Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*
Payment of Reasonable Costs in Hospitals; Audits and Adjustment of Payments

A. Subject: _____

B. Program Regulation: _____

C. Federal Register Citation 45 CFR 250.30(a)(3) & (b)(1) D. Federal Statutory Citation: _____

3. STATUS OF PLAN ITEM:

A Submitted 1 Regional Review not Completed 2 Regional Staff Negotiating with State 3 Awaiting Central Office Action

B Not Submitted 4 Other (Describe)

4. ISSUE (Do NOT complete if 3A1 is checked; if item 1C is checked, complete Item 10 on reverse side)

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) 6/31/74

D. No Further Action Pending State Legislation to be sought (date) _____

6. REPORTING STATUS

Now This Quarter

Reported Last Quarter Date First Reported _____

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

F. Court Case Pending

G. Other (describe)

Inadequate audit staff on available common audit agreement is being negotiated.

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements

2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: Pre-release draft of audit report (ACN 05-40065)

Draft of audit report (ACN 05-40064)

C. Extent of deviation from requirement:

1. State-wide

2. Selected counties

(a) Number _____

(b) Percent of State revenue in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

Recent HEW audits of hospital costs found that the Illinois Department of Public Aid has made only five final cost settlements with these providers since the program began in 1966.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION V

- | | |
|---|----------------------------------|
| <input type="checkbox"/> APA | <input type="checkbox"/> AoA |
| <input type="checkbox"/> CSA | <input type="checkbox"/> YDDPA |
| <input checked="" type="checkbox"/> MSA | <input type="checkbox"/> HDT |
| <input type="checkbox"/> NCSS | <input type="checkbox"/> RSA |
| | <input type="checkbox"/> Finance |

SRS COMPLIANCE REPORT FOR QUARTER ENDING 3/31/74

DATE PREPARED 4/4/74	DATE STATE 1st ADVISED OF ISSUE June 21, 1973	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE ILLINOIS	STATE AGENCY Illinois Department of Public Aid	

2. FEDERAL REQUIREMENT: *(Be specific)*

A. Subject Nursing Home Administration; Licensing; Training and Instruction Program

B. Program Regulation PR 40-16 (C-1)

C. Federal Register Citation 45 CFR 252.10(b)(3)

D. Federal Statutory Citation 1902(a)(29); 1908

3. STATUS OF PLAN ITEM:

A Submitted

1 Regional Review not Completed

2 Regional Staff Negotiating with State

3 Awaiting Central Office Action

B Not Submitted

2 Other (Describe)

4. ISSUE *(Do NOT complete if 3A1 is checked; if item 1C is checked, complete item 1C on reverse side)*

The State Board for licensure of nursing home administrators is not constituted properly per Federal Regulations; representatives of a single profession are in the majority.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State agrees No answer

6. REPORTING STATUS

Now This Quarter

Reported Last Quarter Date First Reported 9/30/73

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

A bill was introduced into the State legislature during March 1974 which would correct the situation. Passage is anticipated but not realized yet.

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (date) 6/30/74

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: Telephone conferences with State

C. Extent of deviation from requirements:

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacles to resolution:

The State board of Nursing Home Administrators licensure has a majority of a single profession, thus not complying with Federal statutes and regulations.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Social and Rehabilitation Service

REGION V

- APA
- CSA
- MSA
- NCSS

- AoA
- YDDPA
- MDT
- RSA
- Finance

SRS COMPLIANCE REPORT FOR QUARTER ENDING 12/31/73

DATE PREPARED <u>1/7/74</u>	DATE STATE 1st ADVISED OF ISSUE <u>June 21, 1973</u>	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE <u>Illinois</u>	STATE AGENCY <u>Illinois Dept. of Public Aid</u>	

2. FEDERAL REQUIREMENT: *(Be specific)*
 A. Subject Nursing Home Administration; Licensing; Training & Instruction Program
 B. Program Regulation PR 40-16 (C-1)
 C. Federal Register Citation 45 CFR 252.10(b)(3)
 D. Federal Statutory Citation 1902(a)(29), 1903(P.L. 90-24)

3. STATUS OF PLAN ITEM:

A Submitted { 1 Regional Review not Completed 2 Regional Staff Negotiating with State 3 Awaiting Central Office Action

B Not Submitted 4 Other (Describe)

4. ISSUE *(Do NOT complete if 3A1 is checked; if item 1C is checked, complete item 10 on reverse side)*

The State board for licensure of nursing homes administrators is not constituted properly as per Federal regulations; representatives of a single profession are in the majority.

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 9/30/73

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

A bill has been introduced in the State Legislature to correct the situation. The bill will be acted upon in March 1974.

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office to Negotiate until (date) 3/31/74

D. No Further Action Pending State Legislation to be sought (date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe)

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

1. Practices that do not conform to an approved State plan that meets Federal requirements
2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: _____

C. Extent of deviation from requirement:

1. State-wide
2. Selected counties

(a) Number _____

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

The State Board membership has a majority of a single profession, thus not complying with Federal statutes and regulations. The State needs new legislation and has introduced a Bill to correct the situation.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Social and Rehabilitation Service

- | | |
|--------------------------------|---|
| <input type="checkbox"/> APA | <input type="checkbox"/> AoA |
| <input type="checkbox"/> CSA | <input type="checkbox"/> YDDPA |
| <input type="checkbox"/> MSA | <input checked="" type="checkbox"/> MDT |
| <input type="checkbox"/> IICSS | <input type="checkbox"/> RSA |
| | <input type="checkbox"/> Finance |

REGION V

SRS COMPLIANCE REPORT FOR QUARTER ENDING 12-31-73

DATE PREPARED 12-28-73	DATE STATE 1st ADVISED OF ISSUE 1-17-71	1. TYPE OF ISSUE: A <input type="checkbox"/> Lack of approvable State Plan and/or amendment to comply with Federal Requirement B <input checked="" type="checkbox"/> Practice does not comply (operational)
STATE ILLINOIS	STATE AGENCY Illinois Department of Public Aid	

2. FEDERAL REQUIREMENT: (Be specific)

A. Subject Adequacy of Staff

B. Program Regulation SRS P.R. 30-1

C. Federal Register Citation 45 CFR 220.5

D. Federal Statutory Citation

3. STATUS OF PLAN ITEM:

A <input type="checkbox"/> Submitted	}	1 <input type="checkbox"/> Regional Review not Completed	2 <input type="checkbox"/> Regional Staff Negotiating with State	3 <input type="checkbox"/> Awaiting Central Office Action
B <input type="checkbox"/> Not Submitted		4 <input type="checkbox"/> Other (Describe)		

4. ISSUE (Do NOT complete if 3A1 is checked; if item 1C is checked, complete item 1D on reverse side)

5. TIME AVAILABLE FOR REVIEW AND DECISION: DATES

A. Received in Regional Office _____

B. Sent to Central Office _____

(Complete C and D if applicable)

C. 90 day limit expires _____

D. Extension requested to _____

State agrees to extend to _____

State refuses No answer

6. REPORTING STATUS

New This Quarter

Reported Last Quarter Date First Reported 3-31-71

7. EFFECTIVE DATE OF AMENDMENT

Not in Effect

Proposed Date: _____

In Effect Since: _____

8. OBSTACLES TO RESOLUTION OF ISSUE:

A. State Legislation Needed

B. Non-federal funds not available to implement

C. Lack of State Staff to Develop Plan Material

D. Lack of Clarity in Federal Requirement

E. Federal Requirement Not Acceptable to State

F. Court Case Pending

G. Other (describe)

9. REGIONAL COMMISSIONER'S RECOMMENDATION:

A. Formal Action by Administrator

B. Conference Between Administrator and Representatives of State

C. Regional Office Continue Negotiations until (Date) _____

D. No Further Action Pending State Legislation to be sought (Date) _____

E. No Further Action Pending Clarification of Federal Requirement

F. Other (describe) Program of technical Assistance directed to deployment of staff in separate system continues to be provided by the Regional Office.

10. PRACTICE IN QUESTION

A. Deviation from Federal Requirement Represents:

- 1. Practices that do not conform to an approved State plan that meets Federal requirements
- 2. Practices that conform to an "approved" State plan that does NOT meet Federal requirements

B. Source of information: WRO

C. Extent of deviation from requirements:

1. State-wide

2. Selected counties

(a) Number Mainly in Cook County

(b) Percent of State case load in these counties _____ %

D. Briefly describe deviation from Federal plan requirement including obstacle to resolution:

During the 3rd quarter of FY 1972 it was decided, with Central office concurrence, that resolution of this issue could be more readily resolved through a program of technical assistance directed to action which must be taken by the State for deployment of personnel in order to achieve a separated assistance payments system on the one hand and a separate social services system on the other. While there were some delays in organizing the program of technical assistance, this has been reasonably fully underway for the past year with the active consultation of Technical Assistance Program, Incorporated as well as with contractors employed directly by the State agency. Substantial progress has been made in identifying

the numbers and kinds of personnel required to adequately staff the income maintenance system at least at the local level, but a significant period of observation of the operational staffing planning for the assistance payments system will be required before we can be assured that the issue has been completely resolved. Because of the State's preoccupation in planning for the assistance payments system, planning for the deployment of personnel in the social services system has lagged.

A change in the administration of the Illinois Department of Public Aid occurred following the election of a new Governor. The new Director of the Illinois Department of Public Aid, Mr. Joel Edelman, is taking a somewhat different approach to the organization of a social service system than that undertaken by his predecessor. As a result, a number of different models for delivery of social service are being developed and will be tested during the coming months. The foregoing has been reported to the Federal District Court on several occasions. The Federal District Court has shown some inclination to provide the additional time needed by the new Director of the Illinois Department of Public Aid in arriving at a conclusion concerning a desirable model for social service delivery. It is our current belief that the planning for deployment of personnel in the social service system will probably not be resolved until a considerable period of testing has taken place.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

April 5, 1974

James S. Dwight, Jr., Administrator
Attention: Warren Whitted, Special
Assistant to the Administrator
DHEW, Social and Rehabilitation Service

Acting Regional Commissioner, SRS

Region V - Quarterly Compliance Report (Quarter ending March 31, 1974)

The Region is submitting a total of 38 compliance issues this quarter. During the quarter 3 issues were resolved and 18 new issues have been

added. The total of pending issues for the previous quarter was 23. Each new compliance issue added this quarter is readily identifiable from item 6 of the Form SRS-OFC-2.

The Illinois compliance issue, 45 CFR 220.5, Adequacy of Staff, previously reported as an MDT issue is being shown as a CSA issue this quarter.

The large number of issues added this quarter is primarily due to recent changes in Federal policy and/or policy clarifications, and in many instances are related to conversion of the adult categories.

We believe that the issues are largely self-explanatory on the OFO-2 forms. Please feel free, however, to contact the Regional Office should you have any questions concerning this report.

We are attaching a tabulation of issues, by program, by State, which we believe you will find helpful.

* * *

April 1, 1974

ILLINOIS

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

ASSISTANCE PAYMENTS PROGRAM

45 CFR 233.50

Citizenship and Allengage Eligibility Requirement - Plan Issue. State plan amendment precluding AFDC assistance to illegal aliens has not been received.

45 CFR 233.20(a)(3)(ii)

Need, Income and Resources - Plan Issue. State plan for AFDC not amended to provide Skatened, income and resources of SSI beneficiary are not to be considered under Title IV-A.

45 CFR 206.10(a)(1)

Application - Choice of Program - Plan Issue. State has not submitted amendment to require that an individual eligible for benefits under either Title IV-A or XVI have the right to elect which of the programs he wishes to enter and which benefits he wishes to claim.

COMMUNITY SERVICES PROGRAM

45 CFR 220.5

Adequacy of Staff - Practice Issue

MEDICAL SERVICES PROGRAM

45 CFR 249.10(a)(7)

Amount, Duration and Scope of Medical Assistance - Practice Issue.

EPSDT program (Medicaid) does not provide screening for visual and hearing defects for all eligible children, restricting this to those in school.

45 CFR 250.30(a)(3) &
(b)(1)

Payment of Reasonable Costs in Hospitals; Audits and Adjustment of Payments.

45 CFR 252.10(b)(3)

Nursing Home Administration; Licensing; Training and Instruction Program - Practice Issue. The State Board for licensure of nursing home administrators is not constituted properly per Federal Regulations.

Forms attached to the foregoing
page are on file at the U.S.
Commission on Civil Rights.

Exhibit No. 10

1. Current statistics on Department of Public Aid employees and AFDC recipients showing a breakdown by race/sex.

Comment: See attached Exhibit A and B for breakdown on DPA employees and AFDC caseload.

2. The same data for the past two years.

Comment: Data is not available for FY 73 for employees and current data for AFDC caseload will not be available until August 1, 1974.

3. Also, data analyzing special demonstration projects administered by DPA over the last five years designed to ascertain and/or to meet the needs of welfare recipients.

Comment: Data Input Operator training;
Office Training, e.g. typing, shorthand, letter writing;
Licensed Practical Nursing Training;
Cosmetology;
Vocational Training for recipients willing to participate;
Scholarship Award Program leading to college degree;
Child Care;
Job Placement Program;
Relocation Services;
Housing Bureau designed to get landlords to improve substandard housing.

4. Also actual number of welfare mothers who applied for welfare in 1973.

Comment: The actual number of mothers who applied for welfare in 1973 is 49,472.

5. The number of those unwilling to give name of father of child/children.

Comment: This information is not available inasmuch as it does not serve any meaningful purpose in attempting to meet the needs of the recipient.

6. Total number of AFDC recipients by district offices.

Comment: See attached Exhibit C.

7. Average caseload per case manager for last 3 years (broken down by year).

Comment: This question is not within the scope of the hearing please see attached notice "Commission on Civil Rights, Illinois, Federal Register, Vol. 39, No. 96 - Thursday, May 16, 1974." It appears to relate only to women's rights. We do not have immediate access to this information, therefore, this question should not be answered in any way. This was the Agency position in a Court Suit "Brown vs Swank".

8. The total number of employees of the Department State-wide.

Comment: As of May 15, 1974, there were 8,858 employees.

9. The total number of Spanish speaking staff.

Comment: There are 109 Spanish speaking persons hired by the Agency.

10. The total number of Spanish speaking staff in Cook County.

Comment: There are 91 Spanish speaking staff in Cook County.

11. The type of positions held by Spanish speaking staff.

Comment: See attached Exhibit D.

12. The racial breakdown of the AFDC caseload by case manager.

Comment: This information is unavailable inasmuch as our efforts are put forth to meet the needs of the recipients without regard to their ethnic back ground.

EXHIBIT A

UNITED STATES CIVIL SERVICE COMMISSION
CONSOLIDATED STATE REPORT

Form Approved
OMB No. 50-RO430

EQUAL EMPLOYMENT OPPORTUNITY SURVEY OF GRANT-AIDED STATE AND LOCAL AGENCIES

For USCS Use Only		<input checked="" type="checkbox"/> Report on Employees in Continuing Full-Time Positions; <input type="checkbox"/> Report on all Other Employees. (check one)	Date.
SC <u> </u> cc 1-2	PC <u> </u> cc 3-5		FY <u> </u> cc 6-7
State	Agency		Location
ILLINOIS	DEPARTMENT OF PUBLIC AID		301 East Monroe Springfield, Illinois
Name of Individual Completing Report	Telephone No.		
DAVID KEIL	217-782-7492		

(continued)

(continued)

JOB AND OFFICE CATEGORIES			ALL EMPLOYEES		
			Total (Col. 2+3) (1)	Male** cc 10-14 (2)	Female*** cc 15-19 (3)
EXECUTIVE AND MANAGERIAL	Central Headquarters	Line No. cc 8-9 01	160	110	50
	Major Metro Offices	02	106	54	52
	Other Metro Offices	03	9	6	3
	Nonmetro Offices	04	13	12	1
PROFESSIONAL AND TECHNICAL	Central Headquarters	05	517	256	261
	Major Metro Offices	06	2,475	1,084	1,391
	Other Metro Offices	07	271	67	204
	Nonmetro Offices	08	485	154	331
AUXILIARY AND AIDE	Central Headquarters	09	*	*	*
	Major Metro Offices	10	*	*	*
	Other Metro Offices	11	*	*	*
	Nonmetro Offices	12	*	*	*
CLERICAL AND OFFICE	Central Headquarters	13	732	93	639
	Major Metro Offices	14	3,428	341	3,087
	Other Metro Offices	15	232	25	207
	Nonmetro Offices	16	430	23	407
CUSTODIAL AND SERVICE	Central Headquarters	17	*	*	*
	Major Metro Offices	18	*	*	*
	Other Metro Offices	19	*	*	*
	Nonmetro Offices	20	*	*	*
TOTAL			8,858	2,225	6,633

*Data Not Available for these categories from department report, included in clerical - office.

**Partially Estimated.

(continued)

MINORITY GROUP EMPLOYEES

(continued)

JOB AND OFFICE CATEGORIES		Line No. cc 8-9	Male				Female				TOTAL All Minority Groups (12)
			Black cc 20-24 (4)	Oriental cc 25-29 (5)	American Indian cc 30-34 (6)	Spanish Surnamed American cc 35-39 (7)	Black cc 40-44 (8)	Oriental cc 45-49 (9)	American Indian cc 50-54 (10)	Spanish Surnamed American cc 55-59 (11)	
EXECUTIVE AND MANAGERIAL	Central Headquarters	01	5	-	-	1	11	-	-	-	17
	Major Metro Offices	02	21	1	-	-	30	-	-	-	52
	Other Metro Offices	03	-	-	-	-	1	-	-	-	1
	Nonmetro Offices	04	1	-	-	-	-	-	-	-	1
PROFESSIONAL AND TECHNICAL	Central Headquarters	05	17	1	-	4	47	1	-	2	72
	Major Metro Offices	06	228	6	-	21	489	11	-	27	782
	Other Metro Offices	07	-	-	-	1	6	-	-	1	8
	Nonmetro Offices	08	1	-	-	-	10	-	-	-	11
AUXILIARY AND AIDE	Central Headquarters	09	*	*	*	*	*	*	*	*	*
	Major Metro Offices	10	*	*	*	*	*	*	*	*	*
	Other Metro Offices	11	*	*	*	*	*	*	*	*	*
	Nonmetro Offices	12	*	*	*	*	*	*	*	*	*
CLERICAL AND OFFICE	Central Headquarters	13	15	-	-	1	95	-	-	3	114
	Major Metro Offices	14	199	-	-	8	2,306	4	-	27	2,544
	Other Metro Offices	15	3	-	-	-	24	1	-	3	31
	Nonmetro Offices	16	-	-	-	-	11	-	1	-	12
CUSTODIAL AND SERVICE	Central Headquarters	17	*	*	*	*	*	*	*	*	*
	Major Metro Offices	18	*	*	*	*	*	*	*	*	*
	Other Metro Offices	19	*	*	*	*	*	*	*	*	*
	Nonmetro Offices	20	*	*	*	*	*	*	*	*	*
TOTAL			490	8	-	36	3,030	17	1	63	3,645

*Data Not Available for these categories from department report,
included in clerical - office.
**Partially Estimated.

UNITED STATES CIVIL SERVICE COMMISSION

Form Approved
O-E No. 50-10-107

INDIVIDUAL UNIT REPORT

EQUAL EMPLOYMENT OPPORTUNITY SURVEY OF GRANT-AIDED STATE AND LOCAL AGENCIES

State	Agency	Agency Unit and Location	Date
ILLINOIS	DEPARTMENT OF PUBLIC AID	RESEARCH AND STATISTICS 301 E. MONROE SPFLD.	JUNE 6, 1974
	Name of Individual Completing Report	Telephone No.	
	DAVID KEIL	217-762-7492	

I. EMPLOYEES HOLDING REGULAR FULL-TIME CONTINUING POSITIONS

Job categories	ALL EMPLOYEES			MINORITY GROUP EMPLOYEES								Total
	Total (Col. 2+3)	Male**	Female**	Male				Female				
				Black	Oriental	American Indian	Spanish Surnamed American	Black	Oriental	American Indian	Spanish Surnamed American	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Executive-Managerial	288	182	106	27	1	-	1	42	-	-	-	71
Professional-Technical	3,748	1,561	2,187	246	7	-	26	552	12	-	30	873
Auxiliary-Aide	*	*	*	*	*	*	*	*	*	*	*	*
Clerical-Office	4,822	482	4,340	217	-	-	9	2,436	5	1	33	2,701
Custodial-Service	*	*	*	*	*	*	*	*	*	*	*	*
TOTAL	8,858	2,225	6,633	490	8	-	36	3,030	17	1	63	3,645

(continued)

*Data not available for these categories from department report, included in clerical-
 **Partially Estimated
 II. EMPLOYEES ON OTHER THAN REGULAR FULL-TIME BASIS (TEMPORARY, PART-TIME, INTERMITTENT) office

(continued)

Job categories	ALL EMPLOYEES			MINORITY GROUP EMPLOYEES								
	Total (Col. 2+3)	Male	Female	Male				Female				Total
				Black	Oriental	American Indian	Spanish Surnamed American	Black	Oriental	American Indian	Spanish Surnamed American	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Executive-Managerial												
Professional-Technical												
Auxiliary-Aide												
Clerical-Office												
Custodial-Service												
TOTAL →												

Method Used to Collect Minority Group Information:

Visual surveys Post-employment records Other (specify) _____

ADC-U MAG

June 1973

BY SEX

	Total Persons	Male	%	Female	%
Total State	749,916	299,270	39.9	450,646	60.1
Cook	548,423	216,585	39.5	331,838	60.5
Downstate	201,493	82,685	41.0	118,808	59.0

BY RACE

<u>Race</u>	<u>Total State</u>	<u>Cook</u>	<u>Downstate</u>
Total	749,916	548,423	201,493
White	217,413 (30.1%)	101,038 (19.3%)	116,375 (58.6%)
Negro	500,341 (69.3%)	418,456 (80.0%)	81,885 (41.2%)
Indian	1,402 (.2%)	1,284 (.2%)	118 (.0%)
Other	2,824 (.4%)	2,503 (.5%)	321 (.2%)
Unknown	27,936	25,142	2,794

EXHIBIT C

Nursing Homes District Office	None
Western District Office	14,825
Michigan District Office	8,360
Oakland District Office	5,766
Northern District Office	7,859
Park Manor District Office	9,327
Kenwood District Office	3,818
Madison District Office	4,051
Englewood District Office	15,754
G. A. Office	598
Woodlawn District Office	4,177
Robert Taylor Homes District	3,430
Garfield District Office	8,194
Cabrini Homes Office	2,336
Wicker Park District Office	10,379
Southern District Office	20,879
Altgeld Gardens Office	1,362
Ida B. Wells Homes	2,065
Henry Horner Homes Office	1,303
Rockwell Gardens Homes	1,017
Jane Addams Homes Office	2,058
Harold L. Ickes Homes Office	1,540
Stateway Gardens Homes Office	1,389
South Suburban Office	6,829
Hospital Assistance D. O.	107
Lower North District Office	8,215
West Suburban District Office	2,655
Protective Payee	62
Emergency Employment Act	<u>522</u>
Total	148,877

EXHIBIT D

COOK COUNTY

TYPE OF POSITIONS HELD BY SPANISH SPEAKING STAFF

<u>Pay Grade</u>	<u>Male</u>	<u>Female</u>
2	2	2
3	2	10
4	1	7
6	2	-
8	4	11
9	-	1
12	7	15
13	8	8
14	5	4
16	1	-
17	-	1
Total	<hr/> 32	<hr/> 59

NOTE: If more than two persons in your assistance unit works, use another sheet for each person.

Do you or anyone else in your assistance unit earn money from working? <input type="checkbox"/> YES <input type="checkbox"/> NO			
The Working Person's Name Is: _____			
The Person or Company He or She Works For Is: _____			
He or She Is Paid Every: <input type="checkbox"/> Day <input type="checkbox"/> Week <input type="checkbox"/> Two Weeks <input type="checkbox"/> Half Month <input type="checkbox"/> Month <input type="checkbox"/> Other			
His or Her Pay Before Deductions Is: \$ _____ (This Is the Total Amount Really Earned)			
His or Her Pay After Deductions Is: \$ _____ (This Amount Is Received to Take Home)			
How Many Hours Does He or She Work Each Week? A.M. _____ P.M. _____			
Print The Amounts That Are Deducted From His or Her Earnings.			
Income Tax (Federal)	\$ _____	Medical/Hospital Insurance	\$ _____
Income Tax (State)	\$ _____	Pension or Retirement Fund	\$ _____
Social Security (FICA)	\$ _____	Union Dues	\$ _____
Group Life Insurance	\$ _____	Other (Tell What _____)	\$ _____
Do you or anyone else in your assistance unit earn money from working? <input type="checkbox"/> YES <input type="checkbox"/> NO			
The Working Person's Name Is: _____			
The Person or Company He or She Works For Is: _____			
He or She Is Paid Every: <input type="checkbox"/> Day <input type="checkbox"/> Week <input type="checkbox"/> Two Weeks <input type="checkbox"/> Half Month <input type="checkbox"/> Month <input type="checkbox"/> Other			
His or Her Pay Before Deductions Is: \$ _____ (This Is the Total Amount Really Earned)			
His or Her Pay After Deductions Is: \$ _____ (This Amount Is Received to Take Home)			
How Many Hours Does He or She Work Each Week? A.M. _____ P.M. _____			
Print The Amounts That Are Deducted From His or Her Earnings.			
Income Tax (Federal)	\$ _____	Medical/Hospital Insurance	\$ _____
Income Tax (State)	\$ _____	Pension or Retirement Fund	\$ _____
Social Security (FICA)	\$ _____	Union Dues	\$ _____
Group Life Insurance	\$ _____	Other (Tell What _____)	\$ _____
Transportation Expense . . . (Give amount and check below)			
<input type="checkbox"/> Car Payment (If buying a car) Amount each month \$ _____			
<input type="checkbox"/> Drive a car _____ miles a week			
How much each week for <input type="checkbox"/> Bus fare _____ <input type="checkbox"/> Taxi fare _____ <input type="checkbox"/> Pay to ride with a friend _____			
<input type="checkbox"/> Does not have any transportation expense _____			
Other Expense (Tell what) _____ \$ _____			
Check One Box: <input type="checkbox"/> Buys lunch at work <input type="checkbox"/> Takes lunch from home <input type="checkbox"/> Has no lunch expense			
Child Care Needed <input type="checkbox"/> YES <input type="checkbox"/> NO If YES, Why? _____			
Child Care Cost Per Week \$ _____			
For how many children? _____; How many hours each day? _____.			
How many days each week? _____ or each month? _____			
Where? . . . <input type="checkbox"/> At home <input type="checkbox"/> Relative's <input type="checkbox"/> Licensed Home <input type="checkbox"/> Unlicensed Home			

(Please Go To The Next Page)

Answer these questions about all the members in your assistance unit 16 years old or older and not in school.

Has any member registered for work at the Illinois State Employment Service? YES NO

If yes, give the name of the person or persons registered _____

What is the date of last registration for each person? _____

Has any member asked for Unemployment Compensation? YES NO

If yes, give the name of the person _____

When did he/she ask for Unemployment Compensation? _____

Does any member want help getting a job? YES NO

If yes, write the name of the person _____

Does any member want help getting training? YES NO

If yes, write the name of the person _____

The Work Incentive (WIN) Program is an employment counseling and placement program run by the Department of Labor for persons receiving welfare.

Is any member registered with the WIN Program? YES NO

If yes, write the names of all those registered _____

Does any member wish to volunteer for the WIN Program? YES NO

If yes, write their names here _____

More information concerning the WIN program may be obtained from your local public aid office.

Does any member have a health problem which prevents him/her from accepting work or training?

YES NO

If yes, give the name of the person _____

Describe the illness _____

Name of Physician _____

Is any member needed in the home to care for someone who is sick or disabled? YES NO

If yes, give the name of the person cared for _____

Who provides the care? _____

Is there a child under the age of six in your assistance unit? YES NO

Write the names of all children between the ages of 16 and 21 who are not fulltime students _____

Do you or anyone in your assistance unit get any checks or money other than from Public Aid or Employment?
 YES NO

Will you or anyone in your assistance unit be receiving (any time soon) any checks or money which you are not getting now? YES NO

If YES, from where? _____
 When do you expect to get it? _____ MO. _____ YR.

If you answered NO to both questions above, go to the next page.
 If you answered YES to either or both questions above, print the information below.

Print the name of the person who receives money from any of these places on the line beside it:

- Child Support _____
- Social Security _____
- Unemployment Comp. _____
- Veteran's benefits _____
- Railroad retirement _____
- Relative or friend _____
- Pay from Roomers/Boarders _____
- Pay for being in training _____
- Rent FROM property owned _____
- Military Service Allotment _____
- Sick benefits _____
- Railroad unemployment _____
- Striker's benefit _____
- Miner's benefits _____
- Lodges or Union _____
- Workmen's compensation _____
- Pension, any other _____
- Insurance _____
- Payments FROM property sold _____
- Interest on Investments _____
- Farm _____
- Alimony _____
- Trust fund _____
- Local or township relief _____
or General Assistance
- Other (Tell what it is) _____

Print the full name of the person getting the check or money and the other information asked for in the spaces below.

Name of person it is for	How much he or she gets	How often he or she gets it	Claim or account no.	Date of first and last payment

(Please Go To The Next Page)

Do you or any one in your assistance unit own any of these things? YES NO

Thing Owned	How much it is worth	Name of each person who owns it
Property where you live	\$ _____	_____
Land or buildings or a house other than where you live	\$ _____	_____
Money in a savings or checking or in a Safety Deposit Box or in a Credit Union	\$ _____	_____
Cash on hand-in pocket-in the house or that someone else keeps for you	\$ _____	_____
Trust Fund	\$ _____	_____
Stocks or Bonds	\$ _____	_____
Mortgages or Notes	\$ _____	_____
Prepaid Burial Plan	\$ _____	_____

If you answered NO go to the next question.

If you answered YES print the information above.

Answer the following question and then follow the directions for the rest of the page.

I or someone else in my family has sold or transferred all or a part of land or buildings or personal property (money, stocks, bonds, mortgages, notes, etc.) we did own. YES NO

If you answered "NO" to the above question, please go on to the next page now.

If you answered "YES" to the above question, answer each of the following questions.

What kind of property was sold or transferred: Land Buildings Personal Property
 When was it sold or transferred? Month: _____ Year: _____
 How much were you or your family members paid for it? \$ _____
 If you were not paid for it in money, why did you give it to someone else? _____
 How much of what you were paid do you have left? \$ _____

(Please Go To The Next Page)

Exhibits No. 12-15

STATE OF ILLINOIS
DEPARTMENT OF PUBLIC AIDJOEL EDELMAN
DIRECTOR816 EAST WASHINGTON STREET
SPRINGFIELD, ILLINOIS 62782

June 25, 1974

Mr. Arthur S. Fleming, Chairman
U.S. Commission on Civil Rights
Room 412
1 South Halsted Street
Chicago, Illinois

Dear Chairman Fleming:

Pursuant to the hearing that was held June 17, 1974, at the University of Illinois Circle Campus Center, 750 S. Halsted, Chicago, Illinois, we are herewith forwarding Exhibits 12, 13, and 14.

Exhibit 12 Reflects the gross earnings of recipients on Aid to Dependent Children up to and exceeding \$10,000.00 annually.

Exhibit 13 Copies of our Official Bulletins, which clearly indicate that the agency does not refuse assistance to any applicant or recipient who claims U.S. citizenship or alien status in the absence of being able to verify the place and date of birth.

Exhibit 14 [15] Schedule that reflects the total dollars expended by the Department of Public Aid (\$15,799,646.41) and by Department of Children and Family Services (\$13,122,907.32) for a total by the State of Illinois of \$28,922,553.73. The projected amount for FY'75 is \$46,076,372.00 for the State of Illinois.

I hope the aforementioned exhibits will support the testimony that was presented to the Commission on June 17, 1974. If you have any further questions, please feel free to contact my office.

Sincerely,

 A handwritten signature in cursive script that reads "Joel Edelman".

Joel Edelman
Director

JE:sf
Attach 3

ILLINOIS DEPARTMENT OF PUBLIC AID
 ALL AID CASES WITH EARNINGS (CODE 711)
 --MARCH 1974--

PAGE 23

↓

RUN DATE 04/10/74

SIZE OF FAMILY	SPECIAL ALLOWANCE	EXEMPT INCOME	COMPLETED GROSS INCOME	BUDGETED EARNINGS	WORK EXPENSE
06		306.17	858.51	305.91	246.43
04	280/ 65.00	210.48	571.44	114.58	246.36
02	280/ 60.00	201.64	544.92	96.93	246.35
07		202.00	546.00	97.67	246.33
03	280/ 43.33	231.02	633.06	155.72	246.32
03	280/119.16	168.33	444.99	30.41	246.25
02	280/ 60.00	202.03	546.09	97.85	246.21
03	280/ 66.67	202.44	547.32	98.83	246.05
05	280/ 66.66	238.92	656.76	171.81	246.03
05	280/ 35.00	193.00	519.00	79.96	246.02
04		153.00	399.00	.00	246.00
02	280/ 60.00	191.84	515.52	77.87	245.81
05		225.11	615.33	144.42	245.80
05		152.88	398.64	.00	245.76
02		176.67	470.01	47.66	245.68
03	280/104.00	239.56	658.68	173.44	245.65
03		192.69	518.07	79.74	245.64
02		193.33	519.99	81.04	245.62
03	249/ 3.00 280/ 65.00	243.24	669.72	180.88	245.60
04	280/130.00	214.50	583.50	123.75	245.25
04		252.55	697.65	200.50	244.60
04	280/ 60.00	229.62	628.86	154.86	244.38
06		200.83	542.49	97.44	244.22
07	280/ 34.66	240.00	660.00	175.06	244.16

NOTE: Case numbers and names deleted.

State of Illinois
Department of Public Aid

5-16-74

MEMORANDUM

Supplements O.B.s 74.24
and 74.25ACDEF
1234

Re: VERIFICATION OF BIRTH/CITIZENSHIP/ALIEN STATUS

This memorandum is to clarify the intent of the policy and procedures contained in Official Bulletins 74.24 and 74.25. Effective May 1, 1974, citizenship/alienage status must be verified for all applicants and recipients of AFDC, AABD, and related MA-NG. For those AABD and related MA-NG recipients who receive SSI, verification of citizenship shall be the responsibility of Social Security Administration. For all other groups, the responsibility lies with the Department of Public Aid.

For all applicants/recipients who report to be born in the United States or one of its territories, citizenship can be established by the verification of birth. Although a birth certificate is the primary document to verify birthplace, other types of verification will be accepted. (See Attachment to O.B. 74.24 for the various methods of verifying birthplace.)

For those individuals born outside the United States or one of its territories, and who claim to be a naturalized citizen, a copy of citizenship/naturalization papers is to be used as verification.

A person claiming to be a registered alien should have an alien registration card as proof of his alien status.

Staff should not refuse to authorize assistance to an applicant or recipient who claims U.S. citizenship or legal alien status and who agrees to cooperate in securing necessary verification.

JOEL EDELMAN
Director

State of Illinois
 Department of Public Aid
 OFFICIAL BULLETIN NO. 74.24

4-24-74

Suppl. Manual Chapter 4000
 4-24-74

Supplements Manual Chapter
 4000

ACDE
 123

Re: DETERMINATION OF ELIGIBILITY -- C 4000
 Home Visiting Program

To improve the effectiveness of the eligibility determination process, the Illinois Department of Public Aid is initiating an on-going program of home visits by Income Maintenance staff in all county departments. The purpose of this program is two-fold. First is to provide the staff an opportunity to know the people they serve and give recipients an opportunity to discuss their problems with the case manager. Second, the home visiting program will improve Agency standards of performance and provide for timely redeterminations of eligibility. Initially IM staff will be responsible for home visits, verifications and collateral contacts for all AFDC cases for which computer records indicate a redetermination has not been completed within the time limits prescribed in Manual topic 4005.1. Eventually the home visiting program will be extended to all assistance programs on an on-going basis.

At least two days per week shall be scheduled for home visits. A minimum of 15 redeterminations must be completed each week. Supervisory staff shall review visiting schedules before and after each visiting day to assist and guide IM staff in planning their work schedules so that the objective is reached. Visits should be scheduled so that travel time is reduced to a minimum. Staff Development will conduct in-service training sessions for all income maintenance staff prior to the start of the program in each county/district office.

County Superintendents/District Office Supervisors are responsible for seeing that the home visiting program begins in each county/district office as soon as the training program for that office is completed. Each superintendent/district office supervisor will establish a control and reporting system to be certain all cases included in this initial effort are redetermined within the time frame.

Each home visit must include a complete redetermination of eligibility. All eligibility factors pertaining to the case must be investigated. Verifications, when appropriate, must be secured. Collateral contacts, when indicated, shall be made. Referrals for support, determination of eligibility for other income and services available under current policy shall be made.

Verifications of the following eligibility factors must be secured if such data are not already recorded or filed in the case record.

1. For all children for whom assistance is granted, age, birthplace and degree of relationship to the grantee.
2. Birthplace and birthdate for all grantees (to determine citizenship or legal alien status).
3. Citizenship or legal alien status for all members in the assistance unit.

-2-

4. Income and assets.
5. Employment and employment-related expenses.
6. School status for all youths age 16 and over.
7. Dependency - support from absent parent.
8. Determination of the presence in the home of each child in the assistance unit.
9. Service and needs assessment for family.

For all youths age 16 and over, school status must be verified and recorded in the case record. Collateral contacts with elementary and high schools are excellent methods of determining if the child actually lives with the grantee. Pre-school age children can be observed at the time of the home visit.

If the home interview reveals information that indicates any family member may be eligible for benefits from some other source, appropriate referral action shall be taken.

For all AFDC cases in WIN counties, a copy of the WIN registration Form WIN 201, should be in the case record. If a copy of Form 201 is not in the case record, the grantee shall be asked to complete and sign a new form. If the youngest child in the assistance unit has reached age six, or other categories of exemption have changed since Form 201 was completed, the appropriate individual is required to re-register by completing a new Form 201. Established policy and procedures shall be followed to submit this data to the State Department of Labor.

PROCEDURES

Since the home visiting program will begin with the AFDC cases which, according to computer records, are delinquent for redetermination of eligibility, each county department will receive lists of all such cases by caseload. The time frame for the initial thrust of this program begins with the date training of case manager staff is completed in the county/district office; however, all home visits must be completed by July 31, 1974. It is recognized that all collateral contacts and verifications for cases visited in the latter part of July may not be completed by that date.

Internal controls shall be established in the county/district office to be certain that all cases on the list are visited by the end of July. (Cook County District Office Supervisors also will receive case tab cards which are to be used for control purposes.)

Form DPA 2027, Redetermination of Eligibility, has been designed to be used by case managers to record case information at the time of the home visit. In addition, staff should have available at the time of the visit other appropriate forms. For example, DPA Form 514, Information on Case History, shall be used to record supplemental information pertinent to the case; DPA Form 34, Consent to Release Information, can be signed by the grantee at time of home visit to permit verification of specific eligibility requirements; school verification (Forms DPA 541 or DPA 541c in Cook County) can be used during a visit to the local school to verify information concerning the child. Form DPA 2027 and replies to all other forms and letters sent as the result of the home visit are to be filed in the case record.

-3-

Preparation for home visits shall include a review of the case record to determine what information will need verification and a review of the current Form DPA 552 to secure information as to family composition, budgeted income and the amount of the current grant.

In the event the grantee is not home at the time of the initial visit, notification of the attempted home visit shall be left for the grantee with a request that the grantee contact the case manager on a specified date and time. (In Cook County Form CCPA-140b may be used for this purpose.) When the grantee contacts the case manager, arrangements for a second home visit shall be made or in instances where the grantee is employed, special arrangements may be made to complete the redetermination.

In the event the grantee does not respond to the request to contact the case manager within three working days after the specified time, the case manager shall prepare and mail DPA Form 157, Notice of Change, and take the appropriate follow-up action.

The grantee shall be requested to provide verification whenever such information is available to him. Collateral visits will expedite the receipt of information necessary to determine eligibility. One visit to the local school will provide information on children from several AFDC cases. Collateral visits may be added to the visiting schedule.

After information necessary to the redetermination is secured, the case manager shall review current eligibility and need. If eligibility is established and there are no changes in the amount of assistance, the date of redetermination of eligibility shall be changed on Form DPA 552 and the form shall be submitted for processing. If there is an increase in the amount of assistance, the budget will be revised, the date of redetermination of eligibility shall be changed on Form DPA 552 and the form shall be submitted for processing. If a reduction, suspension or cancellation of assistance is indicated, the case manager shall immediately initiate DPA Form 157 and follow procedures outlined in Manual topic 4005.5.

Reporting System: Form DPA 2028, Report on Home Visiting Program - AFDC, has been designed to provide statistical information as to the progress of this initial step in the home visiting program. County superintendents/district office supervisors are to mail this form no later than the close of business of each Monday to:

Mr. Jesse B. Harris, Deputy Director
Programs and Operations
618 East Washington Street
Springfield, Illinois 62762

Copies of this report are to be submitted to the Regional Director/Administrative Field Supervisor.

(over)

-4-

Cook County Only: Each district office will receive one deck of case tab cards for each case included in the initial phase of this program as well as these total listings of all cases by caseload. The case cards will include case name, address, case number and caseload number. In addition the case cards will have printed information for the case manager to complete and report his actions on the case. The deck of cards is to be broken down by supervising caseworker units. The supervising caseworker shall distribute the set of the case tab cards equitably within the unit giving consideration, whenever possible, to geographical areas to reduce travel time. The supervising caseworker will receive a listing of the cases by caseload and will use this as the control.

When the cards are returned from the case manager, the supervising caseworker will make appropriate entries on the control listings. The case manager cards are to be forwarded to a staff member appointed by the district office supervisor to compile the weekly statistical report, DPA Form 2028. This statistical information can be accumulated on a daily basis as forms are received to facilitate completion of the weekly report.



JOEL EDELMAN
Director

Forms Referred to:

DPA 34
DPA 157
DPA 514
DPA 541
DPA 541c
DPA 552
DPA 2027 (new)
DPA 2028 (new)

CCPA - 140b

State of Illinois
Department of Public Aid

GUIDE FOR VERIFICATION PROCESS

The following information is intended only as a guide to staff in the verification process. The consent of the applicant must be secured before any action is initiated to contact sources other than public records for information. Refer to Manual Topic 4003.2.

<u>Eligibility Factors To Be Verified</u>	<u>Sources of Verification</u>
Age, Birthplace, Degree of Relationship	Birth Certificate Baptismal Certificate Bible Entry Medical Records Social Security Records Veteran's Administration Records School Records Census Record Insurance Court Record Marriage Certificates Interviews and Affidavits from relatives, ministers, teachers physicians, attorneys, etc.
Citizenship or Legal Alien Status	Birth Certificates Citizenship Papers Alien Registration Card
Income Assets and Employment	Pay Stubs Employers' Statements Support Orders Social Security Records or Letters of Award Veteran's Records Railroad Retirement Records Unemployment Compensation Board Deeds Insurance Policies Bank Books or Statements Examination of Safe Deposit Boxes

(over)

Eligibility Factors
To Be Verified

School Status for Children
Age 16 and Over

Residence of Children

Sources of Verification

School Records
Affidavits from Landlords or
Neighbors

Dependency - Absent
Parent

Death

Death Certificate
Medical Report
Statement from Undertaker
Minister, Insurance Co.,
Cemetary - Newspapers Report

Divorce

Court Record
Decree

Continued Absence

Legal Separation
Legal Documents
Court Records

No Legal Action
Cooperation in Providing
Information for DPA Form 504a
Willingness to take Court action
and filing for paternity

Incarceration
Prison or Court Records

Military Service
Military Records

Deportation
Immigration and Naturalization
Records

Unemployment
Employer's Statement
Registration with ISES
Cooperation with WIN
School or training Attendance

Incapacity
Medical Report
DVR Records
V.A. Reports
Evaluation of social and
vocational situation

State of Illinois
Department of Public Aid

The following is a list of States known to charge fees for verification of vital statistics:

Fees charged for verification of:

<u>State</u>	<u>Birth</u>	<u>Death</u>	<u>Marriage</u>	<u>Divorce</u>
Alabama	\$2.00	\$2.00	\$2.00	----
Arizona	2.00	2.00	free	free
Arkansas	2.00	2.00	variable	variable
Colorado	2.00	2.00	variable	variable
Delaware	2.50	2.50	2.50	2.00
Washington D.C.	1.00	1.00	1.00	1.00
Georgia	3.00	3.00	variable	variable
Idaho	free	free	variable	variable
Iowa	1.00	1.00	1.00	variable
Kansas	1.00	1.00	1.00	1.00
Kentucky	free	free	.25	1.50
Maine	2.00	2.00	2.00	2.00
Maryland	2.00	2.00	2.00	2.00
Minnesota	2.00	2.00	variable	variable
Mississippi	2.00	2.00	2.00	2.00
Montana	2.00	2.00	.50	.50
Nebraska	2.00	2.00	variable	free
Nevada	free	free	2.25	variable
New Mexico	1.00	1.00	variable	free
North Dakota	2.00	2.00	variable	variable
Ohio	1.00	1.00	variable	variable
Oregon	1.00	2.00	2.00	2.00
Pennsylvania	free	free	variable	variable
South Dakota	2.00	2.00	variable	variable
Tennessee	2.00	2.00	2.00	2.00
Texas	2.00	2.00	1.00	1.00
Utah	free	free	2.00	2.00
Vermont	1.00	1.00	1.00	1.00
Virginia	2.00	2.00	2.00	2.00
Wisconsin	2.00	2.00	2.00	2.00
Wyoming	2.00	2.00	variable	variable

Other states have waived the payment of fees for public governmental agencies.

This Form is to be completed by caseworker

State of Illinois
 Department of Public Aid
 REDETERMINATION OF ELIGIBILITY



DATE OF VISIT _____

CASE NAME _____ CASE NUMBER _____
 LAST FIRST INITIAL CAT. CO./DIST. GRP. BASIC

ADDRESS _____
 Street City Zip Code

I. Name of Each Person in Assistance Unit	Birthdate Mo/Day/Yr.	Their Relationship To Grantee	Social Security Number	Complete For Each Child In Assistance Unit			
				School Year	Mother's Name	Father's Name	Parent's Address If Not Living in Home

II. Name of others who live with the Assistance Unit. If none, enter "NONE".	Their Relationship to Grantee	Their Source of Support is:

III. If anyone in the assistance unit receives any checks or money other than from Public Aid or employment, check the correct boxes below.

- | | | |
|--|---|---|
| <input type="checkbox"/> Child Support Paid to Grantee | <input type="checkbox"/> Military Service Allotment | <input type="checkbox"/> Insurance |
| <input type="checkbox"/> Social Security | <input type="checkbox"/> Sick Benefits | <input type="checkbox"/> Payments FROM Property Sold |
| <input type="checkbox"/> SSI | <input type="checkbox"/> Railroad Unemployment | <input type="checkbox"/> Rent FROM Property Owned |
| <input type="checkbox"/> Unemployment Compensation | <input type="checkbox"/> Striker's Benefits | <input type="checkbox"/> Interest on Investments |
| <input type="checkbox"/> Veteran's Benefits | <input type="checkbox"/> Miner's Benefits | <input type="checkbox"/> Farm |
| <input type="checkbox"/> Railroad Retirement | <input type="checkbox"/> Lodges or Union | <input type="checkbox"/> Alimony |
| <input type="checkbox"/> Relative or Friend | <input type="checkbox"/> Workmen's Compensation | <input type="checkbox"/> Trust Fund |
| <input type="checkbox"/> Pay from Roomers | <input type="checkbox"/> Pension | <input type="checkbox"/> Local or Township Relief or General Assistance |
| <input type="checkbox"/> Pay from Boarders | <input type="checkbox"/> Pay for Being in Training | <input type="checkbox"/> Other (Tell what it is _____) |

Name of Person Money or Check is for	What kind of income does he receive? (Child Support, Social Security, etc.)	Amount	How often is it Received?	Claim or Account No.

IV. Does anyone in the assistance unit own any of the following?		How much is it worth?	Name of Owner
No	Yes	Item Owned or Being Purchased	
<input type="checkbox"/>	<input type="checkbox"/>	Property where you live	\$
<input type="checkbox"/>	<input type="checkbox"/>	Land or buildings or a house other than where you live	\$
<input type="checkbox"/>	<input type="checkbox"/>	Money in a savings or checking account, a safety deposit box or a credit union	\$
<input type="checkbox"/>	<input type="checkbox"/>	Cash savings that you keep or that someone else keeps for you	\$
<input type="checkbox"/>	<input type="checkbox"/>	Trust Fund	\$
<input type="checkbox"/>	<input type="checkbox"/>	Stocks or Bonds	\$
<input type="checkbox"/>	<input type="checkbox"/>	Mortgages or Notes	\$
<input type="checkbox"/>	<input type="checkbox"/>	Prepaid Burial Plan	\$
<input type="checkbox"/>	<input type="checkbox"/>	Other Assets, explain	

V. Has anyone in the assistance unit sold or transferred any property (land, building, money, stocks, bonds, mortgages, note etc.) since receiving public assistance? Yes No

EMPLOYMENT INFORMATION

VI. Does the grantee earn money from working? Yes No If NO, go to Item VII, on this page. If YES, answer the following questions.

Employed by _____ Number of hours worked each week? _____
 Paid every day week two weeks twice monthly month other (specify _____)
 Pay BEFORE Deductions \$ _____ Pay AFTER deductions \$ _____

Enter the Amounts That are Deducted From Each Pay Period

Income Tax (Federal) \$ _____ Social Security (FICA) \$ _____ Mandatory Medical/Hospital Insurance \$ _____
 Income Tax (State) \$ _____ Mandatory Group Life Insurance \$ _____ Mandatory Pension or Retirement Fund \$ _____
 Mandatory Union Dues \$ _____ Other (Tell what _____) \$ _____

Grantee Buys lunch at work? Takes lunch from home? Not Applicable

Does grantee drive a car to work? Yes No If YES, how many miles per week? _____
 Is grantee buying a car? Yes No If YES, how much is the monthly payment? \$ _____

In order to get to work, how much does grantee spend each week for Bus Fare \$ _____ Taxi Fare \$ _____
 A ride with a friend \$ _____ What other transportation expenses to work? _____

VII. Does any other member of the assistance unit (age 14 or older) earn money from working? Yes No
 If NO, go to Item VIII on the next page. If YES, answer the following questions:

Name of the employed person _____ Age _____ How many hours does he work each week _____
 Does he attend school? Yes No If YES, what is the name of the school? _____
 Address of School _____ Does he attend school full time? Yes No

The Person or Company he Works For _____
 He is paid every day week two weeks twice monthly month other (specify _____)
 His pay BEFORE Deductions is \$ _____ His pay AFTER Deductions is \$ _____

Enter the Amounts That are Deducted From Each Pay Period

Income Tax (Federal) \$ _____ Social Security (FICA) \$ _____ Mandatory Medical/Hospital Insurance \$ _____
 Income Tax (State) \$ _____ Mandatory Group Life Insurance \$ _____ Mandatory Pension or Retirement Fund \$ _____
 Mandatory Union Dues \$ _____ Other (Tell what _____) \$ _____

Does he Buy lunch at work? Take lunch from home?
 Does he have to drive a car to work? Yes No If YES, how many miles per week? _____
 Is he buying a car? Yes No If YES, how much is the monthly payment? \$ _____

In order to get to work, how much does he spend each week for bus fare \$ _____ Taxi Fare \$ _____
 A ride with a friend \$ _____ What other transportation expense to work does he have? _____

Does any other member in the assistance unit (age 14 or older) earn money from working? Yes No
 If YES, answer the above questions on an additional sheet of paper and attach it to this form.

VIII. Is child care needed? Yes No If YES, why _____
Names and ages of children receiving care _____
What is the cost of child care per week? \$ _____ How many hours each day? _____ How many days each week _____ or
each month _____ Where is this child care provided? Your home Friend or relative's home Day care center
 Other (Explain) _____ Is the place where child care is provided a licensed facility Yes No

IX. Does grantee attend school? Yes No Does Grantee's husband or wife attend school?
If YES, answer the following questions: Yes No If YES, answer the following
Does the grantee Buy lunch at school Take lunch from home? questions:
How many miles is the school from home? _____ Does he or she Buy lunch at school
 Take lunch from home
Is payment needed for transportation to school? How many miles is his or her school from home
 Yes No If YES, how much each day? _____ Is payment needed for transportation to school?
 Yes No If YES, how much each day? _____

X. Answer these questions about the grantee, and spouse (if in the home) and all children in the assistance unit over
15 years of age and not in school.

Has any member registered for work at the Illinois State Employment Service? Yes No If YES, give the name of the
person or persons registered and date of last registration. _____

Has any member asked for Unemployment Compensation? Yes No If YES, give the name of the person or persons and
date Unemployment Compensation was requested. _____

Does any member want help getting a job? Yes No If YES, write the name of the person _____

Does any member want help getting training? Yes No If YES, write the name of the person _____

Is any member registered with the WIN Program? Yes No If YES, write the names of all those registered.

Does any member wish to volunteer for the WIN Program? Yes No If YES, write their names here.

Does any member have a health problem which prevents him/her from accepting work or training? Yes No
If YES, give the name of the person _____ Describe the illness _____

Name of Physician _____
Is any member needed in the home to care for someone who is sick or disabled? Yes No If YES, give the name of
the person cared for _____ Who provides the care? _____

Is there a child under the age of six in the assistance unit? YES No
Write the names of all children between the ages of 16 and 21 who are not full time students. _____

XI. Does the grantee currently receive food stamps? Yes No If NO, go to Item XII.
Does the grantee have a place to cook in the home? Yes No If NO, where does the assistance unit get its meals? _____

Does any member in the assistance unit receive an educational grant or scholarship? Yes No If YES, how much is received? \$ _____ How long a period of time is covered by this loan or grant? _____
How much is paid for tuition and laboratory fees required to attend school? \$ _____

Is any member of the assistance unit purchasing the house in which the assistance unit lives? Yes No If YES, what is the amount of the monthly mortgage payment? \$ _____ Does this amount include taxes? Yes No
Does the mortgage payment include insurance? Yes No What is the amount of taxes each year? \$ _____
How much does fire or other insurance on the property cost each year? \$ _____

If anyone in the assistance unit owns the house in which the assistance unit lives, what is the amount of taxes each year? \$ _____ How much does the fire or other insurance on the property cost each year? \$ _____

Does anyone in the assistance unit pay for room and board? Yes No If YES, how much \$ _____ weekly or \$ _____ monthly.

Does anyone in the assistance unit rent only a room? Yes No If YES, how much? \$ _____ weekly or \$ _____ monthly.

Does someone not included in the assistance unit pay the rent or house payment? Yes No If YES, what is the monthly amount paid? \$ _____

Is free housing provided by an employer of a member of the assistance unit? Yes No

If any of the following utilities are paid separately from the mortgage or rent payment, indicate the amount of the usual bill.

Heat	\$ _____	Cooking fuel	\$ _____	Sewer	\$ _____
Light	\$ _____	Water	\$ _____	Telephone	\$ _____

Does anyone in the assistance unit have the use of a credit card belonging to a person who is not a member of the assistance unit? Yes No

Does anyone in the assistance unit have the use of a charge account belonging to a person who is not a member of the assistance unit? Yes No

Does any member of the assistance unit pay court ordered child support or alimony? Yes No
If YES, who? _____ Amount \$ _____ weekly or \$ _____ monthly

Does anyone in the assistance unit have a foster child for whom they receive a maintenance allowance in the home? Yes No If YES, how much is the monthly maintenance allowance? \$ _____

XII. Does anyone in the assistance unit have any Life Insurance or Burial Policies? Yes No
 If YES, enter the information requested in the space below.

Name of the Insured Person	Name of Life Insurance Company	Policy Number	Name of Beneficiary	How Much Will Be Paid	Name of the Persons Who Pays the Premiums

XIII. Have any of the children received Medichex services during the past four months? Yes No
 Is any help needed in obtaining Medichex Services? Yes No
 Is any help needed in obtaining Family Planning Services? Yes No

XIV. COMMENTS:

XV. DETERMINATION:

ELIGIBLE NO CHANGE INCREASE DECREASE

NOT ELIGIBLE (Reason) _____

Redetermination Completed By _____ Caseload Number _____

Item 30, DPA 552, Updated Effective _____

State of Illinois
Department of Public Aid

REPORT ON HOME VISITING PROGRAM - AFDC

Week of ___/___/74 through ___/___/74

County/District Office Number

From: _____
County/District Office

To: Mr. Jesse B. Harris, Deputy Director
Programs and Operations
618 East Washington Street
Springfield, Illinois 62762

SECTION A

- 1. Total Home Visits to Be Made _____
- 2. Number of Home Visits Completed to Date _____
 - a) Number of Home Visits Completed This Week _____
- 3. Number of Home Visits Pending _____
(#1 minus #2)

SECTION B

- 1. Number of Redeterminations Completed _____
 - a) No Grant Change - Redetermination Date Changed _____
 - b) Total Grants Increased _____
 - c) Total Grants Reduced or Discontinued _____
 - 1) Reduced _____
 - 2) Suspended _____
 - 3) Cancelled _____

County Superintendent/District Office Supervisor

State of Illinois
Department of Public Aid

4-29-74

OFFICIAL BULLETIN NO. 74.25

SUPPLEMENTED BY Memo 5-16-74

Supplements Manual Chapters
100, 4000, and 5000;
Supplements O.B.s 72.33,
73.4, 73.46 and 74.24

ACDEF
12345

Re: RESIDENCE -- C 100
APPLICATION AND DETERMINATIONS OF ELIGIBILITY FOR ASSISTANCE -- C 4000
MEDICAL ASSISTANCE -- C 5000
Citizenship and Alienage

Federal Regulations now require, as a condition of eligibility for AFDC or Title XIX Medical Assistance, that the applicant (or recipient) be either a U.S. citizen or an alien who has been lawfully admitted for permanent residence or under color of law. This policy is consistent with the 1972 legislation setting up the Supplemental Security Income (SSI) program whereby aliens not legally admitted into the U.S. are excluded from SSI participation. This eligibility condition is being extended to the General Assistance (GA) and Local Aid to the Medically Indigent (AMI) programs. A release covering citizenship/alienage will be issued for GA and AMI in the near future.

General Interpretation of Citizenship/Alienage

Persons born in the United States or its possessions, who are subject to the jurisdiction thereof, are United States citizens. U.S. citizenship can also be acquired by naturalization through court proceedings, or by certain persons born in a foreign country of U.S. citizen parent(s). Birth certificates showing birth in the U.S. or its possessions, or U.S. naturalization documents (or a certificate of citizenship) are instruments which establish U.S. citizenship.

Long residence in this country, or marriage to a citizen do not by themselves confer citizenship on an alien. Furthermore, persons may lose their U.S. citizenship through naturalization or voting in another country, serving in its armed forces, by conviction of treason, or by formal renunciation of U.S. citizenship.

Persons not U.S. citizens by birth or naturalization are considered aliens. Aliens may be grouped as:

1. Immigrants -- aliens who have been admitted for permanent residence. All are required to have Alien Registration Receipt Cards (Form I-151). Form I-151 has the alien's name, registration number, port and date of entry into U.S., class of entry, date of birth, the photograph on the reverse, and the card is laminated in plastic. Present issue is blue printing on a background of small blue dots. Previous issues were either blue or black printing on a background of blue and yellow overlays, or black printing on a light green background.

(over)

-2-

2. Parolees -- aliens not otherwise admissible who have been paroled into the U.S. by the discretion of the U.S. government. Parolees are classified as legally admitted into the U.S. under color of law and are eligible for assistance. Parolees will have Form I-94 rather than Form I-151.
3. Nonimmigrants -- aliens admitted temporarily for specific purposes and periods of time are not eligible for assistance. Included in this group might be foreign governmental officials, visitors for business or pleasure (business does not include accepting employment in the U.S.), students attending specified schools, and exchange visitors under U.S. Department of State sponsorship.
4. Illegal Entrants -- aliens not admitted to the U.S. for either temporary or permanent stay but who entered in such a manner or place to avoid inspection. These individuals are not eligible for assistance. They may possess fraudulent documents.

A. Establishing Eligibility

Effective May 1, 1974, all applicants, for AFDC and Medical Assistance programs will be required to establish that they are either U.S. citizens, "immigrants" or "parolees" (as described above). In the event the applicant does not possess the proper papers to verify these aspects of eligibility for each member of the potential assistance unit, verification of the citizenship/alienage situation(s) should immediately begin. The applicant has responsibility for producing the proper papers, and may request assistance of staff as described below. Presumptive eligibility should be utilized in the situation where the AFDC applicant is in need of immediate financial assistance but verification has not yet been completed.

A review of this new eligibility requirement of all recipients currently receiving AFDC and Medical Assistance (except SSI related MA-NG) must be undertaken by case managers and is to be completed by July 31, 1974. For those cases included in the home visiting program described in O.B. 74.24, this verification can be made at the time of the home visit.

When the verification of citizenship/alienage status necessitates a contact with the U.S. Immigration Service because of lost alien or naturalization identification, the client should make such a contact. County department staff will not attempt to verify citizenship/alienage status through U.S. Immigration Service unless specifically requested to do so by the client. Documentation of such a request by the client must be entered in the case record. Form DPA 2029, Request for Citizenship/Alienage Verification, can be used by the county departments for this purpose. The grantee must sign the form, indicating she has requested the Department to verify the information with the U.S. Immigration Service. The form should be completed in triplicate with the original and one copy filed in the case record.

B. County Department/District Office Actions

1. Applicants

In accord with the verification procedures in O.B.s 73.46 (Part III) and 72.33, the AFDC or MA-NG applicant will be requested to provide birth certificate(s) or record(s) which establish that all members of the assistance unit for whom application is being made were born in the United States or its possessions (Puerto Rico, Virgin Islands, Guam, District of Columbia). If Form DPA 565, Application for Assistance, (or another application form) indicates that any person (parent or child for whom application is included) was born in the United States or its possessions, and is so verified, an entry of U.S. citizenship by birth should be made on Form DPA 514, Information on Case History, and Form DPA 552, Authorization of Assistance, as described in item C.

With regard to an applicant (or member of the assistance unit) providing information of birth in a foreign country, birth records to establish the degree of relationship of the adult(s) and children, birth place, and any documents which may show military service or residence in a foreign country while a U.S. citizen or a foreign national, or U.S. naturalization/alien status, should be requested for verification purposes. The verification of U.S. citizenship or for our purposes, legal alien status, is to be recorded on Forms DPA 514 and DPA 552.

Medical Assistance applications are to be reviewed in the same fashion, however when citizenship or lawfully admitted alien eligibility cannot be resolved within the verification time period(s) established by O.B. 72.33 and 73.46, the application will be denied. The MA-NG applicant will be advised to re-apply when the eligibility requirement can be met with verification documents.

Individuals should be advised to obtain proof of naturalization/legal alien status by contacting the U.S. Immigration and Naturalization Service, 219 South Dearborn Street, Chicago, Illinois 60604.

2. Recipients

Case managers will be responsible for reviewing the eligibility of all AFDC and MA-NG recipients (excluding SSI recipients) for this eligibility requirement within their caseloads with completion of such review by July 31, 1974.

Item 64 on the DPA 552 records the birthplaces of members of the assistance unit. This item and the case record (which may provide previous verification of birth and birthplace) should be reviewed. If adequate verification is already contained in the case record, no further verification is necessary, but recording of such eligibility (on Form DPA 552), as indicated in Part C, should still be completed.

If further verification is necessary, the AFDC or Medical Assistance grantee should be requested to provide birth certificate(s) or citizenship paper(s) for each person included in the assistance unit. The case record should include details of the foreign birth circumstances. Any entry on Form DPA 514 for lawfully admitted alien status will include information obtained from the Alien Registration Receipt Card (Form I-151 or Form I-94) including:

-4-

1. Alien's name (as used for registration)
2. Registration number
3. Port and date of entry into U.S.
4. Class of entry
5. Birthdate
6. Sex

C. Recording Eligibility

As mentioned above, the DPA 514 for each case is to be updated with establishment of eligibility as to U.S. citizenship/lawfully admitted alien status. Additionally, in each instance where establishment of eligibility is completed for a member of the assistance unit, an entry is to be made in item 74 (Personal Allowance) of the DPA 552 to indicate the eligibility condition. The following codes will be used:

- 20 -- U.S. Citizen by birth in U.S. or possessions
- 21 -- U.S. Citizen by birth in foreign country of U.S. Citizen parent(s)
- 22 -- Naturalized Citizen
- 23 -- Immigrant (having immigration papers)
- 24 -- Parolee Status under color of law
- 25 -- Verification of status pending

Code 25 should be entered for those individuals where action has been initiated and the final verification has not yet been obtained. All units involved in redeterminations of eligibility will review, as of August 1, 1974, and thereafter, the entry in item 74 (Personal Allowance) for each recipient and where there is an old entry of Personal Allowance coding, further inquiry will be undertaken in accord with current procedures.

FORMS

An initial supply of the new Form DPA 2029 is being sent under separate cover. An additional supply may be requested from Stores in the usual manner.

MANUAL NOTATIONS

- Chapter 100 - Topic 100 - After the last sentence, enter the following sentence: "Additionally, to be eligible for federally-assisted programs, a person must be a United States citizen, or an alien lawfully admitted for permanent residence or otherwise permanently residing in the U.S. and Illinois under color of law (including any alien who is lawfully present in the U.S. and Illinois as a result of the application of the provisions of section 203(a)(7) or section 212(d)(5) of the Immigration and Nationality Act)." Enter the marginal notation, "Per O.B. 74.25".
- Chapter 4000 - Topic 4003.1 - Enter the marginal notation "See O.B. 74.25 for verification requirements of citizenship/alienage".

Chapter 5000 - Topic 5005 - Enter the marginal notation, "See O.B. 74.25 for eligibility requirements of citizenship/alienage".

BULLETIN NOTATIONS

O.B. 73.46 -- On page 2 in the margin opposite III, enter the notation, "Supplemented by O.B. 74.25".

Joel Edelman
JOEL EDELMAN
Director

CITIZENSHIP/ALIENAGE INSTRUCTIONAL GUIDE

TYPES AND METHODS OF U.S. CITIZENSHIP/
 LEGAL ALIEN STATUS WHICH SATISFY
 ELIGIBILITY FOR PUBLIC ASSISTANCE
 PROGRAMS

VERIFICATION APPROACH

I. CITIZENSHIP BY BIRTH AND MARRIAGE

VERIFICATION DOCUMENTS

A) By Birth on U.S. Soil

- | | |
|---|---|
| <p>1) Anyone born in the U.S. or its possessions is a citizen (rare exceptions).</p> <p>2) A child of alien parents, who is born in the U.S., is a citizen by birth.</p> <p>3) If anyone born in the U.S. leaves the U.S. and takes part abroad in political organizations, votes or takes an oath of allegiance voluntarily (serves in foreign armed forces), or formally renounces his U.S. citizenship, he relinquishes citizenship.</p> | <p>1) Birth Certificate Showing birth in any State of the U.S. or its possessions (Puerto Rico, Guam, Virgin Islands, District of Columbia).</p> <p>2) Birth Certificate as above.</p> <p>3) Passport from U.S. Dept. of State is needed for re-entry. Upon re-entry, Immigration Service notifies Department of State.</p> |
|---|---|

B) By Birth Abroad

- | | |
|--|---|
| <p>1) Child born to U.S. parents living abroad but who return to U.S. before child's 23rd birthday.</p> <p>2) Child born abroad to an alien parent and parent with U.S. citizenship.</p> | <p>1) Report of Birth Abroad, issued by U.S. Department of State; Birth Certificate(s)</p> <p>2) U.S. Birth Certificate; Report of Birth Abroad</p> |
|--|---|

C) By Marriage

- | | |
|---|--------------------------------------|
| <p>1) Alien married to a U.S. citizen prior to 9/22/22.</p> | <p>1) Certificate of Citizenship</p> |
|---|--------------------------------------|

II. CITIZENSHIP BY NATURALIZATION

A) Immigrant alien who has completed naturalization process.

A) Naturalization papers.

B) Child(ren) of alien parents born abroad is citizen if one or both parents are naturalized U.S. citizen(s) before child reaches 18 years of age.

B) Certificate of Citizenship; Passport; Alien Registration Receipt Card.

III. LEGAL ALIEN STATUS

- A) Lawful admittance for permanent residence.
- B) Under color of law (identified as parolees who have been admitted to the U.S. at the discretion of the government, i.e. Cubans, Hungarians, Chinese (Hong Kong), Czechoslovakians, and other refugees from communist countries).
- A) Alien Registration Receipt Card; Immigration papers.
- B) Visa; Alien Registration Receipt Card; Immigration Service Documents.

Exhibit No. 16

ALASKAQuestions Raised on State Compliance with Federal RequirementsMedical Services Administration

45 CFR 250.20

The State has not designated the agency which monitors utilization review for Title XVIII of the Social Security Act to monitor Skilled Nursing Home Services under Title XIX. The required committees have not been established. The State is now moving rapidly to correct these deficiencies.

45 CFR 205.120

Although available in most areas of the State, EPSDT services are not generally available in Anchorage as of June 30, 1973. The State is still planning to utilize the Alaska Health Department as the major provider of EPSDT services in Anchorage. However, the Anchorage Borough Assembly has not yet approved the signing of a contract between the Health Department and the State. The State originally estimated that the contract would be signed by July 1, 1973 -- they now project signature by October 1, 1973.

The State has indicated that small numbers of children are being screened in Anchorage but data does not indicate that services are generally available and being provided to Anchorage eligibles.

Community Services Administration

45 CFR 205.102

Section 205.102(b)(1), Program Regulation Guide on the Separation of Services from Assistance Payments, states: "Under the head of the single State agency, two lines of authority are required, utilizing two State directors or chief officials, one for services and one for assistance payments." Alaska currently has only one State director immediately under the head of the single State agency. He served as a common administrator with social services and assistance payments separated immediately below him. This structural arrangement does not satisfy Federal Regulations. Region X understands that revision of the Separation Regulation is under active consideration.

DATE: June 26, 1973

ALABAMA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program

45 CFR 249.10(a)(5) Provision of Necessary Transportation

ALABAMA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

45 CFR 205.12 Separation of Services from Assistance Payments

ARIZONA

July 1, 1973

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Assistance Payments Program

45 CFR 205.10(3) and (5)(i)

-

Fair Hearings

Plan Amendment denies hearing and full prior notice when change in Federal or State law require automatic grant changes for classes of recipients.

CALIFORNIA

July 1, 1973

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Assistance Payments Program

- 45 CFR 205.10(i1) - Fair Hearings
Inadequate number of staff to handle fair hearings within Federal time standards.
- 45 CFR 206.10(a)(3) - Applications
Applications for APTD not processed within 60 days. Applications for OAA, AB, AFDC not processed within 30 days.
- 45 CFR 205.20(c)(5)
45 CFR 205.40 - Quality Control
Practice is not in full conformity - completing samples, monitoring, reporting.

Community Services Program

- HB IV 4700 D - Statewidness
AFDC social services.
- 45 CFR II, 220.4 - Advisory Committee
Committee not in operation.

Medical Services Program

- 45 CFR 205.120 - Early & Periodic Screening, Diagnosis & Treatment of Children
The State has implemented an EPSDT program but has not achieved statewidness.
- State Letter No. 937 - Civil Rights
Annual on-site inspections of skilled nursing homes.
- 45 CFR 248.21(a)(3)(i)(b) and (b)(2)(i) - Maintenance Level - Medically Needy
Revisions required to conform with AFDC maximum effective 10/1/73 have been changed but not yet submitted as plan.
- 45 CFR 248.21(a)(1)(iv) - Eligibility : Resource Level - Medically Needy
Resource level for medically needy not at resource level of highest payment program (AB).

CALIFORNIA - Page 2

July 1, 1973

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program - cont.

CFR 250.23(a)(3)(iii)

- Periodic Medical Review - A State Medical Review Team has not made an inspection in each facility at least annually.

July 1, 1973

COLORADO

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSMedical Services Program

45 CFR 249.10(a) (3) (iv)

Early and Periodic Screening Diagnosis
and Treatment
Operational IssueThere are no assurances that those eligible
recipients screened receive diagnosis and
treatment.

45 CFR 250.23(a) (2)

Periodic Medical Review and Inspection in
Skilled Nursing Homes and Mental Hospitals
Operational IssueState agency has taken over the Medical
Review process and has stated that it expects
to accomplish at least 70 percent of the
review by August 31.

45 CFR 250.30

Reasonable Charges
Operational IssueState has never made reasonable cost
settlements with hospitals participating
in the mental health program of Title XIX
for recipients over 55.

District of ColumbiaQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REGULATIONSMedical Services

- 45 CFR 250.20
 - State Practice does not perform Utilization Review as required in the approved state plan.

- 45 CFR 249.10(14)
 - State Practice has not included a written agreement between the state mental health authority/ mental institutions and the single state agency for provisions of Inpatient Hospital and Skilled Nursing Home Services to persons age 65 and older in mental institutions.

- 45 CFR 249.10(a)(3)(iv)
 - District practice has not yet implemented requirements for Early Screening, Diagnosis and Treatment of Children.

June 30, 1973

CONNECTICUTQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSAssistance Payments Program

45. CFR 205.10(a) (5) (111) (a) (1)

Instructions to Staff Implementing
Fair Hearings Regulations -
State policy would nullify the effect
of this regulation by requiring
reimbursement if the agency's action
is upheld by the Fair Hearing Decision.

DelawareQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REGULATIONSMedical Services

- | | |
|-------------------------|--|
| 45 CFR 249.10(a)(4) | - Failure to institute methods/ procedures to assure Title XIX recipients the availability of transportation to and from providers of medical services has not been met. |
| 45 CFR 250.20(a)(2)(iv) | - State Agency failure to implement the federal requirements for a Utilization Review Plan. |
| 45 CFR 250.23 | - State Practice does not provide adequate staff to perform periodic medical review and medical inspections in Skilled Nursing Homes and mental hospitals. |
| 45 CFR 206.10(a)(3) | - State Practice has failed to process applications for aid to the disabled within the required 60 days maximum period. |

Date: June 25, 1973

FLORIDA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program

45 CFR 249.10(a)(7) Amount, Duration and Scope of Medical Assistance. Drugs not available to all recipients on an equal basis.

FLORIDA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

45 CFR 205.12

Separation of Services From Assistance Payments

Date: June 26, 1973

GEORGIA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program

45 CFR 205.10 Statewideness. Early and Periodic Screening,
Diagnosis and Treatment

45 CFR 250.23 Periodic Medical Review in Skilled Nursing Homes

GEORGIA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

July 1, 1973

Assistance Payments Programs

Fair Hearings

45 CFR 205.10

Decision whether issue is one
of policy or fact/judgment is
made by local worker rather
than State Office.

HAWAII

July 1, 1973

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Assistance Payments Program

45 CFR 206.10(a)(9)(iii)

-

Overdue Redetermination of Eligibility

More than 40% of redeterminations overdue in AFDC, AABD, and Title XIX.

IDAHOQuestions Raised On State Compliance with Federal RequirementsMedical Services Administration

45 CFR 205.120

Idaho began implementation of the EPSDT program in January 1973. Notices have been mailed out to consumers that the program is now available to them. At this time, screening is only being done by the Child Development Centers in Idaho. As of the last reporting period screening services were being conducted in six of the seven CDC regional clinics. We have not received sufficient information in the Regional Office to determine whether or not the seventh clinic is actually offering EPSDT services.

Community Services Administration

45 CFR 205.102

The organizational pattern of multi-agency merger in Idaho has yet to be clarified. There is inadequate evidence of separation at the State level. There is separation at the local level but the local offices report directly to one Commissioner.

OREGONQuestions Raised on State Compliance with Federal RequirementsAssistance Payments Administration

45 CFR 205.10

The State submitted plan material on Fair Hearings on May 15, 1972. Several issues needing change and negotiation were resolved with the State as a result of an Administrative Review conducted in September 1972. However, the major issues of establishment of overpayments and collection of them according to a policy of "Delayed Corrective Action" remain. The agency takes these actions without establishing willful withholding of information or fraud by the client. The Regional Commissioner recommended formal action by the Administrator on this issue in the Quarterly Compliance Report for the period January 1, 1973 through March 31, 1973. A Formal Submittal was sent to the Administrator on May 4, 1973. Proposed changes in the 45 CFR 205.10 would affect this issue.

Medical Services Administration

45 CFR 249.10(a)(3)

The State Legislature has now approved funds for this program. In the Quarterly Compliance report for the period January 1, 1973 through March 31, 1973 the Regional Commissioner recommended Formal Action by the Administrator in this issue. On July 2, 1973, the Oregon Legislature appropriated $4\frac{1}{2}$ million dollars for this program. The Governor is expected to sign the appropriations bill of which Early and Periodic Screening, Diagnosis and Treatment is a part.

45 CFR 250.23

There is no physician member of the medical review teams as required by 45 CFR 250.23. On December 18, 1972 the Oregon Welfare Emergency Board approved a reclassification of the positions from Public Health Physician I to Public Health Physician II. The State Agency anticipates that the increased salary for Public Health Physician II should make it possible to successfully recruit physicians to head the medical review teams. One of the two physicians positions will be filled as of August 1, 1973.

Community Services Administration

45 CFR 205.102

The Family and Children's Service Agency, Children's Services Division, established by law effective July 1, 1971 was given responsibility for eligibility determination in AFDC-FC. Transfer of this responsibility to the Assistance Payments agency, the Public Welfare Division, requires the action of the State Ways and Means Committee to increase the Public Welfare Division's budget to include sufficient staff to assume this function.

July 1, 1973

ILLINOISQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSASSISTANCE PAYMENTS PROGRAM

- 45 CFR 205.40 (a)5 Reporting requirements were not met for the six-month reporting period, July - December, 1972.
- 45 CFR 205.10 (16) Summaries of Fair Hearings Practice Issue. Periodic Summaries required by Federal Regulations have not been submitted by the State since 3/1/71.
- 45 CFR 233.11 (a) WIN Registrations
As of last available report date (5/15/73) only 53.4 percent of registrations had been accomplished. State reports it will not be able to complete registrations by end of fiscal year.
- 45 CFR 205.10 (a)(ii) Fair Hearings - Practice Issue. Sixty-day standard of prompt action is not met.

MEDICAL SERVICES PROGRAM

- 45 CFR 249.10 (a)(3)(iii) Early and Periodic Screening, Diagnosis and Treatment of Eligible Individuals Under Age 21 - Survey for available resources and make arrangements and agreements for participation.
- 45 CFR 250.23 (a)(2)(i) & (ii) Periodic Medical Review
(i) Review team to be composed of the one or more physicians and other appropriate health personnel and
(ii) function under the supervision of a physician on the team.

OMDT

- 45 CFR 220.5 Adequacy of Staff. Practice Issue. Number of employees precludes State from meeting requirements for delivery of services

July 6, 1973

INDIANAQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSASSISTANCE PAYMENTS PROGRAM

- 45 CFR 233.20(a)(2)(i) Need: Standards of assistance in OAA, AB and APTD. The State plan permits individual determination of money amounts allowed for clothing and personal incidentals and also for room and board allowances up to specified maximums for recipients living in certain residential facilities. The maximums specified for personal needs are the mandated amounts for these items for other adult recipients.
- 45 CFR 206.10(a)(3) Applications. Standards of promptness. Practice issue. Practice does not meet Federal standards.
- 45 CFR 205.10(a)(11) Fair hearings. Practice issue. Standard for promptness in issuing fair hearing decisions is not met.
- 45 CFR 233.20(a)(5)(iv) & (v) Need: State AFDC plan does not meet requirements with respect to:
 (a)(6)(iv)
 (a)(7)(i)
 (a)(1)
- (1) disregard of \$30 + 1/3 of the remainder of earned income;
 - (2) the consideration of all expenses of employment; and
 - (3) decisions as to what work expenses and the amounts allowed for them are "reasonable and justifiable" are left to the discretion of the individual worker (which does not meet the requirement for uniform, equitable and objective determination of need and the amount of payment).

QUALITY CONTROL

- 45 CFR 205.40 Quality Control. Insufficient case reviews completed to enable determination that eligibility and correct payment is held within acceptable tolerance levels.

Indiana (Cont'd.)COMMUNITY SERVICES

45 CFR 205.102

Indiana has not submitted an approvable State Plan for Separation of Aids from Services, due to the unacceptability of this Federal requirement to the State.

45 CFR 222.2

No State Advisory Committee on Services to Adults appointed.

MEDICAL SERVICES

45 CFR 249.10(a)(3)

EPSDT - State began implementing program in eight counties and plans to expand to complete Statewide coverage by January 1974. County departments and providers notified of program but no notification sent to recipients.

OFFICE OF MANPOWER DEVELOPMENT AND TRAINING

45 CFR Ch. 11, Part 220,
Subject B 220.10 for
Titles IV-A & B

Staff development practice issue. Practice does not conform to revised State plan approved December 31, 1969.

45 CFR Ch. 11, Part
205.202 for Titles
I, IV-A, X, XIV (Proposed)

July 10, 1973

IOWA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

ASSISTANCE PAYMENTS PROGRAM

Deprivation of Parental Support
(Stepfather)

July 10, 1973

KANSASQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSMEDICAL SERVICES PROGRAMS

45 CFR 250.23(a)(2)	Periodic Inspections in Skilled Nursing Homes and Institutions for Mental Diseases
45 CFR 205.120	Statewideness - EPSDT
45 CFR 246.10(a)(2)(ii)	Title XIX recipients on Medical Care Advisory Committee

DATE: June 25, 1973

KENTUCKY

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program

45 CFR 250.23	Periodic Medical Review in Skilled Nursing Homes and Mental Hospitals not being provided by the State.
45 CFR 249.10(a)(5)	Provision of Necessary Transportation.
45 CFR 205.120	Statewideness - Early and Periodic Screening, Diagnosis and Treatment

LOUISIANAQuestions Raised on State Compliance with Federal Regulations --Community Services

45 CFR 205.102(1)(2)

*Separation of Services from
Assistance Payments*Medical Services

45 CFR 249.10(a)(3)

*Early Periodic Screening
Diagnosis and Treatment -
Statewide*

45 CFR 250.20

*Utilization Review of Care
and Services*

MarylandQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSMedical Services

- 45 CFR 225.2
- The agency does not use sub-professionals and volunteers in its highly centralized medical assistance program.
- 45 CFR 250.80(f)
- State Practice fails to employ a system to verify with recipients whether services billed by providers were received.
- 45 CFR 250.20(a)(2)
- State has failed to formulate a Utilization Review Plan.

June 30, 1973

MASSACHUSETTSQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSAssistance Payments Program

45 CFR 233.20(a)(3)(1)
233.20(a)(3)(1x)

Disregard of Vacant Land in
determining property resources.

Massachusetts statute issue 1938
has provided that non-income producing
land shall not be taken into
consideration in evaluating resources.

Medical Services Administration

45 CFR 249.33(a)(1)(vii)
PR 40-12 (C-1)

Standards for Payment for Skilled
Nursing Facilities

The State has not satisfactorily
implemented a life safety in-
spection program for the Title
XIX skilled nursing homes in
accordance with the NFPA Code.

45 CFR 250.23
PR 40-21

Periodic Medical Review

State has failed to perform
periodic medical reviews in
mental hospitals.

45 CFR 250.21(a)(b)
PR 40-13

Agreements with Providers of
Services

The State has failed to execute
agreements with each provider
of service.

45 CFR 250.71(a)(b)
PR 40-15 (C-1)

Information Reporting Requirements,
IRS

The State has not submitted the
required reports.

45 CFR 249.10(a)(3)(1)
PR 40-11 (C-4)

Amount, Duration and Scope -
EPSDT

The State has not established the
necessary administrative mechanisms
as specified in the regulations.

June 1, 1973

MASSACHUSETTS cont'd

- | | |
|---|--|
| 45 CFR 205.120 | Statewideness - EPSDT |
| | The State has not made necessary provisions for administration of the EPSDT program on a Statewide basis. |
| 45 CFR 250.30(b)(1)(i)(ii)
PR 40-4 (C-4) | Reasonable Charges |
| | The State has failed to pass retroactive adjustments to hospitals since the inception of the Title XIX program. |
| 45 CFR 250.30(b)(1)(ii)
PR 40-4 (C-4) | Reasonable Charges |
| | The State is reimbursing in-patient hospital services on the basis of non-approvable plan material. |
| 45 CFR 249.(b)(4)(i)(h)
PR 40-11(C-4) | Amount, Duration and Scope |
| 45 CFR 249.33(a)(2)(i)
PR 40-12 (C-1) | Standards for Payment for SNH Care |
| | The State failed to renegotiate valid provider agreements with SNH's receiving payment under the State's Medical Assistance Program. |

July 6, 1973

MINNESOTAQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSASSISTANCE PAYMENTS PROGRAM

- 45 CFR 233.10 (a)(1)(11) State plan for MA and AB provides for County waiver of real property maxima in cases where "undue hardship" would result from liquidation of excess resources. In OAA personal property maxima can be waived where "excess loss" would result from liquidation. State criteria to define "undue hardship" and "excess loss" are not given.
- 45 CFR 233.20(a)(3) Liquid assets permitted under plan for OAA total \$2250, thereby exceeding \$2000 maximum permitted under Federal regulations.
- 45 CFR 233.20(a)(2)(11) Special need items have been deleted from the State plan for AFDC. These include school transportation allowance, supplemental clothing allowance, supplemental fuel and utility allowance, and school drivers training allowance.
- 45 CFR 205.10(a)(2) Fair Hearing - Requirements not met in these areas:
- 45 CFR 205.10(a)(11)
- 45 CFR 205.10(a)(16)
- (1) Informational brochure on fair hearings is not available to all applicants, recipients and interested parties.
 - (2) In 41% of hearing decisions rendered, more than 60 days has elapsed since date of appeal.
 - (3) A periodic summary of hearing decisions is not being disseminated.
- 45 CFR 206.10(a)(3) State statistics reveal that the 60-day standard for a decision is exceeded in 50.8% of Aid to the Disabled applications.
- 45 CFR 233.20(a)(10) Plan amendment contains method for disregard of earned income contrary to the method presented in Federal regulations.

MEDICAL SERVICES

45 CFR 249.10(a)(3)

EPSDT - Total program

45 CFR 248.21(a)(3)(i)(b)

Real and personal property levels in Medically Needy are not as liberal as the most liberal level used in any money payment program. Level of income reserved for maintenance in MA is not as liberal as the level used in money assistance programs.

45 CFR 248.21(a)(3)(i)(d)

REHABILITATION SERVICES

45 CFR 401.5

"Designation of Sole State Agency." Minnesota Attorney General has maintained that the State agency for the Blind should be considered the "Sole State Agency" under Section 401.5(c). The HEW Regional Attorney has issued the opinion (9/22/72) that only the Department of Public Welfare qualifies as the "Sole State Agency."

45 CFR 401.6(c)

"Location of VR Organizational Unit." According to current organizational charts of the Department of Public Welfare, the State Services for the Blind is not given equal status as other major organizational units, as required by Section 401.6(c).

July 1, 1973

MICHIGANQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSASSISTANCE PAYMENTS PROGRAM

- 45 CFR 205.40(a)5 Reporting requirements were not met for the six-month reporting period July - December, 1972
- 45 CFR 233.20(a) (2) (v) Need: special diet allowance not uniformly available; this special need was deleted as an allowable budget item except in cases approved prior to 6/23/72.
- 45 CFR 205.10 Fair Hearings - Practice Issue Instructional material does not adequately cover all the requirements to which State committed itself in pre-print plan.
- 45 CFR 205.120 Presumptive Eligibility, Plan Issue. Not mandated Statewide.

MEDICAL SERVICES PROGRAM

- 45 CFR 250.23(a) (2) (i) and (a) (3) (iii) Periodic Medical Review State review teams are without an on-site physician.
- 45 CFR 250.23(a) (2) (i) Periodic Medical Review - State review teams do not review patients in mental hospitals.
- 45 CFR 248.21(a) (3) (b) Title XIX income levels.

MISSISSIPPI

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

July 1, 1973

Assistance Payments Programs

Medicaid Eligibility

45 CFR 248.10(b)(1)(i)

State does not certify ADC Caretaker Relatives eligible for Medicaid, if the caretaker elects to have his needs included in the budget of another case.

Simplified Method - Adult Categories

45 CFR 205.20

State routinely verifies age, income and property on all applications.

July 10, 1973

MISSOURI

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

MEDICAL SERVICES PROGRAM

45 CFR 249.10(a)(3)(iv)

Inclusion of Additional Services - EPSDT Agency has not issued materials advising local staffs and recipients of the availability of eyeglasses and hearing aids.

45 CFR 246.10(a)(2)(ii)

Title XIX recipients on Medical Care Advisory Committee

July 1, 1973

MONTANA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Community Services Program

45 CFR 220.4

Local Advisory Committees on AFDC and CWS
Operational Issue

State has not established local advisory
committees in 46 counties.

Jø 30, 1973

NEW HAMPSHIREQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REGULATIONSMedical Services Administration

45 CFR 249.10 (a)(3)(1)(iv)

Amount, Duration and Scope for EPSDT for Individuals under age 21.

Administrative system to confirm that children referred for diagnosis and treatment services have received these services will not be operative until on or about June 1, 1973.

All private practitioners in the State have not been communicated with regarding the contents of the screening package.

45 CFR 205.120

Statewideness - EPSDT

State has not provided full EPSDT services to eligible recipients throughout the State.

June 30, 1973

NEW YORKQuestions Raised on State Compliance with Federal RequirementsAssistance Payments

- | | |
|---------------------------|---|
| 45 CFR 233.20(a) (3) (ii) | Reduction of current assistance to recoup funds advanced to prevent eviction if rent had been previously included in the grant. |
| 45 CFR 205.10 | Fair Hearings.
Failure to the Federal fair hearings requirements; and failure to meet fully the standard for rendering decisions in 60 days. |
| 45 CFR 233.20(a) (2) | Failure to establish State-wide shelter standard. Schedules of maximum shelter amounts are established by the various local agencies. |
| 45 CFR 233.20(a) (2) | Failure to up-date shelter standards in all local agencies as of July 1, 1969. |

June 30, 1973

NEW JERSEYQuestions Raised on State Compliance with Federal RequirementsAssistance Payments

45 CFR 203.1

Deprivation of Parental Support.
Assumption of Income from step-parent.

45 CFR 205.10

Fair Hearings.
State practice not fully in compliance
with Federal Requirements.
Decisions on fair hearings not rendered
within 60 days and failure to continue
assistance at an unreduced level during
adjournment unless adjournment is due
to delay by State or local agency.

NEW JERSEY

Questions raised on State compliance with Federal requirements June 30, 1973

Medical Services Program

45 CFR 205.10

Fair Hearings

State practice not fully in compliance with Federal requirements.

Decisions on fair hearings not rendered within 60 days and failure to continue assistance at an unreduced level during adjournment unless adjournment is due to delay by State or local agency.

45 CFR 250.23

Period Medical Review and Medical Inspection

State does not fully comply with provisions in that physicians do not visit the facility as part of a team evaluation and evaluatory reports are not prepared and distributed as required.

Early and Periodic Screening, Diagnosis and Treatment

All providers have not been notified of EPSDT "screening package" and of the reporting requirements. Neither administrative mechanisms nor a reporting system has been developed to assure that children screened have received the "screening package" and that those referred for diagnosis and treatment have received these services.

45 CFR 249.10(a)(3)(iii)

Agreements with Providers

The State has not provided for agreements to assure maximum utilization of existing screening, diagnosis and treatment services.

Section 1905(a)(16)

Intermediate Care

Although State Plan places responsibility for ICF under Title XIX Program payments have continued to be made under the Welfare Titles.

Questions Raised on State Compliance with Federal Requirements

NEW JERSEY

45 CFR 205.102

Submittal of separation plan of
services from assistance payments.

Issue: The reorganized structure
is not in compliance with separation
regulation.

New York State - Medical Services

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

June 30, 1973

- 1) 1902(a)(4)
1902(a)(20)

Administration of Assistance for
Aged in Mental Institutions -
State does not meet Federal re-
quirements for staffing of the
Medical Assistance Unit and for
the administration of the program
for assistance for aged individuals
in institutions for mental disease.

- 2) 45 CFR 205.10

Fair Hearings
State fair hearings practice is not
fully in compliance with Federal
requirements.

NEW YORK

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

JULY 1, 1973

Manpower Development & Training

45CFR205.202
Titles I, IVA, X,
XIV, XVI or XIX

Practice issue. Educational Leave
policies suspended; Legislature
failed to appropriate funds.

45CFR220.10

Questions Raised on State Compliance with Federal Requirements

NEW YORK

45 CFR 205.102

Submittal of separation plan of services from assistance payments.

Issue: To determine its conformity to Federal guidelines

Questions Raised on State Compliance with Federal Requirements

New York

45 CFR 205.102

Submittal of separation plan of
services from assistance payments.

Issue: To determine its conformity
to Federal guidelines

NORTH CAROLINA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

July 1, 1973

Assistance Payments Programs

Fair Hearings

45 CFR 205.10

(Includes MSA Compliance Issue)

The State Office of Social Services has not complied with Federal policy requiring continuation of medical and financial assistance in AFDC pending a final Fair Hearing decision by the Commissioner or for group hearings in all categories, if requested by recipients.

Date: June 27, 1973

North Carolina

Questions Raised on State Compliance With Federal Requirements

Medical Services Program

45 CFR 249.10(a)(3) Requirements for Early and Periodic Screening
Diagnosis, and Treatment of Individuals Under
Age 21

45 CFR 250.23 Periodic Medical Review

NORTH CAROLINA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

45 CFR 205.102

Separation of Services From Assistance Payments

July 1, 1973

North DakotaQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSAssistance Payments Program

45 CFR 205.10

Fair Hearings
Operational Issue

Advance Notice waived to unacceptable degree. Proposed Federal regulations will resolve this issue when published.

Community Services Program

45 CFR 205.102

Separation of Services and Assistance
Plan Issue

State has not submitted information requested by Regional Commissioner to determine action on separation plan.

Medical Services Program

45 CFR 249.10(a) (3) (iv)

Early and Periodic Screening, Diagnosis
and Treatment
Operational Issue

State has not defined its screening package.

45 CFR 249.10(a) (3) (iv)

Early and Periodic Screening, Diagnosis
and Treatment
Operational Issue

State has not developed an adequate system for assuring follow up of those persons screened.

July 1, 1973

OHIOQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSASSISTANCE PAYMENTS PROGRAM

- 45 CFR 233.20(a)(3)(11)(a)
(v1)(b) Need and Amount of Assistance. Plan Issue. AFDC plan amendment calls for disregarding income from Social Security, child survivor's benefits in determining needs of parent (beneficiary) and her children.
- 45 CFR 233.20(a)(1), (2)(111) Need and amount of assistance. Plan Issue. OAA plan amendment implementing State statute which results in a standard that is not uniformly applied and precludes determination of need on an objective and equitable basis.
- 45 CFR 206.10(a)(9)(111) Redetermination of Eligibility in AFDC. Practice Issue. Redeterminations are delinquent in five counties.
- 45 CFR 205.10(a)(3)(vi) Fair Hearings. Practice Issue. State instructions provide that the hearing officer make a decision "on the record" where there is no dispute over facts and when both the agency and appellant waive their right to a fair hearing.
- 45 CFR 205.10(a)(11) & (16) Fair Hearings. Practice Issue. Commitments in approved plan not met with respect to two areas:
(1) The 60 day standard of prompt action
(2) The issuance of periodic summaries of Fair Hearing decisions (none issued since April 1971).

OHIO (Cont'd)MEDICAL SERVICES PROGRAM

- | | |
|--------------------------|---|
| 45 CFR 249.10(a)(3)(ii) | EPSDT of Eligible Children Under Aged 21. (Develop and Execute Notification to Eligible Children et al) |
| 45 CFR 249.10(a)(3)(iii) | EPSDT - (Survey for available resources and make arrangements and agreements for participation) |
| 45 CFR 249.10(a)(5) | EPSDT - System for making referrals, appointments and arranging transportation. |

PennsylvaniaQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSAssistance Payments

- 45 CFR 233.20(a)(2)(11) - State practice does not provide Statewide in the shelter standard.

Medical Services

- 45 CFR 249.10(a)(3) - State practice has not implemented Early Screening, Diagnosis and Treatment of Children in any part of the State.
- 45 CFR 248.21(a)(3) - Contrary to the Regulations (CFR 248.21(a)(3) the state uses gross rather than net income when determining financial eligibility for the medically needy.
- 45 CFR 249.10(a)(4) - Pennsylvania imposes a \$5.00/month co-payment on medically needy recipients for transportation services. The state plan amendment describing the co-payment mechanism has not been approved by the Regional Office. The state may reduce this to \$2.00/month to satisfy intent of HR 1.
- 45 CFR 250.23(a)(2) - State Practice does not provide for periodic review and medical inspections in skilled nursing home facilities.

Puerto Rico

Questions raised on State compliance with Federal requirements June 30, 1973

Section 1902(a)(13)(B)
Section 1902(a)(26)

Payment of Medicare Deductibles
P.R. is not paying deductibles for inpatient care for patients eligible for Title XVIII and Title XIX.

45 CFR 249.10(a)(3)

Early and Periodic Screening, Diagnosis and Treatment

i. Administrative Mechanisms

P.R. has not yet developed the necessary mechanisms to identify Medicaid eligible children who are receiving care or those who are not receiving care.

ii. Notification of Recipients

P.R. has not notified Medicaid eligible recipients of the EPSDT program.

iii. Agreements with Providers

P.R. still does not have an agreement between MCH and Title XIX.

June 30, 1973

PUERTO RICO

QUESTION RAISED ON COMPLIANCE WITH FEDERAL REQUIREMENTS

Office of Management

45 CFR 205.40

Quality Control report to the Federal Government as prescribed.

Although established tolerance limits have been exceeded, Commonwealth has not submitted the narrative report on the nature and causes of the problems, the actions planned or taken to reduce or eliminate the incidence of error, and results of previous action taken.

Questions Raised on State Compliance with Federal Requirements

PUERTO RICO

45 CFR 205.102

Submittal of plan of separation of services from assistance payments.

Issue: The reorganized structure is not in compliance with separation regulation.

June 30, 1973

RHODE ISLAND

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Administration

45 CFR 250.23
PR 40-21

Medical Review

The State has not conducted Medical Review in its Mental Hospitals as required in the regulations.

SOUTH CAROLINA

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

45 CFR 205.102 Separation of Services from Assistance Payments

July 1, 1973

SOUTH DAKOTAQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSAssistance Payments Program

45 CFR 233.20

Adjustment of Assistance Standards
Operational IssueStandard not properly updated. Assistance
will be provided State toward developing
flat grant which will resolve issue.Medical Services Program

45 CFR 249.10(a)(3)(iii)

Early and Periodic Screening, Diagnosis
and Treatment
Operational IssueInadequate agreements with screening
resources. Arrangements initiated by
State to establish necessary agreements.

45 CFR 249.10(a)(3)(iv)

Early and Periodic Screening, Diagnosis
and Treatment
Operational IssueNo assurance that screened eligible recipients
receive diagnosis and treatment.

Date: June 30, 1973

TENNESSEE

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program

- | | |
|--------------------------|---|
| 45 CFR 249.10(a)(5) | Assuring necessary Transportation |
| 45 CFR 205.120 | Early and Periodic Screening Diagnosis and Treatment - Statewideness.
THIS ITEM PREVIOUSLY REPORTED HAS BEEN RESOLVED. |
| 45 CFR 249.10(a)(3)(i) | Early and Periodic Screening Diagnosis and Treatment; Administrative Mechanisms. |
| 45 CFR 249.10(a)(3)(iii) | Early and Periodic Screening Diagnosis and Treatment; agreements to assure maximum utilization of existing services. |

TENNESSEE

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

45 CFR 205.102 Separation of Services from Assistance Payments

Date: June 30, 1973

TENNESSEE

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Medical Services Program

- | | |
|--------------------------|---|
| 45 CFR 249.10(a)(5) | Assuring necessary Transportation |
| 45 CFR 205.120 | Early and Periodic Screening Diagnosis and Treatment - Statewideness.
THIS ITEM PREVIOUSLY REPORTED HAS BEEN RESOLVED. |
| 45 CFR 249.10(a)(3)(i) | Early and Periodic Screening Diagnosis and Treatment; Administrative Mechanisms. |
| 45 CFR 249.10(a)(3)(iii) | Early and Periodic Screening Diagnosis and Treatment; agreements to assure maximum utilization of existing services. |

TEXASQuestions Raised on State Compliance with Federal Regulations --Assistance Payments --

45 CFR 206.10(a)(5)	Delay in assistance due to guardianship policy - AB- APTD
45 CFR 206.10(a)(3)	Prompt furnishing of assistance

Medical Services --

45 CFR 252.10(b)(3)	Licensing of Administrators of Nursing Homes
45 CFR 249.10(a)(4)	Home Health Services
45 CFR 249.10(a)(3)(iv)	EPSDT - Eye Glasses and Hearing Aids
45 CFR 205.120	EPSDT - Statewideess

July 1, 1973

UTAH

QUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTS

Community Services Program

45 CFR 220.2 and 220.5

Change in Single Organizational Unit
for Services and Staffing Patterns
Plan Issue

Plan material not yet submitted.

June 30, 1973

VERMONTQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSMedical Services Administration

45 CFR 249.10(a)(3)(i)(ii)(IV)
PR 40-11 (C-4)

Amount, Duration and Scope of EPSDT
for Individuals under age 21

Administrative outreach mechanisms are insufficient to assure that individuals under age 6 who are eligible for medical assistance may receive services of available screening and diagnostic facilities. The State Legislature does not permit the hiring of required staff for implementation of the outreach provision.

The State has not communicated the contents and related administrative data of the screening package to all private practitioners.

45 CFR 205.120
PR 10-11

Statewide - EPSDT

The State has not fully implemented provisions for EPSDT program on a Statewide basis.

45 CFR 250.23
PR 40-21

Medical Review

Medical Review in the State's two (2) mental hospitals have not been accomplished.

VirginiaQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSMedical Services

- 45 CFR 246.10(a)(1) - State plan does not provide for required rotation of membership on the state's Medical Care Advisory Committee.
- 45 CFR 250.20(a)(1) and (2) - State Utilization Review Plan does not include certain required components (e.g., clinic and OPD services, mental retardation, etc.) UR not performed by Title XVIII UR Committee or other, as required.

Virgin Islands

Questions raised on State compliance with Federal requirements
June 30, 1973

Medical Services Program

Section 1902(a)(4)(A)

Staffing for administration
of Medical Assistance Program

Inadequate staffing of Medical Assistance Unit to adequately administer the State's Title XIX Program.

Section 1905(a)(4)(B)

45 CFR 249.10(a)(3)(i)

Early and Periodic Screening,
Diagnosis and Treatment of
Individuals under 21.
Administrative Mechanisms

Virgin Islands has not fully established the necessary administrative mechanisms needed to identify available screening and diagnosis facilities or to assure that children referred for diagnosis and treatment services have received these services.

Section 1905(a)(4)(B)

45 CFR 249.10(a)(3)(iii)

Early and Periodic Screening,
Diagnosis and Treatment of
Individuals under 21.
Notification of Recipients.

Virgin Islands has not yet informed all eligible individuals of services available under EPSDT Program.

WASHINGTONQuestions Raised on State Compliance with Federal RequirementsAssistance Payments Administration

45 CFR 205.10(a)(5)(iii)(a)(1) The State considers payments made pending a Fair Hearing to be an overpayment if the client loses the hearing decision. The State contends Federal Regulations do not bar them from the above mentioned practice. They indicate that other regulations require that they not pay ineligible persons.

Medical Services Administration

45 CFR 205.120 The State Agency is continuing to work on increasing the number of providers for the Early and Periodic Screening Diagnosis and Treatment Program. At this time, the program does not meet the statewide requirements of 45 CFR 205.120.

45 CFR 250.23(a)(2) This regulation as clarified by MSA - Policy Information Memo dated February 15, 1972, requires on-site participation by physician-supervisor of the medical review team. The State notified the Regional Office that by March 1973, medical review teams would be functioning in accordance with Federal requirements. The State has since completed a two month Medical Review Demonstration project, however, medical review teams with physician on-site participation have not materialized.

45 CFR 250.20 Utilization Reviews are not being performed in skilled nursing facilities, intermediate care facilities and mental hospitals in a formalized process. The State is continuing to work on implementation of utilization review as a formalized process and believes that current practice can be modified for an effective utilization review program.

Community Services Administration

45 CFR 205.102(b)(1)(i)

Washington State Department of Social & Health Services does not comply with the projected organization structure at all administrative levels as required by 45 CFR 205.102 (b)(1)(i). The State organizational structure contains four common administrative levels rather than the maximum of three common levels of administration which are permitted.

National Center for Social Statistics

45 CFR 205.60(a)(2)

The State has not submitted a valid report of their WIN activities. The report was established as of July 1972. In December 1972, the State corresponded with the National Center for Social Statistics and stated they would begin reporting for January, 1973. The only reports that the Regional Office has received as of this date were for the months of April and May. These reports were not complete.

West VirginiaQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSMedical Services

45 CFR 246.10

- The State Commissioner of Welfare has not convened a meeting of the Advisory Council since 1969.

Assistance Payments

45 CFR 223.20(a)(2)(ii)

- State plan and practice has not completely updated the need items regarding food, specials and maximum.

July 1, 1973

WISCONSINQUESTIONS RAISED ON STATE COMPLIANCE WITH FEDERAL REQUIREMENTSASSISTANCE PAYMENTS PROGRAM45 CFR 233.20(a)(2)(i)
(iii) and (v)

Standards of Assistance - Special Needs
No uniform statewide standard for special needs. A plan amendment instructs counties to establish payment amounts for clothing and household replacements.

COMMUNITY SERVICES PROGRAM

45 CFR 205.102

Separation of Services from Assistance Payments - Wisconsin has submitted a revised Plan for Separation with a letter of explanation as to its position on the question of separation at the State level. The revised Plan seems to meet all of the basic requirements except for the administrative structure at the State level.

MEDICAL SERVICES PROGRAM45 CFR 205.30
45 CFR 240.10(a)(3)(i)(iv)

EPSDT - Methods have not yet been developed to assure that children needing diagnosis and/or treatment actually receive these services. Phasing in goes slowly; 85 children screened as of June 22, 1973.

45 CFR 246.10(a)(2)(ii)

Medical Care Advisory Committee
No Title XIX recipients on committee.

45 CFR 250.20

Utilization Review - Not in place for every item of care and service in State plan.

45 CFR 240.10(a)(6)(iii)

Amount, Duration, and Scope - State agency refuses to make full payment from Title XIX for the medically needy for services which are or could be covered under Title XVIII had the individual enrolled. No further progress or action noted during this quarter. Further Regional Office action is not recommended.

WISCONSIN (Cont'd)

45 CFR 250.23(a)(2)(i) and
(iii)

Periodic Medical Review - No
physician on site during periodic
medical reviews

Chart, "Summary of Compliance Issues
by States by Program, Report for
Quarter Ending June 30, 1973," is on
file at the U.S. Commission on
Civil Rights.

Exhibit No. 17

ADMINISTRATIVE CONFERENCE OF THE UNITED STATES

726 JACKSON PLACE, N.W.
WASHINGTON, D.C. 20506RECOMMENDATION 31. ENFORCEMENT OF STANDARDS
IN FEDERAL GRANT-IN-AID PROGRAMS*

Federal agencies annually disburse billions of dollars in grants-in-aid to state and local governments and to private entities to subsidize activities in such areas as welfare, housing, transportation, urban development and renewal, law enforcement, education, pollution control and health. While state and local governments and private organizations are the direct recipients of the grants, the intended ultimate beneficiaries of the grant programs are private persons helped by the expanded level of support or services made possible by federal funds.

In administering these grants both public and private grantees must observe the federal grant standards established to assure the accomplishment of federal purposes. Federal agencies have often encountered difficulty in enforcing compliance by the grantees with the federal standards. A factor contributing to this difficulty is that many federal agencies do not have adequate procedures for resolving questions of compliance and for handling complaints by private persons affected by a grant-in-aid program that the program does not comply with federal standards. A further contributing factor is that the principal sanction presently available to federal agencies for securing compliance is to cut off the flow of federal funds. This sanction raises a serious problem because, unless its threatened imposition prompts compliance, it stops worthwhile programs and adversely affects the interests of the innocent private persons whom the Congress intended to benefit through the program of federal financial assistance.

* Adopted December 7, 1971.

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To aid in alleviating this situation the following recommendations are proposed with respect to each federal program in aid of state, local or private activities through which support or services are provided to individual beneficiaries or to the public generally. However, the recommendation does not apply to research, training, or demonstration grants to government units or private organizations or individuals, or to grants such as fellowship grants to individuals that primarily benefit the recipients of the grants.

RECOMMENDATION

A. The Federal Administrative Complaint Procedure

The federal grantor agency should have an administrative procedure for the receipt and impartial consideration of complaints by persons affected by the grant-in-aid program that a plan, project application or other data submitted by a grant applicant or grantee as a basis for federal funding does not meet one or more federal standards. This procedure should afford the complainant an opportunity to submit to the grantor agency for its consideration data and argument in support of the complaint, and should afford the grant applicant or grantee involved a fair opportunity to respond. If the agency determines that the complaint is apparently ill-founded or is insubstantial, it should notify the complainant of its determination and should state in writing the reasons therefor. If the agency determines that the complaint appears to be substantial and supported by the information at hand, it should so notify both the complainant and the grant applicant or grantee of its present determination in this respect and should state in writing the reasons therefor. If the agency exercises discretion not to make a determination on one or more issues raised by a complaint, it should so notify the complainant in writing. The agency should pass upon all complaints within a prescribed period of time.

The complaint procedure administered by the federal grantor agency should also provide for the receipt and impartial consideration of complaints that a grantee has in its administration of the funded program failed to comply with one or more federal standards. It is anticipated that many grantor agencies will find it necessary to limit their consideration of such complaints to situations in which the complainant raises issues

which affect a substantial number of persons or which are particularly important to the effectuation of federal policy and will, therefore, dispose of most individual complaints concerning grantee administration by referring the complainant to such complaint procedures as are required to be established by the grantee. The grantor agency should seek by regulation to define the classes of cases that it will consider sufficiently substantial to warrant processing through the federal complaint procedure and those classes of cases wherein complainants will be required to pursue a remedy through available complaint procedures administered by the grantee.

B. The Grantee's Administrative Complaint Procedures

The federal grantor agency should require as a grant condition the establishment by the grantee of procedures to handle complaints concerning the grantee's operation of the federally assisted program. These procedures should afford any person affected by an action of the grantee in the operation of the program a fair opportunity to contest that action. The "fair opportunity" to contest will necessarily vary with the nature of the issues involved and the identity and interests of the complainant. In all cases, however, the complainant should have the right to submit to the grantee for its consideration data and argument in support of the complainant's position.

C. The Information System

The federal grantor agency should seek to assure that persons affected by a grant-in-aid program receive adequate information about the program in order that they may take advantage of the federal and the grantee complaint procedures. The federal grantor agency should require as a grant condition that all program materials (regulations, handbooks, manuals, etc.) governing the grantee's administration of a program supported in whole or in part by federal grant-in-aid funds and all plans, applications and other documents required to be submitted to the federal agency as a condition to the receipt of federal funds should be readily accessible to persons affected or likely to be affected by the operation of the funded program. Plans, applications and other documents that provide the basis for federal funding should be made readily accessible to interested persons no later than the time of their submission to the grantor agency for approval and at an earlier time when required by law.

The federal grantor agency should seek to assure that the grantee's system for dissemination of program materials and grant submissions takes account of the nature, location and representation

of affected persons. For example, as a part of a plan to make such materials readily accessible, program information might be deposited not only in the offices of the grantee but also in public and university libraries and in the offices of affected interest groups and their legal representatives. It might also be necessary to require the provision of descriptive summaries of technical rules or project applications or to require an oral explanation of program features, for example, the complaint procedures, which are critical to the protection of a beneficiary's interests. The federal agency should make parallel efforts to disseminate materials relating to its administration of the federal grant program.

D. Range of Sanctions

The federal grantor agency should seek to develop an adequate range of sanctions for insuring compliance with federal standards by grantees that apply for or receive federal financial assistance. The sanction of the total denial or cut-off of federal funds should be retained and used where necessary to obtain compliance, but the agency should have available lesser sanctions that do not result in the prevention or discontinuance of beneficial programs and projects. This range of sanctions should include in appropriate cases:

1. The public disclosure by the agency of a grantee's failure to comply with federal standards and an indication of the steps believed by the agency now to be appropriate.
2. An injunctive action brought by the agency or the Department of Justice in the federal courts to require the grantee to fulfill any assurances of compliance with federal standards made by the grantee or to enforce the federal standards attached to the grant.
3. The disallowance as a program or project cost of an expenditure by the grantee that does not conform with federal standards, or other partial denial or cut-off of funds that affects only that portion of a program or project that is not in compliance with federal standards.

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4. The imposition on a grantee who has not complied with federal standards of additional administrative requirements specially designed to assure that the grantee brings its operations into compliance with federal standards and redresses the effects of past noncompliance.

5. The transfer of a grant, or the awarding of subsequent grants under the same or related grant-in-aid programs, to a different grantee if the original grantee violates federal standards.

Where an agency lacks statutory authority to invoke one or more of the above sanctions and such authority would provide an appropriate means of insuring compliance with federal standards in a grant-in-aid program administered by the agency, it should seek the necessary authority from the Congress.

E. Other Performance Incentives

The agency should also consider the provision of incentives, such as the contribution of an increased matching share or the awarding of additional grant funds, to grantees who fulfill certain federal goals. Where the agency lacks statutory authority to provide compliance incentives and such authority would provide an appropriate means of ensuring effectuation of federal objectives in a grant-in-aid program administered by the agency, it should seek the necessary authority from the Congress.

ADMINISTRATIVE CONFERENCE OF THE UNITED STATES

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COMMITTEE ON COMPLIANCE AND ENFORCEMENT PROCEEDINGS

REPORT IN SUPPORT OF RECOMMENDATION

ON ENFORCEMENT OF FEDERAL

STANDARDS IN FEDERAL GRANT-IN-AID PROGRAMS

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This report was prepared to support a recommendation of the Committee on Compliance and Enforcement Proceedings of the Administrative Conference of the United States. It represents only the views of its authors. The recommendation it supports has been approved by the Committee, but neither the report nor the recommendation has been considered by the Administrative Conference of the United States.

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SUMMARY OF REPORT

Federal grants-in-aid are a mechanism for the large-scale transfer of federal funds to state governments and private entities to achieve program objectives which Congress evidently does not want assigned to the federal government but which it believes the grantees do not have the resources or motivation to accomplish on their own. The real beneficiaries of these grant-in-aid programs are the welfare recipients, highway users, school children or other private individuals that are helped by the grantees' federally assisted activities. Federal standards that accompany a grant program are intended to insure that the program accomplishes its objectives in accordance with national goals.

The Report which follows seeks to analyze the problems that federal grantor agencies have encountered in enforcing federal standards in grant-in-aid programs. On the whole the enforcement record is not a successful one. The Committee recommends that federal grantor agencies respond to this situation by developing administrative procedures for handling complaints directed at grant-in-aid programs by making readily accessible to prospective complainants adequate information about grant programs, and by utilizing a more flexible range of sanctions to achieve compliance. These recommended procedures are not intended as a substitute or replacement for other efforts by federal agencies to improve their enforcement efforts.

The recommendations are intended to cover a wide range of grant-in-aid programs. However, particular attention has been given in this Report and in the two Appendices which follow to the urban renewal, AFDC, and federal aid highways programs.

Recommendation

Federal agencies annually disburse billions of dollars in grants-in-aid to state and local governments and to private entities to subsidize activities in such areas as welfare, housing, transportation, urban development and renewal, law enforcement, education, pollution control and health. While state and local governments and private organizations are the direct recipients of the grants, the intended ultimate beneficiaries of the grant programs are private persons helped by the expanded level of support or services made possible by federal funds.

In administering these grants both public and private grantees must observe the federal grant standards established to assure the accomplishment of federal purposes. Federal agencies have often encountered difficulty in enforcing compliance by the grantees with the federal standards. A factor contributing to this difficulty is that many federal agencies do not have adequate procedures for resolving questions of compliance and for handling complaints by private persons affected by a grant-in-aid program that the program does not comply with federal standards. A further contributing factor is that the principal sanction presently available to federal agencies for securing compliance is to cut off the flow of federal funds. This sanction raises a serious problem because, unless its threatened imposition prompts compliance, it stops worthwhile programs and adversely affects the interests of the innocent private persons whom the Congress intended to benefit through the program of federal financial assistance.

To aid in alleviating this situation the following recommendations are proposed with respect to each federal program in aid of state, local or private activities through which support or services are provided to individual beneficiaries or to the public generally.

A. The Federal Administrative Complaint Procedure. The federal grantor agency should have an administrative procedure for the receipt and impartial disposition of complaints by persons affected by the grant-in-aid program that a plan, project application or other data submitted by a grant applicant or grantee as a basis for federal funding does not meet one or more federal standards. This procedure should afford the complainant an opportunity to submit to the grantor agency for its consideration data and argument in support of the complaint, and should afford the grant applicant or grantee involved a fair opportunity to respond to the complaint. If the agency determines that the complaint is not valid, it should notify the complainant of its determination and should state in writing the reason for its decision. If the agency determines that the complaint is valid, it should so notify both the complainant and the grant applicant or grantee of its determination and should state in writing the reason for its decision. If the agency exercises discretion not to make a

determination on one or more issues raised by a complaint, it should so notify the complainant in writing. The agency should dispose of all complaints within a prescribed period of time.

The complaint procedure administered by the federal grantor agency should also provide for the receipt and impartial disposition of complaints that a grantee has in its administration of the funded program failed to comply with one or more federal standards. It is anticipated that many grantor agencies will find it necessary to limit their consideration of such complaints to situations in which the complainant raises issues which affect a substantial number of persons or which are particularly important to the effectuation of federal policy and will, therefore, dispose of most individual complaints concerning grantee administration by referring the complainant to such complaint procedures as are required to be established by the grantee. The grantor agency should by regulation define the classes of cases that it will consider sufficiently substantial to warrant processing through the federal complaint procedure and those classes of cases wherein complainants will be required to pursue a remedy through available complaint procedures administered by the grantee.

B. The Grantee's Administrative Complaint Procedures. The federal grantor agency should require as a grant condition the establishment by the grantee of procedures to handle complaints concerning the grantee's operation of the federally assisted program. These procedures should afford any person affected by an action of the grantee in the operation of the program a fair opportunity to contest that action. The "fair opportunity" to contest will necessarily vary with the nature of the issues involved and the identity and interests of the complainant. In all cases, however, the complainant should have the right to submit to the grantee for its consideration data and argument in support of the complainant's position. Where it is claimed that the action which is the basis for the complaint deprives the complainant of any individual benefit or protection to which he is entitled under the grant-in-aid program, the grantee should afford the complainant an adjudicatory hearing on all contested issues of fact.

C. The Information System. The federal grantor agency should insure that persons affected by a grant-in-aid program receive adequate information about the program in order that they may take advantage of the federal and the grantee complaint procedures. The federal grantor agency should require as a grant condition that all program materials (regulations, handbooks, manuals, etc.) governing the grantee's administration of a program supported in whole or in part by federal grant-in-aid funds and all plans, applications and other documents required to be submitted to the federal agency as a condition

to the receipt of federal funds should be readily accessible to persons affected or likely to be affected by the operation of the funded program. Plans, applications and other documents that provide the basis for federal funding should be made readily accessible to interested persons no later than the time of their submission to the grantor agency for approval and at an earlier time when required by law.

The federal grantor agency should insure that the grantee's system for dissemination of program materials and grant submissions takes account of the nature, location and representation of affected persons. For example, as a part of a plan to make such materials readily accessible, program information might be deposited not only in the offices of the grantee but also in public and university libraries and in the offices of affected interest groups and their legal representatives. It might also be necessary to require the provision of descriptive summaries of technical rules or project applications or to require an oral explanation of program features for example, the complaint procedures, which are critical to the protection of a beneficiary's interests. The federal agency should make parallel efforts to disseminate materials relating to its administration of the federal grant program.

D. Range of Sanctions. The federal grantor agency should seek to develop an adequate range of sanctions for insuring compliance with federal standards by grantees that apply for or receive federal financial assistance. The sanction of the total denial or cut-off of federal funds should be retained and used where necessary to obtain compliance, but the agency should have available lesser sanctions that do not result in the prevention or discontinuance of beneficial programs and projects. This range of sanctions should include in appropriate cases:

1. the public disclosure by the agency that a grantee has failed to comply with federal standards;
2. an injunctive action brought by the agency or the Department of Justice in the federal courts to require the grantee to fulfill any assurances of compliance with federal standards made by the grantee or to enforce the federal standards attached to the grant;
3. the disallowance as a program or project cost of an expenditure by the grantee that does not conform with federal standards, or other partial denial or cut-off of funds that affects only that portion of a program or project that is not in compliance with federal standards;

4. the imposition of special administrative conditions on grantee operations, including retroactive awarding of benefits, in order to insure the reparation of any individual damage or prejudice or to correct any shortcomings in the effectuation of federal policy which have resulted from failures to comply with federal standards; and

5. the transfer of a grant, or the awarding of subsequent grants under the same or related grant-in-aid programs, to a different grantee if the original grantee violates federal standards.

Where an agency lacks statutory authority to invoke one or more of the above sanctions and such authority would provide an appropriate means of insuring compliance with federal standards in a grant-in-aid program administered by the agency, it should seek the necessary authority from the Congress.

The agency should also consider the provision of incentives, such as the contribution of an increased matching share or the awarding of additional grant funds, to grantees who comply with certain federal standards. Where the agency lacks statutory authority to provide compliance incentives and such authority would provide an appropriate means of ensuring compliance with federal standards in a grant-in-aid program administered by the agency, it should seek the necessary authority from the Congress.

I. FEDERAL STANDARDS IN THE GRANT-IN-AID SYSTEM; THE COMPLIANCE PROBLEM

The General Scope of the Study and Recommendation. Federal expenditures for grants-in-aid have increased tenfold in the last two decades. Total outlays for federal aid programs amounted to only \$2.4 billion dollars in 1951. For fiscal year 1971 the estimated outlay is \$27.6 billion. Bureau of the Budget, Simplifying Federal Aid to States and Communities 5 (1970). The great majority of these dollars have gone to state and local governments and only a small percentage of the total to private persons and institutions. The number and variety of federal assistance programs has also expanded greatly over the years. OEC has attempted on several occasions to catalog existing assistance programs. Its most recent catalog lists 1019 domestic assistance programs administered by 57 different federal departments and agencies. Catalog of Federal Domestic Assistance Programs: A Description of the Federal Government's Domestic Programs to Assist the American People in Furthering their Social and Economic Progress (April, 1970). On the other hand, a congressional study by Representative Roth counted each authorization as a separate program and uncovered 1315 separate federal assistance programs. Listing of Operating Federal Assistance Programs, House Doc. 91-177 (1969).

Federal grants are of two basic varieties: formula grants and project grants. Formula grants are distributed to all states according to a predetermined formula spelled out in the enacting statute. A state must normally submit a state plan for approval by the federal agency administering the program in order to qualify for its share of the funds. Formula grants are found most frequently in the health, education and welfare areas and continue from year to year on an ongoing basis. A state which has an approved plan on file with the federal agency is entitled as a matter of right to the continued payment of its share of any funds authorized and then appropriated by Congress for the program. For this reason formula grants are sometimes referred to as mandatory grants. Project grants, on the other hand, are not necessarily spread among eligible recipients on any formula basis but are disbursed to eligible recipients for specific projects on the basis of project applications. Grants in the housing, urban development and environmental areas are generally of the project variety. Recipients are generally local units of government or private entities rather than states as in the case of formula grants. Project grants rely on local initiative and local sensing of needs in requesting funds and in following up applications. They are far more flexible than formula grants and allow federal administrators considerable discretion in deciding which project applications deserve funding. For these reasons they are often referred to as discretionary grants. For an excellent discussion of the characteristics of these

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two varieties of grants and a comprehensive description of the existing federal grant-in-aid system, see Advisory Commission on Intergovernmental Relations, Fiscal Balance in the American Federal System, Ch. 5 (1967).

Quite often the line between formula and project grants becomes blurred. The Hill Burton Act, for instance, authorizes HEW to make project grants to public and private hospitals for the construction and modernization of hospital facilities but contains in addition a precise formula for apportioning the available funds among the states. Project applications of local hospitals must be approved by a state agency prior to their submission to HEW and must be in conformity with a state plan that has been approved by HEW. 20 U.S.C. §§291-291i (1970). Federal highway and water pollution grants similarly have both formula and project characteristics, as do many education grants.

Any recommendation on the enforcement of federal standards cannot possibly treat all grant programs. Some limitation on coverage is mandatory. The proposed recommendation therefore excludes from its coverage all research, training and demonstration grants to governmental units and to private persons and institutions. Also excluded are fellowships and other grants to individuals that primarily benefit the recipient of the grant. The unifying feature of the grant-in-aid programs which the recommendation is intended to cover is that the immediate recipients of the grants are in no real sense the beneficiaries thereof. These grants are a federal subsidy which encourages a state or local government or a private provider of support or services to undertake or expand activities which benefit third persons within the reach of its programs, such as welfare recipients, highway users, school children or the medically indigent. That is, the grants are "grant-in-aid-of" programs administered for the benefit of third parties. Among the principal grant-in-aid programs which would be covered by the recommendation are:

1. Social Assistance grants to the states under the Social Security Act for a) Old Age Assistance (42 U.S.C. §§301 et seq.); b) Aid and Services to Needy Families with Children and for Child-Welfare Services (42 U.S.C. §§601 et seq.); c) Maternal and Child Health Services (42 U.S.C. §§703 et seq.); d) Aid to the Blind (42 U.S.C. §§1201 et seq.); and e) Aid to the Permanently and Totally Disabled (42 U.S.C. §§1351 et seq.). These are formula grants and are administered by HEW.

2. Urban Renewal project grants to local public agencies under Title I of the Housing Act of 1949, 42 U.S.C. §§1441 et seq. HUD administers these grants.

3. Grants and loans on a project basis to local housing authorities for the development and acquisition of low-rent public housing (42 U.S.C. §§1409 and 1411) and for annual contributions to local housing authorities to assist them in achieving and maintaining the low rent character of public housing (42 U.S.C. §1410). HUD administers these programs.
4. Model Cities grants to cities (42 U.S.C. §§3301 et seq.). HUD administers this program
5. Highway construction grants distributed to the states on a formula basis by the Bureau of Public Roads in DOT (23 U.S.C. §§101 et seq.). The grantees are normally state highway departments.
6. Urban Mass Transportation grants to state and local governments (49 U.S.C. §§1601 et seq.). These grants are distributed on project basis by the Urban Mass Transportation Administration in DOT.
7. Airport planning and construction grants to state and local governments (49 U.S.C. §§1101 et seq.). These grants are distributed by the Federal Aviation Administration in DOT.
8. Education grants made available to the states on a formula basis for distribution to local educational agencies serving areas with concentrations of children from low income families (20 U.S.C. §214a) (Title I of Elementary and Secondary Education Act of 1965). The Office of Education in HEW administers this program. The grantees are the local educational agencies.
9. Grants to state, local and regional agencies for the construction of waste treatment works (33 U.S.C. §1158). This program was administered by Federal Water Quality Administration in the Department of the Interior but has been transferred under an executive reorganization plan to the new Environmental Protection Agency in the Office of the President.
10. Grants to state and local governments for the acquisition and preservation of open space lands (42 U.S.C. §§1500 et seq.). HUD administers these grants.
11. Grants to air pollution control agencies on a project basis for planning purposes and for the control of air pollution (42 U.S.C. §1857c). This program was administered by the Air Pollution Control Administration in HEW but has been transferred under an executive reorganization plan to the new Environmental Protection Agency in the Office of the President.

12. Law Enforcement grants to the states under Title I of the Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. §§3701 et seq.). These grants are distributed on a formula basis and share many of the characteristics of block grants. Normally the federal grant goes to a state crime commission that then approves applications for funds from state and local law enforcement agencies.

13. Various grants distributed among the states on a formula basis by HEW to aid localities in the construction (and occasionally the servicing) of libraries, hospitals and educational and vocational facilities (scattered through 20 and 42 U.S.C.). The local grantees may be either private or governmental entities. Grantee applications must normally be approved both by HEW and by the appropriate state agency.

14. Block-type grants to the states for public health services under the Partnership in Health Act of 1966 (42 U.S.C. §246).

15. Grants for waterworks and sewers available on a project basis primarily to local governmental units (42 U.S.C. §§3101 et seq.). HUD administers this program. The Department of Agriculture administers an overlapping program for rural areas (7 U.S.C. §1926).

16. Grants to public and private non-profit organizations for antipoverty programs, e.g., Emergency Food and Medical Services (42 U.S.C. §2809); Legal Services (42 U.S.C. §2781); and Community Action (42 U.S.C. §2781 et seq.). The Office of Economic Opportunity administers these programs.

17. Grants to state employment security agencies to facilitate employment (scattered throughout 29 U.S.C. and 42 U.S.C.) and to industries and public and non-profit organizations to provide job training for disadvantaged youth (42 U.S.C. §2711). The Manpower Administration in the Department of Labor administers these project grants.

Federal Standards in Grant-in-Aid Programs. Federal grants to state and local governments and to private persons have strings attached; and the recipients of federal financial assistance must comply with any conditions that come with the money. These strings or conditions are referred to in this Report as federal standards. They are devices for insuring that the persons Congress intended to benefit through a grant program actually receive the benefits thereof. Normally the prospective recipient of a federal grant must demonstrate that it will comply with the federal standards either in the project application which it must file to obtain a project grant or in the plan which it must file to become eligible for a formula grant. These standards take a great variety of forms. Some of them are quite

specific and commit the grantee to a detailed course of action while others tend to be vague and only require the grantee to take into account various factors or to adopt certain goals. While some standards are clearly found in the statute book, others derive from the broad powers of federal agencies to adopt appropriate rules and regulations to carry out their duties.

A very general form of federal standard is necessarily involved in all federal grant programs, because each program of federal grants-in-aid has been developed for a particular purpose determined by the Congress to be of national concern. Examples of such "categorical" grants would be grants for airport construction, urban renewal, or aid to families with dependent children. Federal funds must be spent by the grantee within the confines of the particular assistance program. Welfare funds cannot be spent for the construction of airports, and vice versa. Recent criticism of the Office of Education for its administration of grants-in-aid under Title I of the Elementary and Secondary Education Act of 1965 has been concerned with violations of this type of federal standard. Local educational agencies have allegedly mis-spent Title I funds on recreational and audio-visual equipment that has benefited all school children and not merely the needy children that Title I funds are meant to aid. Washington Research Council, Title I of ESEA. Is it Helping Children? (1969). As will be seen below, the enforcement of this type of federal standard has not raised as many problems as the enforcement of standards that determine how funds are to be spent within a given category. Normally the federal government deals with the former situation by refusing to release matching federal funds when it discovers that the grantee plans to spend money outside the scope of the categorical assistance program or by seeking restitution of federal funds that have already been so expended.

The more troublesome type of grant standards, with which this Report is primarily concerned, may conveniently be divided into four somewhat overlapping categories. First, there are standards that are statutory or constitutional in origin and that apply to all or to a great number of programs of federal financial assistance. Title VI of the Civil Rights Act of 1964 requires that no person "shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." 42 U.S.C. §2000d (1970). Another statutory standard which applies to all grant programs is the Hatch Act's prohibition on political activity by state and local employees engaged in federally financed activity. 5 U.S.C. §§1501 et seq. (1970). The great majority of grant-in-aid programs also require that federal funds must be used to supplement and not supplant the grantee's

expenditures. Finally, the National Environmental Policy Act of 1969, 42 U.S.C. §4332(C) (1970), requires all federal agencies to report on and consider the environmental impact of "major federal actions significantly affecting the quality of the human environment." §102(2)(c), Public Law 91-190. The term "federal actions" is surely broad enough to cover federal grants-in-aid, and this landmark legislation may prove to be the genesis of a new federal standard applicable to most programs of federal financial assistance. *Sive*, *Some Thoughts of an Environmental Lawyer in the Wilderness of Administrative Law*, 70 *Col. L. Rev.* 612, 643-651 (1970); *San Antonio Conservation Society v. Texas Highway Dept.*, 400 U.S. 938 (1970) (Black, Douglas and Brennan, J.J., dissenting from denial of certiorari).

A second cluster of statutory standards is found in the great majority of formula grants distributed to the states. For instance, Congress has normally insisted that each recipient state designate a single state agency to administer the federally assisted program and observe a merit system for employment in that agency. Health and welfare services funded through formula grants must likewise generally be made available on a state-wide basis. An analogous type of standard is sometimes found in the project grant area. Congress may require that an areawide plan for attacking a particular problem or range of problems be submitted to the federal agency before any project grants will be awarded in a given geographic area for projects which relate to that problem. The most well-known such requirement is the workable program for community improvement which local governmental units must prepare and have certified by the Secretary of HUD every two years in order to be eligible for urban renewal and related grants under Title I of the Housing Act of 1949. The workable program must include an effective program of housing code enforcement. 42 U.S.C. §1451(c) and (e) (1970).

The third and most important group of standards are those statutory standards which apply only to a single grant program or closely related group of programs. Congress has determined that these standards are necessary to insure the proper implementation of particular grant programs. For example, states that receive federal highway construction aid must hold public hearings on the routing of highways that affect urban areas (23 U.S.C. §128 (1970)) and must take extraordinary steps to preserve parkland (23 U.S.C. §138 (1970)). Grants for urban mass transportation must conform with various federal standards for protecting existing private transit companies and their employees. 49 U.S.C. §1602(c) (1970). States that apply for federal assistance for aid to needy families with dependent children must give assurances in their state plans that they will comply with numerous federal standards in operating their programs. These standards vary in magnitude from a requirement

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that the AFDC program operate uniformly throughout the state to detailed requirements for pursuing runaway fathers and for disregarding certain earned income of family members. Among the federal standards intended to protect welfare recipients are requirements that state and local welfare agencies promptly furnish assistance to all eligible individuals and afford a recipient a fair hearing prior to a denial of benefits. 42 U.S.C. §602(a) (1970).

Federal standards also play a particularly vital role in urban renewal grants. Local public agencies receiving urban renewal grants must rehabilitate buildings wherever feasible rather than demolish them (42 U.S.C. §1460(c) (1970)) and must provide satisfactory relocation housing for individuals and families displaced by an urban renewal project (42 U.S.C. §1455(c) (1970)). These standards, particularly the one on relocation, are difficult to comply with and often unpopular with local officials who may be interested primarily in urban beautification and in increasing the local tax rolls. The standards, on the other hand, are intended to protect the interests of residents of the urban renewal area. Congress has recently reformulated the federal standard on relocation and extended it to all federally assisted programs that result in the displacement of persons through the construction of highways, airports, buildings or otherwise. 42 U.S.C. §§4601 et seq. (1970) (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.) ^{1/} This new law also establishes uniform federal standards on procedures for land acquisition which apply to all federally assisted programs which involve the acquisition of real property or a public improvement for which real property is to be acquired. Its enactment significantly increases the importance of this recommendation because it establishes major federal standards that apply to a great number of federal grant-in-aid programs and that should often prove difficult to enforce.

A fourth and final cluster of federal standards are those which the federal agencies themselves have developed. They apply only to particular programs and appear in agency regulations, manuals, handbooks, policy statements, forms, and other materials necessary for program administration. For a discussion of these various administrative tools, see Skoler, Lynch and Axilbund, *Legal and Quasi-Legal Considerations in New Federal Aid Programs*, 56 *Geo. L.J.* 1144, 1153-1157 (1968). Many handbooks and manuals contain program policies that are advisory only; these are not federal standards that will be enforced through a fund cut-off or other sanction. On the other hand, other administrative requirements (sometimes but not always found in formal regulations) are

^{1/} The impetus for this legislation was the Report of the Advisory Commission on Intergovernmental Relations, Relocation: Unequal Treatment of People and Businesses Displaced by Governments (1965). Federal standards for relocation of displaced persons are by no means new to the highway area. In 1968, Congress imposed significant relocation responsibilities on state road builders that received federal funds.

clearly binding on the recipients of a grant. These standards may go beyond what is specifically required in the statute and depend for their validity on the federal agency's general power to adopt rules and regulations in furtherance of the grant program. HUD's Urban Renewal Handbook, for instance, contains a myriad of standards which local public agencies must observe in such diverse areas as acquiring land for the project, entering into contracts for project work, selecting private sponsors to redevelop a project area, and disposing of land acquired for the project. The number of such standards presently in force in all grant programs is difficult to determine, but at least two of them have figured prominently in recent Supreme Court cases. In Thorpe v. Housing Authority of the City of Durham, 383 U.S. 268 (1969), the Court upheld the validity of a HUD circular which amended the Department's Low-Rent Management Manual to require local public housing authorities that received federal financial assistance to afford a tenant prior to eviction a private conference where the tenant would be told the reason for the eviction and given an opportunity to reply. The circular was held binding on the local housing authority, and the tenant could successfully resist any eviction procedure until the authority had complied with it. In Lewis v. Martin, 397 U.S. 552 (1970), the Court held valid a HEW regulation (45 C.F.R. 203.1) that specified when a state may take into account the income of a stepfather or other man in the house in determining the resources available to a needy child.

To a certain degree one may legitimately argue that if there is a problem with enforcement of federal standards it is because there are too many of them. The solution to the compliance problem might then be in "federalizing" programs where dominant national interests require national control and in relaxing standards in other programs by techniques such as block grants or special revenue sharing. The first solution to the standards problem has been adopted in part by the House of Representatives for the AFDC program by its passage of H.R. 1 (the Nixon-Mills Family Assistance Plan) during the current session of Congress. The block grant approach is proposed for the federal aid highways program in the administration's special revenue sharing proposals on transportation, J. 1693, 92nd Cong., 1st Sess., and is already used in the law enforcement area.

Each solution has significant problems. "Federalization" is rarely possible because of the political, administrative and fiscal ramifications of the historic state and local involvement in these areas. Even in the context of the supposed state financial crisis which has moved us so far toward the "federalization" of welfare, the provisions of H.R. 1 really only carve out as federal responsibilities a particular level of monetary support and certain program elements directly related to the provision of employment. There would remain a grant-in-aid program for social services to low-income persons hedged about with many of the present AFDC conditions and

what is in effect a grant-in-aid program for state supplementary payments, again with many of the present conditions retained. No doubt block grants do give the states greater authority to determine priorities among competing needs in the broad area of the block grant, but certain federal standards, such as Title VI and the Hatch Act, must still be complied with. There may also be specific federal standards for individual block grant programs. For example, state agencies that receive block grants for law enforcement must "pass through" at least 40% of the planning money and 75% of the action money to units of local government. 42 U.S.C. §§3723(c), 3733(c) (1970). In addition, no more than 1/3 of a block grant to a state may be expended for the compensation of personnel. 42 U.S.C. §3731(d) (1970). For an excellent discussion on the structuring of law enforcement block grants, see Advisory Commission on Intergovernmental Relations, Making the Safe Streets Work: An Intergovernmental Challenge (1970).

Yet, the block grant or special revenue-sharing approach has a great deal to recommend it because it begins to approximate an ideal form of grant. The provision of funds from the federal treasury for a particular state, local or privately run program is largely, if not always, based on a recognition of benefits from that program which are external to the jurisdiction or geographic area in which it will function and of external costs from state, local or private underinvestment in the activity which is to be supported. Ideally then, the federal government might make its grant-in-aid payments to individual grantees on the basis of calculations of the amount of aid necessary to produce an "optimal" level of program output. The only "program" condition necessary on such grants would be that the specified outputs be achieved.

The difficulty with these ideal grants is that we have no reliable means by which to measure or estimate external economies and diseconomies, or the amount of aid necessary to produce--in conjunction with whatever level or grantee spending is likely to be forthcoming--optimal levels of output. Perhaps more importantly, we are not very good at coming up with sensible definitions of the "outputs" themselves, which would tell us whether the grant monies were being appropriately expended. To take the AFDC example, what should the state be asked to produce? Happy children? Whole families? Low illegitimacy? Productive and self-reliant adults? A percentage reduction in "poverty"? Even taking the more easily measured indicators as goals, the establishment of causal relationships between a grant program and a particular and measurable social change would be enormously difficult. See generally, M. Olson, The Optimal Allocation of Jurisdictional Responsibility: The Principle of "Fiscal Equivalence," and Mushkin & Cotton, Systematic Analysis and Grants-in-Aid in the Federal System in I The Analysis and Evaluation of Public Expenditures, Joint Economic Committee of the Congress, 91st Cong., 1st Sess. pp. 321-56 (1969).

The drafters of federal grant programs thus tend to be driven toward a choice between (1) providing money and no standards; (2) the provisions of "goals" or output standards in respect of which compliance will be virtually impossible to estimate or which are measurable but poor surrogates for the true purposes of the grant program; (3) "input" requirements which represent the planner's best guess concerning the necessary techniques for producing the desired results. The input standard or condition has usually been chosen. Moreover, it is difficult to make a convincing argument for the general relaxation of the only type of standard which seems feasible. Presumably these standards are thought necessary to achieve national goals and it is in the name of these goals that federal grant-in-aid programs make very substantial redistributions of resources among the states.

Figures compiled for 1966 indicate that seventeen states are in effect the net grantors and the rest are net beneficiaries of federal grant-in-aid programs. Ohio Legislative Service Commission, Impact of Federal Grants-in-Aid on Ohio Administrative Policies, Staff Research Report No. 90, p. 37 (1969). Earlier statistics on (1) per capita grants-in-aid received as a percentage of per capita contributions to grants and (2) on grants received as a percentage of total federal taxes paid revealed that the states' percentages in these two categories varied from New Jersey's 37% to Wyoming's 4.59% on the first scale and Delaware's 4.41% to Mississippi's 45.78% on the second. Report of the Virginia Commission on Constitutional Government, Federal Grants-in-Aid 67 (1961). Certainly, it would seem politically irresponsible to make resource shifts of this magnitude without some considerable exercise of control over expenditures. Hence, it seems sensible to expect that categorical grant programs with more or less extensive federal standards on conditions will be with us for some time.

The Need for Better Enforcement of Federal Standards. Obviously, there is an immense body of statutory law establishing grant programs and providing standards for their administration, but until recently there has been very little case law interpreting the statutes and determining the respective rights and remedies of the grantor, grantee and affected third parties. Federal agencies normally make important grant policies and decisions through informal agency action that may go unreported and only rarely reach such decisions in the context of formal rulemaking or adjudicatory proceedings. The absence of any body of law or of formal procedures becomes particularly apparent when one compares the law of federal grants with the law surrounding government contracts and licenses. Government contractors and licensees have definite rights and definite procedures available for asserting them before administrative and judicial tribunals. Third parties affected by governmental action in these areas also now have judicial remedies under an expanded law of standing. Scenic Hudson

Preservation Conference v. FPC, 354 F.2d 608 (2d Cir. 1965); Scanwell Laboratories v. Schaffer, 424 F.2d 859 (D.C. Cir. 1970) (unsuccessful bidder on government contract has standing to challenge legality of award).

There is growing pressure to secure similar rights for grantees and for third persons affected by the grant process. It has been suggested that the present system too often leaves grantees, the beneficiaries of grant programs and their supporters helpless to counteract autocratic decisions by federal administrators who are relatively unaccountable to a popular constituency and often insensitive or unsympathetic to local problems and realities. Cahn and Cahn, The New Sovereign Immunity, 81 Harv. L. Rev. 929 (1968). Of particular concern is the position of the putative ultimate beneficiary of a grant program whose interests are dependent upon the enforcement of federal standards and whose rights may be ignored in the accommodation of grantor and grantee interests through processes in which he does not participate. The basis for this concern will appear more fully from a brief review of administrative and judicial enforcement of federal grant standards.

The Agency Enforcement Effort. It is difficult to generalize on the past record of the federal agencies in enforcing federal standards in grant-in-aid programs. It is apparent, however, that federal grantor agencies have had less than total success in enforcing important federal standards in a number of major grant-in-aid programs. There is also considerable evidence that the federal enforcement effort has been seriously deficient with respect to some standards. The United States Commission on Civil Rights recently conducted an exhaustive study of the federal government's enforcement of the Title VI standard of non-discrimination in federally assisted programs. The Commission found that the enforcement effort lacked uniformity and consistency and demonstrated a reluctance to apply available sanctions in cases of non-compliance. Federal Civil Rights Effort 603-09 (1970). The General Accounting Office has documented on several occasions HUD's failure to obtain compliance with the federal standard that adequate relocation housing be available for persons displaced by an urban renewal project. Tondro, Urban Renewal Relocation: Problems in Enforcement of Conditions on Federal Grants to Local Agencies, 117 Univ. of Pa. L. Rev. 183, 194-95 at nn. 79-86 (1968). See also Cahn, Eichenberg and Romberg, The Legal Lawbreakers: A Study of the Nonadministration of Federal Relocation Requirements, (1970) (Citizens Advocate Center). No doubt the standards of non-discrimination and of adequate relocation housing are among the most intractable to enforce; but the failures in these areas are discouraging because these standards reflect vital national concern and vital beneficiary interests. In other areas federal agencies have not sufficiently articulated, much less enforced, federal standards that are vital to grant-in-aid programs. For example, throughout the 1950s

and most of the 1960s HEW failed to develop adequate federal standards to prevent states from applying discriminatory eligibility requirements for AFDC payments. Bell, Aid to Dependent Children 186-194 (1965).

HEW has recently acted in a number of cases to enforce compliance with federal standards. In late 1969, the Department ordered conformity hearings to determine whether Nevada and Connecticut were complying with federal standards in their public assistance programs, particularly AFDC. See National Welfare Rights Organization v. Finch, 429 F.2d 725 (D.C. Cir. 1970). The Department in late June 1970, ordered conformity hearings for four additional states (Arizona, California, Nebraska and Pennsylvania) and released to the press a state-by-state list of questions raised concerning state compliance with federal requirements in all the social assistance programs under the Social Security Act. These questions involve both the adequacy of the state plans and amendments thereto on file with the Department and the validity of state administrative practices. Each of the six states cited by the Department have been found after hearings to be out of compliance with one or more federal standards and have been given compliance deadlines after which funds will be withdrawn. In four of these cases compliance has been achieved and two states are contesting the hearing decisions in the courts.

The Department appears to be quite serious about enforcing at least the major federal requirements and is proceeding to call additional conformity hearings. However, it is obvious from the Department's own quarterly compliance reports that many issues go unresolved. Moreover, the formal reports only list referrals by Regional Offices to the central office. The former negotiate about many issues for many months before identifying them as conformity issues. Finally, persons experienced in dealing with state welfare systems uniformly report that the regional offices know of only a fraction of the conformity problems which exist.

There are a number of reasons for this failure to enforce federal grant-in-aid requirements. (Specific problems with agency enforcement in one program, Aid to Families with Dependent Children, are detailed in an Appendix to this Report.) At the most general level the reason is that agencies are with few exceptions not "enforcement-oriented." Grant-in-aid programs are after all meant to be cooperative efforts. The posture of the federal agency toward its grantees is not generally that of an umpire calling fouls, but that of a coach giving support in the form of cash and expertise. Moreover, there are strong incentives for low-visibility conflict and accommodation. The first such incentive is the adverse effect of the mainstay of the federal enforcement arsenal, the fund cut-off. The remedy, if it has to be applied, helps none and torpedoes the program. A second incentive is that sharp delineation of federal versus state positions and

stringent efforts to exact compliance are likely to cause control of the conflict to get out of the hands of agency professionals and into the hands of politicians. If this happens, the results are always unpredictable and may from the program professional's viewpoint be disastrous. See Derthick, The Influence of Federal Grants (1970).

There is at least some evidence, however, that the fund cut-off is not as ineffective as one might expect. The recent AFDC experience, for example, suggests that states will comply when threatened in a credible fashion with fund cut-off. The fund cut-off or the threat thereof has also proved effective in achieving desegregation in many southern school districts receiving federal funds under Title I of the Elementary and Secondary Education Act of 1965. Carter, Equal Educational Opportunities for Negroes -- Abstraction or Reality, 1968 Ill. L. Forum, 160, 174-76. However, there is no doubt that this sanction enormously raises the political stakes in any federal grantor/state or local grantee confrontation, and that federal grant personnel are hesitant to play, or to play often, in high-ante games. A classic example of this type of confrontation occurred in 1963 when HEW refused to provide federal funds under what is now the AFDC program for Michigan's plan to provide assistance for needy children with an unemployed parent because Michigan's definition of unemployment conflicted with federal law. This struggle quickly developed into a personal one between Governor Romney and Assistant Secretary Cohen at HEW. Steiner, Social Insecurity: The Politics of Welfare, 101-107 (1966). Similar problems have recently arisen in California.

The tendency then is for federal grantor agencies to stress program development rather than enforcement, to develop a close working liaison with grantees which is likely to be upset by any high visibility conflict, and to deal more effectively with issues of compliance which respond to negotiation than with issues which require large expenditures of effort and political capital. This is an understandable stance, but one which should be counter-balanced by inputs from the persons affected by any non-compliance with federal standards. It is to the provision of a structural system of such inputs through effective complaint mechanisms at both the grantor and grantee levels of administration that the following recommendation is directed.

Litigation as an Indicator of the Compliance Problem. The last two or three years have witnessed an unprecedented influx of suits in the federal courts challenging grant-in-aid programs. Normally these challenges have centered on the issue of whether the operation of a grant program complies with federal requirements. Such suits are really private enforcement actions to obtain compliance with federal standards. A major impetus behind this influx of suits is the new body of law on standing that permits a growing number of

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persons to test in the courts the legality of governmental action. Persons that suffer injury in fact from governmental action and whose interests are arguably protected or regulated by statute now have standing to obtain judicial review of agency action in the federal courts. Ass'n. of Data Processing Service Organizations, Inc. v. Camp, 397 U.S. 150 (1970); Barlow v. Collins, 397 U.S. 159 (1970). The impact of these decisions on the grant process is bound to be substantial. It is now generally conceded that the intended beneficiaries of a federal grant-in-aid program who are adversely affected by the operation of the program at the federal, state or local level have standing to sue the offending officials. The principal grounds of complaint in these suits will invariably be the non-compliance with federal standards by the officials who are running the program.

This trend toward increased judicial involvement in the grant process has been furthered by the Supreme Court's recent decision in Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402 (1971). That case involved a challenge by park-loving citizens and conservation groups to the construction of a federally aided highway through a public park. The plaintiffs alleged that the Secretary of Transportation's approval of the project for federal funding was illegal because it violated 23 U.S.C. §138. That section instructs the Secretary not to approve any project which involves the taking of public park land "unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park ... resulting from such use." The Court held that the Secretary's decision was reviewable and that the District Court should determine whether the Secretary acted within the scope of his authority, whether his decision was arbitrary, capricious, or an abuse of discretion, and whether applicable procedural requirements were observed.

Litigation concerning compliance with federal grant standards takes essentially two forms: (1) a suit seeking review of a federal grantor agency's funding decision and (2) a suit against a grantee claiming that its failure to comply with federal standards has deprived the plaintiff of rights, privileges or immunities guaranteed by federal law. Suits in the first category raise the normal problems associated with judicial review of federal agency action (jurisdiction, venue, reviewability, etc.), while suits in the second category are normally based on the civil rights acts' provisions codified at 42 U.S.C. §1983 (1970). However, at least one case, Gomez v. Florida State Employment Service, 417 F.2d 569 (5th Cir. 1969), has indicated that a private civil action based on federal grant standards might be implied without the aid of 42 U.S.C. §1983. (Gomez seems to have bred a rash of suits charging that federally funded employment agencies are violating federal standards by referring migrant workers to jobs providing substandard working conditions. New York Times, October 3, 1971, page 1, col. 4.)

Recent litigation has highlighted four areas where the problem of enforcing federal standards in grant-in-aid programs is acute. The first area is that of civil rights. Title VI of the Civil Rights Act of 1964 provides for the termination or denial of federal financial assistance to persons who violate the Congressional mandate that "No person in the United States, shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." 42 U.S.C. §2000d (1970). Under this provision, HEW has cut off in the 1960s federal funds from numerous school districts and hospitals in the South. The present administration, however, has on occasion discouraged fund cut-offs by HEW, and the Fifth Circuit's decision in Taylor County Board of Education v. Finch, 414 F.2d 1068 (1969), has undermined much of HEW's past efforts by requiring that HEW make a finding of discrimination in each program of categorical assistance and not just find that the recipient discriminated generally in its operations.

Litigation concerning the enforcement of Title VI has also involved HUD. Two federal district courts have recently held in suits brought by private plaintiffs that local housing authorities violated Title VI and the Fourteenth Amendment by discriminating in the selection of sites for federally assisted public housing. Gautreaux v. Chicago Housing Authority, 296 F. Supp. 907 (N.D. Ill. 1968); Hicks v. Weaver, 302 F. Supp. 619 (E.D. La. 1969). In Hicks, the court enjoined HUD from granting federal funds to the local housing authority pending a determination on the merits of the plaintiffs' claim. In Gautreaux, the court refrained from ordering a cut-off of federal funds but granted plaintiffs sweeping affirmative injunctive relief to eliminate the effects of past discrimination and to prevent discrimination in the future. The court feared that even a temporary denial of federal funds would impede the development of public housing in Chicago. (Controversy over HUD's civil rights role now centers on the question of the affirmative measures which the Department must take under the Civil Rights Act of 1968 to insure that its grants do not contribute to segregated housing patterns, Shannon v. HUD, 436 F.2d 809 (3rd Cir. 1970); Gautreaux v. Romney, ___ F.2d ___ (7th Cir. Sept. 10, 1971).

A second area where serious enforcement problems have arisen is in federally assisted state welfare programs. HEW has in the past been extremely reluctant to apply the drastic sanction provided in the statute (42 U.S.C. §604(a)) of cutting off federal funds to states which are not complying with federal standards. Advisory Commission on Intergovernmental Relations, Statutory and Administrative Controls Associated with Federal Grants for Public Assistance 62-64, 92 (1964). Even where welfare recipients claimed that individual states had clearly violated standards in federal statutes on the eligibility of families for welfare and on the determination of a welfare recipient's

standard of need, HEW has failed to take effective action to resolve questions of compliance. Welfare recipients have responded by suing state grantees in the federal courts under 42 U.S.C. §1983 alleging a deprivation under color of state law of rights guaranteed by the federal Constitution and Title IV of the Social Security Act. Every supplement to the CCH Poverty Law Reporter and every issue of the Clearinghouse Review report additional filings by welfare plaintiffs. Since 1967 about one hundred welfare cases have been decided and fully half that many must be presently pending. A number of these cases have reached the Supreme Court, e.g., King v. Smith, 392 U.S. 309 (1968) (Alabama's man in the house rule struck down); Rosado v. Wyman, 397 U.S. 397 (1970) (New York's redetermination of need struck down); Lewis v. Martin, 397 U.S. 552 (1970) (California's income attribution rule struck down).

In all of these cases the Supreme Court faced the same question that would have faced HEW in a conformity proceeding: what sanctions to impose for non-compliance with federal requirements. In King v. Smith, the Court adopted the striking course of holding that the Alabama regulation in question was inconsistent with the federal statute and therefore void under the Supremacy Clause. 392 U.S. 309, 333 n.34. In Rosado v. Wyman, on the other hand, the Court remanded the case to the district court to fix a date which would afford New York an opportunity to revise its program in accordance with federal requirements. If New York did not do so by the determined date, the district court was to enter an order restraining the further use of federal monies. 397 U.S. 397, 421-22. Justice Douglas, in a concurring opinion, recognized the danger in such a remedy: "That a State may choose to refuse to comply with the federal requirements at the cost of losing federal funds is, of course, a risk that any welfare plaintiff takes." 397 U.S. at 427. Justice Douglas did not mention that the plaintiff takes that risk not only for himself but for all welfare recipients.

A third major area where recent litigation has highlighted the enforcement problem is urban renewal. Various federal statutes specify important requirements for federally financed urban renewal projects. The local public agency which executes an urban renewal project must hold a public hearing on the project prior to land acquisition (42 U.S.C. §1455(d)) and must insure that there is adequate relocation housing for individuals and families displaced by the project (42 U.S.C. §1455(c)). Many community and civic groups have found HUD's enforcement of these requirements inadequate and have sued in the federal courts to secure their observance. Norwalk CORE v. Norwalk Redevelopment Association, 395 F.2d 920 (2nd Cir. 1968); Western Addition Community Organization v. Weaver, 294 F. Supp. 433 (N.D. Calif. 1968). Tenants and in Opposition to Redevelopment (TOOR) v. HUD, No. C-69 324 SW (N.D. Calif. 1970). Shannon v. HUD, 305 F. Supp. 205 (E.D. Pa. 1969), rev'd on other grounds 436 F.2d 809, 39 L.W. 2372 (3rd Cir. 1970). Only in the TOOR case were the plaintiffs ultimately successful. In the well known Norwalk

decision, the court upheld the standing to sue of residents of the urban renewal area who had been or were to be displaced by the project but did not determine what the appropriate relief would be if the plaintiffs proved their charge that the local public agency had not adequately provided for the relocation of displacees as required by federal law, 395 F.2d 902, 927. By the time the court recognized the plaintiffs' standing to sue, the project the plaintiffs were seeking to enjoin had already been completed. McGee, Urban Renewal in the Crucible of Judicial Review, 56 Va. L. Rev. 826, 866-67 (1970). In the Western Addition case, HUD had never made the required determination that satisfactory arrangements had been made for relocation of displacees. The court enjoined the Secretary of HUD from honoring future requisitions from the local agency for federal funds until such a plan had been approved. 294 F. Supp. 433, 441. The Secretary subsequently found the local agency's relocation plan and assurances satisfactory to him and the court dissolved the injunction. The court viewed its role in reviewing the Secretary's determination narrowly:

"[T]he judicial function is narrowly limited to ascertaining whether the Secretary has made the determination required of him by law, and, if so, whether he has acted in apparent good faith, reasonably rather than arbitrarily and with some factual basis for his decision. If so, judicial review can go no further."

(Unreported decision of March 5, 1969, see ABA National Institute on Federal Urban Grants, 22 Ad. L. Rev. 113, 268 (1970).)

In the TOOR case, however, the federal district court on April 30, 1970, found that HUD's approval of the San Francisco Redevelopment Agency's relocation plan was arbitrary, capricious and without basis in fact and that the redevelopment agency had failed to comply with a HUD regulation requiring consultation in the planning stage with minority group leaders whenever a contemplated project will result in a substantial net reduction in the supply of housing in the project area available to minority group families. The court enjoined HUD from honoring requisitions from the redevelopment agency after July 1, 1970 and enjoined that agency from any further demolition work or displacement of project residents. Shannon, on the other hand, did not involve compliance with the relocation standard but raised the issue whether an amendment to an urban renewal plan was a "material alteration" which under HUD's procedures required that the local public agency hold a new public hearing. The court held that HUD's decision that an additional hearing was not required was subject to judicial review but that the decision was neither arbitrary nor capricious and therefore should be upheld on the merits. Further litigation should be expected in these areas. Congress acted in 1968 and 1969 to impose

important new requirements on urban renewal projects. Fixed percentages of housing units in project areas redeveloped for predominantly residential uses must be for moderate and low income persons, and low and moderate income housing units must be provided "at least equal in number" to the number of such units that existed prior to demolition if the vacancy rate in the locality is less than 5 percent. 42 U.S.C. §§1455(f) and 1455(h) (1970).

Persons affected by the alleged non-compliance with federal standards contained in the Federal Aid Highways Acts (23 U.S.C. §101 et seq.) have also repaired to the courts to seek relief. The Federal Highway Administration now has a substantial docket of cases seeking review of funding decisions under the Federal Aid Highways Acts. While some of these cases involve special claims to relocation assistance, they are largely suits claiming defects in the planning process required for federally aided highway construction and seeking to enjoin the funding of projects until these defects are cured. Because of the nature of the federal standards the complaint usually takes the form of allegations that the state highway department has not touched all the bases necessary for grant approval, e.g., submission of an environmental statement under NEPA, holding public hearings, or consideration of social, environmental and economic effects and consistency with local planning. Occasionally it may also be possible to allege that the facts do not warrant, or the Secretary of DOT has not made, a finding specifically required of him, e.g., that projects in SMSAs be based on continuous comprehensive transportation planning, or that no feasible or prudent alternative to the taking of parkland is available, or even that the plan do not provide a project conducive to "safety, durability and economy of maintenance."

As one might expect the decided cases raise all the traditional judicial review issues, e.g., standing, reviewability, timeliness, and scope of review. The standing issue for any reasonable class of plaintiffs has been disposed of by the now classic cases of Road Review League v. Boyd, 270 F. Supp. 650 (1967) and Citizens Committee for the Hudson Valley v. Volpe, 425 F.2d 97 (1970). Moreover, the Supreme Court has made clear that the Secretary's judgments concerning required findings under the federal statutes are reviewable at least insofar as a plaintiff alleges that the Secretary has failed to consider the questions involved in accordance with appropriate criteria for the exercise of his judgment. Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402 (1971). This sort of review may be fairly searching. In D.C. Federation of Civic Assoc. v. Volpe, 316 F. Supp. 754 (D.C. D.C. 1970), rev'd and remanded on other grounds 40 L.W. 2211 (D.C. Cir. Oct. 12, 1971), for example, the district court (1) rejected the FHWA's interpretation of one of its Policy and Procedure Memoranda (PPM 20-8 implementing 23 U.S.C. §128) and held that its

action was invalid because not in conformity with the PPM; (2) invalidated a finding of structural feasibility on grounds that the evidence before the division engineer at the time of his approval as "safe and durable" made that approval unreasonable; (3) investigated the reasonableness of a finding that the project conformed to local transportation planning; and (4) in a rather obscure few paragraphs, seemed to invalidate the FHWA's acceptance of the District of Columbia's certification that environmental, economic and social problems had been considered on the ground that the certification was made by a local official who did not know whether these factors had in fact been considered within his department.

The Efficacy of Litigation as a Compliance Technique. Although the remedies side of the law of federal grants has been developing fairly rapidly through the case law, it is still in its infancy. Even when matured it is not likely to provide effective enforcement techniques if the principal reliance is placed on the courts. There are a number of reasons why this is true.

The first general reason has to do with the traditional and inherent difficulties with judicial review. The process is often slow and usually expensive. As the urban renewal cases demonstrate, by the time judicial action is taken the project may be completed or sunk costs may be so great that effective relief is impossible or unreasonably costly to the public. In areas such as public assistance only the major test case can be mounted. Judicial relief for individuals costs more than the benefits produced, and available free counsel is spread very thin.

There is also a problem of use of court resources. Where the court is asked to review a federal grantor agency's determination there are often large gaps in the documentary record which must be supplied by testimonial proof. See, e.g., Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402 (1971); D.C. Federation of Civil Associations v. Volpe, 316 F. Supp. 754 (D.D.C. 1970). This, of course, adds to the burden on court trial calendars. Moreover, in areas such as welfare litigation the nature of the proceeding may require at least preliminary examination by a three judge court under 28 U.S.C. §2281(1970) and expedited appeal to the Supreme Court. This is true because the welfare claimant almost always seeks to enjoin local or state agency implementation of state law on grounds of a violation of the claimant's federal civil rights. Hence, extremely scarce resources are being consumed in some compliance litigation at three times their normal rate.

Since the pressure of welfare compliance litigation is great one might expect that the federal court pipeline for determination of welfare issues will begin to be closed off on jurisdictional grounds. Because \$10,000 can seldom be seriously alleged as the amount in controversy in a welfare claim (these are not the type of class action claims which may be aggregated), the welfare claimant or claimants must allege a colorable constitutional issue in order to give a federal court jurisdiction. 28 U.S.C. §1343(3) (1970). These constitutional issues largely involve equal protection and since the Supreme Court's retrenchment on an expanded review of state social welfare legislation in Dandridge v. Williams, 397 U.S. 471 (1970), it has become increasingly difficult to convince some federal district courts to convene a three-judge federal court. See, e.g., McCall v. Shapiro, 292 F. Supp. 268 (D.C. Conn. 1968); Metcalf v. Swank, 305 F. Supp. 785 (N.D. Ill. 1970) aff'd 444 F.2d 1353 (7th Cir. 1971); Money v. Swank, 432 F.2d 1140 (7th Cir. 1970), and Rosa lo v. Wyman, 414 F.2d 170 (2d Cir. 1969) rev'd on other grounds 397 U.S. 397 (1970). This might mean either that the district court with which the case is originally filed will decline jurisdiction on grounds of failure to allege a substantial federal question, or that the district court will simply refuse to convene a three-judge federal court while retaining statutory claims as within its pendent jurisdiction. Should a three-judge court be convened it might then decide that the federal constitutional question is insubstantial or that it should be decided against the plaintiff with a reference back of the statutory claims to the pendent jurisdiction of the single-judge district court. See, e.g., Rosado v. Wyman, 397 U.S. 397 (1970). The availability of these options tends to make the acceptance of federal court jurisdiction highly discretionary.

These same observations obviously may also apply in other areas where compliance litigation takes the form of a suit by affected third parties against the recipient of federal grant-in-aid funds. Nor is it likely that this sort of compliance litigation can effectively be shifted to state courts. State judiciaries have been considerably less hospitable than federal courts to suits against grantees based on federal grant standards. This seems particularly true in the highway grants field where the approach of the state courts has been that federal standards are conditions on funding and relevant only to a grant decision by FHWA. Morningside - Lenox Pk. Ass'n. v. State Hwy. Dept., 324 Ga. 344, 161 S.E.2d 859 (1968); Futch v. Greer, 353 S.W.2d 896 (Ct. App. Tex. 1962); Linnecke v. Dept. of Hwys., 348 P.2d 235 (Sup. Ct. Nev. 1960); Pickarski v. Smith, 153 A.2d 587 (Sup. Ct. Del. 1959). Occasionally state statutes will direct that federal highway standards be complied with, e.g., N. Y. Hwy. Law, §85 (1964), but even then the court may take the FHWA approval of the project as conclusive evidence of the satisfaction of these requirements. See, Town of Clearmont v. State Hwy. Comm'n., 357 P.2d 470 (Sup. Ct. Wyo. 1960).

Where the technique for raising issues of the compliance of grantees with federal standards takes the form of a suit to review the grantor agency's actions with respect to the grant there is also reason to believe that the judicial remedy leaves something to be desired. When reviewing broad requirements on the basis of the "arbitrary and capricious" standard and necessarily relying largely on testimonial proof concerning mental operations, the courts cannot be expected to upset administrative judgments except in the most egregious situations. What the complainant really needs is a structural means by which he can present his grievance to the agency.

Hence while recognizing the tremendous impact that litigation may sometimes have in furthering compliance with federal standards, see, e.g., Barrett, The Role of the Courts in Welfare Reform, 1970 Duke L.J. 1; National Center for Social Statistics, Trends in AFDC in 1965-1970 and Selected Annual Periods, Report H-4 (1970), the accelerating incidence of litigation concerning federal grant programs is probably more symptomatic of disease than evidence of the application of effective therapy. The proposals which follow are not a panacea for the ills of the various grant-in-aid programs. They are, however, designed to introduce a modicum of order and responsiveness into the process of disposing of claims that there has been a failure to comply with standards attached to federal grants-in-aid.

II. DISCUSSION OF RECOMMENDATION

A. The Federal Administrative Complaint Procedure.

The federal grantor agency should have an administrative procedure for the receipt and impartial disposition of complaints by persons affected by the grant-in-aid program that a plan, project application or other data submitted by a grant applicant or grantee as a basis for federal funding does not meet one or more federal standards. This procedure should afford the complainant an opportunity to submit to the grantor agency for its consideration data and argument in support of the complaint, and should afford the grant applicant or grantee involved a fair opportunity to respond to the complaint. If the agency determines that the complaint is not valid, it should notify the complainant of its determination and should state in writing the reason for its decision. If the agency determines that the complaint is valid, it should so notify both the complainant and the grant applicant or grantee of its determination and should state in writing the reason for its decision. If

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the agency exercises discretion not to make a determination on one or more issues raised by a complaint, it should so notify the complainant in writing. The agency should dispose of all complaints within a prescribed period of time.

The complaint procedure administered by the federal grantor agency should also provide for the receipt and impartial disposition of complaints that a grantee has in its administration of the funded program failed to comply with one or more federal standards. It is anticipated that many grantor agencies will find it necessary to limit their consideration of such complaints to situations in which the complainant raises issues which affect a substantial number of persons or which are particularly important to the effectuation of federal policy and will, therefore, dispose of most individual complaints concerning grantee administration by referring the complainant to such complaint procedures as are required to be established by the grantee. The grantor agency should by regulation define the classes of cases that it will consider sufficiently substantial to warrant processing through the federal complaint procedure and those classes of cases wherein complainants will be required to pursue a remedy through available complaint procedures administered by the grantee.

Summary. The purpose of Part A of the recommendation is to strengthen the role of federal grantor agencies in enforcing federal standards in grant-in-aid programs. The survey on pages 15-17 of this Report indicates that serious enforcement problems exist in many programs and that the inadequate response of federal agencies to these problems has led to the deep involvement of the federal courts in the task of enforcing federal standards. Federal agencies may respond to this situation in a number of ways. Part A proposes that they do so by developing administrative procedures for handling complaints of a grantee's non-compliance with federal standards. The initiation by federal agencies of formal complaint procedures, or the strengthening of existing procedures, should lead to a broader acceptance within the federal agencies of their responsibility to enforce federal standards. In practice, complaint procedures should also operate to provide federal agencies with more complete information on compliance problems and to shift from the courts back to the federal agencies the primary role in resolving questions of compliance with federal standards.

Federal agencies should of course seek to achieve increased compliance with federal standards through any other means that prove effective. They may conduct educational programs to inform grantees of their obligations and may provide technical advice and services to aid grantees in complying with federal standards. These techniques recognize that a grantee's non-compliance may be due to ignorance

or to staff limitations rather than to any conscious disregard of federal standards. The federal grantor agency might also clarify its interpretation of applicable federal standards and even develop models for grantee administration that would assist grantees in conforming with federal standards in their program operations. Other techniques for improving compliance with federal standards include more intensive or frequent administrative reviews of grantee operations and an audit system designed to detect grantee expenditures that violate federal standards.

All of these techniques may prove useful to federal agencies in achieving improved compliance with federal standards. Federal agencies may simultaneously employ one or more of them in addition to utilizing a complaint procedure. Part A singles out the administrative complaint procedure because that technique recognizes that the ultimate beneficiaries of grant-in-aid programs have a significant interest in the grantee's compliance with federal standards. In recent years there have been widespread efforts by individual citizens and public interest groups affected by grant programs to hold program officials accountable for their actions. These efforts often result in law suits, but may also take the form of concerned citizens' meetings, petitions, and campaigns in the press and other mass media. A federal administrative complaint procedure would involve these private interests in the compliance and enforcement process of the federal agency. This involvement at the agency level should lead to an improved record in enforcing federal standards. In addition, an effective complaint mechanism should convince the beneficiaries of the grant-in-aid program that the grantor agency is responsive to their interests and thus restore their confidence in the worth of the grant program.

This encouragement to individuals and public interest groups to police grant programs may cause some discomfort to administrators who find their interference troublesome. Organizations of welfare recipients, conservationists, neighborhood residents, public housing tenants and other persons affected by grant programs are often demanding; and their views may conflict sharply with those of program officials of the federal agency or of the grantee. These new pressure groups however, are now as much an established part of the American scene as are professional and trade associations, labor unions, veterans organizations and the Chamber of Commerce. Often their tactics may be abrasive but their presence is important for informed decision making concerning the allocation of federal funds. Such decisions should not be made by government officials in lofty isolation but rather with an awareness of competing viewpoints and considerations. Federal agencies should therefore welcome the orderly participation of these organizations and of affected individuals in a complaint procedure.

Too often in the past these interests have been left out of the administrative process. Recent reforms in the system of federal grants-in-aid have generally benefitted state and local grantees by strengthening their role in the system without any corresponding recognition of the role of the system's ultimate beneficiaries. Examples of such reforms include the consolidation of grant programs, the institution of block grants, the areawide planning requirements of §204 of the Demonstration Cities and Metropolitan Development Act of 1966 (42 U.S.C. §3354) (1970), the prior consultation on new federal agency regulations and standards which the heads of state and local governments are entitled to under Bureau of the Budget Circular A-85 (June 28, 1967), and the greater reliance on state and local government that is a hallmark of the "New Federalism." These are praiseworthy reforms, but some countervailing role must be played by the ultimate beneficiaries of grant programs. This recommendation seeks to establish such a role in the sensitive area of enforcing federal standards.

Complaints Directed at Grantee Submissions. The first category of complaints covered by Part A are complaints that a plan, project application or other data submitted by a grant applicant or a grantee as a basis for federal funding does not meet one or more federal standards. The phrases "plan, project application or other data" are intended to cover at least six types of submissions: 1) state plans which individual states must have approved by the federal agency in order to qualify for a formula grant; 2) comprehensive or functional state, regional or local plans which must be approved by the federal agency before any project grant will be awarded that relate to the plan; 3) amendments to both these types of plans; 4) project applications for individual project grants; 5) amendments to project applications; and 6) reports and factual data which are either submitted with a plan or project application or submitted at a later stage to demonstrate that a grantee has met specific federal standards. In all cases the word "submission" should be liberally construed to cover the operative provisions of a grantee's plan or application and should not be restricted to documents that are physically transferred from the grantee to the grantor. For instance, a state plan submitted to HEW to qualify for a formula grant may summarize or only refer to the state's operative statutes and regulations and need not contain their actual texts. The statutes and regulations are nevertheless part of the state plan, and a complaint should be able to challenge their conformity with federal standards.

The majority of complaints processed under this aspect of the federal complaint procedure should be complaints directed at pending plans, applications or amendments thereto that have been submitted to the federal agency but not yet acted upon or approved by it. Ideally, as many complaints as possible should be resolved at this stage before the agency has made a funding decision by approving the submission. Many types of complaints are likely to arise at this

stage; three prominent examples may be selected for purposes of illustration. First, potential displaces may complain that a relocation plan accompanying an application for an urban renewal or other project grant does not comply with federal standards. Second, welfare recipients may complain that a new state statute or regulation on eligibility for assistance or income disregard violates federal standards. Finally, conservation groups may complain that a state highway project does not conform with federal environmental or planning requirements. In all three of these examples the complainants are raising issues that are basic to the effectuation of important federal policies and federal agencies should seek to resolve these issues effectively.

The complaint mechanism with respect to grantee submissions is intended to function in two additional situations. First, it covers complaints that the federal agency has improperly approved plans or applications that do not in fact conform with federal standards or that plans or applications submitted and approved in the past are no longer valid because they have not been brought into conformity with newly imposed federal standards. This problem has recently arisen in the area of social assistance grants to the states where HEW is now questioning the conformity with federal standards of state plan material submitted and approved years ago. Although the states involved have continued to receive federal funds on a regular basis, they have either never submitted adequate plan material to HEW or have not conformed their plan material to new federal requirements. In these situations federal agencies should entertain complaints that plan material or applications no longer conform with federal standards. Of course, a federal agency need not continually redetermine issues of compliance and may dispose of subsequent complaints by informing the complainant that a particular issue has already been resolved by the agency.

Secondly, the complaint procedure in Part A applies to situations where the federal agency must make a finding that federal requirements have been satisfied before it releases federal funds to the grantee or before it approves the initiation or continuation of a federally assisted program or project. Congress has increasingly required in recent years that federal administrators make such determinations with respect to the environmental or human impact of grant programs. For example, §138 of the Federal Aid Highway Act of 1968, 23 U.S.C. §138 (1970), prohibits the Secretary of Transportation from authorizing the use of federal funds to finance the construction of highways through public parks if a "feasible and prudent" alternative route exists and unless there has been "all possible planning" to minimize harm to the park. If a grantee proposes to construct a highway through a park the factual data required to support that action is a necessary submittal that provides a basis for federal funding. Under Part A of this recommendation the federal agency should entertain complaints that a feasible and prudent alternative route does exist or that all possible planning has not taken place.

This latter function of the complaint mechanism overlaps with its primary function of resolving complaints at the application stage. Quite often the grantee will include or refer to in its application the factual data which it believes supports a determination that federal standards have been met. Federal statutes or regulations may require that the applicant submit such data and that the federal agency make the determination before approving the application. See §210 of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. §4610 (1970), which provides that a federal agency shall not approve a grant that will result in the displacement of persons unless the agency receives satisfactory assurances concerning the relocation program of the state or local grantee. Quite often, however, the federal agency will not only make such a determination at the application stage (if it makes the determination at that stage at all) but also at a later time when the particular project is fully planned and even partially executed. Postponing the determination in this fashion may be necessary because complete data is often not available at the application stage. For example, in urban renewal projects grants HUD must be satisfied at a reasonable time prior to actual displacement that adequate relocation housing is available for individuals or families to be displaced. 42 U.S.C. §1455(c)(2) (1970). Where the federal agency makes at a later stage than the application stage the crucial determination that results in the continued flow of federal funds, complainants should be able to take advantage at that time of the complaint procedure proposed in Part A.

Complaints Directed at Grantee Operations. The second paragraph of Part A covers complaints that a grantee in its administration of the federally aided program has failed to comply with one or more federal standards. The recommendation, however, recognizes that complaints which involve individual grievances may in many cases be better handled by the grantee's complaint procedures provided for in Part B. Normally the federal agency should refer individual complaints to the grantee's complaint procedures if such procedures are available. The grantee's complaint mechanisms are likely to be more conveniently located and accessible to the complainant, and the grantee is likely to have readier access to the facts. Fair complaint procedures at the grantee level should satisfactorily resolve the great majority of individual complaints. Furthermore, to require the federal agency to handle individual complaints imposes a significant burden on the agency. The federal agency, for example, should not be required to handle the complaint of an individual welfare recipient upset about the termination or reduction of his benefits or the complaint of an individual homeowner in the path of an expressway upset over the State Highway Department's offering price for the acquisition of his house. Those complainants should normally pursue their remedies under the grantee's complaint procedures and, if not satisfied with the result, should then be able to take their individual grievances to court

without further delay. An additional processing of their complaints through a federal administrative complaint procedure would be duplicative and wasteful from the point of view both of the federal agency and of the complainant.

However, not all complaints directed at grantee operations should be referred to the grantee's complaint procedures. Part A provides that federal administrative complaint procedures should handle operational complaints that raise issues which affect a substantial number of persons or which are particularly important to the effectuation of federal policy. Compliance issues which would affect a substantial number of persons include a state or local welfare agency's failure to process promptly applications for assistance, the failure of a hospital aided under the Hill-Burton Act to except charity cases, and a public housing authority's insertion into its tenants' leases of improper provisions. In all these cases the grantee may have complied "on paper" with federal standards in all plans and applications submitted to the federal agency but it has not complied in practice. Since compliance in practice is the only type of compliance that counts, the federal agency should not limit its complaint procedure to issues of paper compliance. It should also assume responsibility for handling complaints of a grantee's widespread non-compliance in practice with federal standards. Such complaints would include a complaint that a grantee's complaint procedures do not comply with the federal standards contained in Part B.

Even when the challenged action of the grantee affects only one person, the federal policy at stake may sometimes be important enough to channel complaints through federal complaint procedures. This is particularly likely to occur where there is some danger that grantees will be hostile or indifferent to the federal policy. The most important example is the federal policy of non-discrimination. All of the regulations implementing Title VI of the Civil Rights Act of 1964 require federal agencies to process directly individual complaints of discrimination in federally assisted programs. The effectuation of other federal policies may likewise require the availability of a federal complaint procedure for handling individual complaints; the federal agency should define those classes of cases by regulation in accordance with the final sentence of Part A.

On the whole, federal agencies should be cautious in opening up their complaint procedures to individual grievances about the grantee's operation and should consider the desirability of channeling into the state or federal courts individual disputes that are not satisfactorily resolved through the grantee's complaint procedures. For example, it does not seem desirable for HEW to hear the complaints of individual welfare recipients that their benefits have been improperly terminated. HUD has made a similar determination with respect to tenants' grievances

in public housing. Under its new lease and grievance procedure for federally assisted public housing, the parties are left to their judicial remedies if a tenant's complaint is not satisfactorily resolved through the public housing authority's complaint procedure. RHM 7465.9 (February 22, 1971). This policy classifies individual tenants' grievances as complaints that are not substantial enough to channel through the federal complaint procedure.

The regulations now appearing under the Uniform Relocation Assistance and Land Acquisition Policies Act of 1970, 42 U.S.C. §4601 et seq. (1970), are not uniform on whether a claimant dissatisfied with a grantee's determination on his eligibility for relocation benefits or the amount thereof may appeal the adverse determination to the federal grantor agency. In grant-in-aid programs administered by HUD the aggrieved claimant may appeal to HUD for a redetermination of the claim, 24 C.F.R. §42.190 (36 F.R. 8785, 8798, May 13, 1971). DOT's regulations, on the other hand, do not authorize individual complaints to the federal agency but limit the claimant to an appeal to the head of the grantee agency. 49 C.F.R. 25.21 (36 F.R. 9178, 9181, May 20, 1971). More intensive study of this problem is needed to determine which approach is better in the context of particular programs but as a general matter it does not appear desirable for the federal agency to handle individual complaints. In addition it is now generally conceded that federal and state courts may review disputes over relocation payments.^{1/} Under these circumstances HUD and other federal agencies that follow its approach should consider the desirability of channeling into the state or federal courts individual disputes over relocation payments that are not satisfactorily resolved through the grantee's complaint procedure.

No doubt relocation is a sensitive area of federal concern, but most of that concern has centered on the issue of whether displaced have in fact been relocated into standard housing and not on the issue of payments. Neither the HUD nor the DOT regulations permit appeals to the federal agency by complainants that claim they have been relocated into substandard housing. Of course, where there are complaints concerning a grantee's relocation practices that affect a substantial number of persons, Part A suggests that a regularized procedure should be available at the federal level for processing complaints.

The Structure of the Federal Complaint Procedure. Federal agencies regain great flexibility in structuring the administrative complaint procedure proposed in Part A of this recommendation. An

^{1/} Prior to the passage of the Uniform Act, judicial review on matters of relocation payments was precluded by statute. Merge v. Troussi, 394 F.2d 79 (3rd Cir. 1968). A similar provision precluding judicial review was in the Uniform Act as reported out of the House Public Works Committee but subsequently deleted. The Act is therefore silent on the availability of judicial review.

agency must simply make public a procedure whereby it will receive and impartially dispose of complaints that a grantee's submissions or operations violate federal standards. The procedure should afford the complainant an opportunity to present data and argument in support of the complaint and should offer the grantee or grantees involved a fair opportunity to respond to the complaint. The agency should dispose of all complaints within a prescribed period of time; the agency should either determine that a complaint is valid, determine that it is invalid, or exercise its discretion not to make such a determination. Individual complaints may in addition be disposed of by referring them to the grantee's complaint procedures. All dispositions should be in writing, and determinations of validity or invalidity should be accompanied by a statement of the reasons for the determination.

The federal agency should delegate the responsibility for handling complaints to designated officials in the regional or area offices of the agency. Those officials should have the responsibility of investigating complaints to determine their validity and of disposing of all complaints in an appropriate fashion. Their identities should be publicized and prospective complainants directed to them. The decisions of these officials may, if the agency chooses, be subject to further administrative review at a higher level within the agency or by the agency head himself. The final administrative decision should constitute the agency's decision on the complaint.

Earlier drafts of this recommendation proposed that the officials designated to handle complaints should be independent hearing officers who did not have responsibilities for program planning or administration. It was felt that an independent official was likely to be more enforcement oriented than a program official. More intensive study of the problem in the context of the AFDC program convinced the committee that independent hearing officers should not be required. The principal consideration which led to this change was the desirability in many cases of more closely integrating the enforcement process and program administration. An important function of a complaint mechanism is to supply the federal agency with information on compliance questions. Even an individual complaint which the federal agency refers to a grantee's complaint procedures may alert the program staff of the agency to a potential problem. Program officials who handle complaints are able to utilize the information which they acquire in this role in deciding whether to conduct administrative reviews and in making informal efforts to educate grantee personnel on federal requirements and to persuade them to comply. A well informed program official in this fashion bring about a high degree of compliance with federal standards without imposing any formal sanctions. Furthermore, the formal handling of complaints by program officials should focus their attention on compliance questions and make them more enforcement oriented. Field work by one of the committee's consultants disclosed

that federal program officials in the AFDC and highway programs too often view their function as primarily an administrative and promotional one and consider the observance of federal standards a matter of state responsibility. This attitude is likely to change with the establishment of a federal administrative complaint procedure because the existence of the complaint procedure emphasizes that the federal agency is responsible for enforcing federal standards in grant-in-aid programs. If program officials handle the complaints they are likely to consider enforcement a program responsibility.

The nature of the hearing afforded to the complainant is left by Part A largely to the determination of the federal agency. The recommendation does provide, however, that the complaint procedure should afford the complainant an opportunity to submit data and argument in support of the complaint. An opportunity to present data and argument is a minimum requirement for a fair hearing. Whether the data and argument should be presented in written or oral form may vary with the nature of the program, the complaint and the complainant. Written submissions may be an appropriate basis for decision in most cases but in many instances a complainant should also be able to present his complaint orally to an agency official. An informal oral presentation in the office of the agency official may be particularly appropriate where the complainant is not represented by an attorney and cannot be expected to ascertain independently the precise legal basis for his complaint. Where appropriate, the official designated to handle complaints should seek to resolve them through informal negotiation and conferences between the complainant and representatives of the grantee. In addition, the grantee should always be afforded a fair opportunity to respond to complaints. Normally the agency official handling complaints should notify a grantee of the substance of a complaint that relates to the grantee's activities and afford the grantee an opportunity to present data and argument in response to the complaint. Of course, the official need not formally notify the grantee of complaints that are irrelevant or palpably invalid.

The complaint procedure should not involve in the great majority of cases a formal hearing on the record with oral testimony and cross-examination. Agency officials handling complaints should be able to dispose of most of them on the basis of written submissions supplemented by their own informal investigations and meetings with the complainant and representatives of the grantee. In some cases, however, more formal hearings may be desirable. The agency should therefore have available a procedure for a more formal hearing on a complaint at which the complainant and other similarly situated, as well as representatives of the grantee, may present testimony and oral argument. For example, complaints directed at grantee practices affecting a substantial number of persons may raise contested issues of fact. Complaints of this type may challenge a grantee's practices

in relocating displaced or evicting tenants. Ventilating the factual issues at a more formal public hearing may serve a number of useful purposes. First, it should help the federal agency determine what the real facts are. Second, the publicity that accompanies the disposition of the complaint may serve as an effective sanction for achieving compliance by the grantee with federal standards. If a public hearing discloses widespread violations of federal standards, a grantee is under considerable pressure to rectify the situation. See Part D(1). Third, a public hearing should convince the complainants that the federal agency is responsive to their needs and may even convince them that the grantee's non-compliance is not as widespread as they first thought. Finally, if an agency holds a full hearing, a reviewing court should more readily defer to any findings of fact made by the agency.

What little law there is in this area indicates that third persons affected by a federal grant-in-aid program are normally not entitled under the Due Process Clause of the Fifth Amendment to a trial-type hearing on their complaints concerning the administration of the program by the federal agency. Kendler v. Wirtz, 388 F.2d 381 (3rd Cir. 1968) (railway workers affected by a mass transit grant); Hahn v. Gottlieb, 430 F.2d 1234 (1st Cir. 1970) (tenant in a below market interest rate project affected by a rent increase); Powelton Civic Ass'n. v. HUD, 284 F. Supp. (E.D. Pa. 1966) (residents challenging eligibility of area for urban renewal). Of course, the nature of the factual and legal issues in dispute determines the type of hearing which is required; and where the Due Process Clause requires a trial-type or formal hearing on complaints, federal agencies should follow that procedure under Part A. Courts are reluctant, however, to require trial-type procedures where informal procedures may work just as well. See First National Bank of Smithfield v. Saxon, 352 F.2d 267, 273-77 (4th Cir. 1965) (Sobeloff, J., dissenting).

Agency Discretion not to Resolve Complaints. Part A permits a federal agency to exercise discretion not to determine one or more issues raised by a complaint. It is important that the agency in such cases notify the complainant within a prescribed period of time of its decision not to act. This should allow the complainant to pursue any judicial remedies available free of the encumbrance of doctrines such as exhaustion of administrative remedies and primary jurisdiction.

There are two major reasons why it seems desirable that federal agencies retain some discretion over the time when they formally raise compliance issues in the public forum. First, the federal agency is not merely a neutral arbiter in complaint proceedings. It has independent enforcement responsibilities and, therefore,

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should not be forced by the mere filing of a complaint into the position of choosing between either (1) reliance on the perhaps inadequate submissions of parties or (2) allocating significant agency resources to the development of facts and policy in an area that it does not feel is significant to the accomplishment of federal objectives when compared with other compliance issues to which the same resources might be devoted. If the agency cannot thoroughly investigate every potential compliance issue -- and an agency like the Social and Rehabilitation Service of HEW certainly could not without outrageous expenditures -- then it must have the capacity to assign priorities to the possible issues it might pursue. This proposal is in accord with present law which recognizes the standing of affected persons to intervene in a conformity hearing once the agency has raised an issue of non-compliance but does not recognize their standing to trigger a conformity proceeding by raising new compliance issues. National Welfare Rights Organization v. Finch, 429 F.2d 725 (D.C. Cir. 1970). Second, the agency should be in a position to decide whether it has a better chance at ensuring compliance in a particular area by low visibility conflict or negotiation rather than by surfacing issues in a public hearing. Particularly where state or local governments are involved the "cooperative" approach may often achieve a higher degree of overall compliance with federal standards than the public confrontation that follows a finding of non-conformity.

An agency's decision not to resolve issues raised in a complaint does not mean the agency should forget about those issues. The complaint procedure has still served a function of supplying the agency with information on a potential problem, and the agency should use that information in its informal contacts with the grantee. In those informal contacts the federal agency should communicate any doubts which it has about the grantee's compliance and discuss with the grantee possible modifications or adjustments in the grantee's plan or application that would resolve those doubts and still permit the grantee to proceed with its program.

There are also arguments against recognizing that a federal agency has discretion not to resolve complaints. The recognition of this discretion may reduce the role of the federal agency in resolving compliance questions and limit the participation of affected persons in the agency's compliance and enforcement process; it is thus in some sense inconsistent with the main thrust of the recommendation for a federal administrative complaint procedure. The federal grant-in-aid system, however, has many ambiguities. It depends for its ultimate success on the effectiveness of the federal agency in achieving compliance with federal policy through the use of all the techniques at its disposal. A complaint procedure should improve the effectiveness of the grant system, but at the same time it should avoid abstract judgments concerning the use of particular

compliance techniques which might interfere with the federal agency's primary responsibility of developing and implementing an effective enforcement program.

Present Agency Practices: The Experiences of HUD and HEW. The implementation of Part A should require some affirmative action of all federal grantor agencies covered by the recommendation. The recommendation contemplates a publicized complaint procedure which is part of the federal agency's enforcement machinery and which provides a forum for resolving issues of compliance. Existing complaint procedures do not appear to meet these criteria. While agencies do respond to complaints and often make substantial efforts to investigate the matter and to help the complainant, the process is too often a haphazard one. Prospective complainants do not know to whom in the agency they should direct their complaints or who has responsibility for resolving them. Field research by one of the consultants at the HUD regional offices in Philadelphia and New York revealed that an inordinate amount of time was spent handling the relatively small number of individual complaints that came to the attention of the field staff. The arrival of more complainants would swamp the process. More serious complaints challenging whole projects were never really resolved but shunted to the courts.

The fairly extensive experience of HUD and HEW in handling complaints from private persons affected by their programs indicates what further steps are required by this recommendation. HUD receives a considerable number of complaints that workable programs filed by local governmental units for certification by HUD and applications for loan and grant contracts for urban renewal projects do not conform with federal standards, particularly standards with respect to the provision of low-income housing and the relocation of displaced persons. Often these complaints are drafted by lawyers and resemble a plaintiff's complaint in a law suit. They are entitled administrative complaints and the lengthy allegations of fact contained therein are often supported by documentary material. The impetus for preparing these administrative complaints evidently came from the decision in Powelton Civic Ass'n. v. HUD, 284 F. Supp. 809 (E.D. Pa. 1968). Powelton held that the residents of an urban renewal area had a due process right to submit to HUD for consideration documentary evidence and written argument challenging the eligibility for federal funding of an urban renewal project in Philadelphia. One senses, however, that the lawyers' purpose in filing administrative complaints with HUD is not so much to convince HUD of the merits of their clients' case as to avoid the defense in a subsequent judicial action that their clients did not exhaust their administrative remedies. The Department of Justice raises this defense routinely even though there are presently no formal remedies available to exhaust.

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HUD's reaction to these complaints is by no means a negative one. It does read and consider any relevant written material sent to it and does respond in writing to all complaints. Normally the regional offices handle this task, but the Washington office may become involved if the complaint is a troublesome one or was directed to the Washington office initially. Often the General Counsel's staff responds to complaints; program officials also handle complaints even though they are closely involved in planning and administering the grants which are the sources of the complaints. In at least one instance, a well documented complaint led to a HUD field investigation which resulted in the rejection of the application of the Westside Urban Renewal Project in Pulaski, Tenn. Berger and Cogen, Responsive Urban Renewal, 1 Urban Law Annual, 75, 106-17 (1968).

For quite some time HUD has been considering the institution of a more formal structure for handling these complaints. What is lacking in HUD's present procedures is the designation of specific officials to receive complaints and to resolve, in a reasoned fashion, issues of compliance. Such an effort by HUD should have at least four beneficial results: 1) it would force HUD to clarify its own thinking on compliance questions; 2) in cases where HUD finds non-compliance, it would put pressure on state and local governments to revise their plans and applications to conform with federal standards; 3) in cases where HUD finds compliance, it would often forestall litigation either because the complainant is satisfied with the explanation or is convinced that it is futile to pursue the matter further; and 4) if the complainant nevertheless does take the matter to court, the court has the benefit of HUD's views and expertise on the compliance issue and may accord them considerable weight. State and local governments applying for grants should not be prejudiced by a complaint procedure because they have always had ready access to agency officials to present their views and because the recommendation does not affect any right they may have to obtain a hearing or judicial review of a decision to deny or withhold federal funds.

There is also already a complaint procedure used by the Social and Rehabilitation Services in the regional offices of HEW. It is highly informal, but it operates in a reasonably consistent fashion. Whenever a complaint is received the complaining party receives a response within five to seven days. If the complaint is about a local practice, the regional office will usually refer the complaint to the state agency. The theory is that the states are primarily responsible for correcting local practices. Where the question is one of eligibility the regional office will suggest to the complainant that he continue to deal with the local office and also inform him of his right to a state appeal or fair hearing. The regional office's response will suggest that the person write back if satisfaction from the state is not achieved. If the issue involves a state practice or policy, then

the regional office will take the appropriate action itself. Also, in some cases involving local practices where the state does not seem to be making any progress in solving the problem, the regional office will send a staff member to investigate. The investigation usually involves a visit to the complainant and to the local welfare department. A report stating the facts of the investigation and the conclusions based upon it are then sent to the state agency for appropriate action.

Under present procedures the citizen's complaint seems to have two values. First, it seems to result in prompt redress for a complainant who has made a good case. Secondly, it is a good source of information for the regional office on local compliance issues. Unfortunately, there is seldom an effective utilization of this information for general enforcement purposes. Because of the limitations on staff, the regional office does not feel that every complaint should actuate an administrative review or investigation. Hence, only a large volume of complaints or an extremely well documented complaint suggesting a pattern of maladministration will result in an administrative review. The regional office never reports to the Washington office as a conformity issue any issue about which it merely has complaints and has not itself conducted an investigation.

Also, the present complaint procedure seems to have its own Catch 22. Both the Assistant Payments Director and the Regional Commissioner at the regional office surveyed by one of the consultants stated that the reason they were able to handle complaints so efficiently was that they only get a few. Indeed, no complaints have ever been received from two states in that region. However, if the complaint procedure were to become generally known and utilized, it would collapse in a short time because the regional office does not have the staff nor the desire to act as a reviewing center for local agency practices. This is something the regional office thinks the state department should be doing on its own. There is no systematic method in any state for informing recipients or the general public of the opportunity to complain to HEW.

Obviously this procedure would have to be upgraded in importance and regularized to provide the sort of mechanism suggested by Part A. Indeed, SRS presently has a draft of a procedure which is to provide the substance for the currently vacant Chapter IV of its compliance manual entitled "Special Procedures for Complaints on the Operation of State Approved Plans."

The basic outline of the draft procedure is as follows: First, complaints are divided into group 1 and group 2 complaints. Group 1 complaints are those which can be handled by an explanation, by referring the complainant to the state or local agency or by suggesting

that the complainant file a fair hearing petition with the state agency. Group 2 complaints are those in which there is sufficient indication in the complaint that there is a serious problem in the operation of an approved state plan that, if true, the allegations would prove nonconformity with federal requirements. This would require that the practices appear to affect a substantial number of individuals. The regional offices are instructed to set up a screening process which includes acknowledgment of the receipt of the complaint to the complainant with information concerning the department's proposed plan of future action.

For Group 2 complaints the following procedures will be followed: First, a notification is given to the state with a request that the state respond within 15 days to the allegations. If the state agency agrees with the facts, the Regional Commissioner will then issue a notice that a compliance issue exists and begin a period of negotiations with the state in order to achieve compliance. The complainant is to be notified by the Regional Commissioner when corrective action has been taken. If the state agency denies the allegations and is able to produce "conclusive evidence" that the issue does not exist (whatever that means), the Regional Commissioner notifies the state agency that a compliance issue does not exist and notifies the complainant of that decision as well as the basis for the decision.

If there is a disagreement about the facts and the Regional Commissioner is not convinced that the state agency has produced conclusive evidence which would show a compliance issue does not exist, he is to arrange for a conference at which the state agency, the regional office and the complainant will participate. The conference is apparently an informal one and will be scheduled by the state agency, if it agrees to do so. After this conference is held the Regional Commissioner will notify the Administrator of SRS of his findings, that is, whether there is a potential issue of compliance and his plan for next steps. The next steps available to him are the usual ones for securing compliance in cases which do not arise by private party complaint. That is, the Regional Commissioner may do a formal agency review of the state's practice, he may ask the state to do a review, he may have a further conference with the complainants, etc. The Regional Commissioner is to continue negotiations with the state while observing the time limits on negotiations in the compliance manual. At the expiration of the six months of negotiations the Regional Commissioner is expected to refer the matter to the central office.

This is a procedure which should be helpful in producing information for HEW concerning nonconformity. Moreover, it preserves the Department's control over the scheduling of conformity hearings and, hence, the surfacing in public of state and federal conflicts.

However, it may pose serious problems for those private parties who are interested in achieving compliance by state welfare departments with federal public assistance standards. There is obviously no assurance that the Department will follow up a valid complaint with an enforcement proceeding. Should the Department fail to act, its failure may not be judicially reviewable. There is also the equally complex issue of the impact of this complaint procedure on the availability of a judicial remedy against state agencies.

Without entering into an extended discussion of the "reviewability" or "exhaustion" and "primary jurisdiction" issues which this complaint procedure raises, one might merely observe that this is a situation in which the observance of Part A's recommendation for time limits within which all agency action concerning complainants will be taken is critical. While it is probably necessary and perhaps desirable to impinge on the claimant's access to judicial remedies when providing an administrative complaint procedure, that procedure should not introduce the complaining party into a process which has no fixed date for producing a determination. If it does, the procedure may in some programs, for example, programs of categorical public assistance, subtract from rather than add to the effective remedies of program beneficiaries who complain of grantee non-compliance with federal standards. Where the agency develops a procedure which retains discretion not to process particular complaints, a separate and shorter time limit for making a determination not to go forward with a complaint would seem appropriate.

Experience with Complaints under Title VI of the Civil Rights Act of 1964. Agency regulations implementing Title VI of the Civil Rights Act of 1964 provide that a person who believes that a recipient of federal financial assistance has discriminated against him on the basis of race, color, or national origin has a right to file a written complaint with the federal agency administering the program of federal financial assistance. See, e.g., 45 C.F.R. 80.7 (b) (HEW); 24 C.F.R. 1.7(b) (HUD); 43 C.F.R. 17.6(b) (Interior). These regulations also generally provide for the designation of a "responsible department or agency official" to receive complaints of discrimination. See, e.g., 45 C.F.R. 80.13(c) (HEW). Title VI regulations further require that recipients of federal financial assistance take reasonable measures to inform the ultimate beneficiaries of the assistance of their right to complain about discriminatory treatment. See, e.g., 45 C.F.R. 80.6(d) (HEW). If a complaint is not valid, the responsible agency official designated to receive the complaint must so inform the complainant in writing. See, e.g., 45 C.F.R. 80.7(d)(2) (HEW). Conversely, where a complaint is valid, assistance may be terminated only where the recipient is afforded an opportunity for an administrative hearing and there is an express finding on the record of discrimination. 42 U.S.C. §2000d-1 (1970).

Complaints under Title VI are most likely to involve discriminatory practices in the operation of a program receiving federal financial assistance. Only a minority of Title VI complaints are directed at plans, applications or other submissions on file with a federal agency. Normally these documents will contain routine assurances of non-discrimination, and the complaints will allege that grantors are violating these assurances in executing their grants. The United States Commission on Civil Rights, in its exhaustive study on the Federal Civil Rights Enforcement Effort (1970), has concluded that the existing mechanism for handling Title VI complaints is confusing and inadequate. The officials responsible for handling complaints do not have sufficient status within their respective agencies; their salary level is likely to be lower than that of program administrators and their staffs disproportionately small for the task involved. Too often these officials are responsible to program administrators who are naturally inclined to favor overall program accomplishments over civil rights enforcement. Compliance proceedings are also likely to be protracted, and sanctions are only rarely imposed. Id. at 702-24.

Part A contains no specific reference to complaints of discrimination by grantees of federal financial assistance. Federal agencies may retain under this recommendation separate procedures for handling Title VI complaints while establishing or formalizing new procedures for handling other complaints. Civil rights enforcement is a delicate task that may justify a separate enforcement mechanism staffed by civil rights specialists. Furthermore, Title VI affords grantees special hearing rights prior to the imposition of sanctions. However, these recommendations should prompt all federal agencies to examine the effectiveness of their existing procedures for handling Title VI complaints. Where those procedures do not conform with the minimum requirements proposed in Part A, appropriate action should be taken to improve the procedures.

The Federal Complaint Procedure and the Imposition of Sanctions. If the federal agency determines that a complaint directed at a grantee submission or a grantee practice is not valid, the federal agency will naturally take no action on the complaint; the complainant has no further federal administrative remedies and may pursue any judicial remedies available. The situation is not so simple if the agency determines that the complaint is valid. The issue then arises of how the federal agency should achieve compliance with federal standards. The federal agency should of course inform the grantee of its determination and seek to persuade the grantee to comply with federal standards. If these efforts prove unsuccessful, the federal agency should consider the imposition of sanctions. Part D of this recommendation proposes that the federal agency have a range of sanctions available for dealing with instances of non-compliance.

These recommendations on the enforcement of federal standards distinguish between the disposition of complaints and the imposition of sanctions for violations of federal standards. In other words, the federal agency's determination that a complaint is valid does not automatically result in the imposition of a sanction unless, of course, the relevant statute leaves the agency no discretion to avoid such action. The complainant may choose to publicize the agency's decision, but the agency otherwise retains control over the enforcement machinery. This distinction between the complaint procedure and the enforcement machinery is desirable for three reasons. First, the federal agency should not limit its enforcement machinery to instances of private complaints but should also invoke it where the agency's own investigations uncover violations of federal standards. Second, the federal agency should have broad discretion to choose the appropriate sanctions to invoke. The purpose of providing the agency with a range of sanctions is to permit the agency to make a flexible (but effective) response to instances of non-compliance. Finally, the enforcement process should be structured to protect the rights and interests of the grantee and of all the beneficiaries of the grant-in-aid program. The complaint process, on the other hand, should be structured to afford a fair hearing to the complainant on his grievance.

This distinction between the disposition of complaints and the imposition of sanctions is particularly apparent where the federal agency responds to a situation of non-compliance by proceeding administratively to terminate all or part of a grantee's funds. A grantee or non-complaining beneficiaries of the program may have statutory or constitutional rights to a hearing prior to the imposition of such a severe sanction. For example, statutes establishing formula grants to the states for social assistance programs provide that HEW must hold a conformity hearing prior to terminating, in whole or in part, a state's grant. See, e.g., 42 U.S.C. 604 (AFDC program). Affected private parties have standing to intervene in the proceeding. National Welfare Rights Organization v. Finch, 429 F.2d 725 (D.C. Cir. 1970). While state and local grantees may not be persons entitled to such a hearing under the Due Process Clause of the Fifth Amendment in cases where there is no statutory right to a hearing, South Carolina v. Katzenbach, 383 U.S. 301, 323-24 (1966), private grantees may have a due process right to a hearing prior to the termination of a grant, Aquavella v. Richardson, 437 F.2d 397 (2nd Cir. 1971) (private nursing home that provides services under Medicare program entitled to judicial review of termination procedures). Of course, the federal agency may avoid duplicative hearings by combining the hearing it affords the complainant with the hearing it must afford the grantee prior to the imposition of a sanction. This approach is likely to be appropriate when the complaint raises factual issues which should be aired at a public hearing.

Where complaints are directed at a grantee's plan, application or other submission it may not be possible to separate a finding of non-compliance from the imposition of sanctions. Once an agency determines that the complaint is valid and that the plan, application or other submission does not meet federal standards, it should simply disapprove the submission and withhold federal funds. The agency's decision on the complaint would thus be the basis for the agency's funding decision. In many instances this should no doubt be the case. For example, if a grantee's initial application for a project grant does not meet federal standards, the federal agency should not approve it nor fund the project unless the grantee brings the application into conformity with federal standards. Likewise, if the agency must make an affirmative finding that an existing project complies with federal environmental or relocation standards, the agency cannot make that finding and permit the project to continue once it determines that the factual data submitted by the grantee does not adequately support the finding. In these cases the agency's determination that a complaint is valid necessarily affects the agency's decision to deny or terminate federal funding for the project.

More flexible responses by the federal agency are appropriate in other areas. For example, amendments to state plan material in formula grant programs become effective upon submission to the federal agency. If the federal agency determines that the amendment does not conform with federal standards, the agency should seek to obtain compliance with federal standards through education, persuasion and, if necessary, the imposition of one or more of a range of sanctions. Mere disapproval of the amendment will have little effect unless the federal agency acts affirmatively to obtain compliance. Since the grant program is already funded and in operation, the termination of federal funding through a conformity proceeding may not be the most appropriate sanction; the federal agency should consider alternative sanctions such as publicity, an action seeking an injunction, or audit exceptions.

Applications for project grants, on the other hand, are generally not funded until approved, and there is a time gap between submission and approval. Even in the project grant area, however, the mere disapproval of a non-complying application often does not resolve the enforcement problem. Many project grants, such as grants for highway construction, are approved in stages; and substantial amendments to project applications are common in urban renewal and related programs. If the federal agency disapproves an amendment to an application or an application for a later stage of an ongoing project, it in effect terminates in midstream the funding basis for the project. In situations like this it seems appropriate for the federal agency to consider invoking alternative sanctions if it cannot persuade the grantee

to revise its submission to conform with federal standards. Alternative sanctions would once again include publicity, injunction, and audit exceptions or other partial fund cut-off.

The Federal Complaint Procedure and Judicial Review. Judicial review is becoming more and more available to persons aggrieved or adversely affected by a federal agency's decision to grant, deny or terminate federal financial assistance. See, e.g., Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402 (1971). This trend is part of a broader trend toward an expanded role for judicial review. There are still areas remaining where an agency's decision on grant matters is committed by law to agency and is therefore not reviewable, Kletschka v. Driver, 411 F.2d 436 (2d Cir. 1969) (termination of Veterans Administration research grant); but the cases discussed in Part I of this Report indicate that affected persons are more and more able to obtain review of an agency's decision that grantee has or has not complied with federal standards. Where the agency holds formal hearings, the traditional scope of judicial review has been for the court to resolve all questions of law and to determine whether there is substantial evidence on the record as a whole to support the agency's findings of fact. The majority of grant decisions, however, are not subject to the requirements for hearings on the record in §§7 - 8 of the Administrative Procedure Act, and the scope of review is accordingly more limited. The reviewing court should only determine whether the agency stayed within its statutory authority, observed all procedural regularities, and acted neither arbitrarily nor capriciously on the basis of the record before the Court. Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402 (1971).

An important advantage of an administrative complaint procedure is the opportunity which it offers a federal agency to reassert its primary responsibility for resolving compliance issues. While the trend in favor of judicial review is too pervasive to eliminate the courts altogether, and, indeed, there is no reason to think that such a result would be desirable, the complaint procedure should make judicial review necessary in fewer cases and more orderly in those cases where it is necessary. If the agency integrates its complaint procedure as much as possible into its program administration by taking decisions on complaints into account when making grant or funding decisions, the courts should normally insist that litigants exhaust their administrative remedies and take advantage of the complaint procedure before bringing suit. In many cases the complaint procedure should eliminate the need for court action by satisfactorily resolving the complaint, and in those cases where it does not the court should at least have the benefit of the agency's views on the complaint. Even more important, the complaint procedure should provide the reviewing court an administrative record and findings on the compliance issue. As indicated in the discussion of the structure of the complaint procedures, the record need not be compiled at a formal or trial-type hearing but may consist of the written submissions

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and arguments of the parties. The record should contain the reasons for any decision accompanied by any findings of fact which the agency has made. These reasons and findings should facilitate any administrative or judicial review which follows and should demonstrate to the complainant that his complaint has been fairly considered.

While the newness of this area makes it difficult to predict the various ways a reviewing court will react to an administrative complaint procedure, the existence of such a procedure is likely to encourage the substitution of review on the administrative record for an evidentiary hearing in the court. This is particularly likely to occur when the federal agency has conducted a full hearing on the issues raised by a complaint. Where a court must review the validity of an administrative determination in the absence of any administrative findings or record, the court has little choice in most cases but to take testimony and to determine the facts for itself. If the administrator has not disclosed the factors he considered or his construction of the evidence "it may be necessary for the District Court [the reviewing court] to require some explanation in order to determine if the Secretary [the administrator] acted within the scope of his authority and if the Secretary's action was justifiable under the applicable standard." Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402, 420 (1971). To that effect, the reviewing court may require "the administrative officials who participated in the decision to give testimony explaining their action," even though such testimony involves an inquiry into the mental processes of the administrative decision makers. Id.

An extreme example of this occurred recently in a suit brought by various civic associations and citizens in the District of Columbia against a highway project popularly known as the Three Sisters Bridge. D. C. Federation of Civic Assoc., Inc v. Volpe, 316 F. Supp. 754 (D.C. D.C. 1970). The plaintiffs charged that the project violated federal standards for the protection of parkland and for public hearings and that Secretary of Transportation had therefore improperly released federal funds for the construction of the bridge. The District Court held a hearing on these issues which consumed over ten trial days. Among the witnesses called to testify were officials of the Department of Transportation and of the District of Columbia Highway Department. Secretary Volpe himself testified for five hours. The District Court explained that the Secretary had been personally involved in the decisions to approve the project and "[s]ince some of these decisions were not committed to writing at the time they were made, it was only by allowing the questioning of the Secretary himself that the Court could ascertain whether the decisions were in fact made and what constituted the basis for the decisions." 316 F. Supp. 760 at 760, n. 12. Further requirements have been imposed on the Secretary by the Court of Appeals, 40 LW 2212 (Oct. 12, 1971).

Extensive hearings and testimony of this type can often be avoided if a federal agency provides the reviewing court with a contemporaneous administrative record resolving complaints about the project and defending any decision to proceed with it. If the reviewing court is furnished with an adequate explanation of the agency's decision it should not hold an evidentiary hearing but should review the record to insure that the agency stayed within its statutory authority, observed all procedural regularities, and acted neither arbitrarily nor capriciously. Citizens to Preserve Overton Park v. Volpe, id at 415-417. Judicial review thus limited in scope should on the whole work to the advantage of the agency. The administrative record need not be the product of a trial-type hearing but may be compiled more informally. Of course, an agency may decide to hold a more formal hearing in order to provide the reviewing court with a complete record and to increase the likelihood of the court's upholding the agency's decision on the basis of the evidence in the record. The prospect of judicial review should also encourage the official who is designated by the federal agency to resolve complaints to state in writing the reasons for his decision along with any determinations of fact which he has made. Findings of fact should have a particularly strong impact on a reviewing court. Absent a strong showing of bad faith or improper behavior there can be no inquiry into the mental processes of the administrative decision maker if he makes formal determinations of fact. Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402, 420 (1971).

B. The Grantee's Administrative Complaint Procedures.

The federal grantor agency should require as a grant condition the establishment by the grantee of procedures to handle complaints concerning the grantee's operation of the federally assisted program. These procedures should afford any person affected by an action of the grantee in the operation of the program a fair opportunity to contest that action. The "fair opportunity" to contest will necessarily vary with the nature of the issues involved and the identity and interests of the complainant. In all cases, however, the complainant should have the right to submit to the grantee for its consideration data and argument in support of the complainant's position. Where it is claimed that the action which is the basis for the complaint deprives the complainant of any individual benefit or protection to which he is entitled under the grant-in-aid program, the grantee should afford the complainant an adjudicatory hearing on all contested issues of fact.

Summary. Part B of this recommendation proposes that the federal grantor agency require as a grant condition the establishment by the grantee of administrative procedures to handle complaints concerning the grantee's operation of a federally assisted program. Such a complaint procedure should assist in achieving compliance with federal standards by providing a formal, publicized mechanism whereby affected persons may inform the grantee of potential violations of federal standards and may obtain a hearing on their complaints. Once the grantee has learned of a violation, it should in the great majority of cases correct the situation voluntarily. Where the grantee refuses to acknowledge a violation of federal standards, the complaint procedure should nevertheless alert both the grantor and the grantee of a potential compliance problem. The federal agency in particular should be able to obtain an overview of the compliance situation by monitoring a grantee's complaint procedures or by requiring periodic reports by the grantee. In addition, an effective complaint procedure should improve the quality of a grantee's program and should make it more responsive to the concerns of the ultimate beneficiaries.

The complainants who take advantage of the grantee's complaint procedures are likely to be individuals with specific grievances. Parts A and B of the recommendation both recognize the need for procedures for handling this type of complaint at the source where the grievance arises rather than at some remote federal office building. The complainant adversely affected by the action of a state or local government or private organization is most likely to direct his grievance to that body. He may not even be aware that federal funds support the action which is the basis of the complaint and is unlikely to think of directing his complaint initially to the federal agency. The complainant is only interested in getting his normal check from the city Welfare Department or in convincing the State Highway Department to provide him with additional relocation assistance. His contacts have been entirely with officials of state or local agencies or of private organizations in the community, and he naturally turns to those officials with his complaint. Those officials are the appropriate ones to handle his complaint because remedial action to rectify the situation which led to the complaint is most likely to come from them. They have ready access to relevant information to determine the validity of the complaint and should have the ability and authority to act quickly where the complaint is valid. For these reasons Part A of this recommendation already provides that the federal agency should normally refer to the grantee any complaints of individual mistreatment that reach it.

Part B of this recommendation provides that a grantee's complaint procedures should handle all types of complaints by persons affected by the grantee's federally assisted activities and should not be limited to complaints that a grantee is violating federal standards. The principal consideration which supports the broader coverage is the ignorance of most complainants on the real basis for their

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complaints. The complainant is upset because he believes that he has been hurt by the action of some city or state department which is forcing him to move or is holding up his check. More often than not the complaint may be unfounded. The complainant's real need may be for adequate information. See Gellhorn, When Americans Complain 153-156. Even if the complaint is justified, the complainant may not know enough about the operation of the program to articulate how the action complained of violates federal, state or local requirements. The complainant is most likely unaware of any federal standards that are involved and is therefore unable to formulate his complaint in terms of a violation of federal standards. The grantee's complaint procedure should therefore cover all types of complaints and should perform in addition an informational and referral function. Thus, if a complaint is directed to the wrong body, the state or local agency or private organization which receives it should dispose of the complaint by directing the complainant to the appropriate place.

Structure of the Grantee's Complaint Procedures. Part B of this recommendation allows grantees to structure their own complaint procedures subject to the federal requirement that those procedures afford a complainant affected by an action of the grantee a fair opportunity to contest that action. The plural "procedures" is used throughout the recommendation to emphasize that grantees may develop alternative complaint procedures to handle different types of complaints. For example, complaints of corruption may be referred through prescribed channels to an official watchdog, while complaints of improper termination of statutory benefits may be handled in accordance with distinctly different procedures. This need for flexibility is particularly strong where state and local governments are grantees. The structure of state and local government itself varies greatly around the country, and each grantee government should have some range of choice concerning how best to integrate any new complaint mechanism into the existing governmental structure. In most cases the existing structure will already include some mechanism for the handling of citizens' grievances. Furthermore, most state and local governments participate in a number of federal programs and should have the authority to coordinate or combine the complaint procedures for these programs.

Much of the recent discussion on the redress of citizens' grievances has centered on proposals to establish the office of ombudsman.^{1/} An ombudsman is an external critic of public administration, generally appointed by and responsible to a legislative body, who has authority to investigate and publicize complaints about administrative practices but no authority (other than persuasion) to correct

^{1/} The path breaking work in the field is of course Gellhorn, When Americans Complain: Governmental Grievance Procedures (1966). For other literature on the ombudsman see Anderson (ed), Ombudsman for American Government? (1968); Tibbles, The Ombudsman: Who Needs Him?, 47 J. of Urban Law 1 (1969).

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them. Part B does not propose the establishment of state or local ombudsmen. Rather, it contemplates an internal complaint mechanism run by the grantee or a separate agency established by the state or local government to handle complaints concerning a number of programs. In both instances, the agency should have authority to resolve complaints and not just to bring administrative abuses to the attention of the public. The purpose of the complaint mechanism is to provide adequate information to all complainants on the nature of the program and to redress those individual complaints that are justified. An ombudsman, on the other hand, not only handles complaints of individual mistreatment but serves the additional purpose of improving the overall quality of public administration through public criticism of recurrent bureaucratic practices that are inefficient, illegal or otherwise undesirable. Thus, Part B does not satisfy any need that exists for an ombudsman and does not speak one way or another on the merits of that office. Rather, it proposes the establishment of a formal internal complaint mechanism as an initial step for dealing with the problem of citizens' grievances. If the internal resolution of those complaints turns out not to be satisfactory because of the agency's self-interest in defending its own program, then there may be an additional need for an independent external critic or ombudsman.

A grantee's operation of a federally assisted program is likely to engender a broad spectrum of complaints. That spectrum should include complaints of rudeness or discourtesy by grantee officials, complaints that a grantee's mode of operation unnecessarily injures the complainant or that the grantee is harassing the complainant, and complaints that the grantee has improperly deprived the complainant of an individual benefit or protection to which he is entitled under the grant-in-aid program. The type of hearing which the grantee should afford the complainant should depend on the nature of the issues involved and the identity and interests of the complainant. In all cases the complainant should have the right to submit data and argument in support of the complaint, either in the form of written submissions or through an informal oral presentation to an official of the grantee.

Where the complainant claims that the grantee has deprived him of welfare benefits, a tenancy in public housing or any other individual benefit or protection to which he is entitled under the grant-in-aid program, the grantee should afford the complainant an adjudicatory hearing on all contested issues of fact. Court decisions have already recognized that adjudicatory hearings are necessary in these situations as a matter of due process. Goldberg v. Kelly, 397 U.S. 254 (1970) (welfare benefits); Escalem v. New York Housing Authority, 425 F.2d 853 (2d Cir. 1970). The precise scope of this line of decisions is unclear; and there remain unsettled questions whether due process requires an adjudicatory hearing when there is an initial

denial of benefits or a subsequent reduction thereof or when the benefit at stake does not have the same crucial importance to the recipient as do welfare benefits or public housing. O'Neil, *Of Justice Delayed and Justice Denied: The Welfare Prior Hearing Cases*, 1970 Supreme Court Review 161, 202-213.

Federal grantor agencies should react affirmatively to this uncertain situation by defining the classes of cases where fairness requires that the grantee afford the complainant an adjudicatory hearing on contested issues of fact. For example, complaints about the location of a highway do not involve the deprivation of any individual benefit or entitlement but raise policy issues about the merits of the particular highway. On the other hand, a homeowner's eligibility for relocation benefits or the amount thereof to which he is entitled deserves different treatment because individual money benefits are at stake. In these situations federal grantor agencies should not force complainants to go to court to assert their rights to an adjudicatory hearing but should require as a grant condition that the grantee afford to complainants such a hearing. In defining those cases where adjudicatory hearings are necessary the federal agency should not limit itself to minimum due process standards as defined by the courts but should go further and draw upon its broad knowledge of its own grant-in-aid programs to determine those categories of cases where formal adjudicatory hearings would be desirable. For example, the law is unclear on the extent to which the due process clause requires private grantees to afford a hearing to ultimate beneficiaries of a grant program who are adversely affected by a grantee's action. The cases in this area have mainly involved tenants in federally subsidized private housing developments. See Langevin v. Chenango Court, ___ F.2d ___ (2d Cir. 1971) (tenants not entitled to a hearing on rent increases even though adjudicative facts involved); McQueen v. Drucker, 317 F. Supp. 1122 (D.C. Mass. 1970) (tenant entitled to a hearing on good cause for eviction), aff'd on other grounds 438 F.2d 781 (1st Cir. 1971). Despite this uncertainty in the law, federal agencies should be able to decide when a private grantee should afford a complainant an adjudicatory hearing.

The Need for Effective Complaint Procedures. The considerations which support the establishment of complaint procedures by state and local governments are not limited to the important role of complaint procedures in the enforcement of federal standards. In view of "the increasing involvement of government officials in the lives of citizens, adequate procedures for the consideration of such individual grievances as citizens may have against such officials are essential to effective government." President's Commission on Law Enforcement and the Administration of Justice, The Challenge of Crime in a Free Society, 103 (1967). It is nevertheless widely recognized that existing procedures for redressing citizens' grievances against the government are inadequate.

The Kerner Commission, for instance, found that the lack of an accessible and visible means of establishing the merits of grievances against agencies of state and local government was a source of tension and frustration among ghetto residents. Report of the National Advisory Commission on Civil Disorders, 151 (1968). Recent proposals to establish the office of ombudsman have also been based on the belief that existing mechanisms for handling complaints are not adequate for the job. Citizens' complaints are presently handled primarily by elected legislative and executive officials who consider this task a service to their constituents. Only rarely do either watchdog executive agencies, such as the Commissioner of Investigation in New York City, or formal administrative complaint procedures within operating agencies play a significant role. The federal government should therefore take some initiative to insure that complaints directed at the operation of federally assisted programs are properly resolved.

These considerations in support of grantee complaint procedures are not fully applicable to grantees that are not governmental bodies. In addition, these private grantees may find unfamiliar their new role of resolving grievances. State and local governments are more accustomed to this role because they have always necessarily recognized their accountability to the governed. Private organizations tend to view themselves as more independent and not responsible to a constituency. Part B nevertheless recommends that both public and private grantees develop administrative complaint procedures. The principal grant-ir-aid programs covered by this recommendation where there are substantial numbers of private grantees are, in addition to subsidized private housing developments, in the health, education and anti-poverty areas. See paragraphs 13, 16 and 17 on page 3. These programs include both governmental and non-governmental grantees; and it would be incongruous for the federal grantor agency to require some grantees to establish complaint mechanisms but not require others to do so. The dividing line between public and private in these areas is too blurred to support such a distinction. Community action agencies, for example, may be governmental units or public agencies or private nonprofit organizations; but if they are non-profit organizations they must be formally designated as a community action agency by a governmental unit. In both cases the community action agency is performing a public function. Most privately endowed hospitals and universities that receive federal grants likewise recognize that they are performing a public function and that they have responsibilities to the public at large. In order to obtain federal grants, these institutions must normally work through a state health or education agency that has developed a comprehensive state plan for meeting the state's responsibilities in the area. Private grantees that are not prepared to operate their own complaint procedures could assign that task to the state agency and direct to it all complaints concerning their operations. In many programs it would even seem sensible for the state agency to handle complaints directed at both public and private grantees and

in this fashion to centralize the complaint process. Whether such an arrangement makes the complaint procedure too remote from the source of the complaints depends on the balance of state and local involvement in the particular grant program.

Part B and Existing Agency Practices. Federal grantor agencies have more often required their grantees to develop administrative complaint procedures than they have imposed similar requirements on themselves. Quite often, however, the federal initiative has come from Congress and the courts, and the federal agencies have only implemented those hearings required by statute or due process.

The Department of Health, Education and Welfare has an extensive experience with state grievance procedures. From 1935 forward there has been a requirement in Title IV of the Social Security Act (42 U.S.C. §502(a)(4)) that states have a "fair hearing" procedure whereby disappointed claimants of public assistance may appeal a determination of ineligibility, reduction of grant, or more recently, failure to act with reasonable promptness upon a grant request. The HEW experience suggests that there may be considerable difficulties in structuring an appropriate complaint procedure at the state level. These difficulties may necessarily involve the federal government in an extensive regulation of the state complaint procedure and in attempts to enforce additional federal standards. This is not, however, necessarily to say that the game is not worth the candle.

The legislative hearings on the 1935 Social Security Act reveal that there was very little understanding on the part of the Congress or the Social Security Board concerning what a "fair hearing" requirement would mean. Everyone understood that it would require some kind of review beyond an initial administrative determination, but the administration's witnesses, testifying before the House Ways and Means Committee, indicated that the federal government through the Social Security Board would promulgate no standards beyond those contained in the statute concerning what an appropriate fair hearing procedure might be. According to the administration the standard for reviewing state plans in the Social Security Board would be whether the state proceedings were "utterly unfair." However, Congressman Vinson pressed the witnesses on two points. First, Vinson did not accept the "leave it to the states, they will be fair" approach. If this were true, Vinson thought that the Congress might as well omit the fair hearing requirement altogether. As we shall see, HEW has over the years come around to the Vinson view that considerable further regulations were necessary in order to have an effective fair hearing procedure. The only amendment to the statutory fair hearing language has been the addition in 1950 of the provisions for fair hearings where an applicant's request for benefits "is not acted upon within a reasonable time." The regulatory activity however has, at least in recent years, been extensive.

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By 1968 the Handbook of Public Assistance required the following of the states: (1) that the state agency be responsible for the fulfillment of the fair hearing requirement; (2) that a fair hearing be available for any claim by a party aggrieved by agency policy as it affected his situation; (3) that decisions of the hearing authority be binding on the state and local agencies and that the state make available to local agencies and to the public at least a summary of all fair hearing decisions; (4) that hearings be conducted by an impartial official of the state agency; (5) that hearing procedures be issued and publicized for the guidance of all concerned; (6) that every claimant be informed in writing at the time of his application and at the time of any agency action affecting his claim of his right to a fair hearing, of the method by which he can obtain a hearing, that he may be represented by others including legal counsel and of any provisions for payment of legal fees by the agency; (7) that hearings be conducted at a time, date and place convenient to the claimant and with adequate written notice; (8) that the claimant or his representative have an opportunity to examine all documents and records used at the hearing; (9) that in the presentation of his case the claimant be allowed to make the presentation himself or with the aid of others, to bring witnesses, to establish all pertinent facts and circumstances, to advance any and all arguments without interference, and to question or refute any testimony or evidence put on by the state or local agency; (10) that definitive, final administrative action be taken 60 days from the day of a request for a fair hearing and that that action be notified to the claimant in writing with notice, to the extent available, of a right of judicial review; (11) that where a decision was favorable to a claimant the agency be required to make corrective payments retroactively to the date of any incorrect action taken; (12) that a decision be based exclusively on the record made at the fair hearing and a verbatim transcript of testimony and exhibits or an official report thereof is required to be made available to the claimant at a place accessible to him or to his representative at any reasonable time.

Pending the decision in Goldberg v. Kelly, 397 U.S. 254 (1970), HEW promulgated regulations, to take effect July 1, 1970, which would have required (1) continuation of assistance payments until the completion of any fair hearing which raised an issue of fact or of judgment concerning the application of state policy to the facts of an individual case and (2) which would have required that the services of lawyers be made available to welfare applicants and recipients who desire them in fair hearings. Goldberg v. Kelly, made the first requirement a part of minimum due process in the determination of public assistance claims but failed to require the provision of legal services. After the Goldberg decision and in connection with a general codification of the Public Assistance Handbook requirements into 45 C.F.R., HEW promulgated more explicit requirements concerning the continuation of

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assistance but withdrew the requirement that legal services be provided. The new regulations, which took effect April 14, 1971, do little more than codify the pre-existing Handbook requirements with the addition of those due process requirements set forth in Goldberg v. Kelly and not previously included in the Handbook, to wit, that a claimant be afforded an opportunity for confrontation and cross-examination of adverse witnesses and that the decision-maker, in order to demonstrate compliance with the requirement of decision on the record, state the reasons for his determination and indicate the evidence relied upon. Some of the other requirements previously in the Handbook are further explicated in the new regulations and there is the new requirement that, if requested, a state agency must provide a group fair hearing on issues of state policy.

All of these requirements for fair hearings by the federal agency are obviously thought to be necessary in order to make meaningful the statutory requirement that a state plan have a fair hearing procedure. The reasons for each requirement could be gone into at some length but that is probably not useful for our purposes. Suffice it to say that the federal agency found that it could not simply require a hearing and expect that the states would come up with hearing processes which fostered the basic federal policy of a meaningful opportunity for review of state actions implementing the AFDC program. The federal policy had to be articulated with clarity and specificity before procedures which fit the particular needs of the welfare clientele and of the issues raised by welfare claims could be expected to be developed. (For further discussion of the problems encountered in the operation of the AFDC fair hearing procedure and in the enforcement of compliance with federal fair hearing standards see Appendix B.)

HUD has also defined with considerable specificity the grievance procedures which local housing authorities must afford their tenants. When the tenant contests an LHA's action which adversely affects his rights, duties, welfare or status, the LHA must afford him an opportunity to present his side of the dispute before an impartial official or before a hearing panel. The tenant has a right to call witnesses, to be represented by counsel or by another person of his own choosing, and to confront and cross-examine witnesses in appropriate circumstances. The official or panel that conducts the hearing must notify the tenant of its decision on the complaint and the reasons and evidence relied upon. RHM §7465.9 (February 22, 1971). In contrast with these specific provisions, HUD's regulations under the Uniform Relocation Assistance and Land Acquisition Policies Act merely provide that "[a]ny person aggrieved by a determination as to eligibility for, or the amount of, a payment under the regulations may have his claim reviewed or reconsidered by the head of the State agency or his authorized designee, in accordance with such procedure as the State agency shall have established for such review or reconsideration."

24 C.F.R. 42.190, May 13, 1971. It would seem that the federal agency should not leave the structure of the complaint procedure entirely to the discretion of the grantee. Furthermore, the regulations do not provide for any procedure to handle complaints by displaced persons that they have been relocated into substandard housing in violation of their statutory rights. Such complaints are serious and should be handled by the grantee's complaint procedures.

C. The Information System

The federal grantor agency should insure that persons affected by a grant-in-aid program receive adequate information about the program in order that they may take advantage of the federal and the grantee complaint procedures. The federal grantor agency should require as a grant condition that all program materials (regulations, handbooks, manuals, etc.) governing the grantee's administration of a program supported in whole or in part by federal grant-in-aid funds and all plans, applications and other documents required to be submitted to the federal agency as a condition to the receipt of federal funds should be readily accessible to persons affected or likely to be affected by the operation of the funded program. Plans, applications and other documents that provide the basis for federal funding should be made readily accessible to interested persons no later than the time of their submission to the grantor agency for approval and at an earlier time when required by law.

The federal grantor agency should insure that the grantee's system for dissemination of program materials and grant submissions takes account of the nature, location and representation of affected persons. For example, as a part of a plan to make such materials readily accessible, program information might be deposited not only in the offices of the grantee but also in public and university libraries and in the offices of affected interest groups and their legal representatives. It might also be necessary to require descriptive summaries of technical rules or project applications or to require an oral explanation of program features, for example, the complaint procedure, which are critical to the protection of a beneficiary's interests. The federal agency should make parallel efforts to disseminate materials relating to its administration of the federal grant program.

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Summary. Part C of this recommendation recognizes that in order for a complaint procedure to be effective the affected populace must have adequate and timely information concerning both the federal grant program and the grantee's or potential grantee's participation in that program. Only if this information is available will affected persons be able to determine intelligently whether there is any basis for complaint that federal standards have not been met. Part C is directed specifically at those aspects of the general problem of making information about public grant programs accessible which are particularly relevant to the adequate functioning of complaint procedures. It does not deal, except incidentally, with public information issues which might arise in the context of implementing general policies for broadening public participation in agency decision making or for better informing potential grantees of the availability of federal funds.

The basic information component for an effective complaint procedure is the accessibility of documents which govern the administration of the funded program by both the grantor and the grantee. At the federal level these documents will include the applicable statutes, regulations, agency handbooks or manuals and any descriptive literature or orders which contain agency interpretations or opinions concerning the proper administration of the relevant grant program. Similar documents describing the grantee's operations should also be made accessible. In addition, affected persons should have access to any plans, applications, reports or other documents which a grantee is required to submit to the federal grantor agency as a basis for initial or continued federal funding.

Part C only covers documents that are current; it is not intended to affect a grantor's or grantee's policy with respect to the preservation and storage of outdated plans or applications that are no longer operative. Those documents mainly interest historians. The documents covered by the recommendation are generally public documents; they almost never contain confidential material and, when filed with the federal agency, are generally obtainable from it by any person under the Freedom of Information Act. Plans and applications of governmental grantees are under present procedures also generally made public at the state or local level before they are submitted to the federal agency because they must normally be approved by the appropriate officials or legislative bodies of the relevant units of state and local government. Project applications for construction and developmental grants must also be cleared with state, regional or metropolitan planning councils in order to assure areawide coordination of federal assistance programs. See Bureau of the Budget, Revised Circular A-95 (February 9, 1971) (implementing §204 of Demonstration Cities and Metropolitan Development Act of 1966 and §201 and Title IV of the Intergovernmental Cooperation Act of 1968).

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This process of clearinghouse review assures that at least those persons within the grantee fraternity or with contacts in the state or local government are aware of plans and applications that are pending or in effect. In addition, a significant number of federal assistance programs require that there be public hearings on individual project applications or that private citizens participate in the overall planning process for the federal grant.

Part C supplements these existing mechanisms and seeks to insure that in all cases persons affected by a grant-in-aid program receive adequate information about the operation of the program in order that they may take advantage of the federal and the grantee complaint procedures. The recommendation also recognizes that the simple availability of the relevant documents may not be adequate to inform affected persons of the content of the requirements surrounding the administration of the funded program. Hence, it may be necessary to require special techniques for the dissemination of this information. We shall discuss below some of the techniques which might be employed.

Information Accessibility as a Grant Condition. Part C provides for the implementation of the requirement that grantee program materials and submissions be accessible by means of a condition attached to the federal grant. The operational responsibility will therefore be on the grantee to make its materials accessible in accordance with whatever specific requirements are contained in the grant condition. The federal grantor agency should impose similar requirements upon itself with respect to the accessibility of federal program materials and should make parallel efforts to disseminate those materials.

The choice of this means for dissemination of grantee program material and submissions was made for several reasons. The basic rationale is that this system is likely to be more effective than the only available alternative, federal grantor dissemination. The grantee will necessarily be better equipped by virtue of the proximity of its operations to the affected populace to make the relevant information accessible. Moreover, to charge federal grantor agencies with the collection and dissemination of all grantee program materials and submissions would be extremely burdensome and would conflict with emerging federal policies for the simplification of the grant application process by the use of proclainers. See, Office of Management and Budget, Simplifying Federal Aid to States and Communities 9-10 (1970). The resources of the federal agency devoted to enforcement of grantee compliance with federal standards can almost certainly be better utilized in the investigation of critical compliance areas and in the investigation and resolution of complaints

concerning state systems than in handling thousands of pieces of paper which reflect every modification of a grantee's regulations. Of course, to the extent that the federal agency has relevant documents concerning the grantee's program on file, it should make them accessible to interested parties in conformity with the Freedom of Information Act and Administrative Conference Recommendation No. 24.

Time of Availability. It is important that adequate information concerning a grantee's plans, applications or other submissions that provide the basis for federal funding be available at an early stage in the funding process. This will facilitate objections by affected parties at a stage where the federal agency is better able to obtain compliance with federal standards. The resolution of compliance questions at this early stage is not likely to have a disruptive effect on the grantee's operations. The recommendation suggests that the time of submission of any plan, project application or other document for approval by the federal agency should be the latest time at which information should be disseminated. The requirement of accessibility to the public at the time of submission for approval is, of course, a minimum standard and is not meant to replace any existing requirements for earlier accessibility, for example, in connection with required public hearings or other citizen participation.

"Approval," as used in the recommendation, does not necessarily mean final approval of a project. This final approval may come at a very late stage in the grant process and after a series of prior "approvals" of various steps in the project or application. Nor does "approval" necessarily connote an action which definitively commits federal funds. Such a commitment occurs in the federal-aid-highways program, for example, only after submission of plans, specifications and estimates. This submission may occur years after initial approval of a highway department's decision on the location of a project. A submission for approval under this recommendation includes any submission which is required as a part of the process of approving the initiation or continuance of federal funding. This generally accords with the notions of finality that have been employed by federal courts in judicial review of agency actions. See, e.g., Township of Hopewell v. Volpe, Civil Action No. 1390-68 (D.C. N.J. 1969).

It should be recognized that a requirement of accessibility of grantee plans and project applications at the time of their submission for approval will have different effects in certain formula grant programs than in project grant programs. In the case of formula grants for categorical public assistance programs, for example, the provisions of the state's plan, or amendments to it,

will normally be submitted for approval after those provisions have gone into effect as a part of the state's statutory or regulatory scheme. Any complaint concerning such a submission will be directed at a finding that state law is out of compliance with federal standards, rather than, as in the project grant context, at a finding merely that the application is not acceptable in its present form. Hence, the complaint mechanism may be somewhat less useful in the formula grant context than in connection with project grants because in the former case the affected parties are likely to be informed of the grantee's policies after decisions have been made and to some degree implemented, rather than while positions are still fluid.

This difficulty might suggest that some special provisions for informing the public be made in those programs where changes in state law or regulations are systematically translated into amendments to state plans or, indeed, in any situation where the grantee's program policies become effective prior to their submission for federal grantor approval. However, we are convinced that any such recommendation would have extensive consequences concerning public participation in grantee decision-making in general and should be approached from that perspective. The questions of what form such participation should take and how federal requirements might be coordinated with state administrative procedure acts are thus left open, and may be the subject of further study and action by the Administrative Conference.

The Form of Information and Techniques for Making It Accessible. Because Part C covers a large number of relatively disparate grant programs there has been no attempt to provide detailed guidelines for public information programs. Rather, the recommendation seeks to present a series of considerations which should animate both the federal agency's efforts to disseminate information concerning the federal program and the public information requirements it imposes on its grantees. The basic consideration is adequacy with respect to utilization of the complaint procedures. In developing an adequate program of public information the federal agency should also consider the "nature, location and representation" of the persons with whom it seeks to communicate and, of course, the nature of its particular program.

A. Federal Agency Efforts: A recurrent difficulty in dealing with federal grant programs is the determination of what the federal standards are which condition the receipt of federal grant monies. In part this results from the failure of grant agencies to use the informal rule making procedures of the APA (as suggested by Administrative Conference Recommendations 16 and 26), including publication of standards in the Federal Register. The result is that federal standards may be contained in compilations ranging from the Code of Federal Regulations to informational circulars distributed only

to grantees. Certain agencies, such as the Social and Rehabilitation Service of HEW, have made considerable progress in getting mandatory federal grant standards put into regulatory form and published in the Federal Register. Other agencies, such as the Federal Highway Administration, have not done nearly so well. FHWA policies are still largely contained in a series of Administrative, Instructional and Policy and Procedure Memoranda which are, to say the least, difficult to use. Moreover, most grant agency handbooks, manuals, or circulars contain everything from mandatory standards to helpful hints. In order to adequately inform interested persons concerning the operation of federal grant programs many agencies should (1) conform to previous Conference recommendations concerning the use of the Federal Register for the publication of mandatory standards and (2) put all of their directory materials into a single set of policy guidelines which are clearly labelled as to their intended effect.

In part the failure to put grant standards into a documentary form more readily accessible to the public may result from a mistaken notion of the impact of federal grant conditions on the rights and privileges of intended beneficiaries. The Federal Highway Administration has, for example, adopted a regulation stating that its "Memoranda" setting forth requirements for grantees provide no rights or privileges not explicitly set forth therein. 35 Fed. Reg. 6322, April 18, 1970. Yet, surely the teaching of cases such as Barlow v. Collins, 397 U.S. 159 (1970), is that persons adversely affected may rely upon federal grant standards as a basis for challenging agency action even in situations where they have no individual entitlement at stake. Cases involving judicial review of highway grant decisions by FHWA have since Road Review League v. Boyd, 270 F. Supp. 650 (1967), consistently taken this view of standing. And, of course, where individual rights or privileges are being sought the position is a fortiori the same. E.g., Thorpe v. Durham Housing Authority, 393 U.S. 268 (1969). Similarly, for purposes of the recommended complaint procedures any mandatory federal grant standard may provide the basis for a complaint by persons adversely affected by the actions of the grantee or by the grantor agency's funding decisions.

In making its program materials accessible the federal agency should not be inattentive to details, such as, subjectmatter indexing, descriptive synopses and identification of available "public information" personnel, which may make the difference between effective and ineffective communication of the substance of federal requirements.

Finally, in order to determine whether there is an adequate basis for complaint concerning a grantee's or potential grantee's compliance with federal standards, affected persons need to have access to both grantor and grantee program materials in the same

place and the same form. Hence, the efforts of federal agencies to disseminate federal program materials should parallel those required for grantees in making the latter materials accessible.

B. Requirements for Grantees: Grant conditions which merely require that a grantee make its program materials accessible are not necessarily sufficient to discharge the grantor agency's obligation to insure that affected persons are adequately informed. Different types of programs administer to the needs of differing clienteles and require different techniques for effective communication. Many grantor agencies recognize this problem and already are experimenting with creative approaches to the dissemination of public information.

For example, the Social and Rehabilitation Service in HEW has extensive regulations concerning public information which are specifically designed to facilitate the utilization by welfare recipients of a state's fair hearing procedure for resolving complaints. SRS requires that state plan materials in the form of program manuals and other statements of agency policy which affect the public (1) be maintained in the state office and each local or district office and (2) be made available for access by the public through custodians. In order to qualify as an appropriate depository a custodian must request the material, be centrally located and accessible to a substantial number of the recipient population, and agree to accept responsibility for filing all amendments and charges forwarded by the agency. These custodians would include libraries, local offices of the Bureau of Indian Affairs, legal service organizations, and organizations of welfare recipients. Title 45 C.F.R. Section 205.70. This seems to be a good regulation which takes account of the nature of the recipient population and the existence of organizations which have a special interest in furthering the recipients' interests.

SRS further requires that states give specific notice to applicants or recipients of the existence of the fair hearing procedure both at the time of initial application and at the time of any subsequent action concerning the applicant or recipient's case. 45 C.F.R. 205.10(a)(2). Synopses of decisions in previous fair hearings are also part of the program materials which must be made accessible to the public, 45 C.F.R. 205.10(a)(16), but it is not clear whether these materials are required to be maintained at all local public welfare offices and made available through custodians as are the grantee's regulations and other statements of agency policy.

In the quite different context of the federal-aid-highways program the FHWA relies heavily on public hearings as a technique for disseminating public information. While there has been a great deal

of criticism of these public hearings, it has largely been with reference to their utility as a device for public participation in decision-making. Certainly the public hearing is a far better informational device than mere newspaper advertisements, and the affected public is usually too large to give fully effective individualized notice of proposals for projects.

Policy and Procedure Memorandum 20-8, 23 C.F.R. §1.38 Appendix A (1970), amended 35 Fed. Reg. 19232 (Dec. 19, 1970), requires state highway departments to hold two public hearings on most federally aided highway projects. There must first be a corridor hearing on the social, economic and environmental effects of the route location and then a design hearing on the similar effects of the highway design. At the corridor hearing interested persons may contend that one or more alternative routes proposed for the highway do not conform with federal standards for the protection of the environment and of local needs. The state highway department must publish a notice of the hearing in local newspapers and mail copies of the notice to all public officials and citizen groups who have requested notice of highway department hearings or "who, by nature of their function, interest or responsibility the highway department knows or believes might be interested" in the proposed project. PPM 20-8, §8(b)(2). The notice must contain a description of the proposed project and specify that maps, drawings and other pertinent information developed by the state highway department are available at a convenient location in the vicinity of the proposed project. PPM 20-8, §8(a)(3). Similar provisions are applicable to design hearings.

The Department of Transportation, which includes the Federal Highway Administration, has, with respect to relocation plans, recently strengthened these requirements on the availability of project information. The Department's regulations under the new Uniform Relocation Assistance and Land Acquisition Policies Act require a state highway department (1) to present its relocation program at all public hearings on a highway project, (2) to prepare brochures on its relocation program, (3) to announce publicly its relocation program through appropriate mass media, (4) to post notices on the relocation program in or on buildings to be acquired, and (5) to mail by certified mail individual notices on the relocation program to all persons to be displaced. 49 C.F.R. 25.83-25.93, 36 F.R. 9178, 9182-83 May 20, 1971. The information to be disseminated includes the right of displacees to relocation assistance and payments, and to appeal any adverse determination on their eligibility for relocation payments or the amount thereof to the head of the state agency. The information system is thus designed to facilitate the use of the grantee's complaint procedure. However, there is no provision for complaints by displacees of inadequate assistance in relocating them into standard housing.

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There is, of course, always room for improvement. For example, while highway departments are required to provide individual notification of hearings to persons requesting it prior to a location or design hearing, they are required only to publicize by newspaper notice that a decision has been made and transmitted to the FHWA for approval. PPM 20-8, §§10-11. Because this is the point at which aggrieved parties are most likely to wish to file a complaint and because there may be a significant interval between the public hearing and a location or design decision, a more effective means of publicizing these decisions seems desirable.

The present practice of the FHWA suggests another public information problem to which agencies should give attention. The potential problem is the tendency in project grants to presume that information has been made available on the local level at an early stage in the development of the project through the local planning process. This presumption is easy to make in programs like federal aid for highways because the first step in the funding process, the application by a state highway department for "program" approval, comes to the FHWA with the imprimatur of state and local approval of the conformity of the projects with local and state-wide planning and with an assurance that environmental considerations have been addressed in at least a preliminary form. This is true because each initial application must have attached to it documentation indicating that the Bureau of the Budget A-95 review procedure has been followed. This means that the project description has been referred to the central clearinghouse (for example, a state planning agency) for the state, which has in turn referred the matter to a regional or metropolitan clearinghouse (e.g., a regional planning commission) and to the state agencies and local officials which might be affected by the project. There is also a referral to any affected federal agencies; included in this referral would be preliminary or draft environmental statements prepared by the highway department. The affected parties send their comments on the project to the clearinghouse which in turn forwards them to the highway department with its comments, if any.

Unless questions are raised by these comments which go to issues such as needs of the localities, conformity with local planning, or environmental, economic or social concerns, the Federal Highway Administration will not raise these questions at this stage nor seek to disseminate information on the project outside the official channels. The Federal Highway Administration's position is that since these comments through the BOB A-95 review procedure come largely from elected officials of the states and localities, they should take affirmative comments or no comments as reflecting the public interest as determined through the appropriate political process. The Federal Highway Administration is not in the business of reforming local government.

However, this attitude may miss the point that the federal aid highway program has already "reformed" local government by vesting great political power in the state highway departments. If local officials, for this reason or for others, fail to provide the sort of critical review of projects which insures conformity with the relevant federal standards, the FHWA is not thereby relieved of its duty to insure such compliance. In order for citizen complaints to aid significantly in that effort, it may be necessary for state highway departments, and other project grantees, to establish an information system which makes their plans accessible to all affected parties at an early stage of project planning--not just to local officials.

HUD has also taken measures to insure that residents of an urban renewal area are able to obtain adequate information about urban renewal plans. A local public agency applying for an urban renewal grant must establish a Project Area Committee (PAC) to assist in the planning and execution of the urban renewal project. The PAC for an urban renewal project should consist of a fair cross section of the residents of an urban renewal area and should receive all information and reports on the project in advance of the time when decisions are made. Urban Renewal Handbook, R H A 7217.1.Supp.; Neighborhood Development Program Handbook, R H A 7387.1. Until the fall of 1970, PAC's were mandatory only in urban renewal projects that involved residential rehabilitation; they are now mandatory in all projects.

The procedures required of grantees by the SRS, Federal Highway Administration and by HUD in some respects go beyond what is literally required by Part C because that recommendation by itself does not require either public hearings or citizen participation. These examples, however, indicate possible ways to implement the general principle stated in Part C in the framework of particular grant programs. Moreover, they suggest that even well-developed, existing informational devices may require modification in connection with the institution of a regularized complaint procedure.

D. Range of Sanctions

The federal grantor agency should seek to develop an adequate range of sanctions for insuring compliance with federal standards by grantees that apply for or receive federal financial assistance. The sanction of the total denial or cut-off of federal funds should be retained and used where necessary to obtain compliance, but the agency should have available lesser sanctions that do not result

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in the prevention or discontinuance of beneficial programs and projects. This range of sanctions should include in appropriate cases:

1. the public disclosure by the agency that a grantee has failed to comply with federal standards;
2. an injunctive action brought by the agency or the Department of Justice in the federal courts to require the grantee to fulfill any assurances of compliance with federal standards made by the grantee or to enforce the federal standards attached to the grant;
3. the disallowance as a program or project cost of an expenditure by the grantee that does not conform with federal standards, or other partial denial or cut-off of funds that affects only that portion of a program or project that is not in compliance with federal standards;
4. the imposition of special administrative conditions on grantee operations, including retroactive awarding of benefits, in order to ensure the reparation of any individual damage or prejudice or to correct any shortcomings in the effectuation of federal policy which have resulted from failure to comply with federal standards; and
5. the transfer of a grant, or the awarding of subsequent grants under the same or related grant-in-aid programs, to a different grantee if the original grantee violates federal standards.

Where an agency lacks statutory authority to invoke one or more of the above sanctions and such authority would provide an appropriate means of insuring compliance with federal standards in a grant-in-aid program administered by the agency, it should seek the necessary authority from the Congress.

The agency should also consider the provision of incentives, such as the contribution of an increased matching share or the awarding of additional grant funds, to grantees who comply with certain federal standards. Where the agency lacks statutory authority to provide compliance incentives and such authority would provide an appropriate means of insuring compliance with federal standards in a grant-in-aid program administered by the agency, it should seek the necessary authority from the Congress.

Summary. Part D of this recommendation represents an initial effort to develop a range of sanctions in addition to the total denial or cut-off of federal funds. The individual sanctions proposed are not intended to replace completely the fund denial or cut-off because in some instances the ultimate sanction of terminating all federal financial assistance (or the threat thereof) may be the only effective means of ending a grantee's non-compliance with federal standards. These sanctions should be imposed formally and openly and not invoked by the federal agency in an informal or covert fashion. Where an agency lacks statutory authority to invoke one or more of the above sanctions and such authority would be an appropriate means of enforcing federal standards in a program administered by the agency, it should seek the necessary authority from the Congress.

Part D(1). This part proposes that in appropriate cases the federal agency publicize a grantee's non-compliance with federal standards. This use of publicity as a sanction should prove most effective if it is coordinated with the federal administrative complaint procedure proposed in Part A. The implementation of that procedure should put grantees on notice that the federal grantor agency is serious about its enforcement responsibilities, and the publicity generated by individual complaints and by any public proceedings held by the federal agency on the complaints is likely to induce compliance. Compliance is particularly likely to result if the federal agency publicizes a strong, well reasoned decision that the plan, application or practice under attack violates federal standards. The grantee may decide that the wiser course is to comply with the federal agency's view of the law, or it may attempt to take the matter to court and comply with the eventual ruling of the court. In neither case is there an interruption in the federally assisted program.

Part D(2). This part proposes that in appropriate cases the federal agency or the Department of Justice sue in the federal courts to compel a grantee to observe federal standards. Suits for injunctive relief are a potentially effective sanction for enforcing federal standards in grant-in-aid programs. Grantee officials are likely to respect any decree issued by the court ordering them to comply with federal standards, and if they do not obey such a decree they may be held in contempt of court.

The legal basis for enforcement suits of this type is quite clearly established. The United States may sue either to enforce specific assurances of compliance with federal standards made by grantees in plans, agreements or applications which they submit to the federal agency or to enforce conditions attached to a grant which the grantee is held to have accepted when he accepted the federal funds. Courts have generally considered such actions to be contractual in nature, and have uniformly upheld the standing of the United States to bring suit to protect its contractual interests.

The Department of Justice recently invoked this remedy in a suit against the State of Alabama to force various state agencies which administered federally assisted programs to recruit, hire, promote or demote their employees on a merit basis and without discrimination on the ground of race or color. United States v. Frazer, 297 F. Supp. 319 (M.D. Ala. 1968) (Johnson, Ch. J.). A large number of categorical assistance programs were involved in Frazer because Congress has normally required that state agencies receiving formula grants adopt a merit system for employment. The state agencies in Alabama had refused to give adequate assurances that they would observe a merit system but they were nevertheless receiving federal funds in large amounts. The Department of Justice sued to enforce the conditions attached to those funds. Alabama argued that the statutory procedures for withholding funds in cases of non-compliance with federal standards was the exclusive remedy available to the United States. The court disagreed and denied the state's motion to dismiss the complaint:

"This Court is clear to the conclusion that the United States does have standing to seek judicial enforcement of the terms and conditions of grants of Federal property and that the administrative remedy of termination of assistance was not intended to be and is not exclusive. The argument of the State, if it prevailed, would necessitate this Court's telling the United States of America that the only remedy it had in this case would be to administratively terminate the Federal funds of \$150,000,000 a year provided to the State agencies here concerned for assistance to the aged, to families with dependent children, to crippled children's services, for aid to the blind, aid to the permanently and totally disabled, and for other similar programs administered by the defendants for the benefit of United States citizens residing in the State of Alabama." 297 F. Supp. at 322.

Judge Johnson subsequently ruled in favor of the United States on the merits and found that the state agencies involved had engaged in massive discrimination in employment. 317 F. Supp. 1079 (M.D. Ala. 1970). He then entered a broad remedial order which the state has appealed to the Fifth Circuit.

A substantial body of precedent supports the Frazer decision. The Supreme Court has on several occasions upheld suits by the United States to enforce statutory conditions attached to grants of public land. United States v. San Francisco, 310 U.S. 16 (1940) (grant to municipality); Oregon and California R. Company v. United States, 236 U.S. 393 (1915) (grant to railroad); McGehee v. Mathis, 71 U.S. 143 (1866) (grant to state). In both of the first two cases, Congress had specifically authorized the Attorney General to sue to enforce

the conditions of the grant. Such a specific grant of authority, however, is not required for the Attorney General to act because the Attorney General may sue on behalf of the United States by virtue of his office if the United States has an interest to protect. Wyandotte Transportation Co. v. United States, 389 U.S. 191. The interest of the United States in these cases is a contractual one. "It is not doubted that the grant by the United States to the state, constituted a contract." McGehee v. Mathis, 71 U.S. 143, 151. Therefore, "the acceptance by the recipient of the grant to which the conditions and stipulations are attached creates an obligation to perform the conditions on the part of the recipient." United States v. Frazer, 297 F. Supp. 319, 322. The United States may also sue to enforce specific assurances of compliance made by grantees of federal financial assistance. Suits have been brought by the Department of Justice to force southern school districts to implement school desegregation plans which they had filed with HEW under Title VI of the Civil Rights Act of 1964 in order to receive federal aid. The Department may institute these suits without satisfying the procedural prerequisites for school desegregation suits under Title IV of the same Act. United States v. Board of Education of Emanuel County et al., Civil Action No. 487 (S.D. Ga. 1969)..

Part D(2) recognizes that enforcement actions in the federal courts are not the appropriate sanction in all cases. When a federal agency encounters an instance of non-compliance, it should consider whether court enforcement is an appropriate and effective sanction. If judicial enforcement does not bring prompt compliance, the agency should invoke one or more of the remaining sanctions mentioned in Part D, including a total fund cut-off in cases where the imposition of that sanction is necessary to obtain compliance. An agency has broad discretion under Part D to determine on a case-by-case basis which ones of the range of sanctions available to it should be invoked. Court enforcement has simply not been tried enough in the past, and agencies have relied too heavily on the administrative cut-off of funds to offending grantees. Many officials at HEW recognize this fact and favor trying newer methods for enforcing federal standards in social assistance programs. The Nixon Administration's bill establishing a Family Assistance Plan, which passed the House but not the Senate in the 91st Congress, adopted this approach and provided that if "the Secretary determines that a State plan which he has approved under Title XVI, XIX, or XX no longer complies with the applicable requirements for approval, or that in the administration of such plan ... there is a failure to comply substantially with any provision of such plan or agreement, the Secretary may request the Attorney General to bring suit to enforce the provisions of such plan or agreement." The Family Assistance Act of 1970, Revised and Resubmitted to the Committee on Finance by the Administration (June 1970) at pp. -275-6.

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In the formula grant programs judicial enforcement of federal standards may have effects which are necessarily very similar to the administrative fund cut-off or a threat of fund cut-off. Implicit in an injunction to comply with federal statutory standards are the words "so long as you accept federal grant-in-aid funds." This notion was made explicit in Rosado v. Wyman, 397 U.S. 397, 420-22 (1970), and the district court was instructed to grant the state an interval in which to achieve compliance or to withdraw from the program because the Supreme Court had been informed that compliance without some reordering of the New York benefit provisions would cost the state \$40,000,000 per year. In most project grants, on the other hand, the grantee may not have the option to withdraw from the federally funded program because he has contractually bound himself to complete the project. In these cases the injunction has a different effect than a fund cut-off and the grantee can simply be ordered to comply with federal standards.

A distinct advantage of the judicial enforcement of federal standards is the flexibility inherent in a judicial decree. A federal judge may fashion an equity decree that both provides effective relief from past illegality and prevents future illegality without requiring a fund cut-off. An agency may not have power to require in this fashion affirmative action by grantees but can only manipulate to a greater or lesser extent the purse strings. For example, if a local housing authority that receives annual contributions from HUD persists in practicing discrimination in the selection of sites and assignment of tenants, there is nothing HUD can do about it at present except cut-off the flow of federal funds or exercise whatever power it has to put the local housing project into federal receivership (see 42 U.S.C. §1413 (1970)); and if HUD cuts off the flow of federal funds, the local housing authority will surely end up in federal receivership. The court, on the other hand, can fashion affirmative relief to undo the effects of past discrimination and to order compliance in the future. No doubt this task is a very delicate one, and the federal agency which has expertise in the area should assist the court in formulating the injunction. That agency can contribute this assistance through the Department of Justice in enforcement actions brought by the United States and through participation as an amicus curiae in actions brought by private parties to enforce federal standards. Agencies should assign high priority to this task. The result may be that beneficial state and local projects which have violated federal standards will continue to function but will be restructured by the court decree

to comply with federal standards.^{1/}

Part D(3). This part recognizes that a partial cut-off of federal funds, limited to that portion of a federally assisted program that is not in compliance with federal standards, may persuade a grantee to comply with federal standards. A partial fund cut-off does not bring the whole program to a halt and is likely to hurt fewer innocent beneficiaries of the program than is a total fund cut-off. Congress recognized this fact in the Social Security Amendments of 1967 when it amended the various sections in Title 42 which provide for fund cut-offs in social assistance programs to authorize the Secretary to limit his withholding of federal funds to that part of a state plan which was not being complied with. 1966 U.S. Code and Congressional and Administrative News 2834 at 3006 and 3148 (Senate Report 744). Thus, if a state is not actually providing certain social services on a statewide basis but only providing them in certain geographical areas, HEW may withhold the federal funds which support those services while continuing the flow of federal funds for the remainder of the social assistance program. There is some doubt whether these amendments authorize HEW to withhold funds from a particular geographic locality in a state where a local agency is not complying with federal standards. Statutes applicable to other formula grant programs specifically authorize the federal agency to withhold federal funds from one locality while continuing the flow of federal funds to other areas of the state. See, e.g., 20 U.S.C. §241 (1970) (grants under Title I of the Elementary and Secondary Education of 1965).

Federal grantor agencies may effectuate a partial fund cut-off in a number of other ways that do not require specific statutory authority. The most common way, which is specifically referred to in Part D(3), is the disallowance as a program or project cost of an expenditure by the grantee that does not conform with the federal standards. This technique builds on the distinction between conformity requirements and matching requirements. Conformity requirements

^{1/} Gautreaux v. Chicago Housing Authority, 296 F. Supp. 907 (N.D. Ill. 1968) (discussed at p. 19 supra) indicates what may happen if agencies do not cooperate with the courts in fashioning remedies in enforcement actions. HUD's participation in that litigation has been criticized as ineffective; its memorandum on the appropriate remedy was "vague" and apparently only delivered to the district judge on the evening before he issued the injunction. The injunction which did issue was drafted entirely by the plaintiff's attorney, who had no expertise in the housing area, and reflected a serious lack of understanding of the problem of urban housing and development. It may therefore prove ineffective in accomplishing its goal of integrated public housing in Chicago. Comment, Public Housing and Urban Policy: Gautreaux v. Chicago Housing Authority, 79 Yale L.J. 712 (1970).

are those standards which grantees must meet in order to be eligible for federal grants. Matching requirements, on the other hand, are those standards which grantees must observe in expending money in order to receive the federal share of the costs incurred. The federal share of total grant costs varies from one grant program to another and may be anywhere from 30% or less up to 100%. If the requisitions submitted by the grantee, or other evidence uncovered by the federal agency, indicate that the grantee is incurring costs that are improper, the federal government should not recognize these expenditures as program or project costs and should not release the federal share of these costs. In other words, the grantee must pay 100% of the cost rather than some lesser percentage because the expenditure is not recognized for federal matching purposes.

Normally matching problems arise at the audit stage; and the partial fund cut-off by the federal agency takes the form of an audit exception to a particular expenditure by the grantee. The clearest case for an audit exception is an expenditure by the grantee for a purpose outside the scope of the categorical assistance program which the grantee seeks to qualify as a program or project cost. For instance, a unit of local government cannot normally designate expenditures on highways as project costs for an urban renewal project. Audit exceptions are also common when a particular expenditure by a grantee violates federal standards. If HEW auditors discover that a state welfare administration has aided an AFDC child who is over the age limit set by federal law for the provision of aid, HEW will decline to share the cost of payments to that child. HEW thus treats the state agency's non-compliance with federal law as a matching question rather than as a conformity question. In this way audit exceptions may be used on a large scale to a whole class of recurring expenditures in an effort to change a non-conforming policy of practice. Derthick, The Influence of Federal Grants: Public Assistance in Massachusetts 23, 208 (1970). At a certain point, of course, the state's non-compliance with federal standards becomes so substantial as to raise a conformity issue that calls for a direct withholding of federal funds. The question of when that point is reached is a determination generally left to the judgment of the grantor agency. Derthick, supra at 23-24.

The principal objection to audit exceptions as a device for achieving compliance with federal standards is their post-hoc nature. The grantee has already received federal funds and has expended them in violation of federal standards. Remedial action may come too late and may depend on the thoroughness of the audit. Not all grantee activities are audited. This difficulty can be overcome if the federal agency announces ahead of time that certain types of expenditures by a grantee will no longer be recognized as project costs until the grantee complies with federal standards. This advance

announcement that audit exceptions will be taken operates as a partial fund cut-off because the grantee can no longer expect to receive the federal share for the contemplated expenditures. Since this technique operates as a sanction for non-compliance with federal standards, grantor agencies should be careful in invoking it.

In administering urban renewal grants HUD has on occasion exercised this power to effect a partial fund cut-off. When HUD discovers that a recipient of an urban renewal grant is not observing federal standards for relocation or land acquisition, HUD may simply tell the grantee not to spend any more money for demolition or land acquisition activities until the matter is cleared up. If the grantee does continue to spend money for those purposes, the expenditures incurred will not be treated as project costs for which the federal government must provide its matching share. This partial fund cut-off allows the remainder of the urban renewal project to continue. In appropriate cases, HUD may restrict its fund cut-off to demolition and land acquisition activities on a particular block in a project or with respect to a particular building. Alternatively, HUD has on occasion informed an LPA (the local public agency that receives the grant) that its administrative expenses will no longer be recognized as project costs until federal standards are complied with. Such action is potentially quite effective. The execution of the project continues; and the partial fund cut-off principally endangers the salaries of the local administrators who are thus provided with a strong incentive to comply with federal standards.

The manner in which urban renewal projects are funded reduces the effectiveness of the partial fund cut-off and demonstrates once again the difficulty of fashioning effective sanctions. The amount of the federal grant, which is initially determined when HUD approves a Survey and Planning Application, is either 66-2/3% or 75% of net project costs. Net project costs may roughly be defined as gross or total project costs less the proceeds to the LPA of selling project land to redevelopers. Following HUD's approval of an LEA's Survey and Planning Application, HUD awards the LPA a grant reservation equivalent to the amount of the grant and then advances federal funds to the LPA for planning the urban renewal project. If the LPA is successful in obtaining a Loan and Grant Contract, HUD then provides the LPA with operating capital to execute the project either by directly loaning money to the LPA or by guaranteeing the LPA's project notes which are sold on the private money market. Every three or six months the LPA presents to HUD its requirements for operating capital and for paying off any project notes that are due. HUD normally meets those requirements by increasing the LPA's loan authorization but may, as the project progresses, make a partial or project payment on the grant. Since the proceeds of land disposition are not available to the LPA until a comparatively late

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stage in the project, the LPA receives from HUD in the form of loan authorizations and project payments the equivalent of gross project costs. Most LPA's incur heavy land acquisition and demolition expenses at an early stage in the project and thus enjoy for the greater portion of the project's duration loan authorizations substantially in excess of the grant reservation. Under these circumstances a threat to withhold funds is somewhat empty because the LPA already has the funds; if the LPA terminates the project, the federal government is already liable for more than the grant reservation.

Despite these peculiarities in the funding of urban renewal projects, the partial fund cut-off may still serve as an effective sanction. To obtain loan authorizations or project payments at three or six month intervals, the LPA must itemize its cash requirements for project costs for each budget line item. If certain costs are not recognized at this point as project costs, the amount of the loan authorization or project payment is reduced by the federal share of those costs and the locality must absorb the entire costs. In this way the flow of federal assistance is at least slowed down. Since LPAs generally desire to complete urban renewal projects as promptly as possible, this slow down should encourage them to comply with federal standards. Furthermore, until they do so they are forced to absorb the full cost of certain expenditures. HUD of course enjoys much greater leverage when urban renewal activities are funded on an annual increment basis under the Neighborhood Development Program. Although an LPA's loan authorization at a given point in an action year may exceed the increment for that year, HUD has not committed itself on the annual increments for the following years. Where particular activities by a LPA violate federal standards, the costs budgeted for those activities should be disregarded when computing the LPA's annual increment.

Part D(4). One of the advantages of the use of a suit to enjoin grantee action inconsistent with federal standards is the flexibility of a decree in equity. The court may issue orders both prohibitory and mandatory, and through careful choice of remedial action may achieve compliance with federal standards without disrupting ongoing programs. Part D(4) of the recommendation suggests that similar powers be exercised by federal grantor agencies where they are available and that they be sought in appropriate cases by agencies which do not presently have such powers. Indeed, the special administrative condition combines the flexibility of the equity decree with agency expertise in administration.

Often an agency which administers project grants will have discretion to impose special conditions on grants. A legal services grant might, for example, be conditioned on the performance of particular law reform activities. Such a condition could be imposed at the beginning of federal funding or it might be required at the

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time of the grant's annual renewal should the agency determine that the grantee's performance has been deficient. In the latter case it would be a special administrative condition of the type recommended here.

In certain formula grant programs the existence of the special condition sanction may be necessary to remove disincentives to voluntary compliance. HEW has recently been involved in a serious effort to enforce §402(a)(23) of the Social Security Act, which requires that states update their standards of need in their programs of Aid to Families with Dependent Children. In this circumstance the recalcitrant grantee has every reason to prolong negotiations and the rendering of a final decision. Every day's delay is a substantial saving of state funds. Were the federal agency empowered to require retroactive adjustments in the payments to individual beneficiaries in appropriate cases, its enforcement position would be enormously strengthened.

Additional uses for the flexible administrative sanction can easily be enumerated in the area of public assistance. Special eligibility procedures might be required in local welfare departments which had been determined to discourage applications. Special training programs might be required to upgrade the abilities of service personnel. In extreme cases the state might be required to administer a local welfare program directly until the local office's operations were regularized as to institute proceedings to remove certain personnel for cause. Similar suggestions could be made for other continuing grant programs ranging from public housing to employment services to public highway construction. §521 of H.R. 1, the Nixon-Mills Family Assistance Plan, recently passed by the House of Representatives, would provide the Secretary of HEW with the necessary authority to take actions similar to the ones mentioned above, consequent upon a finding of non-compliance with federal standards.

Even without special legislative authority, grantor agencies may find that they have authority to impose special administrative sanctions of a limited sort. For example, virtually all agencies have authority to require reports concerning the operations of their grantees. Where a grantee has been determined to be deficient in compliance with a federal standard, the grantee might be required to make special reports to the grantor agency concerning that aspect of its program. Such reports would be designed to allow the federal agency to more carefully monitor the grantee's activities in that particular area and to assure thereby that compliance is achieved.

Part D(5). This recommendation proposes the transfer of a grant, or the awarding of subsequent grants, to a different grantee if the original grantee violates federal standards. Such action may not be feasible in the case of large formula grants administered by the states, but it is often appropriate in the case of project grants. Project grants normally last for a limited number of years, and grantees commonly apply for a renewal of the grant or for a new grant under the same or a related grant program. In these situations Part D(5) proposes that the grantee's past non-observance of federal standards be taken into account. Part D(5), which in effect penalizes the grantee for his past non-compliance with federal standards, is the counterpart to the final paragraph in Part D, which proposes incentives for rewarding grantees who successfully comply with federal standards.

Federal grantor agencies presently consider a grantee's past performance in passing upon new applications for project grants. This is generally done internally and on an ad hoc basis. An LPA that has successfully run one or more urban renewal projects stands a better chance of obtaining the regional office's go-ahead for new projects than does an LPA with a poor record. The latter LPA often encounters delays and lack of interest when it starts to work with the regional office staff on the selection of another urban renewal area and on the preparation of a Survey and Planning Application. Part D(5) and the provision on compliance incentives should encourage federal agencies to formalize this process and to focus their review of past performance on the grantee's compliance with federal standards. The complaint procedure established under Parts A and B of this recommendation should provide a source of relevant data on the grantee's compliance with federal standards. If there have been no complaints that a grantee violated federal standards, or if the complaints have been resolved in the grantee's favor, then the grantee should receive some recognition for its achievement. On the other hand, if there have been complaints and if the federal officials designated to resolve the complaints have found that the grantee has violated federal standards, then the grantee's past violations should be a factor weighing against approving its present application. In extreme cases, the grant could be transferred in mid-project to a new grantee.

The formality which should accompany the operation of complaint procedures should alleviate the dangers that grantees will lose federal funds for political reasons or on account of community disapproval of a project's goals or accomplishments. These dangers have on occasion proved to be real. See the description of OEO's refusal to renew a Head-Start grant to a group of poor Mississippi Blacks, in Cahn and Cahn, The New Sovereign Immunity, 81 Harv. L. Rev. 929 (1968). To an extent these dangers will always accompany a system of discretionary grants-in-aid. It would seem that the development of formal procedures that focus on the grantee's compliance with federal standards should contribute to a lessening of these dangers.

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Compliance Incentives. The final paragraph of Part D proposes to reward grantees who comply with federal standards as an alternative to penalizing those who do not. This provision on compliance incentives is listed separately at the end of Part D because compliance incentives are, strictly speaking, not a sanction. The appropriate role of compliance incentives in achieving compliance with federal standards may, however, be conveniently discussed at this point in the Report. Compliance incentives are likely to take either of two forms. First, the federal government could increase the federal matching share or award an additional lump sum to grantees who fully comply with federal standards over a given period. Second, a grantee's compliance with federal standards on one project grant could be recognized formally as a positive factor when the grantee applied for another project grant under the same or a related program. The majority of LPAs, for example, expect to continue their operations through a series of urban renewal projects. If LPAs knew that their chances of obtaining additional grants would be significantly affected by their successful compliance with federal standards on their first grant, the degree of compliance with federal standards should improve.

Incentives in the form of an increased federal matching share have been employed in formula grants for water pollution control and highway construction. The normal federal share for grants to municipalities to construct waste treatment facilities is 30%. This federal share will increase to 40% if the state becomes involved by paying at least 30% of the costs of all such projects in the state. Alternatively, the federal share will increase to 50% if the state agrees to pay at least 25% of the costs of all projects within the state and to set enforceable water quality standards for the waters into which the project discharges. Finally, the total federal grant for a project may be increased by 10% if the project conforms to a comprehensive metropolitan plan. These incentives, which may increase the federal share of a project's cost to 55%, encourage metropolitan planning and the participation by the state in funding waste treatment plants and in setting and enforcing water quality standards. Abkin, *Federal Programs for Water Pollution Control*, 1 U.C.D. Law Rev. 71, 76-77 (1969). These incentives have had at least some effect and have been included in modified form in the Clean Air Act of 1970, P.L. 91-604.

The Federal Aid Highway Act of 1963, P.L. 88-157, likewise provided that states which agreed to control advertising alongside interstate highways would receive an incentive payment of one-half of one percent of the cost of those portions of the system's projects to which national advertising control standards applied. Twenty-five states took advantage of this incentive, which raised the federal share of the highway construction affected from 90% to 90.5%. Advisory Commission on Intergovernmental Relations, Fiscal Balance in the Federal System, I, 162 (1967). This incentive must therefore be judged as

reasonably successful. The Highway Beautification Act of 1965, P.L. 89-139 (now 23 U.S.C. §131 (1970)), continued this incentive for conforming states and provided further that any state which did not effectively control, under federal standards, the erection and maintenance of outdoor advertising along the interstate and primary highway systems would lose 10% of its Federal-Aid Highway allotment. This provision changed an incentive grant into a partial fund cut-off.^{1/} The experience with this partial fund cut-off has not been happy. Apparently twenty-nine states do not at present effectively control outdoor advertising and are therefore subject to the partial fund cut-off for non-compliance with the federal standard. Lamm and Yasinow, *The Highway Beautification Act of 1965: A Case Study in Legislative Frustration*, 46 *Denver L.J.* 437, 439 n. 15 (1969). Enforcement of this requirement through the partial fund cut-off has nevertheless been deferred pending further study. Birmingham, *Book Review of Outdoor Advertising: History and Regulation* (ed. by Houck), 70 *Col. L. Rev.* 779, 783 (1970). The incentive approach therefore seems to have worked better than the approach of a partial fund cut-off. However, the fault for the latter debacle may rest primarily with Congress, which has never appropriated any funds to pay the states the federal share (75% of the cost of removing non-conforming billboards. Furthermore, the Department of Justice has interpreted the Act to require each state to pay just compensation for the removal of offending billboards in order to avoid the 10% fund cut-off. This federal standard has worked hardship on many states which have maintained a right to remove billboards under the police power without paying for them. Lamm and Yasinow, *supra*.

An award of an increase in the federal matching share to grantees who observe federal standards most likely cannot be implemented without Congressional action. Furthermore, such an incentive should only be used when compliance with federal standards is desirable but not essential. When compliance with a federal standard is considered essential by the federal government (as with non-discrimination), incentives are not appropriate because grantees should not be allowed to purchase the privilege of not complying with federal standards. Incentives may therefore prove more workable in the project grant area where the grantee anticipates applying for further project grants. In passing on subsequent applications the grantee's past performance surely should be taken into account. See the discussion of Part D(5) above.

^{1/} This partial fund cut-off differs slightly from that proposed in Part D(3). The 10% figure is an arbitrary one not related to the federal dollars expended in violation of federal standards. Part D(3), on the other hand, gears the amount of the fund cut-off to the amount of federal funds expended in that portion of a federally assisted program that does not comply with federal standards.

Other Possible Sanctions. The committee considered and rejected a number of other possible sanctions. They are listed here for informational purposes and described in terms of the applicability to grantees that are units of state and local government.

1. Congress might pass a statute providing that state or local officials who wilfully violate federal standards in the administration of a federal grant would be guilty of a civil or criminal offense and subject to fine or imprisonment. Alternatively, the federal grantor agency could administratively rate state or local officials on the basis of their compliance with federal standards. These ratings could affect the career opportunities of these officials and thus influence their conduct.

2. Congress might pass a statute providing for the removal from office of state and local officials who violate federal standards in the administration of a federal grant.

3. Congress might provide by statute for the federal takeover and operation of state and local programs receiving federal financial assistance which consistently violate federal standards.

4. Congress might provide by statute that a fund be set aside from the general revenues which would be apportioned and distributed annually among the states on the basis of population. Federal funds withheld from a state for non-compliance with federal standards in federally assisted programs would be deducted from the state's share of this fund and not from the federal funds available to the state in the federally assisted programs.

These sanctions are appealing in one way because they are likely to be more effective than those proposed in Part D. However, numbers 1-3 run strongly counter to modern notions of federalism and are unlikely to win widespread acceptance. They are simply too harsh and do too much to undermine the independence of state and local government. It would seem far better for the federal government to scuttle the whole grant-in-aid approach and directly administer the programs involved than for the federal government to resort to these sanctions. These sanctions also raise difficult constitutional problems on the power of the federal government to interfere in the governmental affairs of the states. Oklahoma v. Civil Service Commission, 330 U.S. 127, 142-144 (1947).

Number 4, on the other hand, is revenue sharing by the backdoor. The advantages and disadvantages of revenue sharing should be confronted directly and not in the context of fund cut-offs. However, if Congress does determine to institute a system of revenue sharing, number 4 may have merit. Any funds withheld from the state for non-compliance with federal standards should be deducted from the general revenues assigned to the state and not from the funds available to the state for the federally assisted program where the violation occurred. This arrangement would assure the continuation of the program, but at the same time would induce compliance with federal standards by tightening the purse strings. Local governmental units could be included in the enforcement mechanism if the system of revenue sharing adopted by Congress included the mandatory pass-through of funds to local government. Any funds withheld from units of local government for non-compliance with federal standards could be deducted from these pass-through funds.

APPENDIX A: Urban Renewal:
A Test Case for the Federal
Administrative Complaint Procedure
(June 1971)

1. The Application Process. An understanding of how these recommendations, particularly the one on a federal administrative complaint procedure, will work in the concrete setting of the urban renewal program requires some background in the application process for urban renewal project grants. The major source for this information is the mammoth Urban Renewal Handbook published by HUD to guide localities in planning and executing urban renewal projects. The present edition was published in February, 1968; it is frequently supplemented by circulars and transmittal notices.

A conventional urban renewal project involves the rehabilitation or clearance and redevelopment of a blighted, deteriorated or slum area. The project is planned and executed by a local public agency (LPA) which contracts with HUD for federal financial assistance in the form of advances, loans and grants. A city desirous of receiving federal funds for urban renewal must first designate an urban renewal area. The LPA selected by the city to run the urban renewal project must then file with HUD a Survey and Planning Application for the urban renewal project. If the application is granted, HUD reserves a grant for the project out of the undistributed moneys in the Urban Renewal Fund and advances federal funds to the LPA to plan the project. Planning should take no more than eighteen months and culminate in a Loan and Grant Application. Normally that application is submitted in two parts. Part I is submitted prior to the approval by the governing body of the locality of the Urban Renewal Plan, while Part II is submitted subsequent to that approval. The purpose of this two-stage application process is to permit the LPA to gain HUD's approval for its Urban Renewal Plan before it must enter the political fray and gain the city's approval. The two-stage process is now optional and the LPA may combine Part I and Part II into one application. Where the LPA follows the traditional two-stage process, the great majority of information and supporting data on the project accompanies Part I; the Urban Renewal Plan which the LPA proposes to submit to the governing body of the locality for approval must accompany the Part I Application. Part II merely updates this information and includes in addition the approval of the Urban Renewal Plan by the governing body of the locality. Once HUD approves the Part II Application, the city and HUD enter into a Loan and Grant Contract for the urban renewal project. Since the execution stage which follows commonly takes from six to nine years, changes in the Urban Renewal Plan in the course of execution are common. Normally the LPA must gain HUD approval for the changes through filing an Amending Loan and Grant Application only when there is a change in project boundaries or a need for more money.

The application forms themselves are quite brief; they consist of two sides of a single sheet of paper and primarily elicit information on the cost of the proposed project. The LPA must, however,

submit in addition a number of accompanying reports which are considered part of the application. A good number of the reports are technical in nature and merely establish that the LPA has legal authority to proceed or that the application has received the necessary local approval. In the remaining reports, the LPA must establish that the project meets federal requirements. Normally the LPA must do this by supplying HUD with the relevant factual data.

In recent years HUD has taken significant steps to simplify and shorten the application and planning process for urban renewal. In February, 1970, HUD announced a number of major changes in the Urban Renewal Handbook. These changes reduced the requirements for documentation of urban renewal project planning by eliminating 137 of 286 required items of information. This simplification of the planning process reduced the planning stage (i.e., from the approval of the Survey and Planning Application to the approval of the Part I Loan and Grant Application) from 35 months to 14 months. Bureau of the Budget, Simplifying Federal Aid to States and Communities, 9-10 (March 1970). The great majority of the eliminated items were cost estimates or other budgetary items, and the LPA must still demonstrate at the application stage its conformance with important federal standards.

HUD has also experimented with proclaimer certificates. In five limited areas the LPA may file with HUD a proclaimer that federal standards have been complied with in lieu of submitting factual data in documentary form. Proclaimers will not be reviewed by HUD except on a post audit basis. This procedure is intended to reduce HUD processing time and to enable the LPA to proceed more rapidly with the urban renewal project. Urban Renewal Handbook RHM 7200.1. So far proclaimers have been employed only during the execution stage of a project to verify that the LPA has conducted certain program activities or made certain program determinations (e.g., the acquisition price of a parcel of land or the determination of the fair reuse value of a parcel of land) in compliance with federal standards. HUD has been reluctant to permit the use of proclaimers at the application stage and has never implemented a proposal that appeared in the Urban Renewal Handbook that the LPA certify by proclaimer the eligibility of an urban renewal area.

In August 1968, Congress approved a new way of planning and funding urban renewal projects known as the Neighborhood Development Program. See 42 U.S.C.A. §§1469-1469c. A Neighborhood Development Program covers one or more urban renewal areas and is funded by HUD on an annual basis rather than through the reservation of a single project grant. In other words, a LPA operating a Neighborhood Development Program must apply annually for federal funds to carry on urban renewal activities. The federal funds for a particular year are

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referred to as the annual increment. The LPA's annual application must specify the urban renewal activities (planning, land acquisition, relocation, rehabilitation, land marketing, etc.) which it intends to implement in the upcoming action year. The basic purpose of the Neighborhood Development Program (NDP) is to provide greater flexibility in the funding and planning of an urban renewal project. Funds are not committed years in advance and planning continues as the project progresses. Too often in the past, planning decisions on relocation or on the marketing of project land which have been made at the survey and planning stage of an urban renewal project have proved unfeasible five years later at the execution stage. The housing market may have changed or the intended reuse of project land may no longer be economically sound.

NDP is presently a voluntary program; cities may convert existing urban renewal projects to an NDP basis and apply for new projects on an NDP basis. Alternatively, cities may ignore NDP and stick with conventional urban renewal projects. Only 129 localities have taken advantage of NDP as of June 30, 1970. Urban Renewal Directory (June 1970). However, a significant number of the country's larger cities have done so; the amount of money involved in NDP is therefore substantial. HUD has published a separate NDP Handbook. However, the Urban Renewal Handbook governs NDP activities except where modified by the NDP Handbook. As indicated above, the major changes in NDP are intended to permit greater flexibility in planning and funding projects. In both conventional urban renewal projects and in NDP projects, the same basic federal standards control urban renewal activities by the LPA.

2. Federal Standards in Urban Renewal. The number of federal standards that accompany urban renewal grants remains quite large. However, many of these standards are more in the nature of controls to insure that the LPA operates efficiently and does not squander federal funds. These budgetary and program controls are primarily for the benefit of HUD and are distinguishable from federal standards which are intended to protect the interest of third parties or to further national housing goals. The central concern of these recommendations is the enforcement of the latter type of standards. The following list contains the more important of these standards and indicates at what stage of the application process or of project execution compliance questions are likely to arise. The list is a selective one and intended to include only those standards which raise the more serious enforcement problems:

a. Eligibility of Project Area. An urban renewal area must be a slum area or a blighted, deteriorated or deteriorating area. Urban Renewal Handbook, RHA 7205.1. The Handbook provides that at least 20% of the buildings in an urban renewal area must contain one or more serious building deficiencies and the area must contain at least

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two environmental deficiencies, such as overcrowding of structures on the land or excessive dwelling unit density. An LPA must establish area eligibility by the Project Area Data that accompanies a Survey and Planning Application and a Part I Loan and Grant Application. Similar data must accompany an NDP Application that includes a new urban renewal area. Walk-around surveys are the normal means for collecting this data for the Survey and Planning Application. For the Part I Application the LPA normally supplements this data with interior surveys of a substantial number of buildings. While those interior surveys are useful in determining the eligibility of an urban renewal area, their primary purpose is to determine whether an area is suitable for clearance. See d. below.

b. National Goals. In the past, HUD has treated Survey and Planning Applications on a first-come, first-served basis. Each application was considered in turn, and a grant reservation awarded to an LPA if its application was approved. HUD now gives priority consideration to projects that meet specific criteria for the conservation and expansion of low and moderate income housing or for the development of new employment opportunities for jobless, underemployed and low-income persons or that otherwise meet critical and urgent needs. Urban Renewal Handbook: RHA 7202.1. To receive priority consideration under the national goal of expanding the supply of low and moderate income housing, a Survey and Planning Application must provide that 50% of the net acreage in the project area shall be for low and moderate income families and that 50% of the units to be built on cleared sites in the project will be low and moderate income housing. Urban renewal projects that involve predominantly residential redevelopment must normally qualify for priority consideration under this goal. Projects that are predominantly non-residential normally qualify for priority consideration under the companion goal of increasing employment opportunity. That goal is satisfied if commercial or industrial redevelopment of the project land creates new jobs.

These criteria, which are referred to as national goals, are in effect new federal standards, because Survey and Planning Applications that do not receive priority consideration go to the bottom of the pipeline and are not funded unless they are specifically exempted from the national goals. In the Housing and Urban Development Act of 1968 Congress reinforced the administrative standard for expanding the supply of low and moderate income housing. It is now required by statute that a majority of the housing units in a community's predominantly residential renewal projects shall be standard housing units for low and moderate income families or individuals; in addition, at least 20% of the total units shall be for low income persons unless the Secretary waives this requirement on the ground that low income units are not needed. 42 U.S.C.A. §1455(f).

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c. Workable Program Requirements. In order to be eligible for advances, loans or grants for urban renewal, a locality must have a certified Workable Program for Community Improvement. HUD certifies programs for two-year periods. A Workable Program, which is defined by HUD as a "Community's own plan of action for eliminating and preventing slums and blight," must demonstrate that a community is making satisfactory progress in four essential areas: 1) housing codes and housing code enforcement; 2) overall community planning; 3) relocation of individuals, families and businesses displaced by governmental action; and 4) meaningful citizen involvement in planning and executing HUD-assisted programs. Workable Program for Community Improvement Handbook RHA 7100.0. The adequacy of a community's Workable Program may be challenged at the time it is filed with HUD for certification or recertification or at the time the community files a Survey and Planning or a Loan and Grant Application. In addition to the above, there is the further requirement that the planning section of the Workable Program be of sufficient scope and content to permit evaluation of the needs for an urban renewal project. This standard must be met at the time of the Part I Loan and Grant Application for the project; and HUD must make the evaluation and determine that the project is in accord with the general community plan in the Workable Program.

d. Treatment Eligibility: Clearance and Redevelopment. The two basic modes of treatment for an urban renewal area are 1) rehabilitation and 2) clearance and redevelopment. Normally an urban renewal project involves both modes of treatment; part of the area is rehabilitated and part is redeveloped. Congress has expressed a strong preference for rehabilitation; no contract for a loan or grant shall be entered into by HUD for any project which provides "for demolition and removal of buildings and improvements unless the Secretary determines that the objectives of the urban renewal plan could not be achieved through rehabilitation" (42 U.S.C.A. §1460(c)). HUD has accordingly established rigorous standards for clearance and redevelopment activities. In the areas to be cleared, either 1) 50% of the buildings must be structurally substandard to a degree requiring clearance or 2) 50% of the buildings must be structurally substandard or must be in such condition that their removal is justified to remove specific blighting influences. Urban Renewal Handbook, RHA 7207.1 Chapter 1. In the Project Area Data accompanying the Part I Loan and Grant Application, the LPA must demonstrate the eligibility of any project land planned for clearance and redevelopment treatment. Similar data must accompany an NDP Application for an action year in which clearance activities are contemplated. Normally the data must include interior surveys of a substantial sample of the buildings in the area.

e. Treatment Eligibility Rehabilitation. Although rehabilitation is the favored mode of treatment, the Urban Renewal Handbook does require that the LPA demonstrate the economic feasibility of rehabilitation. The feasibility of rehabilitation means that, for the majority of

properties in the area, there is reasonable evidence that rehabilitation up to the Property Rehabilitation Standards in the Urban Renewal Plan can be supported by the income of owner occupants or by rental revenue. Urban Renewal Handbook 7210.1 Chapter 1, Section 6. The purpose of this standard is to protect the residents of the urban renewal area. While federal grants and loans for rehabilitation are sometimes available to property owners, the expense of rehabilitation will in many cases be borne by individual property owners. If the property owner is unwilling or unable to rehabilitate, the LPA may acquire his property, rehabilitate it, and then sell it. The LPA must therefore demonstrate the feasibility of rehabilitation in a Rehabilitation Report that is submitted with the Part I Loan and Grant Application or with the NDP Application for an action year in which rehabilitation activities are contemplated. Normally this Report includes, for typical properties, the extent of repairs required, the cost of the repairs, before and after appraisals of the property, and the debt-carrying capacity of the property and the owner.

e. Relocation of Displaced Individuals and Families. The basic relocation requirement is in 42 U.S.C.A. §1455(c) (1).^{1/} That provision requires that individuals and families displaced from an urban renewal area have available "decent, safe, and sanitary dwellings equal in number to the number ... of the individuals and families displaced and reasonably accessible to their places of employment." The relocation housing must be in the urban renewal area or in other areas not generally less desirable in regard to public utilities and public and commercial facilities and at rents and prices within the financial means of the displaced individuals and families. In addition, the LPA must develop a comprehensive program of relocation assistance for displaced individuals, families, and businesses. The LPA must submit a Relocation Report with the Part I Loan and Grant Application. The Report must contain the LPA's relocation program and data on the housing needs of displaced families and the housing resources available to them. The data must be fairly specific on the number, income and race of the displaced persons and on the housing market and on housing construction in the locality. This information, which must also accompany an NDP application for an action year in which displacement is contemplated, should demonstrate that it is feasible to relocate displacees into standard housing that meets the statutory requirements.

Additional relocation standards must be met at the execution stage of an urban renewal project. The LPA must interview all site residents to be displaced and supply them with an information statement on the availability of relocation assistance and payments. Urban Renewal Handbook, RHA 7212.1 Chapter 3, Section 1. The LPA must also keep records on the relocation of displaced persons (especially displaced families) and continue to provide relocation assistance to individuals and families

^{1/} Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, does not repeal this section. The substantive standard on the availability of relocation housing appears to be the same under both laws.

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in the relocation workload until they are located in standard housing. In addition, §1455(c)(2) provides that the Secretary shall require at a reasonable time prior to actual displacement satisfactory assurances by the LPA that decent, safe and sanitary housing is available for the relocation of each such individual or family. The Urban Renewal Handbook seemingly does not contain any provisions on the data, if any, which the LPA must submit in support of its assurances and how it should submit that data. Finally, Congress provided in the Housing and Urban Development Act of 1969 that HUD must review by December 24, 1970 and every two years thereafter, each locality's relocation plan and the locality's effectiveness in carrying out that plan. This statute reflects the increased concern in Congress over HUD's failure to adequately enforce the basic standard in §1455(c)(1) for the availability of relocation housing.

f. Public Hearing. 42 U.S.C.A. §1455(d) requires that a locality that receives urban renewal funds hold a public hearing prior to acquiring any land for an urban renewal project. The Urban Renewal Handbook requires that the locality hold the public hearing before its governing body approves the Urban Renewal Plan. RHA 7206.1, Chapter 3. Normally the hearing takes place shortly after HUD approves Part I of the Loan and Grant Application. A report on the hearing must accompany Part II of the Application. Further hearings must be held on changes in the Urban Renewal Plan unless the changes are of a minor nature.

g. Minority Group Consideration. Title VI of the Civil Rights Act of 1964 prohibits discrimination in any program receiving federal financial assistance; it of course applies to urban renewal projects. The Urban Renewal Handbook also specifies that the boundaries of an urban renewal area shall be determined without consideration of the race, creed, color or national origin of the residents. RHA 7207.1 Chapter 1. In addition, HUD requires the LPA to consider minority group interests in selecting and planning an urban renewal project. These standards are difficult to paraphrase, and with the exception of the first consideration which overlaps Title VI, are quoted below in their entirety:

(2) Wherever feasible, the project shall contribute to a reduction in the concentration of minority group families within or outside the project area and to furthering equal opportunity in housing in the community. If there are overriding considerations for undertaking a project which does not reduce such concentration or promote equal opportunity in housing, the locality must have other plans for achieving the same objectives.

(3) The project shall not result in a reduction in the supply of dwellings in the community available to minority group families. If the project will result

in a substantial net reduction in the supply of housing in the project area available to minority group families, the locality must have specific proposals for the provision of standard housing elsewhere in the locality available to minority group families, which housing was not previously available to them, to compensate for the reduction.

(4) Representative minority group leadership in the locality must be consulted, directly or through participation in citizens' advisory groups, in the selection and planning of the project. Representative leadership of the minority group means persons accepted as such by the minority community itself, such as persons holding office in civic or other responsible organizations of minority citizens. (RHA 7207.1 Chapter 1)

The LPA must submit with Part I of its Loan and Grant Application a Report on Minority Group Considerations explaining how it has satisfied these criteria. These criteria of course go beyond what is required by Title VI.

h. Title VIII of the Civil Rights Act of 1968. Title VIII of the Civil Rights Act of 1968 also affects urban projects. That Act provides in part that it is the policy of the United States to provide for fair housing throughout the United States and that HUD shall administer its housing programs in a manner affirmatively to further this policy. 42 U.S.C.A. §§3601 et seq. In Shannon v. HUD, 436 F.2d 809 (3rd Cir. Dec. 30, 1970), the LPA sought to amend an Urban Renewal Plan to substitute an apartment project for single family dwellings as the proposed reuse for cleared land in the project area. The court held that Title VIII, as well as other civil rights statutes, required HUD to consider the effect of the apartment project on racial concentration in the community before approving the LPA's Amending Loan and Grant Application. Surely the Shannon holding would require HUD to take similar steps if the apartment project had been included in the initial Urban Renewal Plan filed with the Part I Loan and Grant Application.

i. Citizen Participation. At the beginning of the planning stage the LPA must establish for an urban renewal area a Project Area Committee (PAC) to participate in the preparation of the Urban Renewal Plan and the Loan and Grant Application. The PAC must be representative of a fair cross section of the residents of an urban renewal area; it must have access to the relevant decision makers in the LPA and participate in the project planning. The LPA must submit a Report on Citizen Participation with Part I of the Loan and Grant Application.

j. Land Acquisition Policy. Prior to the acquisition of any land, the LPA must submit to HUD a Land Acquisition Policy Statement which binds it to follow certain federal standards in its land acquisition activity. These federal standards, which are found in 42 U.S.C.A. 3072, ^{1/} require that 1) the LPA make every effort to acquire each piece of property by negotiated purchase before resorting to eminent domain; 2) pay the negotiated purchase price, or in cases of dispute, 75% of appraised fair value of the property as approved by the LPA and concurred in by HUD, before requiring any owner to surrender possession of the property; and 3) provide any person lawfully occupying acquired property with at least 90 days notice to vacate. HUD previously required LPAs to submit a Land Acquisition Policy Statement with each Survey and Planning and/or Loan and Grant Application but now encourages LPAs to submit one policy statement separately from any application which will cover all urban renewal projects in the community. Compliance by the LPA with this filing requirement is of course a mere formality; enforcement problems only arise at the execution stage when the LPA actually begins to acquire property. A common complaint of property owners in an urban renewal area is that the LPA is not offering to pay them a fair price for their homes or is otherwise not treating them fairly. While the Land Acquisition Policy Statement does not directly deal with the issue of fair value, the Urban Renewal Handbook, RHA 7208.1 Chapter 4, Section 1, further requires that the LPA retain two outside appraisers to determine the fair market value of each piece of property to be acquired. The LPA must then offer to acquire the property at a price that represents its fair market value. HUD must concur in the proposed acquisition price. These standards are once again intended to protect individual property owners; they should provide a fruitful source of complaints that an LPA is violating federal standards in executing an urban renewal project.

k. Land Marketing. When an LPA disposes of project land by selling it to redevelopers the sales price must be the fair value of the land for the intended reuse. This standard is intended to prevent redevelopers from obtaining unfair profits.

3. Implementation of Part A of Recommendation. The above survey of the application process for urban renewal project grants and of the more important federal standards for urban renewal projects supports the conclusion that the implementation in the urban renewal program of the administrative complaint procedure proposed in Part A is both feasible and desirable. Feasibility is of course a relative concept; and there is no doubt that the implementation of this recommendation will require additional effort on the part of HUD. The

^{1/} Public Law 91-646, The Uniform Relocation Assistance and Real Property Policies Act of 1970 (January 2, 1971), supersedes this section and broadens the federal standards for land acquisition. HUD has not yet issued Circulars or Transmittal Notices for its Urban Renewal Handbook indicating how the new Act will affect its application requirements.

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formal complaint machinery will require staff and office space, and additional copies of bulky applications will have to be made available. Delays in passing upon applications may also result. This additional burden must be weighed alongside the overall benefits accruing to the urban renewal program from a complaint procedure. These benefits are basically the same as those discussed in the general commentary to Part A, i.e., the more effective enforcement of federal standards, the strengthening of the role of the federal agency, the reduction of interference from the courts, and the improved handling of citizens' grievances. In addition, the complaint procedure should improve the decisional process employed by HUD for allocating scarce urban renewal funds.

The most appropriate time for persons affected by an urban renewal project to file complaints directed at the project is when HUD is reviewing the Part I Loan and Grant Application. At that time the LPA must satisfy HUD that its application and plan comply with federal standards on Area Eligibility, Workable Program Requirements, Treatment Eligibility for Clearance and Redevelopment or for Rehabilitation, Relocation of Displacees, Minority Group Considerations, Title VIII of the Civil Rights Act 1968, Citizen Participation, Public Hearings, and Land Acquisition. Except in the case of Land Acquisition, the LPA must normally submit factual data with its application to demonstrate that the proposed project complies with these federal standards. Persons affected by the urban renewal project who are given access to the LPA's application may challenge the LPA's data on the grounds that it is inaccurate or incomplete. For instance, a complaint may challenge an LPA's description of the housing resources in the community available to displacees or an LPA's finding that the condition and debt-carrying capacity of dwellings in the project area makes their rehabilitation feasible in large portions of the project area. Potential displacees or owners of the dwellings to be rehabilitated may be able to show that the housing market in the community is much tighter than portrayed by the LPA and that the owners of the dwellings are not likely to obtain the financing needed to make rehabilitation feasible.

Complaints of this nature should be resolved before the Loan and Grant Application is approved and the project funded through a Loan and Grant Contract. If the complaints are not resolved at this stage, they will arise again in the midst of project execution when the opponents of the project seek to stop the project through a lawsuit. Opponents of particular urban renewal projects are presently filing administrative complaints with HUD at the application stage, and it would seem better to resolve these complaints promptly rather than to await a lawsuit. If the opponents do not avail themselves of the administrative complaint procedure at the application stage, doctrines of exhaustion or waiver should preclude them from later challenging the project in court at the execution stage unless there was good reason for their failure to present their complaints at the application stage.

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Persons affected by an urban renewal project may also appropriately file complaints when an LPA submits an NDP application for an annual increment for an action year or an Admendatory Loan and Grant Contract to expand a conventional urban renewal project. The LPA must document its compliance with the federal standards applicable to the urban renewal activities covered by the application, and the complainant may seek to challenge that documentation. Complaints directed at Survey and Planning Applications present more difficulty. The purpose of a Survey and Planning Application is to obtain federal money to plan the project; the application may therefore be too sketchy and general to permit an effective challenge. Furthermore, an LPA has the option to eliminate this application by using non-federal funds to plan the project and by applying initially for a Loan and Grant Contract. If the LPA absorbs the planning and other related costs in this way, the federal government contributes 75% of the remaining eligible costs. Survey and Planning Applications nevertheless serve an important role. An application must establish the eligibility of the project area and must demonstrate that the project meets one of the national goals (or is exempt therefrom); and a successful applicant receives a grant reservation. Affected persons opposed to a project proposed in a Survey and Planning Application may complain that the project area is not eligible for urban renewal treatment because it is neither a slum nor a deteriorated area or that the project does not meet any of the national goals. These complaints should be resolved promptly so that projects which fall short of these basic federal standards never get started. Of course, if the Survey and Planning Application is approved these same issues may arise again at the time of the Loan and Grant Application; and only in clear cases will the issues be finally resolved before project planning. The most appropriate time for resolving complaints remains the time of the Loan and Grant Application.

The final benefit which should accrue to the urban renewal program from the introduction of an administrative complaint procedure is the improved allocation of urban renewal funds. HUD must allocate limited urban renewal funds among competing applicants in a way that will best further various national goals. The most important of these goals is the national housing goal of realizing as soon as feasible the "goal of a decent home and a suitable living environment for every American family." 42 U.S.C.A. 1441a. Studies have consistently documented that urban renewal has not adequately contributed to meeting this goal; there is strong evidence that urban renewal has in fact contributed to the shortage of moderate and low income housing. The most recent (and the most thoroughly documented) of these studies is the Comptroller General's Report to the Congress, Opportunity to Improve Allocation of Program Funds to Better Meet the National Housing Goal (Oct. 1970).

Of course, the urban renewal program does not have one clear goal but a number of often competing goals; and it is not accurate to cite "decent housing for all Americans" as the goal of urban renewal. Congress has in fact specifically provided that 35% of urban renewal funds may go to projects that involve predominately non-residential redevelopment.

Exhibit No. 18

"In the interest of cost-savings, publication of the voluminous formal quarterly compliance compilation will be discontinued. Compliance data, however, will be compiled from the regional reports and maintained in the Office of the Administrator."

From: James S. Dwight, Jr., Administrator, Social and Rehabilitation Service, HEW, Memo on Compliance Reporting to Central Office, to SRS Regional Commissioners, Sept. 25, 1973.

Exhibit No. 19



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
 OFFICE OF THE SECRETARY
 WASHINGTON, D.C. 20201

November 15, 1973

Mr. David B. Swoap
 Director
 Department of Social Welfare
 State of California
 714 P Street
 Sacramento, California 95814

Dear Mr. Swoap:

Thank you for your letter of September 19 summarizing several important efforts being made by both State and County agencies in California to improve the delivery of services to minority clients and to increase employment of minority staffs.

Let me also express my appreciation to you for the frankness and cordiality which characterized our meeting with Messrs. Newlin and Moose of your staff on September 5, 1973. We were pleased to have the opportunity to informally discuss some of our preliminary findings and were encouraged to learn of the efforts undertaken by the department in the client service area. The courtesy and cooperation extended by the Department's personnel in both the state and county offices during our review of the Department's operations was much appreciated, as were your considerable efforts to distribute and collect for us a client service questionnaire completed by employees of eight county welfare agencies.

As you are aware, complaints were submitted to Secretary Richardson in early 1971 alleging that the California Department of Social Welfare and its constituent county agencies were failing to provide equal services to Spanish-speaking clients and potential clients on the basis of their national origin. We have completed our review pursuant to Title VI of the Civil Rights Act of 1964 of the issues raised in these complaints. This letter sets forth a summary of our findings relating to such issues.

Title VI and the Departmental Regulation, 45 CFR Part 80 (a copy of which has been provided to you), prohibit discrimination on the grounds of race, color, or national origin by recipients of Federal financial assistance. The Regulation provides that no person shall, on account of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to the provision of services in a discriminatory manner in the operation of any federally-assisted program. More specifically, the Regulation prohibits the operation of any such program in a manner which has "the effect of subjecting individuals to discrimination because of their race, color, or national origin or [has] the effect of defeating or substantially impairing accomplishment of the objectives of the program as respect[s] individuals of a particular race, color, or national origin." 45 CFR 80.3(b)(2).

Due to our limited staff capability, and because of the size, both in terms of staff and current caseload, of the California Department of Social Welfare, the Office found it necessary to select specific California counties to constitute a sample for purposes of reviewing compliance by the state with the requirements of Title VI in the area of client service. Eight counties were selected by the Office after consultation with your Department as the initial sample for the statewide evaluation: Alameda, Los Angeles, San Diego, San Joaquin, San Mateo, Santa Clara, Sonoma, and Tulare. According to data derived from 1970 Fourth Count Census Data, the population of these eight counties represents 59.1% of the total persons in the state; 75.3% of the total Black persons in the state; and 63.4% of the total Spanish-speaking persons in the state. Moreover, according to 1970 Fourth Count Census Data, persons in the eight counties listed above represent approximately 59% of the state's Spanish-speaking persons with income below poverty level and approximately 51% of all persons with income below poverty level. Basic caseload data were also obtained for 26 additional counties within the state (a list of counties is attached). Persons in these counties represent 18.4% of the state's total population; 10.3% of the state's total Black population; and 16.3% of the state's total Mexican American population.

The Office has also reviewed and made use of data contained in reports of the Mexican American Project dated April 1971 and October 1971, published by the California Department of Social Welfare and the Annual Statistical Report of the State of California for 1969-70, as well as client service data supplied by Alpha Beta Associates as of September 31, 1971 and January 31, 1972, for San Mateo, Santa Clara, Sonoma, San Diego, and Tulare Counties.

On-site reviews were conducted by members of our San Francisco Regional and Washington Office staffs in Sonoma, Alameda, San Joaquin, Santa Clara, and Los Angeles Counties. During these reviews, a large number of interviews with county employees, clients, and other interested community members and organizations were conducted. We have also reviewed client service questionnaires distributed and collected by our office at our request from employees of each of the eight counties listed above.

Unless otherwise noted, all other data forming the basis for the conclusions set forth in this letter were collected from sources within your Department, or its constituent agencies. The data so collected have been, in several instances, compared with Fourth Count Census Data relating to the social and ethnic characteristics of the minority populations of various counties within the state.

On the basis of this information, we believe that the current Title VI compliance status of the county welfare agencies in California is brought into question by the following findings:

1. Spanish-surnamed and Asian persons have been subjected to unequal treatment in the delivery of public assistance benefits and social services not because of a lack of eligibility or legal entitlement to benefits and services, but because of their national origin. Because of these clients' language and culture, their limited knowledge of the English language, and the failure of both state and county welfare departments to adequately take account of these characteristics, such clients frequently received inferior treatment and services. County departments failed to utilize staff with an understanding of the culture of, and with language skills necessary to communicate effectively to non-English-speaking persons.
2. Because of the use of the fixed caseload method (fixed number of cases for every eligibility and social service worker) for allocating human resources to clients, county welfare district offices in predominantly Black and Spanish-surnamed areas were providing inferior services to Black and Spanish-surnamed clients as compared to the services provided to clients in predominantly

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non-minority areas. The practice of providing an equal amount of professional staff time per case in minority and non-minority districts, despite a larger number of persons per case (and in most instances, a larger number of service needs as well) in predominantly minority districts, results in a substantial reduction in the time spent per client problem in such districts.

With regard to the first finding set forth above, our review indicated that county departments have, in many cases, failed to utilize culturally and linguistically competent client contact staff to serve both potential and currently enrolled non-English-speaking clients. Caseload data supplied by the state department and county welfare offices and Fourth Count Census Data indicated that as of January 31, 1972, within the eight-county sample large numbers of Spanish-surnamed public assistance cases, ranging from 51.5% in Alameda County to 94% in Tulare County, are Spanish-speaking. These data reflect, in summary, that a substantial percentage of all Spanish-surnamed persons in the aforementioned counties speak Spanish, not English, as the language of regular communication. As I am sure you are aware, several county welfare offices make use of a caseload data record system which separates all Spanish-surnamed clients into primarily English-speaking and primarily Spanish-speaking subcategories. As used in this letter, the term Spanish-speaking refers to persons who use Spanish as their primary language of communication.

Analysis of data obtained during the review revealed that in all counties and in most district offices, a substantial number of Spanish-speaking eligibility and social service cases do not receive services from a bilingual worker or agency-provided translator, or with the assistance of a bilingual friend or acquaintance. For example, in Los Angeles County's 22 Family District offices, approximately 49% of the Spanish-speaking eligibility cases were served by a bilingual worker, approximately 9% of the Spanish-speaking eligibility clients were served by an agency-provided translator, and approximately 2% of the Spanish-speaking eligibility cases were served by a bilingual friend or acquaintance. Consequently, 3,118 clients or 40% of the Spanish-speaking caseload in the 22 Family District Offices did not receive welfare services in Spanish from any source - either a bilingual caseworker, agency-provided translator, or bilingual friend or acquaintance. None of the 22 Family District Offices showed the capability, in terms of bilingual/bicultural staff, to serve the Spanish-speaking eligibility clients which they reported. In this regard, we were

particularly encouraged to learn per your September 19 letter of substantial gains made by the Los Angeles County Department of Public Social Services in the employment of Spanish-speaking eligibility workers since the date of our review.

In the other seven counties in which this analysis of bilingual client service capability was undertaken, the percentage of Spanish-speaking eligibility cases not served by bilingual staff ranged from 64.4% in San Diego County to 95.1% in Tulare County, and averaged 82%; the percentage of Spanish-speaking cases unserved by a bilingual eligibility worker, agency-provided translator, or bilingual friend or acquaintance ranged from 50% in Santa Clara County to 92.4% in Sonoma County, and averaged 55%.

A similar pattern of inadequate bilingual staffing with regard to Asian clients occurred in several district offices in Los Angeles County. For example, in the Metro North Adult District Office, data supplied by staff in questionnaires indicated that of 231 current Japanese eligibility cases, 131 or 56.7% had primary language skills in Japanese, and that of 558 current Chinese eligibility cases, 393 or 70.4% had primary language skills in Chinese. According to data supplied in the questionnaires, only 32 (11 Japanese and 21 Chinese) of these 524 non-English-speaking clients were served by a bilingual eligibility worker. Countywide data related to service to Asian clients by the Adult District Offices showed that of 334 (of 779 total) Japanese clients with primary language skills in Japanese, only 62 or 18.6% were served by a bilingual worker; and that of 502 (of 838 total) Chinese clients with primary language skills in Chinese, only 22 or 4.4% were served by a bilingual worker.

The failure of the county departments to provide linguistically competent initial client contact staff, i. e., telephone operators and receptionists, resulted in Spanish-speaking potential clients receiving markedly different treatment than other potential clients. Spanish-speaking clients have often been told to come back at another time, which imposes greater time delays, more required visits to the department's office and, as a result, the additional burdens of child care, transportation, and expenses. Spanish-speaking clients have also been told to come back with a child or neighbor who could translate, thereby deterring them from returning because of an understandable reluctance or refusal to have to disclose to children, neighbors, and acquaintances private information which the welfare department, by its own criteria, rightfully regards as highly personal and confidential. Spanish-speaking clients have also been asked to wait long periods

of time in order for a translator to be located and have, in many instances, been confronted with a breakdown of communication, thereby deterring enrollment or causing hardships not suffered by non-minority clients.

The inability of non-Spanish-speaking eligibility workers to communicate with Spanish-speaking clients has resulted in (1) the failure by eligibility workers to make available upward adjustments or emergency financial allocations to such clients when their changing circumstances allowed such changes; (2) the exclusion of many eligible Spanish-speaking clients from social services because of the eligibility worker's inability to identify the social service needs; and (3) reductions of benefits and, in some cases, termination of assistance to Spanish-speaking clients with whom non-Spanish-speaking eligibility workers could not effectively communicate. Further, the failure of non-Spanish-speaking social service workers, people who are responsible for evaluating clients' service needs and aiding in the provision of such services, to understand the important welfare-related problems of many Spanish-speaking clients has resulted in the failure of such clients to receive needed social services. As in the case of the initial client contact staff, the use by non-Spanish-speaking eligibility and social service workers of children or neighbors of clients and potential clients as translators has the effect of defeating or substantially impairing the objectives of the program with respect to many Spanish-speaking clients. We, therefore, concluded that the failure of the county departments to provide adequate numbers of Spanish-speaking eligibility caseworkers and social services workers resulted in the discriminatory treatment of Spanish-speaking clients.

Our review of the eight county welfare offices also revealed that little effort had been made to allocate currently available Spanish-speaking, Japanese-speaking, and Chinese-speaking staff so as to reduce as much as possible the number of non-English-speaking public assistance cases unserved by bilingual staff. For example, in San Joaquin County, there were 10 Spanish-speaking eligibility workers serving a total of 276 Spanish-speaking cases. Even utilizing a reduced caseload (75% of regular caseload because of the increased difficulty involved in dealing with many Spanish-speaking clients), a total of 980, or 704 more, Spanish-speaking clients than served could be served. Our study of Tulare County indicated that there were 15 Spanish-speaking eligibility workers with an average caseload

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of 36.4 Spanish-surnamed cases and 111 non-Spanish-speaking eligibility workers with an average Spanish-surnamed caseload of 35.6. With regard to social services in Tulare County, the 16 Spanish-speaking social service workers had a lower average Spanish-surnamed caseload (23.1) than the 55 non-Spanish-speaking social service workers (24.2). To the extent that Spanish-speaking personnel were not assigned to each identifiable unit within the department, i. e., telephone, reception, eligibility intake, ongoing eligibility, and each of the categorical social service units, there was a denial of service to Spanish-speaking persons.

From information gathered during the review, we have concluded that, in most of the county offices which we have reviewed, the absence of any form of agency-provided cultural awareness training for client contact and supervisory personnel resulted in a significantly lower level of understanding by staff of the unique characteristics of Spanish-speaking clients -- such as religious beliefs, family life, self-concept, and similar areas -- than the level of staff understanding of such matters with regard to non-Spanish-speaking clients. As we know you will recognize, an understanding of the cultural background of clients has an important and legitimate bearing on whether and how welfare benefits should be delivered. The lack of such understanding on the part of the staff of county welfare offices has, in our opinion, been a material factor in the current lack of delivery or differential delivery of benefits to the Spanish-speaking community.

We were pleased to learn in your September 19 letter of the significant effort made by the State Personnel Board to secure affirmative action plans from virtually all of the county welfare departments as well as the special minority employment effort underway in San Bernadino County. However, as we have indicated in our previous discussion and as you note in your September 19 letter, we do not intend to suggest or otherwise imply that the County Departments can only provide adequate services to Spanish-speaking and other non-English-speaking clients by utilizing only client contact staff who are members of the same ethnic groups. Rather, it is our intention to stress that in addition to utilizing staff who possess fluency in a language other than English, it is important that such staff, regardless of their own racial/ethnic identity, possess a familiarity and understanding of the total cultural environment of the clients they are to serve.

With regard to the second finding set forth above, our review indicated that county welfare agencies have provided inferior services to minority clients served by district offices in predominantly Black and Spanish-surnamed areas. As a result of the method for assigning staff positions and the size of caseloads; the use of the fixed caseload method (by which a fixed number of cases is determined for every eligibility and social service worker) regardless of the number of persons per case (and, thus, the number of service needs per case) resulted in a substantial reduction of the time spent per client and per client problem in predominantly minority districts. For example, in Los Angeles County, according to county welfare officials, fixed caseloads were established for all district offices as follows: 9 intake eligibility cases per day; 130 ongoing eligibility cases per month; 60 social service cases per month. Based on the data collected during our review, including interviews with county welfare officials in both predominantly minority and predominantly non-minority district offices, it has been determined that:

1. The average number of persons per case in predominantly minority district offices is substantially larger than the average number of persons per case in predominantly non-minority offices.
2. The number of client service problems per case for both the ongoing eligibility service and social services provided by the agency are substantially greater in predominantly minority as compared to non-minority areas.

Further, the language problem detailed in our first finding exacerbates the caseload assignment system, in that the task of determining intake eligibility for Spanish-speaking persons is substantially more difficult than for English-speaking persons, and in that the use of translators reduced the actual amount of communication by at least 50%. The utilization of a system in which the allocation of staff time is based on the number of cases as opposed to the number of persons or client problems has resulted in the provision of inferior services to clients in predominantly minority areas. Additionally, data revealed that under the policies of the Los Angeles County Department of Social Services, district directors could not adjust the requirements for new staff (additional staff positions) based on the number of persons or the number of client problems or on the number of potential cases, persons, or client problems

existing within the district but unserved by the district office. This policy acts to compound the provision of inferior services to minority clients based on the fixed caseload method discussed above.

Our review of the eight county welfare systems referred to above revealed that the location of district offices and sub-offices has, in many instances, resulted in a disproportionately heavy transportation/access burden on minority as compared with non-minority clients and potential clients. In order that the location of district offices and sub-offices not have the effect of defeating or substantially impairing the accomplishment of the objectives of the program (including access to enrollment and knowledge of program benefits) as respects minority persons, we believe that county offices must carefully analyze the impact of the location of current offices and any new district offices or sub-offices (or relocation of current offices or sub-offices) in terms of access by minority current and potential clients. In addition, we believe county offices should prepare and submit to the California Department of Social Welfare a report setting forth such an analysis which would be maintained in the files of that agency for an indefinite period of time.

As you will have noted already, our review concentrated on the difficulties experienced by the Spanish-speaking client, with references made in less systematic fashion to Asians and Blacks. The complaints filed with us required us to address the issue of discrimination against Spanish-speaking clients; problems encountered by other minorities were revealed through the same data, and are pointed out here so that you may have a fuller picture of our findings.

Because we know that you share our concern not only for the compliance of the various county departments of social welfare with the requirements of Title VI of the Civil Rights Act, but also with the basic issues related to the delivery of services to minorities raised in the findings set forth above, we were pleased to learn during our September 5 meeting of your current effort to develop a state-wide plan to improve client services (particularly with respect to client communication) in the county welfare offices. We recognize that the data and other information which has formed the basis for our findings may be somewhat dated and that subsequent actions at both the county and state levels, such as those outlined in your letter of September 19, may have already contributed significantly to the attainment of the comprehensive client service program contemplated by this letter. From our discussions with you,

we anticipate that both the thrust and the specific elements of the state-wide plan will be adequate to correct the deficiencies identified herein. We will appreciate the opportunity to review the Plan currently under development within the next 90 days. Let me renew our offer of immediate assistance with regard to the preparation and design of appropriate elements of the Plan, more specifically, those provisions relating to:

1. The provision of services to Spanish-speaking and non-English-speaking Asian eligibility and social service clients and potential clients by bilingual, culturally aware client contact personnel.
2. The allocation of staff and caseloads on the basis of the number of clients (client service needs) rather than on the number of cases.
3. The preparation of written reports analyzing the impact of the location (or relocation) of county offices on the access to such offices of minority clients and potential clients.

During the course of our review, we became aware of the significant efforts currently underway on a county-wide basis in Santa Clara County to correct many of the deficiencies identified in this letter. These efforts and those in Los Angeles and San Bernardino Counties cited in your September 19 letter as well as our discussions with you and members of your staff, lead us to believe that through aggressive leadership at the state and county level a substantial improvement in the delivery of services to such clients can be achieved.

Sincerely yours,

Peter E. Holmes
Director
Office for Civil Rights

LIST OF 26 COUNTIES FOR WHICH BASIC CASELOAD DATA WAS OBTAINED

COUNTY	COUNTY	COUNTY
Butte	Lassen	Siskiyou
Colusa	Madera	Stanislaus
Contra Costa	Modoc	Sutter
El Dorado	Placer	Tehama
Glenn	Plumas	Tuolumne
Imperial	Sacramento	Ventura
Inyo	San Benito	Yolo
Kern	San Bernadino	Yuba
Kings	Santa Cruz	

ANALYSIS OF WELFARE CLIENT SERVICE

Selected California Counties
As of December 31, 1972

COUNTY	ELIGIBILITY CASELOAD		SOCIAL SERVICES CASELOAD	
	<u>Number of Spanish- Speaking Clients</u>	<u>Number of Spanish- Speaking Workers</u>	<u>Number of Spanish- Speaking Clients</u>	<u>Number of Spanish- Speaking Workers</u>
ALAMEDA	1,868	28	767	19
LOS ANGELES (FBO & ADO)	50,090	463	14,562	230
SAN DIEGO	3,469	52	962	44
SAN JOAQUIN	3,189	10	1,054	6
SAN MATEO	473	2	120	2
SANTA CLARA	10,259	50	2,974	34
SONOMA	311	2	81	4
TULARE	4,023	10	1,245	16

Exhibit No. 20



State of Illinois

THE RIGHT
TO APPEAL
AND TO
RECEIVE
A FAIR HEARING

Department of Public Aid
222 South College Street
Springfield

Definitions

1. "Department" means the Illinois Department of Public Aid.
2. "Director" means the Director of the Illinois Department of Public Aid.
3. "County Department" means the county Department of Public Aid.
4. "Public Aid" means Aid to the Aged, Blind, or Disabled (AABD), Aid to Dependent Children (ADC), or Medical Assistance (MA-NG).
5. "Applicant" means a person who is applying for public aid.
6. "Recipient" means a person who is, or has been, receiving public aid.
7. "Appellant" means a person who has asked for a hearing on an action of the county department which he believes is unfair.
8. "Fair Hearing" means an informal but orderly proceeding before a hearing officer of the Department. All applicants for and recipients of public aid have an opportunity for an impartial review of decisions made by the county department by means of a fair hearing.

Advance Notice. A recipient of public assistance must be given 15 days notice in writing before a county department acts to reduce, suspend, or terminate his assistance. He will also be given the opportunity for an informal conference with a county department representative (within the 15-day period) to discuss the reasons for the proposed change. But this is not the same as an appeal, nor does it prevent him from appealing after such a conference.

Request for Fair Hearing. Any person receiving or applying for public aid may ask for a hearing on any decision which he thinks is unfair, but he must do it within 60 days after the county department decision has been made.

A person applying for public assistance may request a hearing if: 1) the county department does not take his application or does not act on his

application within 30 days (60 days for Aid to the Disabled or Medical Assistance for disabled persons);

2) he believes he was unfairly denied assistance; or 3) the county department authorized a check he thinks is too small.

A person receiving public aid may ask the Department of Public Aid for a hearing if: 1) he believes a mistake has been made in the amount of his check; 2) he believes his check has been stopped or the amount of the check reduced for no reason; 3) he objects to the manner in which he is given assistance—for example, in the form of protective payments; 4) he disagrees with the county department's decision to refer him for education, training, or other services or to exclude him from such services; or 5) he does not agree with other actions of the county department which affect his public aid grant.

Food Stamp applicants and recipients have the right to a fair hearing on decisions made which affect their participation in the Food Stamp Program.

Notice of Appeal. An applicant or recipient may make an appeal orally or in writing to the local county department or to the Illinois Department of Public Aid. The county department will provide a "Notice of Appeal" (DPA 103) which he may use in making his appeal.

The county department will provide information about community legal services that may be available to an appellant at the time a hearing is requested.

If the county department determines that an appeal of a proposed reduction in or discontinuance of an assistance grant is based on a question of fact or judgement and the recipient has appealed the proposed change within the 15-day advance notice period, assistance is continued unchanged during the hearing process. Assistance is not continued unchanged if it is determined that the appeal is based on an issue of law or policy, or the appeal has not been submitted within the 15-day period.

Case Review by the County. The county department (district office in Cook County) will review the action being appealed within 10 working days of the request for a hearing. If the changed deci-

sion is satisfactory to the appellant, the county department may then request that a form, "Request to Withdraw Appeal" (DPA 65) be signed. Only the person who appealed or his representative can withdraw his request for a hearing. He can withdraw his appeal any time before or during the hearing.

If the decision remains unchanged or the changed decision is unsatisfactory and the appeal is not withdrawn, a hearing officer of the state Department of Public Aid schedules a hearing and notifies by mail the appellant of the date of the hearing. This notice is usually sent at least seven days before the date of the hearing. When a hearing has been scheduled, the county department prepares a "Statement of Facts"—(DPA 102)—the facts upon which the county department made its decision—and will provide the appellant with a copy at least two days prior to the hearing.

When an appeal is withdrawn, the hearing officer may still decide to go ahead with the hearing in cases in which there is reason to believe that the hearing should be held in the best interests of the recipient or applicant.

Fair Hearings. Hearings are held in the county where the applicant or recipient lives. Unless circumstances make it necessary to hold hearings elsewhere, they are held in the office of the county department. The exception is Cook County where hearings are usually held in the office of the Illinois Department of Public Aid.

The person appealing a county department decision should take to the hearing any records and receipts or papers which might help him prove his claim (written proof of living expenses, income, medical bills, tax receipts, savings or bank account books, etc.). He or his representative will have the opportunity before and during the hearing to examine all documents and records which the county department plans to introduce as evidence in the hearing.

The hearing is held without cost to the appellant. The county department will provide for payment of unusual expenses (transportation, child care) that might prevent an appellant's attendance at his hearing, and for necessary transportation for the appellant's witnesses and representatives. Legal fees are not paid by the Department.

The Department may hold group hearings when each in a series of individual appeals has a common complaint and the only issue in question is one of policy.

Attendance at Hearings. Hearings are not open to the public. To keep the information confidential, the only persons who will be at the hearing are those directly concerned—the person making the appeal; his lawyer and any other persons he may need to help present the case; the member of the county staff directly responsible for the action for appeal; and the necessary witnesses for the county department. In cases involving medical questions such as disability cases or the incapacity of a parent, the county department asks the examining doctor to be present at the hearing. The appellant may request that his own doctor be present. Witnesses at the hearing are examined under oath.

At the Hearing. The person appealing a county department action is encouraged to tell his story in his own way. In no case shall any child who is under the age of 12 be questioned unless called as a witness by his parent. Hearing proceedings are recorded by a stenographer or tape recorder. No copy of such record will be furnished to any person unless the appeal goes on to court under the Administrative Review Act.

Depositions Permitted. When the appellant is outside the state or is unable to attend a hearing for physical or mental reasons, the Department may accept written information from the appellant and his witnesses, or permit witnesses acting on his behalf to present evidence in support of his claim. If a doctor cannot attend a hearing, he may submit his testimony in writing.

Hearing Officer's Report. At the conclusion of the hearing, the hearing officer prepares a written statement of the facts and recommends a decision. The Director of the Department of Public Aid reviews the report and either upholds, reverses, or modifies the county department action which was appealed.

Unless the appellant has requested a delay he will be notified by letter of the Department's final decision on his appeal within 60 days after the filing of the appeal and will also be notified of his right to judicial review of the decision under the Administrative Review Act.

Postponed Hearings and Rescheduled Hearings.

At the request of the appellant, a hearing may be postponed for a short period of time. When it is necessary to get more information, the hearing may be continued until a later date.

When an appellant, whose assistance has been continued unchanged as a result of his request for a hearing, does not appear at a scheduled hearing and fails to advise the hearing officer of his inability to attend, the county department may proceed with the proposed change in his grant. However, an inquiry will be sent and the appellant may continue with his appeal if he wishes to do so by answering the inquiry within 7 days.

The Official Report. The official report of the hearing consists of the documents filed in the case, along with the facts and the decision. At any time after the hearing decision, the appellant or his lawyer may review the official report in the office of the county department.

Payment of Grants. When the hearing decision favors the person making the claim, or when the county department changes its decision before the hearing, the county department will make a corrected payment. The correction in the amount of the assistance grant will begin with the month in which the error was made.

Exhibit No. 21

This exhibit was unavailable
for publication.

WELFARE CAREERS
AND
LOW WAGE EMPLOYMENT

This report was prepared by Joe A. Miller* and Louis A. Ferman of the Institute of Labor and Industrial Relations, The University of Michigan-Wayne State University, under a contract with the Manpower Administration, U.S. Department of Labor, under the authority of the Manpower Development and Training Act. Organizations undertaking such projects under Government sponsorship are encouraged to express their own judgments freely. Therefore, points of view or opinions stated in this document do not necessarily represent the official position or policy of the Department of Labor. (December, 1972)

Contract No. 51-24-69-05

*Currently Associate Professor, College of Human Development, The Pennsylvania State University

HIGHLIGHTS AND MAJOR FINDINGS OF THE STUDY

The study was undertaken as a comparative analysis of two wage poverty roles; working welfare recipients and non-welfare low-wage workers. The final research design required three samples: (1) a sample of working welfare recipients drawn from the rolls of the AFDC listings; (2) a sample of low-wage workers drawn from an enumeration of households in low income census tracts; and (3) a reinterview sub-sample chosen from the first two samples in the first wave, using selection criteria of family size and composition as well as family income from sources other than public assistance benefits. Detroit, Michigan was the research site for the study. Although women were heavily over-represented in the samples, there was a sufficient number of male respondents to permit comparisons.

A number of important observations, related to policy-making, emerged from the study:

(1) In general there were few differences between the working welfare recipients and non-recipient low-wage workers with respect to personal characteristics or background. Chance factors alone could account for some of the differences between the two groups. What seems apparent is that we are dealing with two facts of wage poverty but at the same social stratum; thus many of their experiences are common and their problems similar. Both groups are in poverty and both are groups in risk. For both groups there is an additive process of disadvantage in the labor market including the following factors: race, sex, education, southern origins and family disruption. There was no evidence that some personal characteristic(s) resulted in low-wage and unprestigious jobs or job instability. The evidence, on the contrary, pointed to a series of instabilities and problems that occurred frequently at this social stratum and which became randomly distributed. Those who become the victims of these instabilities and problems develop behavioral and attitudinal patterns that set them apart from other wage poverty workers. In this context welfare must be viewed as a problem-solving device to deal with these problems and instabilities rather than a long-range adaptation to life.

Of considerable importance is the fact that work for any group in this strata, welfare recipient or not, did not appreciably alter the economic resources or life situation. If the non-recipient low-wage workers were a standard than getting off welfare completely would not really improve the current situation of the recipient.

(2) The study results strongly indicated that sexism in low-wage employment reinforced racism. Women were disadvantaged compared to men even within the ranks of low-wage workers earning under \$2.50 per hour. Welfare recipients and non-recipients have approximately the same wage distribution when sex is controlled for (i.e., the lower average wages of welfare recipients reflect the fact that more are women).

(3) There is not as much instability in wages among low-wage workers as one has been led to believe. About one-fifth of the low-wage respondents reported pay variations due to seasonality of employment or periodic decline in business conditions. This form of earnings irregularity is small compared to what one would expect from discussions about low-wage workers. The number of garnishments are insignificant. Most variations of income are augmentations (e.g., overtime) and not losses in take-home-pay.

(4) The relative influence of formal education and training on wages was not uniform or strong. Within the narrow band of income in this study there was only a weak relationship between formal education and wages. There was a weak positive relationship for women (recipients: $r = .15$ and non-recipients: $r = .06$) and a negative relationship for men (recipients: $r = -.16$ and non-recipients: $r = -.26$). Among male recipients the correlation disappears when the high-wage welfare recipient group is included ($r = .00$).

The relationship between training and wages is also weak. Apparently, those on welfare have a higher chance for training than those not on welfare but the jobs and pay scales of the ex-trainees and non-trainees are quite similar. In the world of wage poverty as mirrored in this study, training apparently made little difference.

(5) The popular image that wage poverty revolves around part-time jobs is in error. The majority of the jobs held by low-wage workers in this study were full time jobs.

(6) Current occupational schema do not permit valid classification of low-wage jobs. A considerable amount of low-wage employment in this study did not fit neatly into conventional job categories.

(7) There is a tendency to view wage poverty workers in the aggregate as clustered within a short range of substandard wages. Such clustering, even conceptually, misses the range of wages that fall under the label of wage poverty. There are substantial differences within the low-wage worker group, of which hourly wage is just one. In short, across the spectrum of low-wage employment, there are "higher" and "lower" paid jobs which tend to concentrate in particular occupational attachments.

(8) Among female workers, both recipient and non-recipient, there is a crowding into a limited number of occupational categories (e.g., service work, low level clerical work). Such jobs are categorized by low wages and difficult working conditions. By contrast, males tend to have a much broader choice of jobs. Even within blue collar work, males have far more options than females regarding wages, training opportunities and promotions. Thus the poverty problems of female workers are further exacerbated by rampant sexism.

(9) Education has more of an influence on wages among females than among males. Part of the explanation lies in the fact that semi-skilled and service jobs that males tend to occupy place no emphasis on education. On the other hand, access to clerical jobs probably places a premium on some level of education but not necessarily the completion of high school.

(10) Union membership comprises a relatively small proportion of the current or more recent jobs held by low-wage recipients and non-recipients. Union membership does result in higher wages and indeed the high-wage members of the sample reported union membership. Union membership predominates in some industries more than others and the absence of union memberships in the low-wage samples is a reflection of the fact that few of the workers are in heavy industry where unionism is widespread.

(11) Workers in the samples recognized the value of fringe benefits. These benefits depended on industrial attachment. The availability of fringe benefits increases sharply as a function of union membership. Failure to have union membership usually means lack of access to fringe benefits.

(12) Workers place a high premium on "good pay, steady income" in describing a good job. Whatever other dimensions of a job are important in defining a good job, economic dimensions are primary for these workers.

(13) There is considerable variation in workers' estimates of chances for actually attaining each of the goals in the current job. Both high-wage recipients and other low-wage workers were least optimistic toward opportunities for achieving two of the three goals most closely connected to economic advantage in the current job--earning a higher wage or salary and having a chance for getting ahead at work.

(14) All in all, sizable proportions of the workers in each recipient sub-group--both high and low-wage workers--view their current jobs as having poor potential for wage or promotional advancement. Proportionately more of the high-wage recipients reflect a higher level of optimism with respect to these job-related goals, but well below half of these workers see much opportunity residing in either area. Certainly, a higher wage is no assurance of high expectations toward these two economic facets of the job, although high-wage recipients are somewhat more sanguine

on these points than are workers in low-wage jobs.

(15) Contrary to popular opinion time spent in employment is high for all groups of low-wage workers. The overwhelming majority of the males worked at least 50 percent of the time period or more (94 percent of the male recipients and 90 percent of the male non-recipients). Even among the females, the majority of the non-recipients worked at some job at least half of the time (66 percent) and the majority of the recipients approximated this standard. The "work ethic" problem is more apparent than real. Large blocs of time are spent in work.

(16) Males tend on the average to have had more employment episodes than females. The picture that emerges is one of sexism where women are crowded into a few jobs and men have a wider range of choices and options.

(17) The long range trend for low-wage working females is to shift away from household services. The female recipients drift toward clerical

and non-household service jobs while the female non-recipients move toward blue collar work.

(18) There appear to be well-defined patterns of exclusion from training and union membership. The amount of training and incidence of union membership is low. Part of this finding is explained by the fact that patterns of industrial attachment place low-wage workers in jobs that do not have training or union membership.

(19) In voluntary job changing as well as in seeking a job, personal and family problems have a heavier influence on women than on men. Undoubtedly such problems draw more on female than male resources.

I. INTRODUCTION TO THE STUDY

It has become commonplace in the 1960's and the early 1970's to characterize the welfare problem as a problem in work ethics. Welfare recipients are not a unitary group but may be differentiated by degree of dependency, structure of the family, employability potential of household members and degree of disability. The public has expressed a curious ambivalence toward people on welfare. There is little public complaint about paying public assistance to the disabled, blind and aged. By contrast, public feelings against recipients of Aid to Families of Dependent Children (AFDC) are tinged with anger and resentment. Most heads of AFDC households are of working age and without physical handicap. Women whose children are in school all day or are able to take care of themselves may

be receiving aid; unemployed males, eligible under provisions offering assistance to families with an unemployed parent, are even more often able to work if they can find jobs. As the number of AFDC recipients has increased, so has the proportion on welfare who could be supplementing their income through employment or could leave the rolls altogether to work. Public criticism of the program has focused on expending large sums of tax revenues on people who are capable of working but apparently do not do so.

The condition of these "welfare poor" has also been increasingly contrasted with the "deserving poor"--people who are in poverty but are full time or substantial participants in the labor market. Jerome Rosow, ex-Assistant Secretary of Labor has described the problem as a question of equity. Rosow argues that it is morally wrong for one family to receive

a doll, exempting the adult(s) from work while in another family of similar circumstance the adult(s) have a full-time or substantial work role. Implicit in Rosow's argument is the distinction between the poor who do work and the poor who do not work. They are polar types that apparently cope with poverty in different ways; one by assuming a work role and the other by assuming a welfare status.

But the distinction made by the Social Security Act of 1935 between those who can support themselves and those who cannot has proved unworkable. The distinction assumed two air-tight categories. Instead the worlds of work and welfare are closely intertwined. AFDC family heads need not make an "all or nothing"-choice but may select the best combination of both. As the number of AFDC recipients has increased, so has the proportion of those on welfare who supplement their income through employment.

Rather than two polar types--the "welfare poor" and the "working or deserving poor"--we have become aware of a continuum between work and welfare where large numbers of welfare recipients are attached to the labor market either as full or part-time workers or as job seekers. Although it is a popular stereotype that welfare recipients are unable or unwilling to work, enjoying the dole as chronic freeloaders, the reality is that: (1) large numbers work or seek work; (2) there are fluctuations in income among AFDC families that cannot be explained without recourse to non-welfare income; and (3) there is a tremendous turnover in the welfare case load, indicating a movement from welfare to other statuses, including job holding.

What has been lost sight of in the network of intense feelings surrounding discussions of welfare and the work ethic is that the AFDC

program is primarily a children's program and is designed to provide service to children who are in families of limited resources. The adults in the AFDC family gain a measure of support only as elements in the service and care of the children. Thus, adult access to and dependence on a welfare status are determined by the status of the children in the family and concern for their welfare rather than a desire to service the needs of the family adults. The AFDC household head acquires and holds that status largely as a function of the children's needs rather than his own. The AFDC household head is dependent on the life situation of his children for his status and as their needs or situation changes so does his status. For example, as the children become self-supporting, his legal claims to the AFDC dole terminate. It is probably not an overstatement to suggest that for certain socio-economic groups, receipt of public assistance at

some time is a normal occurrence for many families and has little to do with the motivation of poor adults to work.

Workfare and Welfare: A National Issue

The public debate on AFDC families has been more concerned with the rhetoric of the work ethic for AFDC recipients than with the reality of work. Substantial numbers of the public feel that AFDC household heads should work but little has been said about the conditions that make work possible. For example, it is apparent that large numbers of AFDC families have dependent children and that for an adult to work, particularly in a single-parent family, some child care arrangement must be established and supported. Again, large numbers of AFDC mothers are young and untrained. It may be unrealistic to think that these mothers can be put to work without considerable prevocational training or counseling. Thus, the conditions

to establish employability must be thoroughly analyzed and identified before large numbers of AFDC recipients can enter the labor force.

Three other considerations loom large also. First, does movement from a welfare status to a job role appreciably benefit the AFDC family and particularly its children? Is the gain in income, self-esteem and social respect worth the price if contacts between parent and child are reduced? The argument has been made that working mothers are becoming the rule rather than the exception in our society. Thus the advent of the AFDC working mother introduces a "normality" rather than an abnormality in family life. The crux of this discussion lies in the nature of family problems that must be solved. AFDC family problems may be so severe, that the absence of the parent at work may exacerbate the problems; a situation quite different from families with a more stable history and structure.

Second, it is assumed that a "working poor" role is more beneficial for the family than a welfare role, both in terms of increased self-esteem for the job holder and resources for the family. We must consider that the welfare role may give to the AFDC family a problem-solving and resource capacity that cannot easily be matched by the kinds of jobs that have traditionally been made available to ex-welfare recipients. These jobs, usually both low wage and dead-end, are not usually associated with a high level of self-esteem and satisfactory resources. The question here is not merely one of any job but rather a good job and the latter may be hard to produce.

Finally, there may be a need in AFDC families to redefine "work", "leisure" and "family obligations". The running of a family by a woman in a single parent household may require extensive skills--coordinative,

problem-solving and functional. Above all it may require a high level of effort and work activity. Society has not yet come to the point of defining such activities as "work" but rather views them as "household obligations" not to be recompensed. The same activities performed for another household as a domestic worker is characterized as a work role to be compensated. Such is the anomaly that the ADC mother frequently finds herself in.

We must then consider that the issue of welfare and workfare springs from the cries of an outraged public and bears no relationship to the actual needs of the AFDC family for more resources and a better life. Any answer to the question of workfare must go beyond public indignation and focus on the needs of the AFDC family, particularly whether workfare will add some substantial strength to the family unit.

Federal Government Programs in Welfare and Workfare

Until 1961, the "welfare poor" were considered to be outside of the labor force. In that year, the federal government extended AFDC coverage to families headed by an unemployed male parent (AFDC-UP). In 1962, the Social Security Act was amended to subsidize employment programs for relief recipients. Until this time, the law did not provide funds for employment rehabilitation. States were encouraged to adapt Community Work and Training (CWT) programs designed to offer work relief rather than handouts. The projects under this program had several marked drawbacks. First, little or no training was involved. The major emphasis was on "working off the dole" rather than preparation for the world of work. Second, the program emphasized social services far more than employability measures. State reimbursement formulae favored social services rather than employment

programs. Finally, almost all projects had a built-in work disincentive, viz., income earned was deducted from the welfare payment.

Under the Economic Opportunity Act of 1964, the CWT program was expanded. The Work Experience and Training (WET) of EOA both broadened the eligibility and provided training funds to develop work skills. The training was poorly organized and often inadequate. Most enrollees had multiple handicaps and there was little experience in dealing with such problems in preparation for work. The job placements that were made were in unskilled, low wage, dead-end jobs; opportunities that were not even marginally better than the welfare status and in some cases, much worse. Like CWT before it, WET was more an income maintenance and/or relief program than work preparation.

The Work Incentive Program (WIN) was enacted in 1967 as an amend-

ment to the Social Security Act. It represents the most ambitious attempt at work rehabilitation of welfare recipients. Combining the resources of the state welfare service with the state employment service, the program offers a combination of prevocational and post-vocational services to qualified clients: orientation and counseling, placement, training, job development and job coaching. From the beginning the program has emphasized employability planning and placement into jobs with opportunities for advancement and good wages. The candidates for the program were "the most employable" and thus represented a "creaming" of welfare recipients. The program had a work requirement--applicants had to be registered for jobs--but in contrast to previous programs most states had an income disregard provision that permitted exemption of some income from welfare accounting systems. Thus, there was an incentive for the welfare recipient to

participate in the program. Ambitious attempts were also in evidence to supply child care services for AFDC families to "free up" mothers with pre-school children for employment. Three problems have been apparent in WIN from the beginning: (1) job placements were in low paying, dead-end jobs and since the recession of 1970, even these opportunities have been few; (2) wages from work have not been competitive with the value of income/services in the welfare program; and (3) the "hard core" welfare recipient is not reached since the emphasis is on immediate employability rather than long-range rehabilitation.

The purpose of these efforts was to allay public criticisms of relief payments to persons able to work and to develop service programs that would "rehabilitate" recipients. In both of the goals, there has been failure. Public criticism continues unabated and only a small fractional dent has been made in rehabilitating welfare recipients.

The Context of the Study

In this study we are addressing ourselves to the work experiences of working welfare recipients and low income workers who are not on the welfare rolls. Specifically, we are looking at two faces of wage poverty: (1) the low income worker who draws his resources and sustenance from a mix of welfare and workfare; and (2) the low income worker who draws his resources wholly from the labor market. The working welfare recipient is in sharp contradiction to the stereotype of the unmotivated, work-avoiding welfare recipient that seems to permeate conventional wisdom and the mass media. Likewise, the low wage worker represents an anomaly. Poverty is usually associated with unemployment and work is not associated with

poverty. The existence of "working poor" thus represents a paradox of the first order.

In truth we know very little about the low wage workers in our society, except that they represent a paradox. Various snapshots have been taken of them and as a result we are beginning to identify their personal characteristics as well as their occupational and industrial location in our society. What is lacking is some picture of the labor market experiences of such workers, the working conditions that characterize their jobs and the career patterns that predominate in this group. We know next to nothing of the job mobility patterns of such workers and the correlates of such job shifts. We know far less about the comparative experiences of different kinds of low wage workers and how one group may differ from another. In cases where a welfare status is combined with or

alternates with a work status, we are still very much in the dark about the linkages between welfare and workfare, and particularly, the conditions that sustain or inhibit labor force participation for welfare recipients.

It is unfortunate but it is in these areas that stereotypic thinking predominates. For example, one assumes that child care is an essential ingredient of a work role for a welfare recipient and a considerable number of policy decisions have been made on the basis of this assumption. There is considerable consensus among policymakers that motivation for work is what separates the "working poor" from the "welfare poor" and policy decisions have been made on the basis of this assumption. There is rhetoric that suggests that training makes a difference for welfare recipients and policy decisions have been made on the basis of this assumption.

In this report we have intentionally tried to identify a number of assumptions that underly these stereotypes and test out propositions that would either confirm or deny the validity of the stereotypes. This process is a necessary first step if policy-making is to become empirically oriented. The objective in this report is two-fold: (1) to shed some light on the assumptions underlying the policy choices that face us in welfare and workfare, and (2) to test the limits of these assumptions as mirrored in the experiences of wage poverty workers.

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Assumptions and Stereotypes Underlying Policy
Decisions on Workfare and Welfare

Since the onset of the WIN program, an increasing bloc of time and effort has been spent by researchers on the study of poverty, welfare, dependency and workfare. This research has been developing

against a background in which conventional wisdom on these topics is prevalent. A number of policy issues have developed, underpinned to a large extent by stereotypic thinking and a number of untested assumptions. Work motivation and work incentives, supportive services for work adjustment, the structure of the labor market--all of these topics which have become the subject of research also have "popular explanations" that have influenced and continue to influence policymakers.

In this section, we will highlight a number of these policy issues and review the stereotypes and assumptions that underpin them. In the main body of the report we have sought to shed some empirical light on these propositions, particularly as they underpin major policy issues.

The Missing "X" Theory

At the core of discussion about welfare and workfare is the distinction between those who work and those who do not. Aside from this, there is some differentiation of poor people on the basis of whether they receive welfare services or not, regardless of whether they are working. These distinctions manifest themselves in two ways. First, there is a common assumption that the welfare poor are characterized by a "missing X" factor; be it lack of motivation, lack of credentials or lack of good working habits. If the "X" factor can be discovered or identified, then a program of rehabilitation will be possible. The answer is usually expressed in a program that stresses supportive services (therapeutic and educational), designed to remedy the personal inadequacy. Second, there is a tendency to simplify the problems of

the welfare recipient by placing a great deal of faith in rehabilitation through removing these personal inadequacies. In this formulation, little credence is given to labor market factors as influences in the development and maintenance of welfare statuses.¹

There is increasing evidence that the "welfare poor," be they working or not, are not substantially different from groups of non-welfare

¹This formulation can be phrased as human capital investment (supply) versus labor market structure (demand). The human capital theory emphasizes the need for human capital investment (education and training) to improve the market value of the job candidate while the labor market structuralists would argue that the structure of the labor market must be manipulated or changed to provide more and better opportunities (e.g., higher minimum wages or anti-discrimination legislation).

low-wage workers.² Rather, the welfare poor may represent another face of poverty among people who come from the same socio-economic strata. The plight of the welfare poor may result from a chance distribution of crisis or catastrophic events rather than some "missing X" factor. If this were the case, then systematic programs designed to remedy a personal inadequacy and beamed at welfare recipients would be a misdirection. The solution would lie more in the fundamental properties of low-wage work than in a welfare recipient status.

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Availability of Quality Jobs and a Career Ladder

A major assumption of a great deal of policy-making is that "good

² Leonard Goodwin, A Study of the Work Orientations of Welfare Recipients Participating in the Work Incentive Program, Brookings Institute, August, 1971 (D.O.L. Contract No. 51-09-69-02)

jobs" would be available for welfare recipients if they were motivated to work. A variation of this thesis is that job ladders exist at all levels of the society and if a person shows his ambition through hard work and effort, there is always the opportunity to advance. These assumptions are at the core of the income disregard welfare provisions that exist in some states. The welfare recipient goes to work and his welfare payments combined with his work income are expected to maintain him and his family initially at some specified family income level (i.e., his work earnings do not initially reduce the size of his welfare dole). Over time, however, the dole is reduced because his work earnings increase and make it progressively possible for the welfare recipient to give up his dependency on the welfare dole.

There are really two questions being asked here: are there jobs for the poor and are these quality jobs? There is no doubt that at any point of time a number of job vacancies exist. Some of these require extensive preparation and credentials and it would be difficult to move undertrained and unskilled workers into these vacancies. At the same time, there is a series of jobs characterized by low wages, little mobility opportunity, substandard working conditions and lack of fringe benefits and/or union protection. These latter jobs, often called the "dirty jobs of the society," are characterized by high turnover and low prestige. It is these jobs that are generally open to the graduates of training programs where the enrollees are unskilled and lack credentials. This is a proposition that has been well-documented in the official statistics of manpower programs. A

more favorable outcome of these programs is access to high pay, blue collar jobs usually in some heavy industry, production line sector of the economy. But these latter jobs are usually not available to female graduates and actually only to a handful of male graduates. There is a further reality here: blue collar, production line jobs (particularly in the automobile industry) are marked by periods of unemployment and layoff since the demand for the product is volatile and subject to considerable fluctuation. The reality, then, is that there are jobs available but (1) they are undesirable by any social standard, (2) they are not linked to career ladders and (3) the financial return from these jobs is frequently not competitive with the service/financial income from welfare. Most of these jobs are in the service sector.

The extraordinary measures that have been employed by manpower

agencies in job placement and job development to obtain jobs for the hard-to-employ are added evidence that access to well paying, high mobility jobs is not easy for unskilled workers who are tinged with added burdens of discrimination. Even entry into such jobs may guarantee little since such workers are the first victims of job layoff when the economy takes a turn for the worse.

The Perseverance of a "Welfare Career"

Another assumption that has strong roots is that welfare recipients seek and desire a "welfare career" or spend a large part of their lives away from the labor market. In program terms, this manifests itself in services to orient the welfare recipient to the world of work. This "orientation mania" manifests itself in all training programs but

particularly in those given for welfare recipients. There is considerable evidence that the welfare recipient is no stranger to work.' In 1968, about one fifth of all AFDC recipients worked full-time while on welfare. Most welfare recipients have also had some work experience in the past. The most central point, however, and one not fully grasped, is that welfare is used as a temporary measure and rarely becomes a lifetime career.

There is also a well-developed perception about intergenerational welfare: the welfare status is socially (and some would even say biologically) inherited and may be transmitted along family lines for several generations. "Let's break the dependency cycle" is a favorite formulation of this thesis. The reality is far removed from the perception.

The Homogeneity of Welfare Populations

A popular stereotype is that the prototype AFDC household unit consists of a single (divorced, separated, widowed or unmarried) female head of household with a large number of dependant children. The emphasis on child care services and training in the WEN program reflects this perception. In reality, the AFDC population can be quite varied. Scant attention is given to the AFDC-UP family, headed by a male with his spouse present. His problem is apt to be quite different from that of the single parent, female-headed family. He is apt to have had long-term labor market participation and thus not need training. He is also likely to have held jobs in high paid, semi-skilled work so that in normal times, his wages were not low.

In developing policy, a number of gradations in the welfare

population are not considered. Working AFDC recipients may hold low-wage or high-wage jobs. They may be chronic users of welfare services or be new to the status. They may be long-term or short-term cases. In the family with both spouses present, the need may be for a family allowance rather than services. Of particular interest is the wide range of household arrangements that exist, from the single parent and dependent children to the husband-wife and children with the presence of related kin or boarders. The presence of such extra members can add to or subtract from family stability since they can add to or drain off resources.

It is crucial to recognize this variability in the development of policy.

Credentialism and Status Mobility

For the last decade, the approach to disadvantage in the labor market has stressed the need to develop credentials for the poor through education and training. The assumption has been that such credentials enhanced opportunities for employment and job mobility. At most, this assumption fits middle class people in high-wage jobs. The evidence is mounting, however, that for lower class people in the world of "dirty jobs" and dead-end jobs, the assumption needs to be revised. In this stratum of economic life, educational achievement and special training are frequently discounted. The jobs require little skill and can be done by anyone. The same is increasingly true in semi-skilled operative work. Even when the job demands special credentials and the applicant has these, he may be barred from the job on the

grounds of discrimination or because he is geographically isolated from the work place. We must recognize the limitations of credentials by themselves in gaining access to a job or holding it.

The Debilitating Effects of the Welfare Status

A considerable body of opinion, often expressed emotionally, sees the welfare status as a debilitating role where the recipient is locked into a network of dependency relationships. Programs for welfare recipients may take the form of "liberating the person from dependency." But such a proposition fails to realize that the welfare status may provide access to services that are not easily available to the non-recipient, low-wage worker. Counseling, medical care and increasingly training, are more easily available to the welfare recipient than to non-recipient, low-wage workers. This suggests that the welfare recipient

role may be far from debilitating and actually provide resources that remove serious strains from life.

Barriers to Employment

Another common assumption is that welfare recipients could work if some barriers to employment were somehow removed. Such barriers include: lack of credentials, lack of access to transportation, lack of child care facilities, lack of access to medical care and lack of access to training. The evidence is overwhelming that such barriers do indeed haunt the poor but, as Schiller³ has noted, the really critical issues with respect to employment are: (1) to what extent removal of these obstacles will increase employment and (2) what kinds of administrative

³Bradley R. Schiller, "Empirical Studies of Welfare Dependency: A Survey", (unpublished paper), n.d.

intervention are necessary to remove them. What is important here is that some services or service delivery is necessary if employment is to be achieved.

This raises the further questions: what services, would they be used and, if so, with what effect. Services to be used must be relevant to the life problems of the poor and thus a primary starting point must be the universe of need of various poor populations. We could also conceive that such services might be well formulated and well delivered but have no real impact. In all of these concerns we must become more aware of the welfare recipient, and what he wants if we are to improve the chances of effective service delivery.

The Dual Economy Perception

In recent economic discourses on the labor market, it has become popular to conceive of a dual economy: a high-wage economy and a low-

wage economy. The first economy includes industries with high wages, jobs with good mobility potential, security with union protection and fringe benefits and work requirements that stress training and education. The second economy includes industries with low wages, jobs that are dead-end, little job security and a lack of formal work requirements. According to the theory of the dual economy, workers in the low wage economy rarely gain access to the high wage economy. Workers in the low wage economy experience great job instability and have chaotic work careers marked by frequent episodes of layoff and unemployment. Workers in the low wage economy lack skills and come from an environment which fails to emphasize or inculcate the virtues of work discipline; a primary requirement for employment in the high wage economy.

Many of these assertions are speculative rather than empirical.

We know little, as yet, about job mobility patterns or life work careers among the poor. Of particular importance, we have little information on the patterns of exchange between workfare and welfare. Until such empirical knowledge is developed, we are in the dark about both experiences and potential capacities of those in wage poverty.

Summary Remarks

These are, then, the main reference points toward which the study is oriented. Our goal is not simply to present a picture of social dependency in a large American city nor to provide another contrast between the "welfare poor" and the "deserving poor." Rather this is a study in the stresses and strains in the work role of low-wage workers; be they welfare recipients or not. Implicit in the following chapters is the interdependence between workfare and welfare. As will be seen,

for many low wage workers, a job requires combining elements of the two rather than assuming an all-or-nothing welfare recipient role.

We undertook to study this problem by establishing personal contacts with low-wage workers rather than confining our observations to case record materials or interviews with the gatekeepers of the welfare institution. We made use of two quite different samples of wage poverty so that we could test out and qualify (if necessary) statements that could not be universally applied to low-wage workers. This ability to provide contrasts within the world of wage poverty gives us a high degree of confidence that the data and findings presented are of no little importance in expanding the knowledge of the "wage poor."

VII.

SUMMING UP:
RESEARCH FINDINGS AND POLICY IMPLICATIONS

In the preceding chapters, we have detailed the methodological underpinnings of the study as well as developed a portrait of the personal and social characteristics of the respondents, their labor market experiences, their perception of the opportunity structure and their past patterns of worker mobility. The study sought to go beyond a mere cataloguing of the characteristics of low-wage workers and set as an objective the identification of work career patterns. We were concerned with who these workers were but we wanted also to know where they had been in the world of work, where they were now and where they perceived themselves to be going.

In this chapter we will seek to sum up the major findings of the study as well as suggest some major policy implications. Before we move on, let us introduce a note of caution. The low wage populations of Detroit described in this report may or may not be comparable to the low wage populations of other cities. In many ways the Detroit labor market is unique. Employment is highly volatile because of the dependence on the automotive industry with its interruptions due to changeover and its unstable consumer demand. Thus, the Detroit labor market swings from periods of high employment to periods of high unemployment in short intervals of time, making economic life very uncertain. Furthermore, it is a "workingman's economy" because of the dependence on

heavy industry production with large numbers of male dominated production jobs. Female employment is concentrated in lower paying jobs. Finally, it is still largely a one-industry labor market (automotive manufacturing) where large numbers of unskilled and uneducated people can be quickly absorbed without any training. These peculiar patterns of the labor market must be recognized and appreciated to understand the Detroit patterns of low-wage employment.

Low Wage Workers in Detroit:
A Profile

In this study we were concerned with two faces of wage poverty: working welfare recipients and non-welfare low-wage workers. In general

there were few differences between the working welfare recipients and non-recipient low-wage workers with respect to personal background or background. Chance factors alone could account for some of the differences between the two groups. What seems apparent is that we are dealing with two faces of wage poverty but at the same social stratum; thus many of their experiences are common and their problems similar. Both groups are in poverty and both are groups in risk. For both groups there is an additive process of disadvantage in the labor market including the following factors: race, sex, education, southern origins and family disruption. There was no evidence that some personal characteristic(s) resulted in low-wage and unprestigious jobs or job instability. The evidence, on the contrary, pointed to a series of instabilities and problems that occurred

frequently at this social stratum and which became randomly distributed. Those who became the victims of these instabilities and problems develop behavioral and attitudinal patterns that set them apart from other wage poverty workers. In this context welfare must be viewed as a problem-solving device to deal with these problems and instabilities rather than as a long-range adaptation to life.

Of considerable importance is the fact that work for any group in this stratum, welfare recipient or not, did not appreciably alter the economic resources or life situation. If the life situation of the non-recipient low-wage workers was a standard their getting off welfare completely would not really improve the current situation. This is because the combined value of services and cash from welfare generally exceeds

the value of the income from low-wage employment.

Let us recapitulate our argument to this point. There is a set of linked characteristics in our society that expose a person to wage and job instability:

1. rural origins with poor opportunities for quality education;
2. in-migrant experiences and status;
3. racial status;
4. sex status; and
5. poor educational and skill preparation

These, in turn, give rise to economic, wage and occupational instability: the precursors of the hard-core unemployed, the underemployed and the low-wage worker. These groups of workers become spatially clustered (ghetto,

barrio) and come to constitute a distinct stratum in our society. Within this stratum distinctive life styles emerge and develop; and for the most part these life styles exist in an environment of economic uncertainty, resource insufficiency and lack of access to services. Within such an environment, there is a high frequency of crises and emergencies (lack of resources, illness). All people in this stratum are susceptible to these crises but they are randomly distributed. The problems are not of a long-run, disabling nature, but rather, short term and require a dependence on institutional aid. Many of these problems are easily managed in the middle class but in this stratum everyone is riding "on the margin" between security and distress. These people are literally "teetering on the edge" and a slight push would send them into prolonged economic distress. One could "knock on any door" and find potential victims.

Sexism. At this stratum, there are various indicators of distress but the startling fact is that on each indicator women fare more poorly than men, even when the race factor is taken into account. Racism has been hypothecated time and time again as the factor in low wages but our study clearly indicates that for Detroit at least, sexism reinforces racism and is more important in accounting for the prevalence of low-wage incomes. The panaceas of training, education and anti-race discrimination legislation would leave this problem untouched.

Sexism is apparently found at all levels of the society (even in the low-wage sector). This has been masked largely because the sexual revolution is a middle class revolution stressing differences in economic and social opportunities between middle class men and women. Our study

clearly shows that such differences exist even in the lowest economic strata of the society. Such differences are reinforced and maintained by patterns of assigning high skill training opportunities in our society (biased against women), by the fact that industrial production jobs (high wages) go to men rather than to women, and high skill "women's jobs" require extensive certification.

What stands out clearly is that in Detroit for the low-wage workers studied, the low wage labor market is essentially a woman's labor market dominated by low-level clerical and service employment. Women workers in the low wage labor market were disadvantaged relative to men because they did not build continuous work history records; the basis of job and wage mobility. They were kept from doing this because: (1) child-bearing removed them from the labor market periodically; (2) married

women are more prone than their husbands to change jobs in response to family crises and (3) "women's jobs" have more instability and turnover than male jobs where union membership acts as an insulator.

These observations lead us to two important policy conclusions about low-wage employment. First, the emphasis should not be on welfare recipient versus non-welfare recipient (meaningless categories) but rather on male workers versus female workers. Second, the emphasis should be shifted from one of a welfare problem to one of a labor market problem. We are saying that even if the welfare problem was solved, we would still have to restructure the operation of the labor market for people in this stratum to reduce the employment inequities for women. Simply supplying more jobs or training opportunities will not solve the problem of low-wage

employment for women and it is for this group that the problem can only be solved by changing the operation of the low-wage labor market (e.g., by opening up prestigious, well-paying jobs to women). If the high wages are in industrial work, it may mean that women at this strata will remain disadvantaged until they are given greater access to these jobs. Granted that "dirty jobs" exist in all societies and must be done, the compelling question becomes: why should they be done exclusively by women (or by any other social grouping such as blacks or chicanos)? Our study has shown that even opening up white-collar jobs to women in this stratum does little good because these jobs are unskilled, low-paid clerical jobs without prospects for advancement. The clear need is to open up high-wage, blue-collar jobs to women in this stratum.

Major Findings of the Study

A number of important observations, related to policy-making, emerged from the study:

(1) The study results strongly indicated that sexism in low-wage employment reinforced racism. Women were disadvantaged compared to men even within the ranks of low-wage workers earning under \$2.50 per hour. Welfare recipients and non-recipients have approximately the same wage distribution when sex is controlled for (i.e., the lower average wages of welfare recipients reflect the fact that more are women).

(2) There is not as much instability in wages among low-wage workers as one has been led to believe. About one-fifth of the low-wage respondents reported pay variations due to seasonality of employment or periodic decline in business conditions. This form of earnings irregularity

is small compared to what one would expect from discussions about low-wage workers. The number of garnishments are insignificant. Most variations of income are augmentations (e.g., overtime) and not losses in take-home-pay.

(3) The relative influence of formal education and training on wages was not uniform or strong. Within the narrow band of income in this study there was only a weak relationship between formal education and wages. There was a weak positive relationship for women (recipients: $r = .15$ and non-recipients: $r = .06$) and a negative relationship for men (recipients: $r = -.16$ and non-recipients: $r = -.26$). Among male recipients the correlation disappears when the high-wage welfare recipient group is included ($r = .00$).

The relationship between training and wages is also weak. Appar-

ently, those on welfare have a higher chance for training than those not on welfare but the jobs and pay scales of the ex-trainees and non-trainees are quite similar. In the world of wage poverty as mirrored in this study, training apparently made little difference.

(4) The popular image that wage poverty revolves around part-time jobs is in error. The majority of the jobs held by low-wage workers in this study were full-time jobs.

(5) Current occupational schema do not permit valid classification of low-wage jobs. A considerable amount of low-wage employment in this study did not fit neatly into conventional job categories.

(6) There is a tendency to view wage poverty workers in the aggregate as clustered within a short range of substandard wages. Such clustering, even conceptually, misses the range of wages that fall under

the label of wage poverty. There are substantial differences within the low-wage worker group, of which hourly wage is just one. In short, across the spectrum of low-wage employment, there are "higher" and "lower" paid jobs which tend to concentrate in particular occupational attachments.

(7) Among female workers, both recipient and non-recipient, there is a crowding into a limited number of occupational categories (.e.g, service, work, low level clerical work). Such jobs are categorized by low wages and difficult working conditions. By contrast, males tend to have a much broader choice of jobs. Even within blue collar work, males have far more options than females regarding wages, training opportunities and promotions. Thus the poverty problems of female workers are further exacerbated by rampant sexism.

(8) Education has more of an influence on wages among females

than among males. Part of the explanation lies in the fact that semi-skilled and service jobs that males tend to occupy place no emphasis on education. On the other hand, access to clerical jobs probably places a premium on some level of education but not necessarily on the completion of high school.

(9) Union membership comprises a relatively small proportion of the current or more recent jobs held by low-wage recipients and non-recipients. Union membership does result in higher wages and indeed the high-wage members of the sample reported union membership. Union membership predominates in some industries more than others and the absence of union memberships in the low-wage samples is a reflection of the fact that few of the workers are in heavy industry where unionism is widespread.

(10) Workers in the samples recognized the value of fringe benefits. These benefits depended on industrial attachment. The availability of fringe benefits increases sharply as a function of union membership. Failure to have union membership usually means lack of access to fringe benefits.

(11) Workers place a high premium on "good pay, steady income" in describing a good job. Whatever other dimensions of a job are important in defining a good job, economic dimensions are primary for these workers.

(12) There is a considerable variation in workers' estimates of chances for actually attaining each of the goals in the current job. Both high-wage recipients and other low-wage workers were least optimistic

about opportunities for achieving two of the three goals most closely connected to economic advantage in the current job--earning a higher wage or salary and having a chance for getting ahead at work. . .

(13) All in all, sizable proportions of the workers in each recipient sub-group -- both high and low-wage workers -- view their current jobs as having poor potential for wage or promotional advancement. Proportionately more of the high-wage recipients reflect a higher level of optimism with respect to these job-related goals, but well below half of these workers see much opportunity residing in either area. Certainly, a higher wage is no assurance of high expectations toward these two economic facets of the job, although high-wage recipients are somewhat more sanguine on these points than are workers in low-wage jobs.

(14) Contrary to popular opinion time spent in employment is high for all groups of low-wage workers. The overwhelming majority of the males worked at least 50 percent of the time period or more (94 percent of the male recipients and 90 percent of the male non-recipients). Even among the females, the majority of the non-recipients worked at some job at least half of the time (66 percent) and the majority of the recipients approximated this standard. The "work ethic" problem is more apparent than real. Large blocs of time are spent in work.

(15) Males tend on the average to have had more employment episodes than females. The picture that emerges is one of sexism where women are crowded into a few jobs and men have a wider range of choices and options.

(16) The long range trend for low-wage working females is to shift away from household services. The female recipients drift toward clerical and non-household service jobs while the female non-recipients move toward blue collar work.

(17) There appear to be well-defined patterns of exclusion from training and union membership. The amount of training and incidence of union membership is low. Part of this finding is explained by the fact that patterns of industrial attachment place low-wage workers in jobs that do not have training or union membership.

(18) In voluntary job changing as well as in seeking a job, personal and family problems have a heavier influence on women than on men. Undoubtedly such problems draw more on female than male resources.

Policy Issues and Implications

The low-wage and dependency status of the respondents in our study is complex as to underlying conditions and proximate causes. The policy remedies have to be adjusted to them. We are suggesting, then, that no one policy or panacea will fit all of the groups described in this study and thus different solutions must be applied to different groups.

Looking at the men and women, it is obvious that we are dealing with two distinctively different portraits of respondents in terms of problems and needs. The recipients and non-recipients are not that different so let us sketch out a profile of recipient males and females with a view to using this as a reference point for a discussion of policy.

The most obvious point to be made about policy is that for both men

and women the welfare status is not intergenerational. Thus, efforts to "destroy" an "intergenerational culture of welfare" (or to help people escape from it) are probably misplaced or misdirected.

Furthermore, the men and the women have quite different family and labor market problems. The women are young in single parent families with pre-school age children and work for very low wages. The men are older in two parent families with older children and work at blue collar jobs for very high wages. The women earn very little and cannot support the small number of children that they have. The men earn a good deal but it is inadequate to support the large families that predominate here. Increasing job earnings would be a solution for women but the men clearly need some added income or services to their present paycheck, possibly in the form of family income allowances.

Profile of Female and Male
Working Recipients

Female

1. Origin from two-parent, non-recipient families.
2. Young
3. Moderate education
4. Family responsibility: young children, few in number
5. One wage earner
6. Southern origin, long residence in Detroit
7. Little or moderate work experience

Male

1. Origin from two-parent, non-recipient families.
2. Middle age to older.
3. Little education
4. Family responsibility: older children, many in number
5. Two or more wage earners.
6. Southern origin, long residence in Detroit
7. Extensive work experience

8. A ^{Female} large proportion working but at low wages
9. Limited occupational opportunities
10. Little chance for advancement
11. Want to "get ahead"
12. Desires work stability, advancement and better pay

8. Few ^{Male} people working at high wages but not enough
9. Broader occupational opportunities
10. Little chance for advancement
11. Want to "get ahead"
12. Desires better pay, career advancement, tenure and upgrading.

We may first look at what factors would be essential for men and women to escape from a low wage status.

For the women:

- (1) Upgrading to more skilled white collar jobs;
- (2) More effective measures to combat racial and sex discrimination, particularly for entry into high-wage, blue collar jobs;
- (3) Within the white collar jobs, an intensive effort to train the more educated women for technical employment.

For the men:

- (1) Supplementary family allowances;
- (2) More skill training;
- (3) Combat racial discrimination;
- (4) Upgrading and providing opportunities for better jobs;

We can also distinguish a number of factors that would be favorable

to the improvement of these groups but would not by themselves do the job.

For the women:

- (1) Child care;
- (2) Health services

For the men:

- (1) On-the-job counseling directed toward upgrading.

We are suggesting that no service program by itself can improve the lot of these people without making some changes in their opportunity for quality jobs.

Finally, there are some remedies that we feel would be totally inappropriate and would lead nowhere. The current move in some larger cities to "professionalize" and upgrade domestic work for women would seem

misplaced, given the almost stampede proportions that are occurring out of household domestic work.

We must also note that the extensive efforts to increase work incentives may be totally misdirected since the resultant jobs rarely lead to any economic viability. What may be far more important in this respect is a concerted attempt to improve the operation and opportunities in the labor market for these people so that quality jobs result.

What stands out is the need to formulate and implement different solutions for men and women who are trapped in wage poverty. The bulk of our respondents were at or near the current minimum wage level but "they

were not making it." It seems reasonable that a higher minimum wage standard is needed but within a framework where there is some attempt to match needs against needed income. This latter can and must be achieved through a process of unionization of the low-wage sector. The latter is not easy to achieve but it would be a positive step to restructuring the low-wage labor market. The hostility of current unionists to these "unwanted workers" and the low resource base of these workers poses a challenge to the trade union movement that it cannot permanently ignore.

Exhibit No. 23

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for publication.**

Exhibit No. 24

This exhibit was unavailable
for publication.

Exhibit No. 25

**This exhibit was unavailable
for publication.**

Exhibit No. 26

U.S. DEPARTMENT OF LABOR
 MANPOWER ADMINISTRATION
 WASHINGTON, D.C. 20210



July 18, 1974

Dr. Arthur S. Fleming
 Chairman, U.S. Commission
 on Civil Rights
 1121 Vermont Avenue, N.W.
 Washington, D. C. 20005

Dear Dr. Fleming:

Enclosed are the statistics requested on Manpower Administration Job Training Programs in Region V. This is in compliance with the thirty (30) day extension of the subpoena issued to Richard C. Gilliland, Assistant Regional Director for Manpower, Chicago, for the hearing held on June 18, 1974, in Chicago.

For further information on these data, please contact Mr. Robert Yerger, Manpower Administration Office of Administration and Management at 376-6074.

Sincerely,

FLOYD E. EDWARDS
 Associate Manpower Administrator
 for Field Direction and Management

Enclosure

Received by
 Date

John J. Ramirez
9/18/74

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- Table 1: Enrolled in Training by ES Offices.
- Table 2: Nonagricultural Placements by ES Offices.
- Table 3: Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training. (Presented by program, with 1 page for each State for each Fiscal Year during which the program was active and for which data was available.)
- Table 4: New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race. (Presented by program, with 1 page for each State.)
- Table 5: Reentrants in the FEP Program.
- Technical Notes

U.S. Department of Labor - Manpower Administration

Table 1. Enrolled in Training by ES Offices
Selected States, FY's 1971 - 1974 ^{1/}

		All Enrollments	Male	Female	White	Black	Other Minority
Illinois:	FY 1971	13,266	6,235	7,031	5,362	7,558	345
	1972	20,637	12,058	8,579	6,216	13,770	643
	1973	21,523	14,708	6,815	7,302	13,663	555
	1974	7,764	4,887	2,877	3,050	4,568	145
Indiana:	FY 1971	3,256	1,520	1,736	1,807	1,424	25
	1972	2,496	1,404	1,092	1,431	1,001	64
	1973	2,025	1,212	813	1,174	805	45
	1974	1,181	673	508	696	451	28
Michigan:	FY 1971	8,876	4,345	4,531	4,402	4,307	161
	1972	9,307	5,171	4,136	4,452	4,623	228
	1973	8,746	4,697	4,049	5,005	3,582	152
	1974	4,489	2,271	2,218	2,423	1,990	70
Minnesota:	FY 1971	2,650	1,803	847	2,207	161	282
	1972	3,001	2,017	984	2,579	178	243
	1973	2,929	1,740	1,189	2,454	214	254
	1974	2,736	1,475	1,261	2,243	128	234
Ohio:	FY 1971	15,507	8,331	7,176	7,275	7,938	35
	1972	12,996	7,749	5,247	6,009	6,680	60
	1973	10,971	6,480	4,491	5,525	5,069	334
	1974	5,452	3,383	2,069	2,969	2,372	91
Wisconsin:	FY 1971	6,837	3,810	3,027	5,108	874	852
	1972	8,497	4,189	4,308	6,746	1,119	614
	1973	4,738	2,968	1,770	3,947	328	432
	1974	4,935	2,865	2,070	4,257	240	348

Note: The sum of the racial groups may not add to the total enrollments in training for any year due to some enrollees for whom racial data was not available.

^{1/} FY 1974 Data through December 31, 1973.

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U.S. Department of Labor - Manpower Administration

Table 1.a. Enrolled in Training by ES Offices
 Selected States, FY's 1971 - 1974 ^{1/}
 (percentage distribution)

		All Enrollments	Male	Female	White	Black	Other Minority
Illinois:	FY 1971	13,266	47.0%	53.0%	40.4%	57.0%	2.6%
	1972	20,637	58.4	41.6	30.1	66.7	3.1
	1973	21,523	68.3	31.7	33.9	63.5	2.6
	1974	7,764	58.9	41.1	39.3	58.8	1.9
Indiana:	FY 1971	3,256	46.7	53.3	55.5	43.7	.8
	1972	2,496	56.3	43.7	57.3	40.1	2.6
	1973	2,025	59.9	40.1	58.0	39.8	2.2
	1974	1,181	57.0	43.0	58.9	38.2	2.4
Michigan:	FY 1971	8,876	49.0	51.0	49.6	48.5	1.8
	1972	9,307	55.6	44.4	47.8	49.7	2.4
	1973	8,746	53.7	46.3	57.2	41.0	1.7
	1974	4,489	50.6	49.4	54.0	44.3	1.6
Minnesota:	FY 1971	2,650	68.0	32.0	83.3	6.1	10.6
	1972	3,001	67.2	32.8	85.9	5.9	8.1
	1973	2,929	59.4	40.6	83.8	7.3	8.7
	1974	2,736	53.9	46.1	82.0	4.7	8.6
Ohio:	FY 1971	15,507	53.7	46.3	46.9	51.2	.2
	1972	12,996	59.6	40.4	46.2	51.4	.5
	1973	10,971	59.1	40.9	50.4	46.2	3.1
	1974	5,452	62.1	37.9	54.5	43.5	1.7
Wisconsin:	FY 1971	6,837	55.7	44.3	74.7	12.8	12.5
	1972	8,497	49.3	50.7	79.4	13.2	7.2
	1973	4,738	62.6	37.4	83.3	6.9	9.1
	1974	4,935	58.1	41.9	86.3	4.9	7.1

Note: The sum of percentages for the racial groups may not add to 100 percent for any year due to some enrollees for whom racial data was not available.

^{1/} FY 1974 Data through December 31, 1973.

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Table 2. Nonagricultural Placements by ES Offices
Selected States, FY's 1971-1974 ^{1/}

		Individuals placed ^{2/}	Male	Female	White	Black	Other Minority
Illinois:	FY 1971	41,496	24,755	16,741	26,464	13,904	1,119
	1972	47,569	29,601	17,968	29,183	17,110	1,266
	1973	61,992	40,640	21,352	37,270	22,886	1,796
	1974	55,374	33,627	21,747	30,970	22,845	1,437
Indiana:	FY 1971	40,261	19,830	20,431	33,845	6,221	187
	1972	46,280	24,545	21,735	38,317	7,647	296
	1973	66,411	37,554	28,857	54,230	11,315	386
	1974	56,344	32,200	24,144	34,476	9,468	465
Michigan:	FY 1971	31,397	17,966	13,431	20,392	10,613	384
	1972	35,508	23,910	11,598	23,411	11,580	499
	1973	73,747	52,600	21,147	49,390	23,335	982
	1974	47,351	32,095	15,256	31,101	15,418	762
Minnesota:	FY 1971	20,731	11,956	8,775	19,377	506	798
	1972	28,278	16,865	11,413	26,682	717	844
	1973	32,715	18,658	14,057	30,409	1,139	1,137
	1974	32,226	18,390	13,836	29,789	1,229	1,124
Ohio:	FY 1971	54,062	32,042	22,020	40,088	13,219	97
	1972	55,928	34,379	21,549	43,178	12,079	94
	1973	73,162	46,863	26,299	55,677	15,552	1,681
	1974	52,850	35,908	16,942	40,853	10,897	993
Wisconsin:	FY 1971	19,704	10,611	9,093	17,601	1,396	696
	1972	23,629	14,157	9,472	20,874	1,626	793
	1973	36,074	22,322	13,752	31,278	2,890	1,116
	1974	36,793	21,457	15,336	31,022	3,361	1,305

^{1/} FY 1974 data through December 31, 1973.^{2/} Nonagricultural placements for over 150 days.Office of Administration and Management
Office of Management Information Systems

U.S. Department of Labor - Manpower Administration

Table 2a. Nonagricultural Placements by ES Offices
 Selected States, FY's 1971-1974 ^{1/}
 (percentage distribution)

		Individuals placed ^{2/}	Male	Female	White	Black	Other Minority
Illinois:	FY 1971	41,496	59.7%	40.3%	63.8%	33.5%	2.7%
	1972	47,569	62.2	37.8	61.4	36.0	2.7
	1973	61,992	65.6	34.4	60.2	36.9	2.9
	1974	55,374	60.7	39.3	56.1	41.3	2.6
Indiana:	FY 1971	40,261	49.3	50.7	84.1	15.5	0.5
	1972	46,280	53.0	47.0	82.8	16.5	0.6
	1973	66,411	56.5	43.5	82.3	17.2	0.6
	1974	56,344	57.1	42.9	77.6	21.3	1.0
Michigan:	FY 1971	31,397	57.2	42.8	65.0	33.8	1.2
	1972	35,508	67.3	32.7	66.0	32.6	1.4
	1973	73,747	71.3	28.7	67.0	31.7	1.3
	1974	47,351	67.8	32.2	65.8	32.6	1.6
Minnesota:	FY 1971	20,731	57.7	42.3	93.7	2.4	3.9
	1972	28,278	59.6	40.4	94.5	2.5	3.0
	1973	32,715	57.0	43.0	93.0	3.5	3.5
	1974	32,226	57.1	42.9	92.7	3.8	3.5
Ohio:	FY 1971	54,062	59.3	40.7	75.1	24.8	0.2
	1972	55,928	61.5	38.5	78.0	21.8	0.2
	1973	73,162	64.1	35.9	76.4	21.3	2.3
	1974	52,850	67.9	32.1	77.5	20.7	1.9
Wisconsin:	FY 1971	19,704	53.9	46.1	89.4	7.1	3.5
	1972	23,629	59.9	40.1	89.6	7.0	3.4
	1973	36,074	61.9	38.1	88.6	8.2	3.2
	1974	36,793	58.3	41.7	86.9	9.4	3.7

Note: The sum of percentages for the racial groups may not add to 100 percent for any year due to some enrollees for whom racial data was not available.

^{1/} FY 1974 data through December 31, 1973.

^{2/} Nonagricultural placements for over 150 days.

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: CEP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	126	38	88	—	126	—
Average wage	\$2.84	\$2.36	\$2.97		\$2.84	
Clerical and sales						
Number employed	203	29	174	—	203	—
Average wage	\$2.31	\$2.20	\$2.31		\$2.31	
Service						
Number employed	92	39	53	—	92	—
Average wage	\$2.10	\$2.14	\$2.07		\$2.10	
Farm, fish, forestry						
Number placed	5	5	—	—	5	—
Average wage	\$2.15	\$2.15			\$2.15	
Processing						
Number employed	34	34	—	—	34	—
Average wage	\$2.77	\$2.77			\$2.77	
Machine Trades						
Number employed	15	15	—	—	15	—
Average wage	\$2.70	\$2.70			\$2.70	
Bench work						
Number employed	34	24	10	—	34	—
Average wage	\$2.26	\$2.25	\$2.29		\$2.26	
Structural work						
Number employed	10	10	—	—	10	—
Average wage	\$2.45	\$2.45			\$2.45	
Miscellaneous						
Number employed	82	68	14	—	82	—
Average wage	\$2.44	\$2.61	\$1.74		\$2.44	

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Indiana
Program: CEP
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	—					
Average wage						
Clerical and sales						
Number employed	6	—	6	—	6	—
Average wage	\$1.10		\$1.10		\$1.10	
Service						
Number employed	—					
Average wage						
Farm, fish, forestry						
Number placed	—					
Average wage						
Processing						
Number employed	337	309	28	63	263	11
Average wage	\$2.88	\$2.88	\$2.83	\$2.86	\$2.89	\$2.88
Machine Trades						
Number employed	17	17	—	—	17	—
Average wage	\$2.87	\$2.87			\$2.87	
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	—					
Average wage						
Miscellaneous						
Number employed	—					
Average wage						

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U.S. Department of Labor - Manpower Administration

Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: CEP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	187	71	116	178	9	—
Average wage	\$2.39	\$2.59	\$2.30	\$2.36	\$2.87	—
Clerical and sales						
Number employed	482	80	402	402	45	35
Average wage	\$2.09	\$2.21	\$2.06	\$2.03	\$2.53	\$2.13
Service						
Number employed	705	286	419	634	36	35
Average wage	\$1.92	\$2.17	\$1.76	\$1.94	\$1.78	\$1.71
Farm, fish, forestry						
Number placed	107	107	—	89	—	18
Average wage	\$2.41	\$2.41	—	\$2.59	—	\$1.60
Processing						
Number employed	54	27	27	45	—	9
Average wage	\$2.05	\$2.16	\$1.93	\$2.06	—	\$2.00
Machine Trades						
Number employed	303	250	53	268	17	18
Average wage	\$2.12	\$2.20	\$1.74	\$2.15	\$2.13	\$1.65
Bench work						
Number employed	72	63	9	53	18	—
Average wage	\$2.51	\$2.72	\$1.85	\$2.16	\$3.95	—
Structural work						
Number employed	223	223	—	187	18	18
Average wage	\$2.96	\$2.96	—	\$2.85	\$3.89	\$3.02
Miscellaneous						
Number employed	286	268	18	259	9	18
Average wage	\$2.46	\$2.53	\$1.50	\$2.51	\$1.75	\$2.12

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: CEP
FY: 1971

Occupational Category	All	Male	Female	White	Black	Other Minority
	Enrollments					
Professional, Tech., and Managerial						
Number employed	67	18	49	54	3	10
Average wage	\$2.32	\$2.85	\$2.09	\$2.37	\$1.75	\$2.22
Clerical and sales						
Number employed	179	34	145	164	5	10
Average wage	\$2.01	\$2.58	\$1.87	\$2.02	\$2.12	\$1.76
Service						
Number employed	127	39	88	106	—	21
Average wage	\$1.84	\$1.98	\$1.78	\$1.88		\$1.67
Farm, fish, forestry						
Number placed	16	16	—	16	—	—
Average wage	\$1.85	\$1.85		\$1.85		
Processing						
Number employed	47	42	5	37	—	10
Average wage	\$1.93	\$1.96	\$1.75	\$1.90		\$2.05
Machine Trades						
Number employed	70	70	—	70	—	—
Average wage	\$2.42	\$2.42		\$2.42		
Bench work						
Number employed	23	2	21	18	—	5
Average wage	\$1.95	\$1.65	\$1.98	\$2.03		\$1.65
Structural work						
Number employed	101	98	3	78	—	23
Average wage	\$2.60	\$2.63	\$1.70	\$2.50		\$2.96
Miscellaneous						
Number employed	104	96	8	89	5	10
Average wage	\$2.82	\$2.90	\$1.90	\$2.67	\$3.21	\$3.86

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Ohio
Program: CEP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	37	25	11	11	26	—
Average wage	\$2.48	\$2.51	\$2.42	\$2.27	\$2.62	
Clerical and sales						
Number employed	172	40	132	7	161	4
Average wage	\$2.20	\$2.48	\$2.11	\$1.80	\$2.24	\$1.70
Service						
Number employed	187	110	77	15	172	—
Average wage	\$2.40	\$2.58	\$2.07	\$2.71	\$2.35	
Farm, fish, forestry						
Number placed	4	4	—	—	4	—
Average wage	\$1.80	\$1.80			\$1.80	
Processing						
Number employed	37	37	—	4	29	4
Average wage	\$2.71	\$2.71		\$2.20	\$2.75	\$2.88
Machine Trades						
Number employed	125	106	19	4	121	—
Average wage	\$3.25	\$3.28	\$3.09	\$1.80	\$3.31	
Bench work						
Number employed	48	29	19	—	44	4
Average wage	\$2.65	\$2.87	\$2.30		\$2.74	\$1.60
Structural work						
Number employed	202	202	—	4	184	14
Average wage	\$3.08	\$3.08		\$3.23	\$3.07	\$3.11
Miscellaneous						
Number employed	84	70	14	4	77	3
Average wage	\$2.67	\$2.76	\$2.20	\$2.57	\$2.59	\$3.57

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: CEP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	96	43	53	56	15	25
Average wage	\$2.12	\$2.37	\$1.93	\$2.02	\$2.18	\$2.32
Clerical and sales						
Number employed	210	40	170	173	22	15
Average wage	\$1.93	\$2.15	\$1.87	\$1.92	\$1.79	\$1.95
Service						
Number employed	170	59	111	117	25	28
Average wage	\$1.88	\$2.09	\$1.77	\$1.70	\$2.38	\$2.26
Farm, fish, forestry						
Number placed	22	22	—	22	—	—
Average wage	\$2.27	\$2.27	—	\$2.27	—	—
Processing						
Number employed	56	37	19	43	6	7
Average wage	\$2.01	\$2.21	\$1.60	\$1.75	\$3.38	\$2.45
Machine Trades						
Number employed	139	139	—	99	18	22
Average wage	\$2.62	\$2.62	—	\$2.60	\$2.87	\$2.52
Bench work						
Number employed	46	22	24	40	—	6
Average wage	\$1.94	\$2.11	\$1.80	\$1.99	—	\$1.67
Structural work						
Number employed	139	139	—	108	15	16
Average wage	\$2.51	\$2.51	—	\$2.47	\$2.60	\$2.98
Miscellaneous						
Number employed	126	104	22	77	24	25
Average wage	\$2.51	\$2.64	\$1.88	\$2.45	\$2.58	\$2.39

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U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: CEP
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	61	7	54	--	61	--
Average wage	\$3.02	\$3.37	\$2.98	--	\$3.02	--
Clerical and sales						
Number employed	272	68	204	--	272	--
Average wage	\$2.42	\$2.61	\$2.61	--	\$2.42	--
Service						
Number employed	58	27	31	--	55	3
Average wage	\$2.24	\$2.38	\$2.11	--	\$2.26	\$2.10
Farm, fish, forestry						
Number employed	--	--	--	--	--	--
Average wage	--	--	--	--	--	--
Processing						
Number employed	27	20	7	--	27	--
Average wage	\$2.42	\$2.53	\$2.08	--	\$2.42	--
Machine Trades						
Number employed	34	24	10	--	34	--
Average wage	\$2.79	\$2.80	\$2.78	--	\$2.79	--
Bench work						
Number employed	65	34	31	--	65	--
Average wage	\$2.34	\$2.50	\$2.15	--	\$2.34	--
Structural work						
Number employed	27	24	3	--	27	--
Average wage	\$2.83	\$2.83	\$2.84	--	\$2.83	--
Miscellaneous						
Number employed	129	105	24	--	129	--
Average wage	\$2.55	\$2.70	\$1.97	--	\$2.55	--

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: CEP
FY: 1972

Occupational Category	All Enrollments			Other		
		Male	Female	White	Black	Minority
Professional, Tech., and Managerial						
Number employed	187	65	122	108	36	43
Average wage	\$2.46	\$2.75	\$2.34	\$2.53	\$2.50	\$2.29
Clerical and sales						
Number employed	547	137	410	460	58	29
Average wage	\$2.12	\$2.22	\$2.09	\$2.09	\$2.44	\$2.07
Service						
Number employed	813	288	525	647	93	73
Average wage	\$1.96	\$2.21	\$1.83	\$2.01	\$1.68	\$1.90
Farm, fish, forestry						
Number employed	43	43	--	43	--	--
Average wage	\$2.79	\$2.79	--	\$2.79	--	--
Processing						
Number employed	129	108	21	115	--	14
Average wage	\$2.59	\$2.66	\$2.24	\$2.54	--	\$3.00
Machine Trades						
Number employed	295	288	7	295	--	--
Average wage	\$2.40	\$2.41	\$2.00	\$2.40	--	--
Bench work						
Number employed	115	79	36	86	14	15
Average wage	\$2.58	\$2.92	\$1.94	\$2.48	\$3.95	\$1.84
Structural work						
Number employed	374	352	22	216	72	86
Average wage	\$3.47	\$3.48	\$3.17	\$3.10	\$4.08	\$3.81
Miscellaneous						
Number employed	496	482	14	424	7	65
Average wage	\$2.52	\$2.54	\$1.87	\$2.39	\$1.75	\$3.53

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Minnesota
Program: CEP
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	107	50	57	87	—	20
Average wage	\$2.35	\$2.95	\$1.92	\$2.35		\$2.32
Clerical and sales						
Number employed	215	34	181	124	60	27
Average wage	\$2.13	\$2.35	\$2.09	\$2.01	\$2.24	\$2.31
Service						
Number employed	198	87	111	164	17	17
Average wage	\$1.94	\$2.12	\$1.81	\$1.92	\$2.21	\$1.84
Farm, fish, forestry						
Number employed	70	67	3	64	—	6
Average wage	\$2.02	\$1.97	\$2.97	\$2.01		\$2.12
Processing						
Number employed	67	37	30	64	—	3
Average wage	\$2.14	\$2.37	\$1.85	\$2.10		\$2.90
Machine Trades						
Number employed	107	104	3	77	13	17
Average wage	\$2.52	\$2.51	\$2.85	\$2.40	\$3.23	\$2.50
Bench work						
Number employed	74	40	34	44	23	7
Average wage	\$2.41	\$2.68	\$2.12	\$2.13	\$3.13	\$1.60
Structural work						
Number employed	198	195	3	144	14	40
Average wage	\$3.28	\$3.30	\$2.00	\$3.10	\$4.31	\$3.60
Miscellaneous						
Number employed	104	94	10	84	17	3
Average wage	\$2.46	\$2.53	\$1.82	\$2.36	\$3.08	\$1.88

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: CEP
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	110	36	74	13	97	—
Average wage	\$2.42	\$2.86	\$2.26	\$2.52	\$2.41	—
Clerical and sales						
Number employed	225	31	194	2	218	5
Average wage	\$2.25	\$2.31	\$2.24	\$1.60	\$2.27	\$2.05
Service						
Number employed	156	72	84	20	118	18
Average wage	\$2.21	\$2.34	\$2.12	\$2.02	\$2.23	\$2.42
Farm, fish, forestry						
Number employed	41	41	—	15	26	—
Average wage	\$3.01	\$3.01	—	\$3.13	\$2.92	—
Processing						
Number employed	33	31	2	5	28	—
Average wage	\$3.33	\$3.33	\$3.37	\$3.78	\$3.25	—
Machine Trades						
Number employed	61	54	7	2	56	3
Average wage	\$2.89	\$2.97	\$2.32	\$2.00	\$2.87	\$4.10
Bench work						
Number employed	66	51	15	5	56	5
Average wage	\$2.78	\$2.99	\$1.97	\$2.15	\$2.94	\$1.75
Structural work						
Number employed	246	246	—	26	200	20
Average wage	\$3.16	\$3.16	—	\$2.86	\$3.23	\$2.10
Miscellaneous						
Number employed	128	118	10	10	113	5
Average wage	\$2.93	\$2.94	\$2.75	\$2.00	\$3.04	\$2.35
\$						

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: CEP
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial:						
Number employed	160	92	68	50	77	33
Average wage	\$2.53	\$2.53	\$2.46	\$2.30	\$2.67	\$2.56
Clerical and sales						
Number employed	335	50	285	109	183	41
Average wage	\$2.27	\$2.40	\$2.25	\$2.01	\$2.34	\$2.37
Service						
Number employed	279	95	184	149	89	41
Average wage	\$1.98	\$2.33	\$1.79	\$1.85	\$2.05	\$2.31
Farm, fish, forestry						
Number employed	24	24		18		6
Average wage	\$2.21	\$2.21		\$2.20		\$2.25
Processing						
Number employed	101	86	15	24	24	53
Average wage	\$2.50	\$2.62	\$1.93	\$2.14	\$2.78	\$2.53
Machine Trades						
Number employed	139	124	15	85	15	39
Average wage	\$2.58	\$2.66	\$1.93	\$2.31	\$3.43	\$2.72
Bench work						
Number employed	92	50	42	45	22	25
Average wage	\$2.31	\$2.56	\$2.50	\$2.07	\$2.58	\$2.56
Structural work						
Number employed	3	3		3		
Average wage	\$2.21	\$2.21		\$2.21		
Miscellaneous						
Number employed	125	113	12	64	48	13
Average wage	\$2.61	\$2.64	\$2.35	\$2.54	\$2.44	\$3.66

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Illinois
Program: CEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	18	9	9	--	18	--
Average wage	\$3.25	\$2.50	\$4.00		\$3.25	--
Clerical and sales						
Number employed	159	9	150	--	159	--
Average wage	\$2.40	\$3.25	\$2.35		\$2.40	--
Service						
Number employed	62	27	35	--	62	--
Average wage	\$2.54	\$2.64	\$2.48		\$2.54	--
Farm, fish, forestry						
Number employed	--	--	--	--	--	--
Average wage	--	--	--	--	--	--
Processing						
Number employed	35	35	---	---	35	--
Average wage	\$2.89	\$2.89	--	--	\$2.89	--
Machine Trades						
Number employed	71	53	18	--	62	9
Average wage	\$3.21	\$3.31	\$2.93	--	\$3.32	\$2.48
Mech work						
Number employed	18	--	18	--	18	--
Average wage	\$2.07	--	\$2.07	--	\$2.07	--
Structural work						
Number employed	62	27	35	18	44	--
Average wage	\$2.91	\$3.39	\$2.56	\$2.40	\$3.12	--
Miscellaneous						
Number employed	292	257	35	--	283	9
Average wage	\$3.86	\$4.11	\$2.07	--	\$3.85	\$2.15

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Michigan
Program: CEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	82	59	23	47	--	35
Average wage	\$2.38	\$2.60	\$1.75	\$2.90	--	\$1.87
Clerical and sales						
Number employed	267	35	232	197	46	23
Average wage	\$2.01	\$2.25	\$1.98	\$2.01	\$2.50	\$1.78
Service						
Number employed	672	243	429	487	116	69
Average wage	\$2.02	\$2.25	\$1.88	\$2.09	\$1.76	\$1.93
Farm, fish, forestry						
Number employed	58	58	--	35	--	23
Average wage	\$2.90	\$2.90	--	\$2.03	--	\$4.21
Processing						
Number employed	81	69	12	69	--	12
Average wage	\$2.63	\$2.73	\$2.02	\$2.37	--	\$2.30
Machine Trades						
Number employed	116	116	--	104	--	12
Average wage	\$2.40	\$2.40	--	\$2.39	--	\$2.50
Mech work						
Number employed	69	23	46	46	--	25
Average wage	\$2.00	\$2.06	\$1.97	\$2.08	--	\$1.84
Structural work						
Number employed	313	278	35	220	46	47
Average wage	\$3.49	\$3.47	\$3.61	\$2.92	\$4.50	\$3.75
Miscellaneous						
Number employed	301	301	--	267	--	35
Average wage	\$2.82	\$2.82	--	\$2.83	--	\$2.72

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Minnesota
Program: CEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	133	75	58	115	4	14
Average wage	\$2.71	\$2.99	\$2.31	\$2.71	\$3.00	\$2.59
Clerical and sales						
Number employed	239	31	208	159	57	23
Average wage	\$2.15	\$2.65	\$2.07	\$2.03	\$2.35	\$2.38
Service						
Number employed	194	115	79	159	13	22
Average wage	\$2.67	\$3.25	\$1.85	\$2.71	\$2.08	\$2.73
Farm, fish, forestry						
Number employed	79	75	4	79	--	--
Average wage	\$1.95	\$1.97	\$1.65	\$1.95	--	--
Processing						
Number employed	31	22	9	27	--	4
Average wage	\$2.80	\$3.18	\$1.87	\$2.94	--	\$2.00
Machine Trades						
Number employed	102	102	--	84	4	14
Average wage	\$2.93	\$2.93	--	\$2.87	\$3.13	\$3.22
Hand work						
Number employed	75	62	13	47	14	14
Average wage	\$2.75	\$2.87	\$2.17	\$2.84	\$3.42	\$1.75
Structural work						
Number employed	239	235	4	159	9	71
Average wage	\$3.16	\$3.19	\$1.70	\$3.17	\$2.92	\$3.17
Miscellaneous						
Number employed	115	102	13	93	18	4
Average wage	\$2.55	\$2.58	\$2.30	\$2.45	\$3.03	\$2.50

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: CEP
FY: 1973

Occupational Category	All Enrollments			Other		
		Male	Female	White	Black	Minority
Professional, Tech., and Managerial						
Number employed	231	65	166	26	196	9
Average wage	\$2.52	\$3.34	\$2.25	\$2.93	\$2.49	\$2.17
Operical and sales						
Number employed	645	122	523	43	580	22
Average wage	\$2.34	\$2.61	\$2.27	\$2.47	\$2.34	\$2.02
Service						
Number employed	314	135	179	35	266	13
Average wage	\$2.27	\$2.35	\$2.21	\$2.28	\$2.29	\$1.82
Farm, fish, forestry						
Number employed	4	4	--	--	4	--
Average wage	\$2.50	\$2.50	--	--	\$2.50	--
Processing						
Number employed	131	100	31	--	127	4
Average wage	\$2.93	\$2.83	\$3.32	--	\$2.91	\$3.62
Machine Trades						
Number employed	122	113	9	17	105	--
Average wage	\$2.75	\$2.79	\$2.24	\$2.57	\$2.78	--
Mech work						
Number employed	148	83	65	9	113	26
Average wage	\$2.62	\$2.82	\$2.37	\$2.35	\$2.68	\$2.49
Structural work						
Number employed	279	270	9	22	248	9
Average wage	\$3.08	\$3.08	\$2.75	\$3.50	\$3.08	\$2.63
Miscellaneous						
Number employed	371	323	48	35	314	22
Average wage	\$2.66	\$2.76	\$2.07	\$2.64	\$2.67	\$2.18

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: CEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	246	107	139	84	135	27
Average wage	\$2.73	\$2.71	\$2.74	\$2.59	\$2.85	\$2.52
Clerical and sales						
Number employed	255	46	209	135	97	23
Average wage	\$2.34	\$2.89	\$2.22	\$2.18	\$2.40	\$3.03
Service						
Number employed	172	37	135	125	28	19
Average wage	\$1.89	\$2.39	\$1.77	\$1.78	\$2.17	\$1.98
Farm, fish, forestry						
Number employed	9	9	--	9	--	--
Average wage	\$2.61	\$2.61	--	\$2.61	--	--
Processing						
Number employed	107	84	23	61	9	37
Average wage	\$2.98	\$3.14	\$2.40	\$2.16	\$5.20	\$3.75
Machine Trades						
Number employed	153	79	74	139	5	9
Average wage	\$2.28	\$2.66	\$1.88	\$2.31	\$2.25	\$1.87
Mech work						
Number employed	65	46	19	47	9	9
Average wage	\$2.23	\$2.17	\$2.36	\$2.11	\$2.11	\$2.94
Structural work						
Number employed	241	218	23	190	32	19
Average wage	\$3.05	\$3.07	\$2.81	\$2.90	\$4.08	\$2.72
Miscellaneous						
Number employed	135	126	9	97	29	9
Average wage	\$2.59	\$2.64	\$2.01	\$2.16	\$3.92	\$2.71

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: Institutional
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	875	94	781	569	295	11
Average wage	\$2.77	\$2.99	\$2.74	\$2.64	\$3.01	\$2.80
Clerical and sales						
Number employed	834	19	815	284	521	31
Average wage	\$2.35	\$3.07	\$2.33	\$2.26	\$2.39	\$2.40
Service						
Number employed	107	21	86	62	45	—
Average wage	\$2.37	\$2.27	\$2.40	\$2.36	\$2.39	—
Farm, fish, forestry						
Number employed	3	3	—	—	3	—
Average wage	\$2.30	\$2.30	—	—	\$2.30	—
Processing						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Machine Trades						
Number employed	233	233	—	180	51	2
Average wage	\$3.10	\$3.10	—	\$3.01	\$3.45	\$2.50
Bench work						
Number employed	8	3	5	3	5	—
Average wage	\$3.53	\$3.00	\$3.80	\$3.00	\$3.00	—
Structural work						
Number employed	172	172	—	134	35	3
Average wage	\$3.53	\$3.53	—	\$3.36	\$4.20	\$3.25
Miscellaneous						
Number employed	11	11	—	11	—	—
Average wage	\$1.75	\$1.75	—	\$1.75	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: Institutional
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	180	38	142	152	24	4
Average wage	\$2.61	\$2.75	\$2.57	\$2.59	\$2.67	\$2.83
Clerical and sales						
Number employed	178	8	170	94	84	—
Average wage	\$1.98	\$2.64	\$1.96	\$1.90	\$2.07	—
Service						
Number employed	126	18	108	38	88	—
Average wage	\$1.92	\$2.55	\$1.82	\$1.79	\$1.98	—
Farm, fish, forestry						
Number employed	—					
Average wage	—					
Processing						
Number employed	—					
Average wage	—					
Machine Trades						
Number employed	162	162		114	46	2
Average wage	\$2.49	\$2.49		\$2.43	\$2.62	\$3.40
Bench work						
Number employed	38	10	28	24	14	—
Average wage	\$1.96	\$2.97	\$1.60	\$2.15	\$1.63	—
Structural work						
Number employed	174	174		138	32	4
Average wage	\$2.81	\$2.81		\$2.86	\$2.63	\$2.55
Miscellaneous						
Number employed	8	6	2	8	—	—
Average wage	\$2.64	\$2.83	\$2.08	\$2.64	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: Institutional
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	859	109	750	705	151	3
Average wage	\$3.26	\$2.89	\$3.31	\$3.26	\$3.25	\$2.00
Clerical and sales						
Number employed	206	6	270	119	151	6
Average wage	\$2.29	\$2.82	\$2.28	\$2.12	\$2.41	\$2.55
Service						
Number employed	117	40	77	75	38	4
Average wage	\$2.41	\$3.17	\$2.01	\$2.38	\$2.43	\$2.72
Farm, fish, forestry						
Number employed	24	24	—	24	—	—
Average wage	\$2.60	\$2.60	—	\$2.60	—	—
Processing						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Machine Trades						
Number employed	248	246	2	171	56	21
Average wage	\$2.95	\$2.96	\$2.00	\$2.71	\$2.61	\$3.02
Bench work						
Number employed	30	22	8	20	10	—
Average wage	\$2.46	\$2.69	\$1.85	\$2.71	\$1.98	—
Structural work						
Number employed	141	141	—	95	38	8
Average wage	\$2.70	\$2.70	—	\$2.63	\$2.76	\$3.23
Miscellaneous						
Number employed	8	8	—	6	2	—
Average wage	\$3.50	\$3.50	—	\$3.66	\$3.00	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: Institutional
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	243	88	155	243	—	—
Average wage	\$2.66	\$3.01	\$2.47	\$2.66		
Clerical and sales						
Number employed	359	44	315	309	36	14
Average wage	\$2.09	\$2.18	\$2.07	\$2.09	\$2.09	\$1.94
Service						
Number employed	97	47	50	83	3	11
Average wage	\$2.15	\$2.48	\$1.83	\$2.13	\$2.00	\$2.30
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	3	3	—	3	—	—
Average wage	\$2.50	\$2.50		\$2.50		
Machine Trades						
Number employed	149	149	—	132	3	14
Average wage	\$2.63	\$2.63		\$2.62	\$3.17	\$2.64
Bench work						
Number employed	17	8	9	14	—	3
Average wage	\$1.78	\$2.00	\$1.56	\$1.94		\$1.00
Structural work						
Number employed	237	237	—	210	11	16
Average wage	\$3.05	\$3.05		\$3.01	\$3.64	\$3.17
Miscellaneous						
Number employed	5	5	—	5	—	—
Average wage	\$2.87	\$2.87		\$2.87		

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: Institutional
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	350	82	268	263	85	2
Average wage	\$2.54	\$2.61	\$2.51	\$2.42	\$2.86	\$3.81
Clerical and sales						
Number employed	473	3	470	247	223	3
Average wage	\$2.02	\$2.21	\$2.02	\$1.99	\$2.05	\$1.91
Service						
Number employed	252	43	209	71	178	3
Average wage	\$2.08	\$2.64	\$1.97	\$2.10	\$2.07	\$2.48
Farm, fish, forestry						
Number employed	7	7	—	7	—	—
Average wage	\$1.80	\$1.80		\$1.80		
Processing						
Number employed	3	2	1	2	2	
Average wage	\$1.56	\$2.08	\$1.12	\$2.00	\$1.12	
Machine Trades						
Number employed	292	285	7	242	49	1
Average wage	\$2.64	\$2.64	\$2.68	\$2.69	\$2.38	\$2.88
Bench work						
Number employed	3	3	—	3	—	—
Average wage	\$2.70	\$2.70		\$2.70		
Structural work						
Number employed	266	266	—	212	54	—
Average wage	\$2.73	\$2.73		\$2.75	\$2.64	
Miscellaneous						
Number employed	23	23	—	10	12	—
Average wage	\$3.30	\$3.30		\$3.29	\$3.31	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: Institutional
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	99	44	55	99	—	—
Average wage	\$2.87	\$2.96	\$2.80	\$2.87		
Clerical and sales						
Number employed	283	15	268	224	26	33
Average wage	\$1.98	\$2.31	\$1.96	\$1.97	\$1.98	\$2.04
Service						
Number employed	15	4	11	15	—	—
Average wage	\$1.64	\$2.00	\$1.53	\$1.65		
Farm, fish, forestry						
Number employed	7	7	—	4	—	3
Average wage	\$1.75	\$1.75		\$2.50		\$1.00
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	169	169	—	132	4	33
Average wage	\$2.37	\$2.37		\$2.42	\$2.60	\$2.18
Bench work						
Number employed	4	4	—	4	—	—
Average wage	\$2.25	\$2.25		\$2.25		
Structural work						
Number employed	158	158	—	121	7	30
Average wage	\$2.58	\$2.58		\$2.54	\$3.15	\$2.61
Miscellaneous						
Number employed	3	3	—	3	—	—
Average wage	\$2.50	\$2.50		\$2.50		

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: Institutional
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	1,576	276	1,300	1,183	393	--
Average wage	\$2.83	\$3.06	\$2.78	\$2.83	\$2.84	
Clerical and sales						
Number employed	1,437	69	1,368	523	886	28
Average wage	\$2.50	\$2.81	\$2.48	\$2.34	\$2.58	\$2.67
Service						
Number employed	337	117	220	275	62	--
Average wage	\$2.56	\$3.39	\$2.12	\$2.56	\$2.56	
Farm, fish, forestry						
Number employed	--					
Average wage						
Processing						
Number employed	--					
Average wage						
Machine Trades						
Number employed	28	28	--	21	7	--
Average wage	\$3.30	\$3.30		\$3.41	\$3.00	
Bench work						
Number employed	200	151	49	83	110	7
Average wage	\$2.74	\$2.92	\$2.18	\$2.65	\$2.75	\$3.50
Structural work						
Number employed	103	103	--	89	14	--
Average wage	\$2.46	\$2.46		\$2.40	\$2.87	
Miscellaneous						
Number employed	62	62	--	48	14	--
Average wage	\$3.66	\$3.66		\$3.26	\$5.06	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: Institutional
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	370	100	270	339	31	—
Average wage	\$2.81	\$2.88	\$2.79	\$2.82	\$2.75	—
Clerical and sales						
Number employed	393	70	323	246	147	—
Average wage	\$2.31	\$2.31	\$2.31	\$2.32	\$2.30	—
Service						
Number employed	239	48	191	123	116	—
Average wage	\$2.06	\$2.11	\$2.04	\$2.14	\$1.97	—
Farm, fish, forestry						
Number employed	—					
Average wage	—					
Processing						
Number employed	—					
Average wage	—					
Machine Trades						
Number employed	477	477	—	362	108	7
Average wage	\$2.77	\$2.77	—	\$2.65	\$3.18	\$2.50
Bench work						
Number employed	131	85	46	100	31	—
Average wage	\$3.07	\$3.62	\$2.07	\$3.18	\$2.71	—
Structural work						
Number employed	593	593	—	524	62	7
Average wage	\$2.93	\$2.93	—	\$2.88	\$3.29	\$3.85
Miscellaneous						
Number employed	31	31	—	23	—	8
Average wage	\$2.50	\$2.50	—	\$2.47	—	\$2.60

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Michigan
Program: Institutional
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	3,009	706	2,303	2,490	434	85
Average wage	\$3.94	\$4.37	\$3.81	\$4.04	\$3.54	\$3.21
Clerical and sales						
Number employed	1,321	163	1,158	815	296	210
Average wage	\$2.77	\$4.02	\$2.52	\$2.81	\$2.70	\$2.38
Service						
Number employed	476	247	229	355	109	12
Average wage	\$2.69	\$3.12	\$2.23	\$2.73	\$2.66	\$1.67
Farm, fish, forestry						
Number employed	30	24	6	18	12	—
Average wage	\$2.90	\$2.74	\$3.55	\$3.26	\$2.37	—
Processing						
Number employed	42	30	12	24	18	—
Average wage	\$3.46	\$3.38	\$3.66	\$3.14	\$3.88	—
Machine Trades						
Number employed	1,212	1,212		1,031	115	66
Average wage	\$3.22	\$3.22		\$3.20	\$3.53	\$3.09
Bench work						
Number employed	156	145	11	139	17	—
Average wage	\$3.41	\$3.49	\$2.45	\$3.47	\$2.95	—
Structural work						
Number employed	856	850	6	730	90	36
Average wage	\$3.48	\$3.48	\$3.00	\$3.44	\$3.57	\$3.95
Miscellaneous						
Number employed	24	24	—	24	—	—
Average wage	\$2.52	\$2.62	—	\$2.62	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: Institutional
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	243	71	172	243	—	—
Average wage	\$2.68	\$3.23	\$2.46	\$2.68		
Clerical and sales						
Number employed	340	26	314	309	17	14
Average wage	\$2.35	\$3.12	\$2.29	\$2.38	\$2.42	\$2.15
Service						
Number employed	77	37	40	74	3	—
Average wage	\$2.15	\$2.35	\$1.96	\$2.13	\$2.68	
Farm, fish, forestry						
Number employed	3	3	—	3	—	—
Average wage	\$3.00	\$3.00		\$3.00		
Processing						
Number employed	11	11	—	11	—	—
Average wage	\$2.77	\$2.77		\$2.77		
Machine Trades						
Number employed	189	189	—	169	3	17
Average wage	\$3.31	\$3.31		\$3.32	\$3.60	\$3.15
Bench work						
Number employed	9	9	—	9	—	—
Average wage	\$3.21	\$3.21		\$3.21		
Structural work						
Number employed	217	214	3	191	6	20
Average wage	\$3.99	\$4.01	\$2.50	\$4.01	\$4.02	\$3.82
Miscellaneous						
Number employed	14	14	—	14	—	—
Average wage	\$3.77	\$3.77		\$3.77		

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: Institutional
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	421	85	336	281	128	12
Average wage	\$2.93	\$2.72	\$2.98	\$2.79	\$3.23	\$3.28
Clerical and sales						
Number employed	975	90	885	481	494	—
Average wage	\$2.30	\$2.58	\$2.27	\$2.27	\$2.32	
Service						
Number employed	481	170	311	192	289	—
Average wage	\$2.32	\$2.75	\$2.08	\$2.63	\$2.12	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	749	741	8	566	179	4
Average wage	\$2.95	\$2.94	\$3.89	\$2.94	\$2.97	\$2.45
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	711	711	—	506	205	—
Average wage	\$2.93	\$2.93		\$2.94	\$2.89	
Miscellaneous						
Number employed	38	38	—	30	8	—
Average wage	\$3.52	\$3.52		\$3.44	\$3.80	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: Institutional
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	127	62	65	117	3	7
Average wage	\$2.89	\$3.04	\$2.73	\$2.92	\$1.80	\$2.70
Clerical and sales						
Number employed	414	18	396	366	27	21
Average wage	\$2.13	\$2.81	\$2.10	\$2.13	\$2.20	\$2.08
Service						
Number employed	41	2	39	37	2	2
Average wage	\$1.85	\$2.50	\$1.81	\$1.80	\$2.50	\$1.90
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	41	39	2	37	4	—
Average wage	\$2.15	\$2.17	\$1.90	\$2.17	\$2.00	
Machine Trades						
Number employed	541	500	41	456	60	25
Average wage	\$2.89	\$2.92	\$2.47	\$2.91	\$2.62	\$3.15
Bench work						
Number employed	7	5		2	—	3
Average wage	\$2.00	\$2.00		\$2.00		\$2.00
Structural work						
Number employed	463	460	3	391	41	31
Average wage	\$3.14	\$3.14	\$1.85	\$3.14	\$2.90	\$3.38
Miscellaneous						
Number employed	—					
Average wage						

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: Institutional
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	322	93	229	234	88	—
Average wage	\$2.92	\$3.37	\$2.73	\$2.87	\$3.05	
Clerical and sales						
Number employed	334	12	322	123	211	—
Average wage	\$2.51	\$3.08	\$2.49	\$2.34	\$2.60	
Service						
Number employed	91	59	32	82	9	—
Average wage	\$2.80	\$3.21	\$2.06	\$2.77	\$3.07	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	211	209	3	141	70	—
Average wage	\$3.21	\$3.21	\$2.72	\$3.15	\$3.33	
Bench work						
Number employed	23	21	3	12	11	—
Average wage	\$2.75	\$2.79	\$2.50	\$3.11	\$2.40	
Structural work						
Number employed	272	272	—	228	44	—
Average wage	\$4.44	\$4.44		\$4.44	\$4.47	
Miscellaneous						
Number employed	41	41	—	18	23	—
Average wage	\$4.91	\$4.91		\$3.62	\$5.59	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: Institutional
FY: 1973

Occupational Category	All	Male	Female	White	Black	Other Minority
	Enrollments					
Professional, Tech., and Managerial						
Number employed	160	37	123	152	4	4
Average wage	\$2.82	\$2.77	\$2.84	\$2.82	\$2.80	\$3.08
Clerical and sales						
Number employed	123	25	98	62	61	—
Average wage	\$2.39	\$2.48	\$2.37	\$2.47	\$2.32	
Service						
Number employed	111	16	94	45	66	—
Average wage	\$2.18	\$2.34	\$2.15	\$2.05	\$2.26	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	226	226	—	164	62	—
Average wage	\$3.14	\$3.14		\$3.16	\$3.10	
Bench work						
Number employed	37	25	12	33	4	—
Average wage	\$2.96	\$3.53	\$1.83	\$2.99	\$2.75	
Structural work						
Number employed	300	300	—	267	33	—
Average wage	\$3.30	\$3.30		\$3.28	\$3.48	
Miscellaneous						
Number employed	—					
Average wage						

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: Institutional
FY: 1973

Occupational Category	All Enrollments			Other		
		Male	Female	White	Black	Minority
Professional, Tech., and Managerial						
Number employed	1,848	304	1,544	1,453	354	41
Average wage	\$3.96	\$3.74	\$4.00	\$4.01	\$3.80	\$3.38
Clerical and sales						
Number employed	889	108	781	636	246	7
Average wage	\$2.72	\$3.42	\$2.62	\$2.70	\$2.78	\$2.05
Service						
Number employed	289	51	238	217	72	—
Average wage	\$2.39	\$3.03	\$2.26	\$2.21	\$2.94	—
Farm, fish, forestry						
Number placed	—					
Average wage						
Processing						
Number employed	22	14	8	14	8	—
Average wage	\$2.81	\$2.56	\$3.32	\$2.56	\$3.32	—
Machine Trades						
Number employed	658	658	—	541	117	—
Average wage	\$3.31	\$3.31	—	\$3.24	\$3.62	—
Bench work						
Number employed	152	137	15	145	7	—
Average wage	\$3.39	\$3.38	\$3.47	\$3.38	\$3.50	—
Structural work						
Number employed	564	564	—	463	101	—
Average wage	\$3.23	\$3.23	—	\$3.16	\$3.58	—
Miscellaneous						
Number employed	36	36	—	—	—	—
Average wage	\$3.03	\$3.03	—	—	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: Institutional
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	139	46	93	139	—	—
Average wage	\$2.60	\$2.84	\$2.48	\$2.60	—	—
Clerical and sales						
Number employed	378	39	339	342	22	14
Average wage	\$2.48	\$2.99	\$2.42	\$2.44	\$2.54	\$3.21
Service						
Number employed	75	43	32	68	7	—
Average wage	\$2.29	\$2.33	\$2.24	\$2.26	\$2.68	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	18	18	—	18	—	—
Average wage	\$3.60	\$3.60	—	\$3.60	—	—
Machine Trades						
Number employed	132	132	—	114	11	7
Average wage	\$3.28	\$3.28	—	\$3.28	\$3.65	\$2.72
Bench work						
Number employed	7	7	—	7	—	—
Average wage	\$3.16	\$3.16	—	\$3.16	—	—
Structural work						
Number employed	193	185	8	164	4	25
Average wage	\$3.57	\$3.61	\$2.38	\$3.57	\$4.25	\$3.46
Miscellaneous						
Number employed	18	18	—	18	—	—
Average wage	\$4.15	\$4.15	—	\$4.15	—	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: Institutional
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	221	110	111	162	49	10
Average wage	\$2.96	\$2.94	\$2.98	\$2.94	\$3.12	\$2.00
Clerical and sales						
Number employed	966	110	856	460	506	—
Average wage	\$2.43	\$2.95	\$2.36	\$2.40	\$2.46	
Service						
Number employed	344	149	195	104	240	—
Average wage	\$2.11	\$2.35	\$1.94	\$2.24	\$2.88	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	1,038	1,031	7	850	188	—
Average wage	\$3.22	\$3.21	\$4.59	\$3.21	\$3.24	
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	726	720	6	558	162	6
Average wage	\$3.11	\$3.10	\$3.34	\$3.14	\$3.01	\$2.75
Miscellaneous						
Number employed	713	713	—	254	240	220
Average wage	\$5.08	\$5.08		\$5.12	\$5.56	\$3.00

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Wisconsin
Program: Institutional
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	114	53	81	89	—	25
Average wage	\$2.96	\$3.00	\$2.94	\$3.03		\$2.70
Clerical and sales						
Number employed	430	—	430	398	16	16
Average wage	\$2.12		\$2.12	\$2.13	\$1.85	\$2.15
Service						
Number employed	49	8	41	41	8	—
Average wage	\$2.22	\$2.50	\$2.17	\$2.17	\$2.50	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	860	811	49	762	57	41
Average wage	\$2.95	\$2.99	\$2.39	\$2.93	\$2.96	\$3.28
Bench work						
Number employed	8	8	—	8	—	—
Average wage	\$2.00	\$2.00		\$2.00		
Structural work						
Number employed	592	584	8	527	57	8
Average wage	\$3.10	\$3.12	\$1.85	\$3.11	\$2.92	\$3.83
Miscellaneous						
Number employed	—					
Average wage						

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: JOBS
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	6	6	---	---	6	---
Average wage	\$2.30	\$2.30	---	---	\$2.30	---
Clerical and sales						
Number employed	269	136	133	39	227	3
Average wage	\$2.58	\$2.81	\$2.17	\$2.55	\$2.47	\$2.29
Service						
Number employed	124	115	9	9	115	---
Average wage	\$2.11	\$2.03	\$2.08	\$1.92	\$2.01	---
Farm, fish, forestry						
Number employed	4	4	---	4	---	---
Average wage	\$4.75	\$4.75	---	\$4.75	---	---
Processing						
Number employed	819	419	400	139	675	5
Average wage	\$3.03	\$2.80	---	\$2.73	\$2.78	---
Machine Trades						
Number employed	301	114	187	112	189	---
Average wage	\$3.05	\$2.80	---	\$2.73	\$2.78	---
Bench work						
Number employed	170	149	21	22	148	---
Average wage	\$2.21	\$2.23	\$2.01	\$1.85	\$2.24	---
Structural work						
Number employed	497	457	41	219	278	---
Average wage	\$2.66	\$2.77	\$1.76	\$2.39	\$2.82	---
Miscellaneous						
Number employed	265	172	93	45	220	---
Average wage	\$2.58	\$2.78	\$2.13	\$2.68	\$2.77	---

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Indiana
Program: JOBS
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	4	3	1	2	2	—
Average wage	\$2.57	\$2.64	\$ —	\$2.52	\$2.89	\$ —
Clerical and sales						
Number employed	14	6	8	6	8	—
Average wage	2.44	2.20	2.18	2.00	2.33	—
Service						
Number employed	23	5	18	1	22	—
Average wage	1.96	1.89	1.89	1.89	1.89	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	9	8	1	6	3	—
Average wage	2.88	2.79	2.54	2.75	2.76	—
Machine Trades						
Number employed	13	6	7	2	11	—
Average wage	3.53	3.21	—	4.00	3.05	—
Bench work						
Number employed	81	40	41	36	43	2
Average wage	2.38	2.40	2.07	2.06	2.36	2.40
Structural work						
Number employed	4	1	.3	3	1	—
Average wage	3.35	2.53	—	—	2.53	—
Miscellaneous						
Number employed	7	7	—	7	—	—
Average wage	3.68	3.68	—	3.68	—	—

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: JOBS
FY: 1971

Occupational Category	All		Male	Female	White	Black	Other Minority
	Enrollments	Average wage					
Professional, Tech., and Managerial							
Number employed	1		1	—	1	—	—
Average wage	\$2.20		\$2.20	—	\$2.20	—	—
Clerical and sales							
Number employed	125		67	58	2	123	—
Average wage	3.39		2.84	2.39	2.95	2.61	—
Service							
Number employed	18		6	12	5	13	—
Average wage	2.00		2.10	1.96	2.08	1.98	—
Farm, fish, forestry							
Number employed	2		2	—	2	—	—
Average wage	3.85		3.85	—	3.85	—	—
Processing							
Number employed	4		4	—	1	3	—
Average wage	3.06		3.06	—	2.25	3.34	—
Machine Trades							
Number employed	243		211	32	49	194	—
Average wage	3.87		2.96	2.70	2.33	3.12	—
Bench work							
Number employed	57		55	2	30	27	—
Average wage	3.52		3.02	2.95	—	2.98	—
Structural work							
Number employed	570		451	119	19	549	2
Average wage	3.64		3.08	3.48	3.00	3.16	4.39
Miscellaneous							
Number employed	68		63	5	31	37	—
Average wage	3.37		3.11	2.67	—	3.06	—

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: JOBS
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	34	18	16	22	10	2
Average wage	2.14	2.38	1.83	1.92	2.73	1.75
Clerical and sales						
Number employed	40	3	37	12	20	8
Average wage	2.03	2.33	2.04	2.10	2.04	2.05
Service						
Number employed	23	7	16	20	2	1
Average wage	2.24	2.70	1.98	2.12	2.64	3.05
Farm, fish, forestry						
Number employed	--	--	--	--	--	--
Average wage	--	--	--	--	--	--
Processing						
Number employed	--	--	--	--	--	--
Average wage	--	--	--	--	--	--
Machine Trades						
Number employed	34	28	6	15	18	1
Average wage	2.44	2.42	2.40	2.41	2.42	2.40
Bench work						
Number employed	8	2	6	1	7	---
Average wage	2.80	3.15	2.54	2.71	2.55	---
Structural work						
Number employed	1	1	---	1	---	---
Average wage	3.00	3.00	---	3.00	---	---
Miscellaneous						
Number employed	9	4	5	5	2	2
Average wage	2.56	3.01	2.06	3.01	2.43	1.70

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: JOBS
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	126	106	20	39	87	—
Average wage	\$ 2.74	\$ 2.95	\$ 2.12	\$ 2.68	\$ 2.83	—
Clerical and sales						
Number employed	31	18	13	3	28	—
Average wage	2.53	2.90	2.04	2.42	2.51	—
Service						
Number employed	74	22	52	6	68	—
Average wage	2.03	2.02	2.02	1.99	2.02	—
Farm, fish, forestry						
Number employed	3	3	—	3	—	—
Average wage	2.00	2.00	—	2.00	—	—
Processing						
Number employed	24	24	—	8	16	—
Average wage	2.76	2.76	—	2.65	2.85	—
Machine Trades						
Number employed	81	74	7	7	74	—
Average wage	2.85	2.83	2.95	2.81	2.83	—
Bench work						
Number employed	138	98	40	48	90	—
Average wage	2.31	2.76	1.84	1.70	2.89	—
Structural work						
Number employed	81	68	13	5	74	2
Average wage	3.01	2.99	2.89	2.63	3.01	2.95
Miscellaneous						
Number employed	49	33	16	14	35	—
Average wage	2.75	2.69	2.38	2.49	2.57	—

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U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: JOBS
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	71	59	12	28	43	---
Average wage	\$3.76	\$4.05	\$1.97	\$2.10	\$2.20	---
Clerical and sales						
Number employed	12	12	---	12	---	---
Average wage	\$2.19	\$2.19	---	\$2.19	---	---
Service						
Number employed	8	4	4	---	4	---
Average wage	\$2.17	\$2.50	\$1.85	---	\$1.85	---
Farm, fish, forestry						
Number employed	---	---	---	---	---	---
Average wage	---	---	---	---	---	---
Processing						
Number employed	---	---	---	---	---	---
Average wage	---	---	---	---	---	---
Machine Trades						
Number employed	47	47	---	---	47	---
Average wage	\$3.53	\$3.53	---	---	\$3.53	---
Bench work						
Number employed	8	8	---	---	8	---
Average wage	\$2.51	\$2.51	---	---	\$2.51	---
Structural work						
Number employed	16	16	---	16	---	---
Average wage	\$4.18	\$4.18	---	\$4.18	---	---
Miscellaneous						
Number employed	16	16	---	---	16	---
Average wage	\$2.52	\$2.52	---	---	\$2.52	---

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U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: JOBS
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	34	23	11	11	23	--
Average wage	\$ 2.86	\$3.18	\$ 2.37	\$2.80	\$ 2.84	\$3.01
Clerical and sales						
Number employed	477	185	292	86	348	43
Average wage	2.40	2.61	2.19	2.16	2.37	2.28
Service						
Number employed	195	117	78	56	117	22
Average wage	2.14	2.16	2.09	2.02	2.14	2.34
Farm, fish, forestry						
Number employed	11	11	--	11	--	--
Average wage	4.21	4.21	--	4.21	--	--
Processing						
Number employed	628	521	107	177	343	108
Average wage	2.73	2.64	2.86	2.64	2.74	2.55
Machine Trades						
Number employed	302	231	71	88	164	50
Average wage	2.85	2.81	2.86	2.62	2.86	3.38
Bench work						
Number employed	492	425	67	302	150	40
Average wage	2.51	2.57	2.17	2.60	2.46	2.92
Structural work						
Number employed	628	530	98	309	282	37
Average wage	2.37	2.49	1.81	2.00	2.72	3.60
Miscellaneous						
Number employed	439	307	132	150	289	--
Average wage	2.55	2.65	2.27	2.75	2.70	--

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: JOBS
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	27	23	4	12	15	---
Average wage	2.38	2.37	2.51	2.15	2.61	---
Clerical and sales						
Number employed	66	12	54	17	49	---
Average wage	2.11	3.50	1.90	1.93	2.18	---
Service						
Number employed	28	8	20	2	26	---
Average wage	2.00	2.17	1.96	1.89	2.02	---
Farm, fish, forestry						
Number employed	2	2	---	---	---	---
Average wage	2.14	2.14	---	---	---	---
Processing						
Number employed	42	35	7	26	16	---
Average wage	2.96	3.01	2.53	2.91	2.96	---
Machine Trades						
Number employed	30	26	4	6	24	---
Average wage	4.03	4.20	2.18	3.11	4.21	---
Bench work						
Number employed	139	65	74	60	69	10
Average wage	2.25	2.47	2.03	2.21	2.25	2.40
Structural work						
Number employed	29	27	2	10	19	---
Average wage	2.70	2.64	3.00	2.66	2.65	---
Miscellaneous						
Number employed	25	25	---	10	15	---
Average wage	3.30	3.30	---	2.90	3.45	---

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: JOBS
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	11	4	10	--	3	8
Average wage	\$3.79	\$3.79	\$2.73	\$3.17	\$3.79	\$3.24
Clerical and sales						
Number employed	189	73	116	40	115	34
Average wage	\$3.13	\$2.84	\$2.19	\$2.59	\$2.35	\$1.88
Service						
Number employed	22	12	10	9	13	--
Average wage	\$2.28	\$2.58	\$1.91	\$2.47	\$2.23	--
Farm, fish, forestry						
Number employed	1	1	--	--	1	--
Average wage	\$3.00	\$3.00	--	--	\$3.00	--
Processing						
Number employed	21	17	4	4	17	--
Average wage	\$3.47	\$3.38	\$3.72	\$2.74	\$3.55	--
Machine Trades						
Number employed	341	215	126	132	132	77
Average wage	\$3.59	\$2.81	\$2.43	\$2.55	\$3.11	\$1.75
Bench work						
Number employed	85	42	43	41	44	--
Average wage	\$3.79	\$2.90	\$1.98	\$1.86	\$2.61	--
Structural work						
Number employed	2,408	1,869	539	501	1,584	323
Average wage	\$3.97	\$3.91	\$4.03	\$3.83	\$3.94	\$4.21
Miscellaneous						
Number employed	98	63	35	41	57	--
Average wage	\$3.76	\$3.37	\$2.99	\$3.21	\$3.31	--

U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: JOBS
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	5	4	1	3	2	0
Average wage	\$2.61	\$2.92	\$2.06	\$2.33	\$2.94	\$2.77
Clerical and sales						
Number employed	163	32	131	66	68	29
Average wage	\$2.09	\$2.34	\$2.04	\$2.10	\$2.05	\$2.03
Service						
Number employed	81	30	51	67	12	2
Average wage	\$2.22	\$2.37	\$2.02	\$2.12	\$2.37	\$2.17
Farm, fish, forestry						
Number employed	1	1	--	1	--	--
Average wage	\$2.50	\$2.50	--	\$2.50	--	--
Processing						
Number employed	3	3	--	1	2	--
Average wage	\$2.40	\$2.40	--	\$2.50	\$2.35	--
Machine Trades						
Number employed	170	141	29	73	81	16
Average wage	\$2.45	\$2.43	\$2.42	\$2.43	\$2.46	\$2.07
Bench work						
Number employed	96	25	71	16	64	16
Average wage	\$2.69	\$2.84	\$2.63	\$2.61	\$2.66	\$2.62
Structural work						
Number employed	35	35	--	17	10	8
Average wage	\$2.72	\$2.72	--	\$2.53	\$2.90	\$2.98
Miscellaneous						
Number employed	40	31	9	13	20	7
Average wage	\$3.25	\$3.15	\$2.43	\$3.07	\$3.11	\$2.88

U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: JOBS
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	5	5	--	3	2	--
Average wage	\$2.69	\$2.96	\$2.18	\$2.62	\$2.76	--
Clerical and sales						
Number employed	78	18	60	15	63	--
Average wage	\$2.05	\$2.65	\$1.93	\$2.11	\$2.05	--
Service						
Number employed	70	18	52	10	60	--
Average wage	\$2.15	\$2.34	\$2.08	\$2.29	\$2.12	--
Farm, fish, forestry						
Number employed	18	18	--	14	4	--
Average wage	\$2.00	\$2.00	--	\$2.00	\$2.00	--
Processing						
Number employed	340	309	31	155	185	--
Average wage	\$2.54	\$2.02	\$2.15	\$2.54	\$2.52	--
Machine Trades						
Number employed	235	205	31	69	145	22
Average wage	\$3.06	\$2.98	\$2.67	\$3.03	\$2.96	\$2.95
Bench work						
Number employed	141	64	77	78	63	--
Average wage	\$2.14	\$2.54	\$1.98	\$1.75	\$2.83	--
Structural work						
Number employed	79	64	15	31	48	--
Average wage	\$3.78	\$3.57	\$2.70	\$3.04	\$3.97	--
Miscellaneous						
Number employed	96	67	29	21	75	--
Average wage	\$2.48	\$2.33	\$2.19	\$2.31	\$2.26	--

U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: JOBS
FY: 1972

Occupational Category	All Enrollments	Sex		Race		
		Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	3	3	--	--	3	--
Average wage	\$2.78	\$3.01	--	--	\$2.70	\$3.24
Clerical and sales						
Number employed	66	17	49	36	30	--
Average wage	\$2.10	\$2.10	\$2.01	\$2.01	\$2.08	--
Service						
Number employed	14	4	10	--	14	--
Average wage	\$1.88	\$2.27	\$1.80	--	\$1.88	--
Farm, fish, forestry						
Number employed	--	--	--	--	--	--
Average wage	--	--	--	--	--	--
Processing						
Number employed	22	16	6	10	8	4
Average wage	\$4.22	\$4.23	\$4.27	\$4.12	\$4.33	\$4.44
Machine Trades						
Number employed	118	93	25	20	85	13
Average wage	\$3.94	\$3.96	\$4.03	\$4.25	\$3.98	\$4.25
Bench work						
Number employed	9	9	--	3	6	--
Average wage	\$2.59	\$2.59	--	\$2.67	\$2.59	--
Structural work						
Number employed	50	36	14	8	42	--
Average wage	\$4.25	\$4.23	\$4.16	\$4.10	\$4.22	--
Miscellaneous						
Number employed	14	14	--	--	14	--
Average wage	\$2.60	\$2.60	--	--	\$2.60	--

U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: JOBS
FY: '73

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	35	4	31	12	23	--
Average wage	\$2.94	\$3.23	\$2.45	\$2.94	\$2.89	\$3.19
Clerical and sales						
Number employed	246	87	159	47	195	4
Average wage	\$2.31	\$2.50	\$2.20	\$2.15	\$2.34	\$2.26
Service						
Number employed	72	28	44	37	33	2
Average wage	\$2.22	\$2.24	\$2.23	\$2.08	\$2.32	\$2.69
Farm, fish, forestry						
Number employed	2	2	--	2	--	--
Average wage	\$2.60	\$2.60	--	\$2.60	--	--
Processing						
Number employed	311	229	82	96	212	3
Average wage	\$2.86	\$2.67	\$2.86	\$2.76	\$2.80	\$2.22
Machine Trades						
Number employed	111	63	48	41	67	3
Average wage	\$3.07	\$2.97	\$2.78	\$2.71	\$3.07	\$3.19
Bench work						
Number employed	198	176	22	102	81	15
Average wage	\$2.76	\$2.88	\$2.13	\$2.74	\$2.87	\$2.93
Structural work						
Number employed	340	298	63	169	165	6
Average wage	\$2.36	\$2.44	\$1.99	\$2.00	\$2.67	\$3.60
Miscellaneous						
Number employed	168	123	45	59	100	9
Average wage	\$2.66	\$2.68	\$2.58	\$2.75	\$2.64	\$2.72

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: JOBS
FY: '73

Occupational Category	All Enrollments	Sex		Race		
		Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	63	41	22	34	29	--
Average wage	\$2.76	\$3.02	\$2.27	\$2.55	\$3.00	--
Clerical and sales						
Number employed	62	6	54	11	51	--
Average wage	\$2.13	\$4.10	\$1.91	\$1.93	\$2.16	--
Service						
Number employed	8	4	4	2	6	--
Average wage	\$2.37	\$2.38	\$2.24	\$1.36	\$2.46	--
Farm, fish, forestry						
Number employed	1	1	--	1	--	--
Average wage	\$2.12	\$2.12	--	\$2.12	--	--
Processing						
Number employed	12	12	--	--	4	--
Average wage	\$3.14	\$3.14	--	\$3.09	\$3.27	--
Machine Trades						
Number employed	61	44	17	25	36	--
Average wage	\$2.92	\$3.78	\$2.18	\$2.42	\$3.99	--
Bench work						
Number employed	76	35	41	30	46	--
Average wage	\$2.39	\$2.61	\$2.07	\$2.37	\$2.29	--
Structural work						
Number employed	23	23	--	9	14	--
Average wage	\$2.74	\$2.74	--	\$2.77	\$2.71	--
Miscellaneous						
Number employed	36	30	6	3	33	--
Average wage	\$3.45	\$3.41	--	\$3.12	\$3.48	--

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: JOBS
FY: '73

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	12	10	2	--	10	2
Average wage	\$3.88	\$4.00	\$2.37	--	\$3.98	\$3.37
Clerical and sales						
Number employed	102	32	70	19	18	5
Average wage	\$3.15	\$3.03	\$2.07	\$2.48	\$2.27	\$3.13
Service						
Number employed	8	4	4	4	4	--
Average wage	\$2.75	\$2.91	\$2.05	\$2.96	\$2.22	--
Farm, fish, forestry						
Number employed	4	4	--	--	4	--
Average wage	\$3.22	\$3.22	--	--	\$3.22	--
Processing						
Number employed	16	13	3	1	15	--
Average wage	\$3.65	\$3.58	\$3.72	\$3.72	\$3.67	--
Machine Trades						
Number employed	138	54	5	28	21	6
Average wage	\$2.65	\$2.69	\$2.19	\$2.52	\$3.07	\$1.74
Bench work						
Number employed	38	21	17	6	32	--
Average wage	\$3.58	\$2.98	\$2.28	\$1.67	\$2.79	--
Structural work						
Number employed	2,729	2,531	198	374	2,342	13
Average wage	\$3.82	\$3.75	\$3.83	\$3.76	\$3.75	\$3.92
Miscellaneous						
Number employed	60	51	9	25	35	--
Average wage	\$3.66	\$3.15	\$2.73	\$3.03	\$3.13	--

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: JOBS
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	6	4	2	4	2	---
Average wage	\$2.68	\$3.05	\$2.19	\$2.50	\$2.71	---
Clerical and sales						
Number employed	97	14	83	50	36	11
Average wage	\$2.19	\$2.44	\$2.11	\$2.19	\$2.15	\$2.11
Service						
Number employed	38	21	17	32	6	---
Average wage	\$2.45	\$2.61	\$2.11	\$2.40	\$2.23	---
Farm, fish, forestry						
Number employed	1	1	---	1	---	---
Average wage	\$2.50	\$2.50	---	\$2.50	---	---
Processing						
Number employed	2	2	---	1	1	---
Average wage	\$2.42	\$2.42	---	\$2.50	\$2.35	---
Machine Trades						
Number employed	123	116	7	69	47	19
Average wage	\$2.49	\$2.47	\$2.56	\$2.48	\$2.51	\$2.10
Bench work						
Number employed	92	98	83	9	41	3
Average wage	\$2.70	\$3.01	\$2.64	\$2.76	\$2.66	\$2.62
Structural work						
Number employed	40	40	---	20	14	6
Average wage	\$2.79	\$2.82	---	\$2.65	\$2.98	\$3.00
Miscellaneous						
Number employed	33	33	---	13	9	1
Average wage	\$3.34	\$3.34	---	\$3.28	\$3.27	\$3.54

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: JOBS
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	5	5	---	4	1	---
Average wage	\$2.96	\$2.96	---	\$3.01	\$2.97	---
Clerical and sales						
Number employed	36	13	23	8	28	---
Average wage	\$2.20	\$2.69	\$1.93	\$2.42	\$2.15	---
Service						
Number employed	6	5	1	3	3	---
Average wage	\$2.41	\$2.50	\$2.00	\$2.41	\$2.41	---
Farm, fish, forestry						
Number employed	8	8	---	6	2	---
Average wage	\$2.00	\$2.00	---	\$2.00	\$2.00	---
Processing						
Number employed	174	163	11	66	108	---
Average wage	\$2.57	\$2.60	\$2.16	\$2.54	\$2.58	---
Machine Trades						
Number employed	160	144	261	58	102	---
Average wage	\$3.09	\$3.05	\$2.69	\$3.04	\$3.02	---
Bench work						
Number employed	31	7	24	13	18	---
Average wage	\$2.75	\$2.75	\$2.57	\$2.43	\$2.69	---
Structural work						
Number employed	52	50	2	30	22	---
Average wage	\$3.28	\$3.34	\$3.10	\$3.19	\$3.76	---
Miscellaneous						
Number employed	36	30	6	6	30	---
Average wage	\$2.44	\$2.37	\$2.15	\$2.55	\$2.28	---

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: JOBS
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	82	50	32	36	43	3
Average wage	\$2.65	\$2.93	\$2.26	\$2.47	\$2.82	\$2.74
Clerical and sales						
Number employed	19	12	7	5	14	---
Average wage	\$2.23	INA	\$1.94	\$2.33	\$2.10	---
Service						
Number employed	---	---	---	---	---	---
Average wage	---	---	---	---	---	---
Farm, fish, forestry						
Number employed	---	---	---	---	---	---
Average wage	---	---	---	---	---	---
Processing						
Number employed	13	11	2	4	8	1
Average wage	\$4.32	\$4.29	\$4.44	\$4.35	\$4.25	\$4.44
Machine Trades						
Number employed	66	56	10	8	57	1
Average wage	\$4.01	\$4.10	\$4.00	\$4.25	\$4.13	\$4.25
Bench work						
Number employed	2	2	---	1	1	---
Average wage	\$2.38	\$2.38	---	\$2.10	\$2.67	---
Structural work						
Number employed	26	20	6	6	20	---
Average wage	\$4.34	\$4.26	\$4.50	\$4.10	\$4.36	---
Miscellaneous						
Number employed	---	---	---	---	---	---
Average wage	---	---	---	---	---	---

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: Job Corps
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	13	1	12	4	8	1
Average wage	\$2.60	\$2.00	\$2.66	\$3.25	\$2.40	\$1.80
Clerical and sales						
Number employed	26	—	26	1	22	3
Average wage	\$2.00		\$2.00	\$2.10	\$1.96	\$2.35
Service						
Number employed	70	35	35	9	53	8
Average wage	\$1.92	\$2.04	\$1.79	\$1.96	\$1.85	\$2.28
Farm, fish, forestry						
Number employed	1	1	—	1	—	—
Average wage	\$2.10	\$2.10		\$2.10		
Processing						
Number employed	40	39	1	1	34	6
Average wage	\$2.25	\$2.19	INA	INA	\$2.33	INA
Machine Trades						
Number employed	71	71	—	8	54	9
Average wage	\$2.24	\$2.24		\$2.51	\$2.20	\$2.44
Bench work						
Number employed	19	18	1	—	19	—
Average wage	\$2.33	\$2.38	\$1.70		\$2.33	
Structural work						
Number employed	179	178	1	27	144	8
Average wage	\$2.62	\$2.67	INA	\$2.51	\$2.63	\$2.73
Miscellaneous						
Number employed	9	8	1	1	8	—
Average wage	\$2.35	\$2.53	\$1.25	\$1.25	\$2.54	

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: Job Corps
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	—					
Average wage						
Clerical and sales						
Number employed	6	—	6	3	3	—
Average wage	\$1.70		\$1.70	\$1.80	\$1.60	
Service						
Number employed	11	6	5	3	8	—
Average wage	\$1.68	\$1.75	\$1.62	\$1.65	\$1.70	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	3	3	—	—	3	—
Average wage	\$2.25	\$2.25			\$2.25	
Machine Trades						
Number employed	9	9	—	3	6	—
Average wage	\$1.90	\$1.90		\$1.80	\$2.05	
Bench work						
Number employed	3	—	3		3	—
Average wage	\$1.80		\$1.80		\$1.80	
Structural work						
Number employed	78	78	—	52	26	—
Average wage	\$2.18	\$2.18		\$2.08	\$2.43	
Miscellaneous						
Number employed	3	3	—	3	—	—
Average wage	\$1.98	\$1.98		\$1.98		

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: Job Corps
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	23	1	22	5	17	1
Average wage	\$2.39	\$2.75	\$2.37	\$1.88	\$2.57	\$2.00
Clerical and sales						
Number employed	33	1	32	6	22	5
Average wage	\$2.13	\$2.00	\$2.14	\$1.98	\$2.09	\$2.44
Service						
Number employed	61	29	32	12	48	1
Average wage	\$2.11	\$2.36	\$1.88	\$1.92	\$2.19	\$1.45
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	9	9	—	1	8	—
Average wage	\$2.30	\$2.30		\$2.10	\$2.36	
Machine Trades						
Number employed	33	33	—	5	28	—
Average wage	\$2.61	\$2.61		\$2.01	\$2.76	
Bench work						
Number employed	13	11	2	1	11	1
Average wage	\$2.69	\$2.88	\$1.80	\$2.88	\$2.66	\$2.00
Structural work						
Number employed	93	93	—	15	73	5
Average wage	\$2.82	\$2.82		\$2.59	\$2.90	\$2.24
Miscellaneous						
Number employed	2	—	2	1	1	—
Average wage	\$1.57		\$1.57	\$1.40	\$1.75	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: Job Corps
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	1	1	—	1	—	—
Average wage	\$1.75	\$1.75		\$1.75		
Clerical and sales						
Number employed	2	—	2	2	—	—
Average wage	\$1.70		\$1.70	\$1.70		
Service						
Number employed	2	2	—	1	—	—
Average wage	\$1.80	\$1.80		\$2.00		
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	—					
Average wage						
Bench work						
Number employed	1	—	1	—	—	—
Average wage	\$1.65		\$1.65			
Structural work						
Number employed	8	8	—	8	—	—
Average wage	\$1.84	\$1.84		\$1.84		
Miscellaneous						
Number employed	1	—	1	1	—	—
Average wage	\$1.85		\$1.85	\$1.85		

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: Job Corps
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	16	1	15	9	7	—
Average wage	\$2.24	\$1.60	\$2.29	\$2.16	\$2.33	—
Clerical and sales						
Number employed	1	1	—	—	1	—
Average wage	\$1.65	\$1.65	—	—	\$1.65	—
Service						
Number employed	58	28	30	24	34	—
Average wage	\$1.77	\$1.88	\$1.67	\$1.67	\$1.82	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	6	6	—	6	—	—
Average wage	\$2.22	\$2.22	—	\$2.22	—	—
Machine Trades						
Number employed	52	52	—	18	29	—
Average wage	\$1.84	\$1.84	—	\$1.84	\$1.80	—
Bench work						
Number employed	22	19	3	6	16	—
Average wage	\$2.21	\$2.26	\$1.82	\$1.87	\$2.41	—
Structural work						
Number employed	38	38	—	16	22	—
Average wage	\$2.10	\$2.10	—	\$1.77	\$2.37	—
Miscellaneous						
Number employed	10	6	4	5	4	1
Average wage	\$1.64	\$1.73	\$1.48	\$1.50	\$1.84	\$1.60

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: Job Corps
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	4	—	4	4	—	—
Average wage	\$1.87		\$1.87	\$1.87		
Clerical and sales						
Number employed	6	—	6	—	6	—
Average wage	\$1.86		\$1.86		\$1.86	
Service						
Number employed	6	4	2	2	4	—
Average wage	\$1.93	\$1.90	\$2.00	\$1.80	\$2.00	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	2	2	—	—	—	2
Average wage	\$2.25	\$2.25				\$2.25
Machine Trades						
Number employed	18	18	—	16	2	—
Average wage	\$1.86	\$1.86		\$1.81	\$2.25	
Bench work						
Number employed	2	—	2	2	—	—
Average wage	\$1.60		\$1.60	\$1.60		
Structural work						
Number employed	59	59	—	45	8	6
Average wage	\$2.64	\$2.64		\$2.66	\$2.53	\$3.42
Miscellaneous						
Number employed	2	2	—	2	—	—
Average wage	\$1.00	\$1.00		\$1.00		

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: Job Corps
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	19	2	17	6	11	1
Average wage	\$2.57	\$2.14	\$2.62	\$2.82	\$2.53	\$1.80
Clerical and sales						
Number employed	77	1	76	10	45	16
Average wage	\$2.16	\$1.35	\$2.17	\$2.27	\$2.01	\$2.54
Service						
Number employed	137	50	87	11	106	9
Average wage	\$2.11	\$2.21	\$2.05	\$1.99	\$2.08	\$2.46
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	43	42	1	1	37	—
Average wage	\$2.32	\$2.33	\$1.75	\$1.75	\$2.28	
Machine Trades						
Number employed	91	88	3	6	67	7
Average wage	\$2.37	\$2.39	\$1.90	\$2.16	\$2.36	\$2.49
Bench work						
Number employed	30	27	3	1	23	3
Average wage	\$2.57	\$2.62	\$2.10	\$3.02	\$2.64	\$2.40
Structural work						
Number employed	260	259	—	29	201	13
Average wage	\$2.69	\$2.69		\$2.41	\$2.71	\$2.66
Miscellaneous						
Number employed	16	15	1	—	14	—
Average wage	\$2.71	\$2.76	\$2.05		\$2.69	

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Indiana
Program: Job Corps
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	—					
Average wage						
Clerical and sales						
Number employed	14	2	12	2	12	—
Average wage	\$2.20	\$1.50	\$2.32	\$1.50	\$2.32	
Service						
Number employed	21	14	7	10	10	—
Average wage	\$1.80	\$1.93	\$1.58	\$1.60	\$2.02	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	19	19	—	4	10	—
Average wage	\$2.48	\$2.48		\$2.00	\$3.00	
Bench work						
Number employed	4	2	2	—	4	—
Average wage	\$2.63	\$3.47	\$1.80		\$2.63	
Structural work						
Number employed	60	60	—	27	27	2
Average wage	\$3.09	\$3.09		\$3.09	\$2.99	\$4.10
Miscellaneous						
Number employed	2	2	—	2	—	—
Average wage	\$1.98	\$1.98		\$1.98		

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: Job Corps
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	43	16	27	9	29	3
Average wage	\$2.60	\$3.02	\$2.35	\$2.11	\$2.86	\$1.98
Clerical and sales						
Number employed	36	—	36	4	26	5
Average wage	\$2.28		\$2.28	\$1.99	\$2.23	\$2.68
Service						
Number employed	62	28	34	10	49	—
Average wage	\$2.10	\$2.39	\$1.86	\$1.80	\$2.11	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	16	16	—	—	12	—
Average wage	\$2.60	\$2.60			\$2.81	
Machine Trades						
Number employed	76	76	—	16	49	4
Average wage	\$2.84	\$2.84		\$2.47	\$3.05	\$2.14
Bench work						
Number employed	17	15	2	—	17	—
Average wage	\$3.02	\$3.18	\$1.80		\$3.02	
Structural work						
Number employed	162	1	161	27	119	2
Average wage	\$2.87	\$2.86	\$4.56	\$2.44	\$2.95	\$3.51
Miscellaneous						
Number employed	57	55	2	11	37	6
Average wage	\$3.52	\$3.59	\$1.67	\$2.96	\$3.75	\$2.73

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Minnesota
Program: Job Corps
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	2	—	2	1	—	1
Average wage	\$1.55		\$1.55	\$1.25		\$1.85
Clerical and sales						
Number employed	3	1	2	2	—	1
Average wage	\$1.20	\$1.60	\$1.00	\$1.55		.50
Service						
Number employed	5	4	1	3	—	1
Average wage	\$1.97	\$2.08	\$1.50	\$2.16		\$1.75
Farm, fish, forestry						
Number employed	1	1	—	—	—	1
Average wage	\$2.00	\$2.00				\$2.00
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	3	3	—	3	—	—
Average wage	\$2.71	\$2.71		\$2.71		
Bench work						
Number employed	3	1	2	1	1	—
Average wage	\$1.76	\$2.00	\$1.65	\$2.00	\$1.65	
Structural work						
Number employed	25	25	—	17	3	3
Average wage	\$2.58	\$2.58		\$2.64	\$2.79	\$1.86
Miscellaneous						
Number employed	1	1	—	—	1	—
Average wage	\$4.00	\$4.00			\$4.00	

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: Job Corps
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	25	3	22	12	12	—
Average wage	\$2.31	\$2.50	\$2.28	\$2.35	\$2.37	—
Clerical and sales						
Number employed	62	27	35	17	40	—
Average wage	\$2.12	\$2.17	\$2.09	\$1.87	\$2.24	—
Service						
Number employed	86	40	46	32	45	—
Average wage	\$1.88	\$1.90	\$1.85	\$1.75	\$1.98	—
Farm, fish, forestry						
Number employed	2	2	—	1	1	—
Average wage	\$2.12	\$2.12	—	\$2.25	\$2.00	—
Processing						
Number employed	19	19	—	—	17	—
Average wage	\$2.22	\$2.22	—	—	\$2.17	—
Machine Trades						
Number employed	81	80	1	33	41	1
Average wage	\$2.22	\$2.23	\$2.00	\$2.02	\$2.30	\$2.00
Bench work						
Number employed	20	18	2	9	10	—
Average wage	\$1.84	\$1.85	\$1.80	\$1.89	\$1.83	—
Structural work						
Number employed	269	269	—	83	156	7
Average wage	\$2.41	\$2.41	—	\$2.38	\$2.42	\$2.58
Miscellaneous						
Number employed	14	12	2	4	8	—
Average wage	\$2.59	\$2.75	\$1.60	\$2.68	\$2.61	—

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: Job Corps
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	7	—	7	4	3	—
Average wage	\$1.85		\$1.85	\$2.00	\$1.62	
Clerical and sales						
Number employed	8	1	7	5	3	—
Average wage	\$2.05	\$2.65	\$1.94	\$2.15	\$1.87	
Service						
Number employed	26	7	19	11	13	2
Average wage	\$1.71	\$1.84	\$1.66	\$1.50	\$1.96	\$1.10
Farm, fish, forestry						
Number employed	1	1	—	—	—	1
Average wage	\$2.80	\$2.80				\$2.80
Processing						
Number employed	2	2	—	—	—	2
Average wage	\$2.25	\$2.25				\$2.25
Machine Trades						
Number employed	17	17	—	12	3	2
Average wage	\$1.97	\$1.97		\$1.82	\$2.62	\$1.60
Bench work						
Number employed	1	—	1	1	—	—
Average wage	\$1.60		\$1.60	\$1.60		
Structural work						
Number employed	64	64	—	41	20	3
Average wage	\$2.68	\$2.68		\$2.72	\$2.46	\$2.67
Miscellaneous						
Number employed	16	16	—	2	11	3
Average wage	\$3.40	\$3.40		\$1.00	\$3.65	\$3.38

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: Job Corps
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	16	1	15	7	9	—
Average wage	\$2.64	\$2.28	\$2.66	\$2.66	\$2.62	
Clerical and sales						
Number employed	99	12	87	20	61	18
Average wage	\$2.24	\$2.27	\$2.24	\$2.12	\$2.20	\$2.52
Service						
Number employed	168	67	101	15	138	15
Average wage	\$2.16	\$2.22	\$2.12	\$1.85	\$2.16	\$2.34
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	50	49	1	3	47	—
Average wage	\$2.40	\$2.42	\$1.75	\$1.75	\$2.41	
Machine Trades						
Number employed	87	84	3	9	64	14
Average wage	\$2.44	\$2.46	\$1.90	\$3.19	\$2.37	\$2.43
Bench work						
Number employed	27	23	4	—	22	3
Average wage	\$2.54	\$2.64	\$1.83		\$2.60	\$2.60
Structural work						
Number employed	304	304	—	49	229	26
Average wage	\$2.68	\$2.68		\$2.70	\$2.64	\$3.04
Miscellaneous						
Number employed	31	31	—	7	18	6
Average wage	\$3.33	\$3.33		\$3.76	\$3.05	\$3.81

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Indiana
Program: Job Corps
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial	—					
Number employed	—					
Average wage						
Clerical and sales						
Number employed	9	—	9	—	9	—
Average wage	\$2.56		\$2.56		\$2.56	
Service						
Number employed	28	16	12	9	17	—
Average wage	\$1.90	\$2.03	\$1.71	\$1.73	\$2.01	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	2	2	—	—	2	—
Average wage	\$2.33	\$2.33			\$2.33	
Machine Trades						
Number employed	14	14	—	6	8	—
Average wage	\$2.33	\$2.33		\$2.28	\$2.44	
Bench work						
Number employed	2	2	—	2	—	—
Average wage	\$1.60	\$1.60		\$1.50		
Structural work						
Number employed	42	42	—	20	20	2
Average wage	\$3.07	\$3.07		\$3.12	\$2.98	\$4.10
Miscellaneous						
Number employed	4	4	—	2	2	—
Average wage	\$1.92	\$1.92		\$2.25	\$1.60	

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: Job Corps
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	38	10	28	7	28	3
Average wage	\$2.58	\$2.73	\$2.53	\$3.21	\$2.79	\$1.97
Clerical and sales						
Number employed	38	2	36	2	30	5
Average wage	\$2.31	\$2.25	\$2.31	\$2.30	\$2.20	\$2.80
Service						
Number employed	47	20	27	10	37	—
Average wage	\$2.25	\$2.58	\$2.01	\$1.95	\$2.26	—
Farm, fish, forestry						
Number employed	—					
Average wage	—					
Processing						
Number employed	22	22	—	4	18	—
Average wage	\$2.91	\$2.91	—	INA	\$2.95	—
Machine Trades						
Number employed	70	70	—	16	52	7
Average wage	\$2.95	\$2.95	—	\$2.38	\$3.14	\$3.00
Bench work						
Number employed	11	10	1	1	10	—
Average wage	\$2.83	\$2.91	\$2.00	\$1.90	\$2.92	—
Structural work						
Number employed	149	149	—	20	126	3
Average wage	\$3.19	\$3.19	—	\$3.19	\$3.19	\$3.85
Miscellaneous						
Number employed	53	52	1	3	47	3
Average wage	\$3.40	\$3.44	\$1.60	\$3.33	\$3.40	\$3.11

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Minnesota
Program: Job Corps
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	9	—	9	6	—	3
Average wage	\$2.15		\$2.15	\$2.30		\$1.85
Clerical and sales						
Number employed	21	3	18	15	3	3
Average wage	\$1.68	\$1.60	\$1.69	\$1.87	\$1.90	\$.50
Service						
Number employed	18	9	9	15	3	—
Average wage	\$2.09	\$2.33	\$1.85	\$2.06	\$2.25	
Farm, fish, forestry						
Number employed	6	6	—	—	—	6
Average wage	\$4.00	\$4.00				\$4.00
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	—					
Average wage						
Bench work						
Number employed	3	3	—	3	—	—
Average wage	\$2.00	\$2.00		\$2.00		
Structural work						
Number employed	62	62	—	41	12	9
Average wage	\$2.61	\$2.61		\$2.80	\$2.51	\$2.05
Miscellaneous						
Number employed	12	12	—	6	3	3
Average wage	\$3.13	\$3.13		\$2.64	\$4.00	\$3.23

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: Job Corps
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	34	2	32	18	14	2
Average wage	\$2.33	\$3.08	\$2.28	\$2.15	\$2.67	\$2.00
Clerical and sales						
Number employed	71	25	46	33	38	—
Average wage	\$2.21	\$2.26	\$2.18	\$2.18	\$2.29	
Service						
Number employed	92	48	44	31	61	—
Average wage	\$1.97	\$2.03	\$1.90	\$2.16	\$1.84	
Farm, fish, forestry						
Number employed	1	1	—	—	1	—
Average wage	\$2.00	\$2.00			\$2.00	
Processing						
Number employed	15	15	—	2	13	—
Average wage	\$2.29	\$2.29		\$2.60	\$2.24	
Machine Trades						
Number employed	89	87	2	35	50	4
Average wage	\$2.37	\$2.38	\$1.92	\$2.09	\$2.51	\$1.85
Bench work						
Number employed	8	5	3	2	6	—
Average wage	\$2.03	\$2.35	\$1.51	\$1.44	\$2.23	
Structural work						
Number employed	291	291	—	100	180	11
Average wage	\$2.56	\$2.56		\$2.48	\$2.62	\$2.29
Miscellaneous						
Number employed	13	13	—	5	8	—
Average wage	\$2.92	\$2.92		\$2.61	\$3.04	

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: Job Corps
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	8	—	8	8	—	—
Average wage	\$2.25		\$2.25	\$2.25		
Clerical and sales						
Number employed	8	2	6	2	6	—
Average wage	\$1.93	\$2.65	\$1.70	\$2.65	\$1.70	
Service						
Number employed	26	8	18	8	18	—
Average wage	\$1.86	\$1.77	\$1.90	\$1.89	\$1.85	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	2	2	—	—	—	—
Average wage	\$2.25	\$2.25				
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	66	66	—	51	11	4
Average wage	\$2.87	\$2.87		\$2.71	\$3.15	\$1.60
Miscellaneous						
Number employed	32	32	—	6	18	8
Average wage	\$3.54	\$3.54		\$2.30	\$3.96	\$2.92

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: Job Corps
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	8	—	8	—	8	—
Average wage	\$3.49		\$3.49		\$3.49	
Clerical and sales						
Number employed	45	8	37	12	33	—
Average wage	\$2.44	\$2.28	\$2.47	\$1.30	\$2.77	
Service						
Number employed	122	69	53	4	114	4
Average wage	\$2.27	\$2.34	\$2.17	\$2.50	\$2.25	\$2.35
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	49	49	—	—	49	—
Average wage	\$2.40	\$2.40			\$2.40	
Machine Trades						
Number employed	45	45	—	8	37	—
Average wage	\$2.79	\$2.79		\$3.77	\$2.57	
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	277	277	—	24	229	24
Average wage	\$2.58	\$2.58		\$2.22	\$2.57	\$4.82
Miscellaneous						
Number employed	57	53	4	12	33	12
Average wage	\$3.36	\$3.46	\$2.05	\$3.43	\$2.98	\$4.25

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Indiana
Program: Job Corps
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	—					
Average wage						
Clerical and sales						
Number employed	15	—	15	—	15	—
Average wage	\$2.73		\$2.73		\$2.73	
\$						
Service						
Number employed	39	34	5	14	25	—
Average wage	\$2.23	\$2.32	\$1.60	\$1.87	\$2.45	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	5	5	—	—	5	—
Average wage	\$3.68	\$3.68			\$3.68	
Bench work						
Number employed	5	5	—	5	—	—
Average wage	\$1.60	\$1.60		\$1.60		
Structural work						
Number employed	44	44	—	20	24	—
Average wage	\$2.81	\$2.81		\$2.45	\$3.01	
Miscellaneous						
Number employed	—					
Average wage						

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: Job Corps
FY: 1974

Occupational Category	All Enrollments	Sex		Race		
		Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	31	—	31	—	31	—
Average wage	\$2.89		\$3.89		\$3.89	
Clerical and sales						
Number employed	42	—	42	—	42	—
Average wage	\$2.43		\$2.43		\$2.43	
Service						
Number employed	27	4	23	—	27	—
Average wage	\$2.04	\$2.00	\$2.05		\$1.96	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	35	35	—	4	31	—
Average wage	\$2.08	\$2.08		\$1.60	\$2.14	
Bench work						
Number employed	12	12	—		12	—
Average wage	\$3.83	\$3.83			\$3.83	
Structural work						
Number employed	147	147	—	31	116	—
Average wage	\$3.32	\$3.32		\$2.80	\$3.44	
Miscellaneous						
Number employed	35	35	—	35	—	—
Average wage	\$3.25	\$3.25		\$3.25		

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training ^aState: Minnesota
Program: Job Corps
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	3	—	3	3	—	—
Average wage	\$3.00		\$3.00	\$3.00		
Clerical and sales						
Number employed	17	—	17	10	3	4
Average wage	\$1.73		\$1.73	\$2.08	\$1.90	\$.50
Service						
Number employed	7	3	4	3	4	—
Average wage	\$2.12	\$2.00	\$2.25	\$2.00	\$2.25	
Farm, fish, forestry						
Number employed	3	3	—	—	—	3
Average wage	\$2.00	\$3.00				\$2.00
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	3	3	—	3	—	—
Average wage	\$3.64	\$3.64		\$3.64		
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	14	14	—	14	—	—
Average wage	\$2.38	\$2.38		\$2.38		
Miscellaneous						
Number employed	7	7	—	7	—	—
Average wage	\$2.75	\$2.75		\$2.75		

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: Job Corps
FY: 1974

Occupational Category	All Enrollments	Sex		Race		
		Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	21	—	21	6	12	3
Average wage	\$2.79		\$2.79	\$3.02	\$2.87	\$2.00
Clerical and sales						
Number employed	107	30	77	54	53	—
Average wage	\$2.19	\$2.45	\$2.09	\$2.28	\$2.08	
Service						
Number employed	131	54	77	39	92	—
Average wage	\$1.98	\$2.19	\$1.84	\$2.15	\$1.91	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	3	3	—	—	3	—
Average wage	\$2.00	\$2.00			\$2.00	
Machine Trades						
Number employed	56	83	3	44	33	9
Average wage	\$2.23	\$2.24	\$1.85	\$2.04	\$2.58	\$1.85
Bench work						
Number employed	6	3	3	3	3	—
Average wage	\$1.81	\$2.75	\$.88	\$.88	\$2.75	
Structural work						
Number employed	286	286	—	95	173	18
Average wage	\$2.58	\$2.58		\$2.45	\$2.65	\$3.40
Miscellaneous						
Number employed	9	9	—	6	3	—
Average wage	\$2.47	\$2.47		\$2.83	\$1.75	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: Job Corps
FY: 1974

Occupational Category	All			White	Black	Other
	Enrollments	Male	Female			Minority
Professional, Tech., and Managerial						
Number employed	3	—	3	3	—	—
Average wage	\$.50		\$.50	\$.50		
Clerical and sales						
Number employed	7	—	7	7	—	—
Average wage	\$1.60		\$1.60	\$1.60		
Service						
Number employed	10	3	7	10		
Average wage	\$1.78	\$1.75	\$1.80	\$1.78		
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	—					
Average wage						
Bench work						
Number employed	—					
Average wage						
Structural work						
Number employed	23	23	—	20	3	—
Average wage	\$2.80	\$2.80		\$3.00	\$1.60	
Miscellaneous						
Number employed	23	23	—	7	16	—
Average wage	\$3.75	\$3.75		\$2.73	\$4.42	

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U.S. Department of Labor - Manpower Administration

Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: JOP
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	48	40	8	25	23	—
Average wage	\$3.35	\$3.51	\$2.62	\$3.36	\$3.37	—
Clerical and sales						
Number employed	21	15	6	17	4	—
Average wage	\$2.76	\$2.90	\$2.44	\$2.74	\$2.85	—
Service						
Number employed	4	2	2	4	—	—
Average wage	\$2.07	\$2.15	\$2.00	\$2.07	—	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	2	2	—	2	—	—
Average wage	\$3.00	\$3.00	—	\$3.00	—	—
Machine Trades						
Number employed	32	32	—	23	9	—
Average wage	\$3.24	\$3.24	—	\$3.19	\$3.42	—
Bench work						
Number employed	6	4	2	6	—	—
Average wage	\$2.98	\$3.62	\$1.70	\$2.98	—	—
Structural work						
Number employed	17	17	—	17	—	—
Average wage	\$2.96	\$2.96	—	\$2.96	—	—
Miscellaneous						
Number employed	4	4	—	2	2	—
Average wage	\$3.32	\$3.32	—	\$3.85	\$2.80	—

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: JOP
FY: 1971

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	5	4	1	5	—	—
Average wage	\$3.97	\$4.25	\$3.41	\$3.97	—	—
Clerical and sales						
Number employed	15	9	6	11	2	2
Average wage	\$2.59	\$2.85	\$2.16	\$2.67	\$2.25	\$2.50
Service						
Number employed	11	7	4	7	4	—
Average wage	\$2.40	\$2.59	\$2.02	\$2.41	\$2.40	—
Farm, fish, forestry						
Number employed	2	2	—	2	—	—
Average wage	\$1.80	\$1.80	—	\$1.80	—	—
Processing						
Number employed	7	5	2	7	—	—
Average wage	\$2.20	\$2.18	\$2.25	\$2.20	—	—
Machine Trades						
Number employed	47	44	4	36	11	—
Average wage	\$2.74	\$2.77	\$2.38	\$2.77	\$2.64	—
Bench work						
Number employed	15	5	10	7	8	—
Average wage	\$2.23	\$2.28	\$2.20	\$2.25	\$2.21	—
Structural work						
Number employed	23	27	—	22	5	—
Average wage	\$2.92	\$2.92	—	\$3.02	\$2.54	—
Miscellaneous						
Number employed	11	11	—	5	6	—
Average wage	\$2.81	\$2.81	—	\$2.59	\$3.03	—

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Minnesota
Program: JOP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	19	19	—	19	—	—
Average wage	\$3.03	\$3.03		\$3.03		
Clerical and sales						
Number employed	24	17	7	24	—	—
Average wage	\$2.39	\$2.67	\$1.77	\$2.39		
Service						
Number employed	5	5	—	5	—	—
Average wage	\$1.93	\$1.93		\$1.93		
Farm, fish, forestry						
Number employed	2	2	—	2	—	—
Average wage	\$3.75	\$3.75		\$3.75		
Processing						
Number employed	4	4	—	4	—	—
Average wage	\$2.77	\$2.77		\$2.77		
Machine Trades						
Number employed	39	39	—	39	—	—
Average wage	\$2.71	\$2.71		\$2.71		
Bench work						
Number employed	9	7	2	7	—	2
Average wage	\$2.47	\$2.19	\$3.60	\$2.34		\$3.00
Structural work						
Number employed	22	22	—	22	—	—
Average wage	\$3.13	\$3.13		\$3.13		
Miscellaneous						
Number employed	4	4	—	4	—	—
Average wage	\$2.62	\$2.62		\$2.62		

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: JOP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	2	2	—	2	—	—
Average wage	\$2.80	\$2.80	—	\$2.80	—	—
Clerical and sales						
Number employed	10	6	4	3	6	1
Average wage	\$2.27	\$2.33	\$2.20	\$2.42	\$2.25	\$2.10
Service						
Number employed	2	—	2	—	2	—
Average wage	\$1.90	—	\$1.90	—	\$1.90	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	3	3	—	3	—	—
Average wage	\$2.50	\$2.50	—	\$2.50	—	—
Machine Trades						
Number employed	16	13	3	12	4	—
Average wage	\$2.67	\$2.87	\$1.80	\$2.97	\$1.86	—
Bench work						
Number employed	3	3	—	—	3	—
Average wage	\$2.67	\$2.67	—	—	\$2.67	—
Structural work						
Number employed	9	9	—	9	—	—
Average wage	\$2.40	\$2.40	—	\$2.40	—	—
Miscellaneous						
Number employed	3	—	3	—	3	—
Average wage	\$1.90	—	\$1.90	—	\$1.90	—

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: JOP
FY: 1971

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	29	10	19	28	1	—
Average wage	\$2.08	\$2.55	\$1.85	\$2.08	\$2.15	—
Clerical and sales						
Number employed	19	12	7	12	3	4
Average wage	\$2.33	\$2.54	\$1.97	\$2.20	\$2.29	\$2.50
Service						
Number employed	43	12	31	26	15	2
Average wage	\$2.13	\$2.13	\$2.13	\$2.12	\$2.15	\$2.15
Farm, fish, forestry						
Number employed	—					
Average wage	—					
Processing						
Number employed	4	3	1	4	—	—
Average wage	\$2.36	\$2.30	\$2.50	\$2.42	—	—
Machine Trades						
Number employed	32	31	1	28	1	3
Average wage	\$2.23	\$2.26	\$1.60	\$2.26	\$2.15	\$1.75
Bench work						
Number employed	58	23	35	56	1	1
Average wage	\$1.87	\$2.03	\$1.77	\$1.86	\$2.59	\$1.80
Structural work						
Number employed	78	59	19	77	—	1
Average wage	\$1.91	\$1.99	\$1.65	\$1.89	—	\$2.75
Miscellaneous						
Number employed	8	7	1	8	—	—
Average wage	\$2.42	\$2.47	\$2.91	\$2.42	—	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Illinois
Program: JOP
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	91	64	27	47	41	—
Average wage	\$3.27	\$3.56	\$2.59	\$3.03	\$3.58	—
Clerical and sales						
Number employed	157	84	73	69	87	1
Average wage	\$2.65	\$2.86	\$2.42	\$2.73	\$2.59	\$2.06
Service						
Number employed	31	14	17	22	7	1
Average wage	\$2.22	\$2.45	\$2.03	\$2.15	\$2.29	\$3.20
Farm, fish, forestry						
Number employed	2	2	—	2	—	—
Average wage	\$2.00	\$2.00	—	\$2.00	—	—
Processing						
Number employed	31	31	—	31	—	—
Average wage	\$3.21	\$3.21	—	\$3.21	—	—
Machine Trades						
Number employed	175	171	4	135	24	1
Average wage	\$2.90	\$2.91	\$2.40	\$2.83	\$3.25	\$3.36
Bench work						
Number employed	68	38	30	46	19	3
Average wage	\$2.52	\$2.83	\$2.13	\$2.47	\$2.74	\$2.32
Structural work						
Number employed	98	91	7	67	31	—
Average wage	\$3.63	\$3.72	\$2.44	\$3.23	\$4.48	—
Miscellaneous						
Number employed	55	49	6	43	12	—
Average wage	\$2.69	\$2.77	\$2.08	\$2.57	\$3.11	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Indiana
Program: JOP
FY: 1972.

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	7	3	4	3	4	—
Average wage	\$3.47	\$3.76	\$3.25	\$3.35	\$3.56	—
Clerical and sales						
Number employed	10	6	4	7	3	—
Average wage	\$2.92	\$3.12	\$2.62	\$2.96	\$2.83	—
Service						
Number employed	4	2	2	4	—	—
Average wage	\$2.37	\$3.00	\$1.75	\$2.37	—	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	4	4	—	4	—	—
Average wage	\$3.15	\$3.15	—	\$3.15	—	—
Machine Trades						
Number employed	13	12	1	11	2	—
Average wage	\$2.78	\$2.87	\$1.69	\$2.82	\$2.55	—
Bench work						
Number employed	27	19	8	27	—	—
Average wage	\$2.37	\$2.57	\$1.90	\$2.37	—	—
Structural work						
Number employed	18	18	—	11	7	—
Average wage	\$3.38	\$3.38	—	\$3.30	\$3.50	—
Miscellaneous						
Number employed	12	12	—	7	5	—
Average wage	\$2.74	\$2.74	—	\$2.62	\$2.92	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: JOP
FY: 1972

Occupational Category	All Enrollments	Sex		Race		
		Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	27	23	4	24	3	—
Average wage	\$3.62	\$3.78	\$2.66	\$3.63	\$3.55	—
Clerical and sales						
Number employed	60	35	25	49	9	2
Average wage	\$2.74	\$2.99	\$2.39	\$2.78	\$2.58	\$2.75
Service						
Number employed	15	9	6	11	4	—
Average wage	\$2.37	\$2.55	\$2.11	\$2.34	\$2.47	—
Farm, fish, forestry						
Number employed	3	3	—	3	—	—
Average wage	\$2.45	\$2.45	—	\$2.45	—	—
Processing						
Number employed	28	25	3	22	6	—
Average wage	\$2.95	\$3.04	\$2.20	\$2.80	\$3.40	—
Machine Trades						
Number employed	149	144	5	129	16	4
Average wage	\$3.13	\$3.15	\$2.49	\$3.13	\$3.16	\$2.90
Bench work						
Number employed	57	43	14	44	13	—
Average wage	\$2.87	\$3.03	\$2.39	\$2.82	\$3.06	—
Structural work						
Number employed	100	100	—	64	25	1
Average wage	\$3.61	\$3.61	—	\$3.41	\$4.02	\$2.25
Miscellaneous						
Number employed	39	37	2	32	6	1
Average wage	\$2.78	\$2.79	\$2.62	\$2.76	\$2.83	\$3.00

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: JOP
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	97	85	12	94	2	1
Average wage	\$2.89	\$2.92	\$2.72	\$2.89	\$2.40	\$2.00
Clerical and sales						
Number employed	226	155	71	222	3	1
Average wage	\$2.42	\$2.65	\$1.93	\$2.43	\$1.93	\$2.35
Service						
Number employed	48	25	23	43	2	3
Average wage	\$2.02	\$2.29	\$1.72	\$1.99	\$2.15	\$2.10
Farm, fish, forestry						
Number employed	6	6	—	6	—	—
Average wage	\$2.37	\$2.37	—	\$2.37	—	—
Processing						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Machine Trades						
Number employed	262	247	15	245	2	13
Average wage	\$2.61	\$2.65	\$2.00	\$2.61	\$2.95	\$2.59
Bench work						
Number employed	198	114	84	190	1	7
Average wage	\$2.39	\$2.68	\$2.00	\$2.38	\$3.65	\$2.33
Structural work						
Number employed	192	188	4	189	1	2
Average wage	\$2.89	\$2.90	\$2.78	\$2.89	\$3.50	\$3.17
Miscellaneous						
Number employed	50	49	1	49	1	—
Average wage	\$2.62	\$2.61	\$3.25	\$2.60	\$2.75	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: JOP
FY: 1972.

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	52	36	16	45	7	—
Average wage	\$2.79	\$2.99	\$2.35	\$2.85	\$2.43	—
Clerical and sales						
Number employed	194	131	63	144	48	2
Average wage	\$2.54	\$2.67	\$2.27	\$2.57	\$2.41	\$2.15
Service						
Number employed	89	67	22	72	17	—
Average wage	\$2.13	\$2.19	\$1.97	\$2.12	\$2.10	—
Farm, fish, forestry						
Number employed	11	11	—	9	2	—
Average wage	\$3.06	\$3.06	—	\$3.04	\$3.17	—
Processing						
Number employed	51	47	4	32	19	—
Average wage	\$2.55	\$2.55	\$2.51	\$2.66	\$2.35	—
Machine Trades						
Number employed	263	243	20	216	33	1
Average wage	\$2.73	\$2.80	\$1.85	\$2.82	\$2.30	\$1.80
Bench work						
Number employed	153	101	52	119	34	—
Average wage	\$2.44	\$2.61	\$2.11	\$2.54	\$2.08	—
Structural work						
Number employed	258	257	1	193	60	—
Average wage	\$3.01	\$3.02	\$2.58	\$2.95	\$3.23	—
Miscellaneous						
Number employed	25	17	8	15	10	—
Average wage	\$2.56	\$2.88	\$1.90	\$2.82	\$2.17	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After Training

State: Wisconsin
Program: JOP
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	120	37	82	103	17	—
Average wage	\$2.19	\$2.66	\$1.97	\$2.20	\$2.07	—
Clerical and sales						
Number employed	85	35	50	69	11	5
Average wage	\$2.22	\$2.56	\$1.99	\$2.20	\$2.21	\$2.35
Service						
Number employed	153	51	102	123	28	2
Average wage	\$2.08	\$2.17	\$2.04	\$2.05	\$2.22	\$1.87
Farm, fish, forestry						
Number employed	4	4	—	1	3	—
Average wage	\$3.10	\$3.10	—	\$3.10	\$3.10	—
Processing						
Number employed	70	62	8	66	2	2
Average wage	\$2.38	\$2.41	\$2.10	\$2.32	\$3.29	\$2.52
Machine Trades						
Number employed	284	208	76	264	6	14
Average wage	\$2.43	\$2.61	\$1.92	\$2.42	\$3.15	\$2.30
Bench work						
Number employed	113	58	55	95	5	13
Average wage	\$2.16	\$2.35	\$1.97	\$2.13	\$2.70	\$2.24
Structural work						
Number employed	245	233	12	226	1	18
Average wage	\$2.34	\$2.37	\$1.67	\$2.32	\$3.50	\$2.50
Miscellaneous						
Number employed	41	34	7	36	—	5
Average wage	\$2.33	\$2.40	\$1.95	\$2.31	—	\$2.48

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: JOP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	124	90	34	66	47	11
Average wage	\$3.14	\$3.25	\$2.85	\$3.09	\$3.26	\$3.25
Clerical and sales						
Number employed	221	107	114	104	110	7
Average wage	\$2.75	\$3.01	\$2.51	\$2.82	\$2.70	\$2.43
Service						
Number employed	37	23	14	23	11	3
Average wage	\$2.71	\$3.08	\$2.12	\$2.40	\$3.23	\$3.20
Farm, fish, forestry						
Number employed	3	3	—	3	—	—
Average wage	\$1.75	\$1.75	—	\$1.75	—	—
Processing						
Number employed	64	61	3	54	10	—
Average wage	\$3.26	\$3.31	\$2.35	\$3.27	\$3.16	—
Machine Trades						
Number employed	246	242	4	213	33	—
Average wage	\$2.98	\$2.99	\$2.44	\$2.96	\$3.07	—
Bench work						
Number employed	131	78	53	100	24	7
Average wage	\$2.59	\$2.91	\$2.12	\$2.49	\$3.04	\$2.32
Structural work						
Number employed	167	144	23	114	50	3
Average wage	\$3.68	\$3.84	\$2.67	\$3.21	\$4.79	\$3.32
Miscellaneous						
Number employed	90	83	7	61	27	2
Average wage	\$3.08	\$3.13	\$2.45	\$2.96	\$3.32	\$3.21

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Indiana
Program: JOP
FY: 1973

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	9	8	1	8	1	—
Average wage	\$3.44	\$3.59	\$2.25	\$3.59	\$2.25	—
Clerical and sales						
Number employed	16	10	6	11	5	—
Average wage	\$3.01	\$3.56	\$2.10	\$3.41	\$2.21	—
Service						
Number employed	6	6	—	5	1	—
Average wage	\$2.55	\$2.55	—	\$2.46	\$3.00	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	27	27	—	25	2	—
Average wage	\$3.84	\$3.84	—	\$3.81	\$4.27	—
Machine Trades						
Number employed	24	23	1	23	1	—
Average wage	\$3.26	\$3.25	\$3.50	\$3.27	\$3.00	—
Bench work						
Number employed	24	22	2	21	3	—
Average wage	\$2.82	\$2.88	\$2.10	\$2.78	\$3.06	—
Structural work						
Number employed	37	27	10	21	16	—
Average wage	\$3.27	\$3.46	\$2.77	\$3.22	\$3.33	—
Miscellaneous						
Number employed	19	19	—	18	1	—
Average wage	\$3.32	\$3.32	—	\$3.29	\$3.78	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: JOP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	56	48	8	48	6	2
Average wage	\$3.41	\$3.59	\$2.25	\$3.40	\$3.05	\$5.07
Clerical and sales						
Number employed	100	64	36	82	16	2
Average wage	\$2.98	\$3.18	\$2.62	\$2.97	\$2.78	\$5.69
Service						
Number employed	42	19	23	35	7	—
Average wage	\$2.49	\$2.99	\$2.10	\$2.41	\$2.91	—
Farm, fish, forestry						
Number employed	—					
Average wage	—					
Processing						
Number employed	32	29	3	25	7	—
Average wage	\$3.24	\$3.29	\$2.75	\$3.07	\$3.85	—
Machine Trades						
Number employed	255	249	6	227	21	7
Average wage	\$3.69	\$3.71	\$2.80	\$3.66	\$4.01	\$2.75
Bench work						
Number employed	102	69	33	92	10	—
Average wage	\$2.95	\$3.26	\$2.31	\$2.89	\$3.49	—
Structural work						
Number employed	286	286	—	133	146	7
Average wage	\$4.12	\$4.12	—	\$3.79	\$4.42	\$2.25
Miscellaneous						
Number employed	59	53	6	53	5	1
Average wage	\$3.42	\$3.54	\$2.28	\$3.43	\$3.47	\$3.00

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Minnesota
Program: JOP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	110	94	16	108	2	—
Average wage	\$3.28	\$3.30	\$3.18	\$3.18	\$9.00	
Clerical and sales						
Number employed	190	130	60	178	7	3
Average wage	\$2.68	\$2.90	\$2.22	\$2.70	\$2.39	\$2.51
Service						
Number employed	42	26	16	37	1	2
Average wage	\$2.27	\$2.48	\$1.92	\$2.25	\$2.50	\$2.12
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	38	30	8	37	1	—
Average wage	\$2.35	\$2.44	\$2.04	\$2.32	\$3.58	
Machine Trades						
Number employed	269	248	21	255	4	9
Average wage	\$2.66	\$2.72	\$1.94	\$2.64	\$3.81	\$2.75
Bench work						
Number employed	89	48	41	85	—	3
Average wage	\$2.39	\$2.96	\$1.73	\$2.35		\$3.25
Structural work						
Number employed	152	150	2	148	—	2
Average wage	\$2.93	\$2.93	\$2.50	\$2.93		\$2.35
Miscellaneous						
Number employed	44	43	1	33	9	—
Average wage	\$3.05	\$3.03	\$3.75	\$2.80	\$3.86	

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: JOP
FY: 1973

Occupational Category	All Enrollments			Other		
		Male	Female	White	Black	Minority
Professional, Tech., and Managerial						
Number employed	42	28	14	39	3	—
Average wage	\$3.08	\$3.45	\$2.33	\$3.10	\$2.83	—
Clerical and sales						
Number employed	107	88	19	94	13	—
Average wage	\$2.78	\$2.88	\$2.77	\$2.76	\$2.67	—
Service						
Number employed	55	26	29	44	11	—
Average wage	\$2.10	\$2.38	\$1.85	\$2.10	\$2.09	—
Farm, fish, forestry						
Number employed	13	13	—	13	—	—
Average wage	\$2.89	\$2.89	—	\$2.89	—	—
Processing						
Number employed	24	19	5	24	—	—
Average wage	\$2.57	\$2.64	\$2.26	\$2.57	—	—
Machine Trades						
Number employed	274	269	5	250	24	—
Average wage	\$2.84	\$2.85	\$2.12	\$2.86	\$2.60	—
Bench work						
Number employed	102	78	24	84	18	—
Average wage	\$2.74	\$2.86	\$2.31	\$2.78	\$2.49	—
Structural work						
Number employed	226	221	5	185	41	—
Average wage	\$3.12	\$3.15	\$1.82	\$3.13	\$3.11	—
Miscellaneous						
Number employed	25	24	1	19	6	—
Average wage	\$3.09	\$3.10	\$1.75	\$3.25	\$2.57	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: JOP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	157	70	87	107	36	13
Average wage	\$2.54	\$2.80	\$2.34	\$2.56	\$2.50	\$2.47
Clerical and sales						
Number employed	129	56	73	114	4	10
Average wage	\$2.21	\$2.49	\$1.99	\$2.22	\$2.51	\$1.86
Service						
Number employed	110	49	61	81	21	8
Average wage	\$1.99	\$2.12	\$1.88	\$1.96	\$2.17	\$1.76
Farm, fish, forestry						
Number employed	10	10	—	6	—	4
Average wage	\$2.40	\$2.40	—	\$2.18	—	\$2.72
Processing						
Number employed	48	45	3	39	6	1
Average wage	\$2.64	\$2.65	\$2.60	\$2.64	\$2.76	\$1.60
Machine Trades						
Number employed	350	283	67	319	6	21
Average wage	\$2.60	\$2.71	\$2.14	\$2.63	\$3.09	\$2.03
Bench work						
Number employed	166	93	73	143	5	17
Average wage	\$2.22	\$2.45	\$1.91	\$2.19	\$2.82	\$2.28
Structural work						
Number employed	220	215	5	176	2	41
Average wage	\$2.51	\$2.53	\$1.78	\$2.60	\$3.32	\$2.07
Miscellaneous						
Number employed	65	36	29	54	3	7
Average wage	\$2.21	\$2.46	\$1.89	\$2.20	\$3.00	\$1.98

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: JOP
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	17	15	2	10	7	—
Average wage	\$3.30	\$3.25	\$3.81	\$3.40	\$3.16	—
Clerical and sales						
Number employed	15	8	7	12	3	—
Average wage	\$3.36	\$3.82	\$2.77	\$3.19	\$3.93	—
Service						
Number employed	3	3	—	2	1	—
Average wage	\$3.00	\$3.00	—	\$3.00	\$3.00	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	10	10	—	8	2	—
Average wage	\$3.44	\$3.44	—	\$3.58	\$2.75	—
Machine Trades						
Number employed	43	43	—	34	9	—
Average wage	\$3.10	\$3.10	—	\$3.09	\$2.93	—
Bench work						
Number employed	21	7	14	14	7	—
Average wage	\$2.56	\$3.00	\$2.34	\$2.34	\$3.00	—
Structural work						
Number employed	34	34	—	22	12	—
Average wage	\$4.41	\$4.41	—	\$3.82	\$5.52	—
Miscellaneous						
Number employed	15	15	—	10	5	—
Average wage	\$2.89	\$2.89	—	\$2.83	\$3.07	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: JOP
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	2	2	—	2	—	—
Average wage	\$5.00	\$5.00	—	\$5.00	—	—
Clerical and sales						
Number employed	5	—	5	—	4	—
Average wage	\$2.40	—	\$2.40	—	\$2.50	—
Service						
Number employed	1	1	—	1	—	—
Average wage	\$3.00	\$3.00	—	\$3.00	—	—
Farm, fish, forestry						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Processing						
Number employed	19	14	5	14	5	—
Average wage	\$4.01	\$4.04	\$3.93	\$4.03	\$3.95	—
Machine Trades						
Number employed	8	7	1	8	—	—
Average wage	\$3.38	\$3.36	\$3.50	\$3.38	—	—
Bench work						
Number employed	4	4	—	3	1	—
Average wage	\$3.34	\$3.34	—	\$3.23	\$3.69	—
Structural work						
Number employed	6	5	1	4	2	—
Average wage	\$3.94	\$4.33	\$2.03	\$3.79	\$4.25	—
Miscellaneous						
Number employed	2	2	—	1	1	—
Average wage	\$3.76	\$3.76	—	\$3.75	\$3.78	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: JOP
FY: 1974

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	3	3	—	—	3	—
Average wage	\$3.56	\$3.56			\$3.56	
Clerical and sales						
Number employed	26	17	9	20	3	3
Average wage	\$2.91	\$3.48	\$2.74	\$3.01	\$2.30	INA
Service						
Number employed	6	3	3	3	3	—
Average wage	\$2.35	\$2.50	\$2.20	\$2.50	\$2.20	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	6	6	—	3	3	—
Average wage	\$3.25	\$3.25		\$3.25	\$3.25	
Machine Trades						
Number employed	88	88	—	77	11	—
Average wage	\$3.98	\$3.98		\$3.95	\$4.20	
Bench work						
Number employed	11	11	—	11	—	—
Average wage	\$3.07	\$3.07		\$3.07		
Structural work						
Number employed	37	37	—	28	9	—
Average wage	\$3.87	\$3.87		\$3.86	\$3.85	
Miscellaneous						
Number employed	11	11	—	11	—	—
Average wage	\$4.20	\$4.20		\$4.20		

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: JOP
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	32	23	9	31	1	—
Average wage	\$3.34	\$3.30	\$3.43	\$3.25	\$6.00	
Clerical and sales						
Number employed	68	45	23	64	3	1
Average wage	\$2.75	\$2.98	\$2.31	\$2.76	\$2.58	\$2.50
Service						
Number employed	6	2	4	5	—	—
Average wage	\$2.29	\$2.70	\$2.08	\$2.30		
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	16	11	5	16	—	—
Average wage	\$2.69	\$2.97	\$2.08	\$2.69		
Machine Trades						
Number employed	79	75	4	72	2	5
Average wage	\$2.87	\$2.93	\$1.75	\$2.85	\$4.25	\$2.70
Bench work						
Number employed	44	14	30	41	—	3
Average wage	\$2.28	\$3.07	\$1.92	\$2.22		\$3.12
Structural work						
Number employed	40	40	—	38	—	1
Average wage	\$3.10	\$3.10		\$3.08		\$2.35
Miscellaneous						
Number employed	11	11	—	7	2	1
Average wage	\$3.43	\$3.43		\$3.31	\$3.75	\$3.30

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: JOP
FY: 1974

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	7	5	2	3	4	—
Average wage	\$5.05	\$5.93	\$2.40	\$6.82	\$3.27	—
Clerical and sales						
Number employed	27	18	9	20	7	—
Average wage	\$2.94	\$3.14	\$2.51	\$2.95	\$2.93	—
Service						
Number employed	5	5	—	5	—	—
Average wage	\$2.63	\$2.63	—	\$2.63	—	—
Farm, fish, forestry						
Number employed	3	3	—	3	—	—
Average wage	\$2.35	\$2.35	—	\$2.35	—	—
Processing						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Machine Trades						
Number employed	77	77	—	70	7	—
Average wage	\$3.05	\$3.05	—	\$3.11	\$2.40	—
Bench work						
Number employed	20	18	2	18	2	—
Average wage	\$2.79	\$2.87	\$2.00	\$2.78	\$2.96	—
Structural work						
Number employed	40	35	5	33	7	—
Average wage	\$2.92	\$3.08	\$1.82	\$2.93	\$2.78	—
Miscellaneous						
Number employed	7	7	—	5	2	—
Average wage	\$2.59	\$2.59	—	\$2.67	\$2.35	—

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: JOP
FY: 1974

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	32	20	12	31	1	—
Average wage	\$2.71	\$3.11	\$2.00	\$2.73	\$2.25	
Clerical and sales						
Number employed	38	18	20	30	1	7
Average wage	\$2.37	\$2.64	\$2.12	\$2.45	\$3.10	\$1.94
Service						
Number employed	14	5	9	12	2	—
Average wage	\$2.16	\$2.33	\$2.07	\$2.07	\$2.61	
Farm, fish, forestry						
Number employed	—					
Average wage						
Processing						
Number employed	20	20	—	18	2	—
Average wage	\$3.40	\$3.40		\$3.45	\$3.05	
Machine Trades						
Number employed	140	126	14	126	9	5
Average wage	\$2.75	\$2.79	\$2.45	\$2.71	\$3.37	\$2.45
Bench work						
Number employed	67	39	28	52	2	13
Average wage	\$2.56	\$2.65	\$2.43	\$2.49	\$2.96	\$2.31
Structural work						
Number employed	111	110	1	98	2	11
Average wage	\$2.49	\$2.49	\$2.83	\$2.53	\$3.15	\$1.96
Miscellaneous						
Number employed	7	5	2	5	1	1
Average wage	\$2.92	\$2.82	\$3.11	\$3.23	\$3.00	\$1.60

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: PEP
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	275	180	95	144	118	4
Average wage	\$3.90	\$4.19	\$3.35	\$4.31	\$3.35	\$3.89
Clerical and sales						
Number employed	164	24	140	90	67	3
Average wage	\$2.79	\$3.25	\$2.71	\$2.85	\$2.71	\$2.91
Service						
Number employed	250	189	61	175	70	—
Average wage	\$3.43	\$3.66	\$2.75	\$3.52	\$3.23	—
Farm, fish, forestry						
Number employed	34	34	—	20	12	—
Average wage	\$3.14	\$3.14	—	\$3.20	\$3.10	—
Processing						
Number employed	5	5	—	3	2	—
Average wage	\$3.81	\$3.81	—	\$3.27	\$4.63	—
Machine Trades						
Number employed	7	7	—	5	2	—
Average wage	\$4.56	\$4.56	—	\$4.93	\$3.64	—
Bench work						
Number employed	4	4	—	3	1	—
Average wage	\$4.36	\$4.36	—	\$4.38	\$4.29	—
Structural work						
Number employed	171	166	5	122	37	1
Average wage	\$3.73	\$3.74	\$3.19	\$3.77	\$3.71	\$3.40
Miscellaneous						
Number employed	47	45	2	39	8	—
Average wage	\$3.89	\$3.95	\$2.56	\$3.97	\$3.53	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: PEP
FY: 1972

Occupational Category	All			Other		
	Enrollments	Male	Female	White	Black	Minority
Professional, Tech., and Managerial						
Number employed	150	86	64	94	50	2
Average wage	\$3.86	\$3.96	\$3.72	\$4.06	\$3.45	\$3.96
Clerical and sales						
Number employed	100	11	88	73	26	—
Average wage	\$2.69	\$3.29	\$2.62	\$2.69	\$2.71	
Service						
Number employed	262	203	59	228	31	1
Average wage	\$2.82	\$2.94	\$2.41	\$2.81	\$2.85	\$2.55
Farm, fish, forestry						
Number employed	41	40	1	28	9	—
Average wage	\$3.31	\$3.27	\$4.80	\$3.26	\$3.66	
Processing						
Number employed	7	6	1	3	3	—
Average wage	\$2.68	\$2.83	\$1.78	\$2.37	\$2.98	
Machine Trades						
Number employed	21	20	1	17	2	1
Average wage	\$3.09	\$3.07	\$3.50	\$3.13	\$3.13	\$2.55
Bench work						
Number employed	4	4	—	4	—	—
Average wage	\$3.25	\$3.25		\$3.25		
Structural work						
Number employed	183	181	2	159	15	—
Average wage	\$3.10	\$3.09	\$3.63	\$3.07	\$3.45	
Miscellaneous						
Number employed	61	58	3	41	14	1
Average wage	\$3.26	\$3.28	\$2.71	\$3.13	\$3.50	\$3.84

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Michigan
Program: PEP
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	421	260	161	326	79	5
Average wage	\$4.20	\$4.27	\$4.09	\$4.30	\$3.77	\$4.85
Clerical and sales						
Number employed	345	474	293	277	50	6
Average wage	\$3.08	\$3.75	\$2.98	\$3.11	\$3.02	\$2.71
Service						
Number employed	400	330	64	325	49	1
Average wage	\$3.57	\$3.77	\$2.60	\$3.58	\$3.41	\$3.32
Farm, fish, forestry						
Number employed	113	103	9	87	12	1
Average wage	\$3.82	\$3.89	\$3.14	\$3.88	\$4.11	\$3.55
Processing						
Number employed	44	41	3	38	5	—
Average wage	\$4.02	\$4.04	\$3.72	\$4.02	\$4.04	—
Machine Trades						
Number employed	13	13	—	10	—	—
Average wage	\$4.35	\$4.35	—	\$4.28	—	—
Bench work						
Number employed	9	7	—	7	1	—
Average wage	\$3.84	\$4.03	—	\$3.91	\$4.25	—
Structural work						
Number employed	244	241	2	202	22	8
Average wage	\$3.79	\$3.80	\$2.76	\$3.86	\$3.66	\$3.21
Miscellaneous						
Number employed	103	95	6	85	8	1
Average wage	\$3.65	\$3.66	\$3.73	\$3.68	\$3.39	\$3.25

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: PEP
FY: 1972

Occupational Category	All Enrollments			Other		
		Male	Female	White	Black	Minority
Professional, Tech., and Managerial						
Number employed	299	231	68	266	21	8
Average wage	\$4.21	\$4.30	\$3.92	\$4.32	\$3.29	\$2.72
Clerical and sales						
Number employed	172	49	123	165	5	2
Average wage	\$2.80	\$2.33	\$2.58	\$2.79	\$3.04	\$2.93
Service						
Number employed	151	120	31	134	8	7
Average wage	\$3.42	\$3.66	\$2.51	\$3.32	\$4.02	\$4.30
Farm, fish, forestry						
Number employed	42	42	—	39	—	1
Average wage	\$4.14	\$4.14	—	\$4.10	—	\$4.75
Processing						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Machine Trades						
Number employed	17	17	—	14	—	3
Average wage	\$4.10	\$4.10	—	\$4.55	—	\$2.00
Bench work						
Number employed	3	3	—	3	—	—
Average wage	\$2.70	\$2.70	—	\$2.70	—	—
Structural work						
Number employed	89	88	1	85	3	1
Average wage	\$4.14	\$4.16	\$3.05	\$4.10	\$5.51	\$4.00
Miscellaneous						
Number employed	33	33	—	26	—	7
Average wage	\$3.82	\$3.82	—	\$4.31	—	\$2.00

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: PEP
FY: 1972

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	340	210	130	242	93	1
Average wage	\$3.98	\$4.05	\$3.85	\$4.14	\$3.58	\$3.38
Clerical and sales						
Number employed	236	61	175	168	65	—
Average wage	\$2.95	\$3.70	\$2.69	\$3.00	\$2.84	—
Service						
Number employed	513	437	76	364	143	—
Average wage	\$3.51	\$3.70	\$2.45	\$3.61	\$3.28	—
Farm, fish, forestry						
Number employed	59	59	—	43	14	—
Average wage	\$3.43	\$3.43	—	\$3.43	\$3.69	—
Processing						
Number employed	35	32	3	29	6	—
Average wage	\$3.36	\$3.45	\$2.38	\$3.35	\$3.41	—
Machine Trades						
Number employed	37	37	—	33	4	—
Average wage	\$3.74	\$3.74	—	\$3.77	\$3.44	—
Bench work						
Number employed	12	12	—	11	1	—
Average wage	\$3.40	\$3.40	—	\$3.41	\$3.27	—
Structural work						
Number employed	268	262	5	219	43	1
Average wage	\$3.35	\$3.37	\$2.43	\$3.30	\$3.62	\$3.00
Miscellaneous						
Number employed	178	171	7	128	48	—
Average wage	\$3.48	\$3.48	\$3.33	\$3.41	\$3.68	—

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: PEP
FY: 1972

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	205	148	56	173	20	5
Average wage	\$4.26	\$4.47	\$3.64	\$4.29	\$3.75	\$4.93
Clerical and sales						
Number employed	136	30	105	114	13	3
Average wage	\$2.93	\$3.59	\$2.74	\$2.95	\$2.88	\$2.48
Service						
Number employed	141	106	35	120	13	—
Average wage	\$3.49	\$3.66	\$2.97	\$3.52	\$3.48	—
Farm, fish, forestry						
Number employed	42	42	—	38	2	1
Average wage	\$3.62	\$3.62	—	\$3.62	\$3.95	\$2.25
Processing						
Number employed	4	2	—	1	—	—
Average wage	\$3.97	\$3.66	—	\$3.28	—	—
Machine Trades						
Number employed	8	8	—	7	—	—
Average wage	\$4.17	\$4.17	—	\$4.22	—	—
Bench work						
Number employed	2	—	2	—	1	—
Average wage	\$2.91	—	\$2.91	—	\$2.91	—
Structural work						
Number employed	44	44	—	34	6	4
Average wage	\$3.24	\$3.24	—	\$3.27	\$3.42	\$2.76
Miscellaneous						
Number employed	116	116	—	82	29	3
Average wage	\$3.92	\$3.92	—	\$3.91	\$3.98	\$3.43

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Illinois
Program: PEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	654	386	268	337	275	42
Average wage	\$3.93	\$4.34	\$3.34	\$4.46	\$3.32	\$3.77
Clerical and sales						
Number employed	490	49	441	238	230	22
Average wage	\$2.80	\$3.43	\$2.73	\$2.89	\$2.68	\$3.67
Service						
Number employed	510	391	119	302	188	20
Average wage	\$3.44	\$3.60	\$2.89	\$3.58	\$3.20	\$3.72
Farm, fish, forestry						
Number employed	89	89	—	47	42	—
Average wage	\$3.53	\$3.53		\$3.43	\$3.74	
Processing						
Number employed	12	12	—	10	2	—
Average wage	\$3.92	\$3.92		\$3.46	\$5.76	
Machine Trades						
Number employed	10	10	—	5	5	—
Average wage	\$4.68	\$4.68		\$6.01	\$3.38	
Bench work						
Number employed	7	7	—	7	—	—
Average wage	\$4.38	\$4.38		\$4.38		
Structural work						
Number employed	305	297	8	196	72	37
Average wage	\$3.65	\$3.66	\$3.32	\$3.74	\$3.52	\$3.40
Miscellaneous						
Number employed	97	97	—	72	25	—
Average wage	\$3.88	\$3.88		\$3.82	\$4.04	

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: PEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	283	133	150	206	70	7
Average wage	\$3.93	\$3.84	\$4.02	\$4.06	\$3.62	\$4.93
Clerical and sales						
Number employed	141	10	131	117	24	—
Average wage	\$2.58	\$3.24	\$2.55	\$2.59	\$2.58	
Service						
Number employed	419	318	101	377	35	7
Average wage	\$2.86	\$3.00	\$2.41	\$2.85	\$2.84	\$2.70
Farm, fish, forestry						
Number employed	84	84	—	70	14	—
Average wage	\$2.93	\$2.93		\$2.85	\$3.49	
Processing						
Number employed	7	2	5	5	2	—
Average wage	\$2.18	\$3.46	\$1.54	\$1.54	\$3.46	
Machine Trades						
Number employed	26	26	—	22	2	2
Average wage	\$2.95	\$2.95		\$2.96	\$3.26	\$2.55
Bench work						
Number employed	9	9	—	9	—	—
Average wage	\$3.38	\$3.38		\$3.38		
Structural work						
Number employed	380	380	—	351	29	—
Average wage	\$3.02	\$3.02		\$2.99	\$3.44	
Miscellaneous						
Number employed	120	118	2	93	14	13
Average wage	\$3.00	\$3.01	\$2.43	\$3.02	\$3.22	\$3.84

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: PEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	790	466	324	489	269	32
Average wage	\$3.73	\$3.89	\$3.50	\$4.26	\$2.68	\$5.05
Clerical and sales						
Number employed	396	56	340	308	63	25
Average wage	\$3.10	\$3.61	\$3.05	\$3.16	\$3.00	\$2.65
Service						
Number employed	530	435	95	431	76	23
Average wage	\$3.64	\$3.85	\$2.97	\$3.65	\$3.52	\$4.04
Farm, fish, forestry						
Number employed	167	158	9	139	14	14
Average wage	\$3.64	\$3.64	\$3.63	\$3.63	\$3.81	\$3.55
Processing						
Number employed	44	44	—	32	12	—
Average wage	\$4.32	\$4.32	—	\$4.41	\$4.04	—
Machine Trades						
Number employed	16	16	—	16	—	—
Average wage	\$4.35	\$4.35	—	\$4.35	—	—
Bench work						
Number employed	14	14	—	14	—	—
Average wage	\$4.01	\$4.01	—	\$4.01	—	—
Structural work						
Number employed	294	289	5	234	39	21
Average wage	\$3.67	\$3.68	\$2.76	\$3.76	\$3.31	\$3.20
Miscellaneous						
Number employed	128	118	10	107	19	2
Average wage	\$3.59	\$3.54	\$4.51	\$3.56	\$3.25	\$3.25

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Table 3. Employment by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: PEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	258	189	69	224	28	6
Average wage	\$4.43	\$4.31	\$4.21	\$4.49	\$3.72	\$2.71
Clerical and sales						
Number employed	146	44	102	134	12	—
Average wage	\$2.90	\$3.57	\$2.61	\$2.83	\$3.68	—
Service						
Number employed	121	94	27	95	15	11
Average wage	\$3.50	\$3.76	\$2.58	\$3.25	\$4.13	\$4.84
Farm, fish, forestry						
Number employed	27	27	—	22	5	—
Average wage	\$3.41	\$3.41	—	\$3.68	\$2.27	—
Processing						
Number employed	—	—	—	—	—	—
Average wage	—	—	—	—	—	—
Machine Trades						
Number employed	20	20	—	20	—	—
Average wage	\$4.43	\$4.43	—	\$4.43	—	—
Bench work						
Number employed	3	3	—	3	—	—
Average wage	\$2.75	\$2.75	—	\$2.75	—	—
Structural work						
Number employed	95	95	—	85	7	3
Average wage	\$4.43	\$4.43	—	\$4.41	\$5.28	\$4.00
Miscellaneous						
Number employed	25	25	—	25	—	—
Average wage	\$4.60	\$4.60	—	\$4.60	—	—

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Ohio
Program: PEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	434	268	166	287	134	13
Average wage	\$3.90	\$4.01	\$3.71	\$4.07	\$3.55	\$5.47
Clerical and sales						
Number employed	336	85	251	251	85	—
Average wage	\$2.99	\$3.85	\$2.70	\$3.00	\$2.97	
Service						
Number employed	711	622	89	494	217	—
Average wage	\$3.72	\$3.91	\$2.42	\$3.77	\$3.64	
Farm, fish, forestry						
Number employed	85	83	2	57	28	—
Average wage	\$3.22	\$3.22	\$3.02	\$3.14	\$3.69	
Processing						
Number employed	30	28	2	26	4	—
Average wage	\$3.31	\$3.38	\$2.33	\$3.39	\$2.81	
Machine Trades						
Number employed	38	38	—	32	6	—
Average wage	\$3.67	\$3.67		\$3.74	\$3.28	
Bench work						
Number employed	11	11	—	9	2	—
Average wage	\$3.40	\$3.40		\$3.43	\$3.27	
Structural work						
Number employed	342	338	4	285	53	4
Average wage	\$3.33	\$3.33	\$3.50	\$3.28	\$3.62	\$3.00
Miscellaneous						
Number employed	243	239	4	158	85	—
Average wage	\$3.53	\$3.52	\$4.31	\$3.45	\$3.69	

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Table 3. Employment by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Wisconsin
Program: PEP
FY: 1973

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	249	175	74	208	28	13
Average wage	\$4.22	\$4.46	\$3.55	\$4.26	\$3.70	\$4.62
Clerical and sales						
Number employed	147	40	107	127	8	12
Average wage	\$3.05	\$3.85	\$2.77	\$3.03	\$3.62	\$2.64
Service						
Number employed	163	109	54	134	29	—
Average wage	\$3.44	\$3.71	\$2.91	\$3.41	\$3.68	—
Farm, fish, forestry						
Number employed	40	40	—	33	7	—
Average wage	\$3.78	\$3.78	—	\$3.72	\$3.95	—
Processing						
Number employed	7	7	—	7	—	—
Average wage	\$3.97	\$3.97	—	\$3.97	—	—
Machine Trades						
Number employed	8	8	—	8	—	—
Average wage	\$4.22	\$4.22	—	\$4.22	—	—
Bench work						
Number employed	3	—	3	—	3	—
Average wage	\$2.91	—	\$2.91	—	\$2.91	—
Structural work						
Number employed	36	35	—	26	8	2
Average wage	\$3.13	\$3.13	—	\$3.06	\$3.54	\$2.25
Miscellaneous						
Number employed	147	147	—	104	38	5
Average wage	\$4.03	\$4.03	—	\$3.98	\$4.16	\$4.34

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Illinois
Program: PEP
FY: '74

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	374	221	153	277	96	—
Average wage	\$3.93	\$4.34	\$3.34	\$4.45	\$4.26	—
Clerical and sales						
Number employed	280	28	252	204	75	1
Average wage	\$2.80	\$3.43	\$2.73	\$2.89	\$2.53	\$2.50
Service						
Number employed	291	223	68	222	68	1
Average wage	\$3.44	\$3.60	\$2.89	\$3.58	\$2.99	\$3.72
Farm, fish, forestry						
Number employed	51	51	—	24	27	—
Average wage	\$3.53	\$3.53	—	\$3.43	\$3.05	—
Processing						
Number employed	7	7	—	7	—	—
Average wage	\$3.92	\$3.92	—	\$3.92	—	—
Machine Trades						
Number employed	6	6	—	6	—	—
Average wage	\$4.68	\$4.68	—	\$4.68	—	—
Bench work						
Number employed	4	4	—	4	—	—
Average wage	\$4.38	\$4.38	—	\$4.38	—	—
Structural work						
Number employed	174	170	4	112	62	—
Average wage	\$3.65	\$3.66	\$3.32	\$3.74	\$4.92	—
Miscellaneous						
Number employed	55	55	—	55	—	—
Average wage	\$3.88	\$3.88	—	\$3.88	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Indiana
Program: PEP
FY:

Occupational Category	All Enrollments	Sex		Race		
		Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	228	107	121	166	62	—
Average wage	\$3.93	\$3.84	\$4.02	\$4.06	\$2.62	—
Clerical and sales						
Number employed	113	8	105	96	17	—
Average wage	\$2.58	\$3.24	\$2.55	\$2.59	\$2.25	—
Service						
Number employed	336	256	80	302	32	2
Average wage	\$2.86	\$3.00	\$2.41	\$2.85	\$3.55	\$3.85
Farm, fish, forestry						
Number employed	68	68	—	57	11	—
Average wage	\$2.93	\$2.93	—	\$2.05	\$3.00	—
Processing						
Number employed	6	2	4	6	—	—
Average wage	\$2.18	\$3.46	\$1.54	\$1.54	—	—
Machine Trades						
Number employed	21	21	—	21	—	—
Average wage	\$2.95	\$2.95	—	\$2.95	—	—
Bench work						
Number employed	6	6	—	6	—	—
Average wage	\$3.38	\$3.38	—	\$3.38	—	—
Structural work						
Number employed	304	304	—	300	4	—
Average wage	\$3.02	\$3.02	—	\$2.99	\$2.88	—
Miscellaneous						
Number employed	96	94	2	94	2	—
Average wage	\$3.00	\$3.01	\$2.43	\$3.02	\$2.88	—

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Table 3. Enrollments by Major Occupational Category,
by Sex and Race, and Average Hourly Wage
After TrainingState: Michigan
Program: PEP
FY: '74

Occupational Category	All Enrollments	Male	Female	White	Black	Other Minority
Professional, Tech., and Managerial						
Number employed	626	369	257	422	165	39
Average wage	\$3.73	\$3.89	\$3.50	\$4.26	\$1.78	\$5.70
Clerical and sales						
Number employed	314	44	270	275	20	19
Average wage	\$3.10	\$3.61	\$3.05	\$3.16	\$2.03	\$2.45
Service						
Number employed	420	345	75	358	31	31
Average wage	\$3.64	\$3.85	\$2.69	\$3.65	\$3.56	\$4.28
Farm, fish, forestry						
Number employed	132	125	7	128	4	—
Average wage	\$3.64	\$3.64	\$3.63	\$3.63	\$4.47	—
Processing						
Number employed	35	35	—	35	—	—
Average wage	\$4.32	\$4.32	—	\$4.32	—	—
Machine Trades						
Number employed	13	13	—	13	—	—
Average wage	\$4.35	\$4.35	—	\$4.35	—	—
Bench work						
Number employed	11	11	—	11	—	—
Average wage	\$4.01	\$4.01	—	\$4.01	—	—
Structural work						
Number employed	232	229	4	222	6	5
Average wage	\$3.67	\$3.68	\$2.76	\$3.76	\$3.15	\$3.15
Miscellaneous						
Number employed	101	95	6	101	—	—
Average wage	\$3.59	\$3.54	\$4.41	\$3.59	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Minnesota
Program: FEP
FY: '74

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	279	205	74	279	—	—
Average wage	\$4.34	\$4.51	\$4.21	\$4.43		
Clerical and sales						
Number employed	158	47	111	145	13	—
Average wage	\$2.90	\$3.57	\$2.61	\$2.83	\$5.03	
Service						
Number employed	131	102	29	131	—	—
Average wage	\$3.50	\$3.76	\$2.58	\$3.50		
Farm, fish, forestry						
Number employed	29	29	—	29	—	—
Average wage	\$3.41	\$3.41		\$3.41		
Processing						
Number employed	—					
Average wage						
Machine Trades						
Number employed	22	22	—	22	—	—
Average wage	\$4.43	\$4.43		\$4.43		
Bench work						
Number employed	4	4	—	4	—	—
Average wage	\$2.74	\$2.75		\$2.75		
Structural work						
Number employed	104	104	—	104	—	—
Average wage	\$4.43	\$4.43		\$4.43		
Miscellaneous						
Number employed	27	27	—	27	—	—
Average wage	\$4.60	\$4.60		\$4.60		

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Ohio
Program: PEP
FY: '74

Occupational Category	All Enrollments	Sex		Race		Other Minority
		Male	Female	White	Black	
Professional, Tech., and Managerial						
Number employed	234	143	91	194	40	—
Average wage	\$3.90	\$4.01	\$3.71	\$4.07	\$3.20	—
Clerical and sales						
Number employed	181	46	135	158	23	—
Average wage	\$2.99	\$3.85	\$2.70	\$3.00	\$3.00	—
Service						
Number employed	383	335	48	383	—	—
Average wage	\$3.72	\$3.91	\$2.42	\$3.72	—	—
Farm, fish, forestry						
Number employed	46	45	1	46	—	—
Average wage	\$3.22	\$3.22	\$3.02	\$3.22	—	—
Processing						
Number employed	16	15	1	16	—	—
Average wage	4\$331	\$3.38	\$2.33	\$3.27	—	—
Machine Trades						
Number employed	21	21	—	21	—	—
Average wage	\$3.67	\$3.67	—	\$3.67	—	—
Bench work						
Number employed	6	6	—	6	—	—
Average wage	\$340	\$340	—	\$3.40	—	—
Structural work						
Number employed	185	183	2	169	16	—
Average wage	\$3.33	\$3.33	\$3.50	\$3.28	\$3.19	—
Miscellaneous						
Number employed	131	129	2	131	—	—
Average wage	3.53	3.52	4.31	3.52	—	—

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Table 3. Enrollments by Major Occupational Category, by Sex and Race, and Average Hourly Wage After Training

State: Wisconsin
Program: PEP
FY: '74

Occupational Category	All Enrollments			White	Black	Other Minority
		Male	Female			
Professional, Tech., and Managerial						
Number employed	184	127	57	184	—	—
Average wage	\$4.22	\$4.46	\$3.55	\$4.22	—	—
Clerical and sales						
Number employed	108	28	80	94	12	2
Average wage	\$3.05	\$3.84	\$2.77	\$3.03	\$4.06	\$2.52
Service						
Number employed	120	80	40	98	22	—
Average wage	\$3.44	\$3.71	\$2.91	\$3.41	\$4.45	—
Farm, fish, forestry						
Number employed	29	29	—	29	—	—
Average wage	\$3.78	\$3.78	—	\$3.78	—	—
Processing						
Number employed	5	5	—	5	—	—
Average wage	\$3.97	\$3.97	—	\$3.97	—	—
Machine Trades						
Number employed	6	6	—	6	—	—
Average wage	\$4.22	\$4.22	—	\$4.22	—	—
Bench work						
Number employed	2	—	2	2	—	—
Average wage	\$2.91	—	\$2.91	\$2.91	—	—
Structural work						
Number employed	27	27	—	27	—	—
Average wage	\$3.13	\$3.13	—	\$3.13	—	—
Miscellaneous						
Number employed	108	108	—	92	16	—
Average wage	\$4.03	\$4.03	—	\$3.98	\$4.61	—

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Indiana
Program: CEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	724	601	123	72	543	109
FY 1972	939	845	94	122	808	9
FY 1973	1,309	458	851	52	1,257	--
FY 1974	772	470	302	31	741	--
Average duration of training (weeks)						
FY 1971	24.0	22.7	29.3	22.6	24.2	24.2
FY 1972	14.8	14.7	15.1	12.6	14.7	16.5
FY 1973	15.3	15.4	15.0	11.8	15.7	--
FY 1974	34.0	-	34.0	--	34.0	--
Number employed						
FY 1971	360	299	61	36	270	54
FY 1972	292	263	29	38	251	3
FY 1973	317	111	206	13	304	--
FY 1974	188	114	74	8	180	--
Average hourly wage						
FY 1971	\$2.85	\$2.88	\$2.54	\$2.86	\$2.83	\$2.88
FY 1972	INA	INA	INA	INA	INA	INA
FY 1973	INA	INA	INA	INA	INA	--
FY 1974	INA	INA	INA	INA	INA	--

* FY 1974 data as of 3/31/74.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Michigan

Program: CEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	4,676	3,600	1,076	1,076	3,507	93
FY 1972	5,522	4,252	1,270	1,325	4,031	166
FY 1973	3,234	1,940	1,294	1,423	1,520	291
FY 1974	2,376	1,948	428	451	1,853	72
Average duration of training (weeks)						
FY 1971	21.6	20.4	21.9	21.9	17.7	18.0
FY 1972	12.7	11.4	14.4	12.4	13.9	13.1
FY 1973	21.9	20.4	24.2	20.0	26.6	25.4
FY 1974	34.7	34.7	INA	34.7	INA	INA
Number employed						
FY 1971	2,419	1,862	557	556	1,814	49
FY 1972	2,999	1,820	1,179	2,450	255	29
FY 1973	1,959	1,175	784	862	921	176
FY 1974	1,107	908	199	210	863	34
Average hourly wage						
FY 1971	\$2.21	\$2.43	\$1.94	\$2.20	\$2.61	\$2.01
FY 1972	\$2.41	\$2.67	\$2.00	\$2.31	\$2.56	\$2.71
FY 1973	\$2.53	\$3.09	\$1.95	\$2.64	\$2.50	\$1.96
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 3/31/74.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Minnesota

Program: CEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	1,717	1,116	601	1,305	86	326
FY 1972	2,268	1,452	816	1,814	204	250
FY 1973	2,125	1,275	850	1,466	170	489
FY 1974	1,969	1,221	748	1,418	217	334
Average duration of training (weeks)						
FY 1971	24.2	23.3	25.2	25.3	19.8	19.9
FY 1972	14.7	14.2	15.4	15.0	12.8	14.8
FY 1973	24.2	23.9	24.8	25.9	24.9	18.3
FY 1974	12.5	20.0	5.0	5.0	INA	20.0
Number employed						
FY 1971	734	477	257	557	37	140
FY 1972	1,141	730	411	913	103	125
FY 1973	1,207	724	483	833	97	277
FY 1974	876	543	333	631	96	149
Average hourly wage						
FY 1971	\$2.24	\$2.50	\$1.88	\$2.21	\$2.48	\$2.40
FY 1972	2.40	2.67	1.99	2.30	2.76	2.61
FY 1973	\$2.77	\$2.93	\$2.38	\$2.79	\$2.55	\$2.93
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 3/31/74.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974.

State: Ohio

Program: CEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,843	1,848	995	114	2,360	369
FY 1972	2,888	2,079	809	260	2,455	173
FY 1973	3,783	1,892	1,891	265	3,178	340
FY 1974	3,875	2,286	1,589	116	3,604	155
Average duration of training (weeks)						
FY 1971	20.2	19.4	22.5	20.0	20.5	17.3
FY 1972	13.8	13.3	15.2	12.7	13.9	INA
FY 1973	19.0	14.8	24.2	16.6	18.6	27.0
FY 1974	24.3	26.5	20.9	6.0	26.3	INA
Number employed						
FY 1971	896	582	314	36	744	116
FY 1972	1,068	769	299	96	908	64
FY 1973	2,245	1,122	1,123	157	1,886	202
FY 1974	1,736	1,024	712	52	1,014	670
Average hourly wage						
FY 1971	\$2.72	\$2.90	\$2.21	\$2.42	\$2.73	\$2.77
FY 1972	2.72	2.96	2.23	2.55	2.74	2.61
FY 1973	\$3.13	\$3.45	\$2.60	\$2.40	\$3.15	INA
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 3/31/74.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Wisconsin

Program: CEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,207	1,213	994	1,258	596	353
FY 1972	2,638	1,556	1,082	1,293	818	527
FY 1973	1,813	1,069	744	997	181	635
FY 1974	1,956	1,193	763	958	626	372
Average duration of training (weeks)						
FY 1971	18.9	18.8	19.3	23.3	13.0	15.5
FY 1972	14.5	14.5	14.5	13.3	15.6	14.5
FY 1973	20.2	16.9	24.4	17.9	25.3	20.5
FY 1974	20.3	20.3	INA	20.3	INA	INA
Number employed						
FY 1971	1,004	592	452	572	271	161
FY 1972	1,257	742	515	616	390	251
FY 1973	1,383	815	568	760	138	485
FY 1974	1,093	667	426	536	350	207
Average hourly wage						
FY 1971	\$2.20	\$2.44	\$1.83	\$2.13	\$2.44	\$2.35
FY 1972	\$2.39	\$2.59	\$2.10	\$2.24	\$2.46	\$2.60
FY 1973	\$2.60	\$2.90	\$2.17	\$2.47	\$2.89	\$2.89
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 3/31/74.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Illinois
Program: MDTA-Inst.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	5,387	2,388	2,999	2,405	2,894	88
FY 1972	5,353	2,392	2,961	2,092	3,173	88
FY 1973	3,284	1,901	1,383	1,478	1,780	26
FY 1974	2,271	883	1,388	1,195	1,053	23
Average duration of training (weeks)						
FY 1971	21.3	16.9	24.3	21.2	21.4	18.3
FY 1972	17.0	17.8	16.0	17.3	16.7	18.8
FY 1973	24.1	10.8	27.4	26.3	22.3	20.1
FY 1974	12.9	9.9	28.0	18.7	10.8	13.0
Number employed						
FY 1971	2,243	555	1,688	1,244	956	43
FY 1972	2,786	1,250	1,536	1,701	1,053	32
FY 1973	1,296	707	589	836	457	3
FY 1974	1,118	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.68	\$3.15	\$2.53	\$2.66	\$2.71	\$2.56
FY 1972	\$2.89	\$3.27	\$2.59	\$2.93	\$2.84	\$3.09
FY 1973	\$3.23	\$3.79	\$2.56	\$3.28	\$3.14	INA
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 12/31/73.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Indiana

Program: MDTA-Inst.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,877	1,629	1,248	1,668	1,197	12
FY 1972	2,233	1,450	783	1,393	802	38
FY 1973	1,838	1,209	629	1,044	726	68
FY 1974	647	356	291	397	233	17
Average duration of training (weeks)						
FY 1971	18.6	17.8	19.5	19.0	18.0	17.0
FY 1972	14.3	14.1	14.5	14.6	13.6	15.3
FY 1973	20.9	19.6	23.1	23.0	18.3	16.3
FY 1974	20.4	21.6	20.6	22.9	19.9	14.5
Number employed						
FY 1971	865	413	452	570	287	8
FY 1972	1,015	637	378	781	224	100
FY 1973	957	624	333	723	226	8
FY 1974	347	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.37	\$2.67	\$2.10	\$2.44	\$2.22	\$2.90
FY 1972	\$2.68	\$2.85	\$2.39	\$2.70	\$2.59	\$2.98
FY 1973	\$2.92	\$3.16	\$2.46	\$3.00	\$2.68	\$3.08
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 12/31/73.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974.

State: Michigan
Program: MDTA-Inst.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	4,585	2,162	2,423	2,202	2,241	142
FY 1972	7,132	3,729	3,403	4,234	2,622	276
FY 1973	6,400	3,180	3,220	4,403	1,824	173
FY 1974	1,606	853	926	1,063	515	28
Average duration of training (weeks)						
FY 1971	20.7	19.5	21.9	22.0	19.7	17.5
FY 1972	11.7	12.8	10.4	11.7	11.7	12.2
FY 1973	22.6	20.5	24.7	22.0	24.6	19.2
FY 1974	10.7	10.1	13.6	11.7	8.6	INA
Number employed						
FY 1971	1,703	597	1,106	1,214	448	41
FY 1972	4,031	1,923	2,108	3,233	668	130
FY 1973	4,458	1,871	2,587	3,511	845	102
FY 1974	928	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.93	\$2.88	\$2.96	\$2.95	\$2.87	\$2.91
FY 1972	\$3.44	\$3.56	\$3.33	\$3.51	\$3.17	\$3.10
FY 1973	\$3.39	\$3.35	\$3.42	\$3.39	\$3.39	\$3.39
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 12/31/73.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974.

State: Minnesota

Program: MDTA-Inst.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,559	1,550	1,009	2,183	150	226
FY 1972	2,536	1,645	891	2,223	134	179
FY 1973	2,055	1,397	658	1,732	146	177
FY 1974	1,137	777	360	1,010	60	67
Average duration of training (weeks)						
FY 1971	20.9	19.3	23.4	21.8	15.4	16.8
FY 1972	15.7	16.6	13.8	16.8	10.1	11.1
FY 1973	16.9	17.2	16.5	18.0	11.5	12.0
FY 1974	21.3	24.4	6.0	21.3	INA	INA
Number employed						
FY 1971	1,110	581	529	999	58	58
FY 1972	1,103	574	529	1,020	29	54
FY 1973	959	488	471	877	36	46
FY 1974	423	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.50	\$2.80	\$2.16	\$2.50	\$2.47	\$2.48
FY 1972	\$2.93	\$3.49	\$2.32	\$2.92	\$2.88	\$3.13
FY 1973	\$2.87	\$3.30	\$2.42	\$2.84	\$3.06	\$3.27
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 12/31/73.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974.

State: Ohio

Program: MDTA-Inst.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	6,068	3,200	2,868	2,906	3,118	44
FY 1972	8,989	5,790	3,199	4,561	4,340	88
FY 1973	7,212	4,616	2,596	3,794	3,339	79
FY 1974	2,359	1,491	868	1,219	1,120	20
Average duration of training (weeks)						
FY 1971	19.5	18.7	20.2	20.1	19.1	16.5
FY 1972	15.2	15.3	15.0	15.5	14.8	18.5
FY 1973	19.1	18.8	19.7	20.4	18.0	11.2
FY 1974	13.4	10.0	20.8	12.5	13.7	INA
Number employed						
FY 1971	1,669	74	955	1,056	602	11
FY 1972	3,365	1,830	1,535	2,051	1,293	21
FY 1973	3,379	2,198	1,181	2,172	1,167	40
FY 1974	1,562	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.37	\$2.68	\$2.15	\$2.43	\$2.27	\$2.58
FY 1972	\$2.67	\$2.90	\$2.40	\$2.74	\$2.55	\$2.86
FY 1973	\$2.88	\$3.15	\$2.37	\$2.99	\$2.68	\$2.58
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 12/31/73.

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974.

State: Wisconsin

Program: MDTA-Inst.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,488	1,307	1,181	1,828	424	236
FY 1972	3,302	2,111	1,191	2,390	623	289
FY 1973	2,053	1,408	645	1,400	490	163
FY 1974	497	289	208	239	191	67
Average duration of training (weeks)						
FY 1971	21.0	19.9	22.4	21.7	19.2	20.4
FY 1972	12.9	11.8	15.0	13.3	11.9	11.8
FY 1973	13.8	12.1	17.0	14.0	12.7	15.6
FY 1974	5.6	5.3	5.9	5.3	6.1	4.7
Number employed						
FY 1971	738	404	334	602	37	99
FY 1972	1,268	844	424	1,092	105	71
FY 1973	1,632	1,148	484	1,451	110	71
FY 1974	547	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.31	\$2.50	\$2.08	\$2.33	\$2.27	\$2.22
FY 1972	\$2.72	\$2.99	\$2.18	\$2.72	\$2.59	\$2.87
FY 1973	\$2.80	\$3.03	\$2.25	\$2.79	\$2.79	\$2.96
FY 1974	INA	INA	INA	INA	INA	INA

* FY 1974 data as of 12/31/73

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Illinois

Program: JOBS

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	8,325	6,565	1,760	1,742	6,518	65
FY 1972	4,826	3,184	1,642	1,493	3,206	127
FY 1973	1,987	1,110	877	613	1,343	31
FY 1974	3,418	INA	INA	INA	INA	INA
Average duration of training (weeks)						
FY 1971	40.9	43.1	31.5	47.0	47.6	7.8
FY 1972	43.8	36.6	34.5	35.7	37.2	40.8
FY 1973	47.9	40.1	45.8	44.5	40.7	51.1
FY 1974	48.0	INA	INA	INA	INA	INA
Number employed						
FY 1971	2,456	2,057	399	606	1,843	7
FY 1972	3,206	2,350	856	1,189	1,715	302
FY 1973	1,483	1,047	436	589	848	46
FY 1974	400	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.74	\$2.73	\$2.10	\$2.52	\$2.65	\$2.58
FY 1972	\$2.62	\$2.73	\$2.25	\$2.46	\$2.64	\$2.89
FY 1973	\$2.72	\$2.85	\$2.34	\$2.56	\$2.74	\$3.02
FY 1974	INA	INA	INA	INA	INA	INA

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Indiana

Program: JOBS

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	658	333	325	217	433	8
FY 1972	507	352	155	164	343	--
FY 1973	305	174	131	134	171	--
FY 1974	155	INA	INA	INA	INA	--
Average duration of training (weeks)						
FY 1971	--	--	--	--	--	--
FY 1972	44.5	39.2	41.2	42.8	36.9	61.5
FY 1973	47.4	44.9	52.1	47.5	48.8	--
FY 1974	60.0	INA	INA	INA	INA	INA
Number employed						
FY 1971	155	85	70	62	91	2
FY 1972	388	223	165	143	235	10
FY 1973	342	195	147	128	218	--
FY 1974	56	INA	INA	INA	INA	--
Average hourly wage						
FY 1971	\$2.54	\$2.51	\$2.02	\$2.25	\$2.28	\$2.40
FY 1972	\$2.53	\$2.91	\$2.01	\$2.41	\$2.60	\$2.40
FY 1973	\$2.67	\$3.14	\$2.05	\$2.50	\$2.77	INA
FY 1974	INA	INA	INA	INA	INA	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Michigan

Program: JOBS

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,497	1,889	608	383	2,111	3
FY 1972	5,821	4,943	878	1,340	4,422	59
FY 1973	3,527	2,822	705	974	2,534	19
FY 1974	978	INA	INA	INA	INA	--
Average duration of training (weeks)						
FY 1971	25.9	31.8	29.9	--	30.2	30.8
FY 1972	45.6	36.1	43.1	29.7	39.8	37.6
FY 1973	50.2	49.9	50.0	48.4	50.5	44.4
FY 1974	48.9	INA	INA	INA	INA	INA
Number employed						
FY 1971	1,088	855	233	70	1,016	2
FY 1972	3,176	2,293	883	767	1,966	442
FY 1973	3,095	2,815	280	466	2,604	25
FY 1974	924	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$3.60	\$3.11	\$2.97	\$3.00	\$3.07	\$3.47
FY 1972	\$3.84	\$3.84	\$3.11	\$3.38	\$3.82	\$3.41
FY 1973	\$3.79	\$3.77	\$3.40	\$3.53	\$3.77	\$3.18
FY 1974	INA	INA	INA	INA	INA	INA

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Minnesota

Program: JOBS

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	507	217	290	264	199	44
FY 1972	1,020	568	452	483	458	79
FY 1973	336	198	138	166	132	38
FY 1974	591	INA	INA	INA	INA	INA
Average duration of training (weeks)						
FY 1971						
FY 1972	43.7	41.2	43.5	43.1	40.0	40.6
FY 1973	45.3	45.4	45.2	46.2	42.1	58.4
FY 1974	45.3	INA	INA	INA	INA	INA
Number employed						
FY 1971	149	65	84	79	58	12
FY 1972	594	302	292	257	259	78
FY 1973	432	254	178	218	178	35
FY 1974	25	INA	INA	INA	INA	INA
Average hourly wage						
FY 1971	\$2.30	\$2.49	\$2.05	\$2.17	\$2.38	\$2.12
FY 1972	\$2.48	\$2.69	\$2.17	\$2.30	\$2.59	\$2.49
FY 1973	\$2.58	\$2.75	\$2.30	\$2.50	\$2.61	\$2.56
FY 1974	\$ INA	INA	INA	INA	INA	INA

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Table 4: New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Ohio

Program: JOBS

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	2,409	1,695	714	536	1,868	5
FY 1972	1,701	1,166	535	592	1,107	2
FY 1973	740	478	262	486	235	19
FY 1974	410	INA	INA	INA	INA	INA
Average duration of training (weeks)						
FY 1971	38.9	45.8	43.4	42.0	45.1	---
FY 1972	48.6	45.3	48.1	42.9	46.8	38.0
FY 1973	47.4	49.9	39.9	46.4	46.3	---
FY 1974	47.5	INA	INA	INA	INA	INA
Number employed						
FY 1971	608	437	171	130	476	8
FY 1972	1,063	768	295	406	645	22
FY 1973	508	425	83	191	317	---
FY 1974	343	INA	INA	INA	INA	---
Average hourly wage						
FY 1971	\$2.59	\$2.82	\$2.14	\$2.30	\$2.69	\$2.95
FY 1972	\$2.64	\$2.81	\$2.12	\$2.53	\$2.67	\$2.45
FY 1973	\$2.83	\$2.90	\$2.37	\$2.81	\$2.79	---
FY 1974	INA	INA	INA	INA	INA	---

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Table 4. - New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Wisconsin

Program: JOBS

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	396	284	112	184	212	---
FY 1972	986	670	316	492	481	13
FY 1973	383	247	136	252	122	9
FY 1974	222	INA	INA	INA	INA	---
Average duration of training (weeks)						
FY 1971	---	---	---	---	---	---
FY 1972	46.2	35.7	50.3	41.1	34.2	46.7
FY 1973	49.5	49.2	47.8	47.8	48.9	33.8
FY 1974	50.5	INA	INA	INA	INA	---
Number employed						
FY 1971	178	162	16	55	123	---
FY 1972	296	192	104	77	202	17
FY 1973	208	148	60	63	138	7
FY 1974	136	INA	INA	INA	INA	---
Average hourly wage						
FY 1971	\$3.39	\$3.38	\$1.94	\$2.10	\$2.43	---
FY 1972	\$3.14	\$3.38	\$2.42	\$2.87	\$3.25	\$3.38
FY 1973	\$3.36	\$3.66	\$2.75	\$2.99	\$3.63	\$3.68
FY 1974	INA	INA	INA	INA	INA	INA

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Illinois
Program: Job Corps

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	1,813	1,436	377	203	1,532	78
FY 1972	2,140	1,431	709	236	1,689	215
FY 1973	1,624	1,158	466	180	1,371	73
FY 1974	1,089	842	247	234	832	23
Average duration of training (weeks)						
FY 1971	10.9	11.0	10.4	9.1	11.2	11.0
FY 1972	20.6	20.8	20.1	14.0	22.2	18.2
FY 1973	25.2	24.3	27.0	18.2	25.2	34.5
FY 1974	23.4	22.9	25.0	14.6	24.2	41.3
Number employed						
FY 1971	429	351	78	47	350	32
FY 1972	673	484	189	70	550	53
FY 1973	782	571	211	105	600	77
FY 1974	603	501	102	69	501	33
Average hourly wage						
FY 1971	\$2.35	\$2.42	\$1.99	\$2.42	\$2.35	\$2.41
FY 1972	\$2.44	\$2.55	\$2.15	\$2.33	\$2.43	\$2.52
FY 1973	\$2.49	\$2.60	\$2.20	\$2.54	\$2.45	\$2.70
FY 1974	\$2.59	\$2.64	\$2.38	\$2.52	\$2.33	\$3.91

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Indiana

Program: Job Corps

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	215	147	68	122	93	--
FY 1972	335	240	95	100	216	19
FY 1973	291	204	87	104	183	14
FY 1974	176	124	52	74	102	--
Average duration of training (weeks)						
FY 1971	10.0	9.9	10.5	8.4	13.2	--
FY 1972	13.3	12.0	17.6	10.7	16.1	11.2
FY 1973	19.2	18.9	19.7	14.7	21.8	26.3
FY 1974	22.2	18.4	30.8	11.3	28.6	--
Number employed						
FY 1971	112	98	14	57	46	--
FY 1972	120	99	21	48	67	5
FY 1973	90	76	21	36	59	2
FY 1974	108	88	20	39	69	--
Average hourly wage						
FY 1971	\$2.07	\$2.13	\$1.69	\$2.04	\$2.14	--
FY 1972	\$2.63	\$2.77	\$2.00	\$2.55	\$2.69	\$2.92
FY 1973	\$2.53	\$2.65	\$2.09	\$2.60	\$2.50	INA
FY 1974	\$2.57	\$2.60	\$2.45	\$2.12	\$2.78	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1971-1974

State: Michigan
Program: Job Corps

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	1,123	735	388	186	898	39
FY 1972	1,264	995	269	212	993	58
FY 1973	958	666	292	143	799	16
FY 1974	862	564	298	161	682	19
Average duration of training (weeks)						
FY 1971	10.1	10.0	10.4	6.7	10.9	11.0
FY 1972	20.8	19.9	23.8	15.0	22.9	18.9
FY 1973	25.0	23.9	27.9	17.6	26.7	35.1
FY 1974	22.2	21.0	24.8	16.2	24.2	8.2
Number employed						
FY 1971	268	177	91	43	207	18
FY 1972	469	367	102	83	364	22
FY 1973	428	335	93	68	304	20
FY 1974	328	232	96	35	293	--
Average hourly wage						
FY 1971	\$2.47	\$2.68	\$2.08	\$ 2.12	\$ 2.56	\$ 2.15
FY 1972	\$2.77	\$2.94	\$2.16	\$ 2.38	\$ 2.86	\$ 2.56
FY 1973	\$2.92	\$3.10	\$2.28	\$ 2.67	\$ 2.97	\$ 2.84
FY 1974	\$2.94	\$3.13	\$2.48	\$ 2.66	\$ 2.96	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Minnesota

Program: Job Corps

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	105	74	31	77	14	14
FY 1972	123	95	28	76	17	30
FY 1973	116	87	29	77	23	16
FY 1974	118	85	23	83	10	25
Average duration of training (weeks)						
FY 1971	7.5	6.7	9.7	8.0	6.0	6.7
FY 1972	15.2	14.0	19.1	16.0	12.8	15.3
FY 1973	16.7	16.1	18.5	14.9	23.4	16.6
FY 1974	16.0	15.9	16.0	16.1	20.9	13.8
Number employed						
FY 1971	15	10	5	13	2	--
FY 1972	43	36	7	29	6	8
FY 1973	44	32	12	30	6	8
FY 1974	54	30	24	40	7	7
Average hourly wage						
FY 1971	\$1.63	\$1.80	\$1.83	\$1.73	\$1.82	--
FY 1972	\$2.33	\$2.51	\$1.41	\$2.44	\$2.80	\$1.67
FY 1973	\$2.45	\$2.68	\$1.84	\$2.43	\$2.63	\$2.52
FY 1974	\$2.28	\$2.52	\$1.98	\$2.49	\$2.07	INA

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Table 2. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Ohio

Program: Job Corps

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	1,748	1,279	469	644	1,080	24
FY 1972	1,729	1,461	373	572	1,123	34
FY 1973	1,622	1,195	427	644	949	29
FY 1974	1,293	891	402	552	727	14
Av'ge duration of training (weeks)						
FY 1971	9.8	9.7	10.1	7.7	11.6	9.0
FY 1972	17.4	16.6	20.7	14.3	20.1	15.7
FY 1973	20.2	20.4	19.7	13.6	24.0	30.6
FY 1974	19.1	19.1	19.1	13.9	21.9	40.2
Number employed						
FY 1971	398	316	82	158	228	12
FY 1972	578	470	108	209	360	9
FY 1973	614	487	127	226	364	24
FY 1974	649	467	182	244	366	39
Av'ge hourly wage						
FY 1971	\$ 2.16	\$ 2.22	\$ 1.95	\$ 2.10	\$ 2.21	\$ 2.29
FY 1972	\$ 2.24	\$ 2.30	\$ 2.01	\$ 2.15	\$ 2.29	\$ 2.51
FY 1973	\$ 2.39	\$ 2.46	\$ 2.09	\$ 2.30	\$ 2.44	\$ 2.18
FY 1974	\$ 2.34	\$ 2.46	\$ 2.04	\$ 2.29	\$ 2.38	\$ 2.81

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Table 2. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Wisconsin

Program: Job Corps

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	251	192	59	153	76	22
FY 1972	245	177	68	130	91	24
FY 1973	179	133	46	95	77	7
FY 1974	100	68	32	64	32	4
Av'ge duration of training (weeks)						
FY 1971	9.9	9.6	11.2	10.6	7.8	11.1
FY 1972	16.1	16.0	16.4	13.6	19.7	18.2
FY 1973	23.1	22.6	24.3	19.7	26.5	23.9
FY 1974	22.0	23.0	19.3	18.5	27.6	19.1
Number employed						
FY 1971	98	84	14	71	18	9
FY 1972	142	108	34	76	53	13
FY 1973	141	122	19	103	38	--
FY 1974	66	50	16	46	20	--
Av'ge hourly wage						
FY 1971	\$ 2.32	\$ 2.40	\$ 1.85	\$ 2.32	\$ 2.18	\$ 3.03
FY 1972	\$ 2.41	\$ 2.61	\$ 1.75	\$ 2.25	\$ 2.46	\$ 2.48
FY 1973	\$ 2.32	\$ 2.40	\$ 1.85	\$ 2.32	\$ 2.18	--
FY 1974	\$ 2.74	\$ 3.17	INA	\$ 2.32	\$ 3.85	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Illinois

Program: JOP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	180	168	12	110	70	--
FY 1972	1,585	1,280	305	1,038	534	13
FY 1973	1,608	1,324	284	1,079	441	88
FY 1974	409	347	62	257	129	23
Av'ge duration of training (weeks)						
FY 1971	24.7	25.1	10.0	27.8	20.1	--
FY 1972	20.0	20.8	16.2	21.0	18.8	17.5
FY 1973	21.5	22.6	16.6	22.5	19.2	21.4
FY 1974	26.0	26.7	21.9	25.7	27.3	23.4
Number employed						
FY 1971	134	116	18	99	35	--
FY 1972	708	544	164	481	222	5
FY 1973	1,083	831	252	738	312	33
FY 1974	158	135	23	112	46	--
Av'ge hourly wage						
FY 1971	\$3.12	\$3.28	\$2.38	\$3.05	\$3.28	--
FY 1972	\$2.92	\$3.10	\$2.34	\$2.82	\$3.16	\$2.65
FY 1973	\$3.03	\$3.20	\$2.46	\$2.93	\$3.27	\$2.83
FY 1974	\$3.36	\$3.49	\$2.58	\$3.19	\$3.79	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, by State, FY's 1971-1974

State: Indiana

Program: JOP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	0	--	--	--	--	--
FY 1972	246	188	58	199	47	--
FY 1973	314	271	43	217	97	--
FY 1974	182	125	57	127	52	3
Av'ge duration of training (weeks)						
FY 1971	--	--	--	--	--	--
FY 1972	21.8	22.7	19.2	21.0	24.2	26.0
FY 1973	23.2	23.1	23.7	22.3	26.2	23.0
FY 1974	28.2	28.6	27.2	28.0	28.7	27.0
Number employed						
FY 1971	0	--	--	--	--	--
FY 1972	95	76	19	74	21	--
FY 1973	162	142	20	132	30	--
FY 1974	47	35	12	33	13	--
Av'ge hourly wage						
FY 1971	--	--	--	--	--	--
FY 1972	\$2.83	\$2.97	\$2.31	\$2.74	\$3.18	--
FY 1973	\$3.26	\$3.36	\$2.51	\$3.29	\$3.12	--
FY 1974	\$3.67	\$3.87	\$3.09	\$3.79	\$3.51	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Michigan

Program: JOP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	170	136	34	125	43	2
FY 1972	1,124	1,010	114	787	323	14
FY 1973	1,343	1,204	139	931	377	35
FY 1974	427	382	45	156	265	6
Av'ge duration of training (weeks)						
FY 1971	19.7	22.6	11.9	19.1	22.0	--
FY 1972	23.0	23.6	19.4	22.6	23.9	25.9
FY 1973	21.7	22.2	17.7	23.5	17.6	26.0
FY 1974	25.7	26.1	20.2	28.0	22.7	24.0
Number employed						
FY 1971	140	115	25	105	35	2
FY 1972	478	419	59	375	95	8
FY 1973	932	817	115	695	218	19
FY 1974	188	176	12	153	32	3
Av'ge hourly wage						
FY 1971	\$2.69	\$2.79	\$2.28	\$2.75	\$2.55	\$2.50
FY 1972	\$3.11	\$3.21	\$2.39	\$3.05	\$3.39	\$2.79
FY 1973	\$3.56	\$3.72	\$2.39	\$3.38	\$4.09	\$3.58
FY 1974	\$3.70	\$3.78	\$2.60	\$3.72	\$3.58	INA

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Minnesota

Program: JOP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	128	114	14	113	3	12
FY 1972	1,718	1,430	288	1,628	37	53
FY 1973	1,019	860	159	939	43	37
FY 1974	406	327	79	377	11	18
Av'ge duration of training (weeks)						
FY 1971	32.1	33.1	23.7	28.7	INA	38.7
FY 1972	18.5	19.2	14.8	18.3	20.4	21.5
FY 1973	19.8	20.7	15.3	19.7	22.2	20.6
FY 1974	19.2	20.3	14.3	18.9	21.4	23.4
Number employed						
FY 1971	128	119	9	121	--	7
FY 1972	1,120	905	215	1,077	15	28
FY 1973	934	769	165	881	24	19
FY 1974	296	221	75	274	8	11
Av'ge hourly wage						
FY 1971	\$2.73	\$2.78	\$2.14	\$2.71	--	\$2.65
FY 1972	\$2.58	\$2.72	\$2.01	\$2.58	\$2.70	\$2.48
FY 1973	\$2.74	\$2.87	\$2.13	\$2.71	\$3.78	\$2.68
FY 1974	\$2.84	\$3.04	\$2.23	\$2.80	\$3.71	\$2.82

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Ohio

Program: JOP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	47	39	8	33	13	1
FY 1972	2,166	1,872	294	1,640	518	8
FY 1973	1,295	1,162	133	1,061	230	4
FY 1974	481	454	27	390	91	--
Av'ge duration of training (weeks)						
FY 1971	24.3	24.3	INA	24.3	INA	INA
FY 1972	20.7	21.7	15.5	21.6	18.7	19.2
FY 1973	24.8	25.9	16.0	24.9	24.5	23.2
FY 1974	31.6	32.1	22.1	32.1	29.6	8.0
Number employed						
FY 1971	48	36	12	30	16	2
FY 1972	1,096	910	186	857	236	3
FY 1973	868	766	102	752	116	--
FY 1974	186	168	18	157	29	--
Av'ge hourly wage						
FY 1971	\$2.45	\$2.61	\$1.98	\$2.66	\$2.05	\$2.10
FY 1972	\$2.67	\$2.77	\$2.14	\$2.71	\$2.53	\$2.03
FY 1973	\$2.86	\$2.95	\$2.14	\$2.87	\$2.72	--
FY 1974	\$3.01	\$3.08	\$2.24	\$3.05	\$2.77	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1971-1974

State: Wisconsin

Program: JOP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1971	276	170	106	246	19	11
FY 1972	1,435	947	487	1,255	102	78
FY 1973	1,391	956	435	1,084	106	181
FY 1974	823	621	202	697	55	55
Av'ge duration of training (weeks)						
FY 1971	12.0	14.5	7.4	12.3	9.4	8.0
FY 1972	16.1	17.3	14.0	16.0	16.4	17.3
FY 1973	17.0	18.0	14.9	17.5	17.9	14.0
FY 1974	18.0	18.6	16.1	17.8	19.9	18.5
Number employed						
FY 1971	271	154	114	238	22	11
FY 1972	1,115	723	392	981	71	63
FY 1973	1,255	857	398	1,039	83	122
FY 1974	429	343	86	372	20	37
Av'ge hourly wage						
FY 1971	\$2.04	\$2.16	\$1.88	\$2.01	\$2.19	\$2.21
FY 1972	\$2.29	\$2.46	\$1.97	\$2.27	\$2.35	\$2.39
FY 1973	\$2.41	\$2.58	\$2.06	\$2.44	\$2.54	\$2.11
FY 1974	\$2.63	\$2.72	\$2.29	\$2.64	\$3.09	\$2.10

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1972-1974.

State: Illinois

Program: PEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1972	7,537	5,047	2,490	3,892	3,592	53
FY 1973	6,694	4,026	2,668	2,982	3,640	71
FY 1974	4,524	2,427	2,097	3,903	577	44
Average duration of training (weeks)						
FY 1972	14.5	14.4	14.8	14.2	14.8	18.2
FY 1973	28.3	27.5	30.0	26.2	31.4	25.4
FY 1974	55.0	55.9	53.2	54.9	56.1	52.8
Number employed						
FY 1972	957	654	303	601	317	8
FY 1973	2,175	1,339	837	1,214	840	121
FY 1974	1,242	765	477	911	328	3
Average hourly wage						
FY 1972	\$3.54	\$3.82	\$2.93	\$3.69	\$3.24	\$3.46
FY 1973	\$3.51	\$3.35	\$2.95	\$3.74	\$3.18	\$3.68
FY 1974	\$3.57	\$3.93	\$3.98	\$3.72	\$2.91	\$2.50

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1972-1974.

State: Indiana

Program: PEP.

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1972	4,819	3,532	1,287	3,520	1,278	21
FY 1973	5,774	4,332	1,442	4,680	1,012	82
FY 1974	4,053	2,603	1,450	2,607	1,351	95
Average duration of training (weeks)						
FY 1972	13.9	13.8	14.2	13.7	13.8	27.2
FY 1973	27.7	25.8	33.1	26.9	30.5	19.7
FY 1974	44.0	42.7	46.4	40.3	49.1	INA
Number employed						
FY 1972	829	609	219	647	150	5
FY 1973	1,469	1,080	389	1,250	190	29
FY 1974	1,178	524	654	1,103	75	--
Average hourly wage						
FY 1972	\$3.12	\$3.20	\$2.91	\$3.09	\$3.20	\$3.37
FY 1973	\$3.10	\$3.11	\$3.07	\$3.08	\$3.28	\$3.34
FY 1974	\$3.03	\$3.63	\$2.56	\$3.25	\$2.88	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1972-1974.

State: Michigan

Program: PEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1972	12,894	8,129	4,765	8,918	3,873	103
FY 1973	3,428	2,247	1,181	2,299	1,016	113
FY 1974	15,103	7,112	7,991	11,587	3,316	200
Average duration of training (weeks)						
FY 1972	15.2	14.2	16.4	15.3	13.1	33.4
FY 1973	29.2	29.1	29.3	29.2	29.3	28.5
FY 1974	52.9	52.9	53.4	52.2	55.8	51.9
Number employed						
FY 1972	1,692	1,137	538	1,357	226	22
FY 1973	2,379	1,596	783	1,770	492	117
FY 1974	1,885	1,266	619	1,565	226	94
Average hourly wage						
FY 1972	\$3.70	\$3.91	\$3.28	\$3.74	\$3.53	\$3.47
FY 1973	\$3.60	\$3.80	\$3.22	\$3.76	\$2.95	\$3.72
FY 1974	\$3.86	\$4.19	\$3.32	\$3.94	\$3.51	\$3.82

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1972-1974.

State: Minnesota

Program: PEP

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1972	3,395	2,421	974	3,030	173	183
FY 1973	702	485	217	431	231	40
FY 1974	5,028	2,514	2,514	4,660	125	243
Average duration of training (weeks)						
FY 1972	14.9	14.3	16.8	15.4	12.4	14.0
FY 1973	34.4	33.0	37.4	36.4	20.2	28.3
FY 1974	55.2	24.9	55.9	54.6	63.5	55.8
Number employed						
FY 1972	806	583	223	37	29	34
FY 1973	695	497	198	608	67	20
FY 1974	754	540	214	741	13	--
Average hourly wage						
FY 1972	\$3.73	\$4.01	\$2.98	\$3.59	\$2.98	\$3.10
FY 1973	\$3.91	\$4.20	\$3.16	\$3.08	\$3.90	\$3.93
FY 1974	\$3.66	\$3.99	\$3.04	\$3.71	\$3.04	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs In Region V, By State, FY's 1972-1974.

State: Ohio
Program: PEP

	All trainees.	Male	Female	White	Black	Other
Enrolled in training						
FY 1972	7,709	5,724	1,985	5,344	2,347	18
FY 1973	4,662	3,610	1,052	3,073	1,559	30
FY 1974	4,048	2,987	1,061	3,293	720	35
Average duration of training (weeks)						
FY 1972	14.4	14.2	14.8	14.7	13.1	15.3
FY 1973	27.0	27.2	26.3	28.5	23.9	29.8
FY 1974	59.8	59.7	60.3	57.8	64.7	59.8
Number employed						
FY 1972	1,678	1,281	396	1,237	417	2
FY 1973	2,230	1,712	518	1,599	614	17
FY 1974	1,203	923	280	1,124	79	--
Average hourly wage						
FY 1972	\$3.50	\$3.64	\$3.03	\$3.54	\$3.37	\$3.19
FY 1973	\$3.54	\$3.70	\$2.99	\$3.55	\$3.53	\$4.23
FY 1974	\$3.76	\$3.87	\$3.36	\$3.81	\$2.16	--

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Table 4. New Enrollees and Number Employed, Showing Duration of Training and Average Hourly Wage, by Sex and Race, for Manpower Programs in Region V, By State, FY's 1972-1974.

State: Wisconsin

Program: PEP-

	All trainees	Male	Female	White	Black	Other
Enrolled in training						
FY 1972	3,559	2,606	953	2,815	612	132
FY 1973	4,188	3,016	1,172	3,099	781	308
FY 1974	2,416	1,290	1,126	2,016	378	22
Average duration of training (weeks)						
FY 1972	16.5	16.6	16.2	16.6	15.7	17.0
FY 1973	29.0	27.4	33.7	30.3	24.8	27.1
FY 1974	51.9	54.1	48.4	52.3	63.3	40.8
Number employed						
FY 1972	698	496	198	569	84	16
FY 1973	800	562	238	647	121	32
FY 1974	589	410	179	537	50	2
Average hourly wage						
FY 1972	\$3.68	\$3.93	\$3.04	\$3.69	\$3.62	\$3.48
FY 1973	\$3.73	\$4.01	\$3.05	\$3.71	\$3.83	\$3.18
FY 1974	\$3.87	\$4.26	\$3.24	\$3.89	\$3.65	\$2.52

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Table 5. Reentrants in the PEP Program, States in Region V
Fiscal Years 1972 - 1974

States	Total reentrants	Male	Female	White	Black	Other
Illinois						
FY 1972	161	110	51	82	67	12
FY 1973	39	18	21	14	23	1
FY 1974	---	---	--	--	--	--
Indiana						
FY 1972	94	70	24	66	26	2
FY 1973	16	12	4	12	4	-
FY 1974	---	---	--	--	--	--
Michigan						
FY 1972	152	94	56	116	27	6
FY 1973	8	6	2	6	1	--
FY 1974	1	1	--	1	--	--
Minnesota						
FY 1972	19	13	6	14	1	3
FY 1973	---	---	--	--	--	--
FY 1974	---	---	--	--	--	--
Ohio						
FY 1972	74	60	14	52	20	--
FY 1973	4	3	1	2	1	--
FY 1974	---	---	--	--	--	--
Wisconsin						
FY 1972	44	31	13	31	11	2
FY 1973	4	3	1	3	1	--
FY 1974	---	---	--	--	--	--

Note: Detail may not add to totals for the racial groups for any year due to some enrollees for whom racial data was not available.

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Technical NotesData Sources

ESARS (Employment Service Automated Reporting System) is the source of data for Tables 1 and 2 (persons referred to training and individuals placed by the Employment Service respectively) covering activity under the Wagner/Peysner Act. It is also the source of the data for the WIN program for Fiscal Year's 1973 and 1974 for enrollments by sex, race and occupation, and for hourly wage data. Such data for Fiscal Year's 1971 and 1972 for WIN was obtained from the characteristics file discussed below.

The Project Status File is the source of the data on total enrollments and employment in Tables 3 and 4 for the training programs funded under the MDTA (Manpower Development and Training Act), EOA (Economic Opportunity Act), EEA (Emergency Employment Act), and SSA (The Social Security Act). It is an aggregation of monthly progress reports submitted by each project.

The Characteristics File is the source of data on sex, race, wages, occupation, duration of training and reentrants, on Tables 3, 4, and 5. It is an aggregation of the separate enrollment, termination, and follow-up (Institutional only) reports submitted for each enrollee. Data from this file represents partial rather than univers reporting and the values on Tables 3 and 4 for the numbers of persons enrolled by sex, race and occupation are extrapolated from the samples available. Where the sample size was insufficient to use, INA is indicated (information not available) for these numbers or for average wages or duration of employment. Fiscal Year 1974 data is as yet incomplete, particularly as regards post-training employment and wages, resulting in some data gaps which can be filled in at a later time, if requested. In addition, characteristics data for the Public Service Careers Program is not available, consequently that program is not included in these materials.

Definitions

Enrollment refers to persons coming into a manpower program during the time period specified. The terms enrollees and trainees are interchangeable.

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Number employed is used on tables 3 and 4 to denote persons who have obtained unsubsidized employment and may include some persons who have obtained employment on their own as well as those placed through the Employment Service or the training agency's placement service, if applicable.

Program acronyms: WIN is the Work Incentive Program funded under the SSA; PEP is the Public Employment Program under the EEA; JOP is the Jobs Optional Program, JOBS is the Job Opportunities in the Business Sector, and CEP is the Concentrated Employment Program, all under the MDTA.

Tables

Table 1 supplies data on the Wagner/Peyser Act as requested by item 3 of the Subpena, "number referred to training". Table 1.a. is a percentage distribution of the numbers in Table 1; the table reflects those enrolled in training by means of referral by the Employment Service. Data for Fiscal Year 1974 covers only two quarters--from July 1, 1973, to December 31, 1973.

Table 2 supplies data requested by subpoena item 2, "number placed". Data shows non-agricultural placements by race and sex and excludes short-term placements. Table 2.a. is a percentage distribution of the numbers in table 2. Data for Fiscal Year 1974 covers two quarters--July 1, 1973, to December 31, 1973.

Table 3: This series provides data for subpoena items 4 and 5 for training programs funded under the MDTA, EEA, EOA and SSA. Unless otherwise noted Fiscal Year 1974 data is for the first two quarters only--July 1, 1973, to December 31, 1973. Subpena item 4 requests data on "number, type and duration of training". Data on type of training is supplied by this table; statistics on number in training and duration are supplied in Table 4. Subpena item 5 requests information on wages of those placed by "types of jobs, specifying, OJT, JOB's, etc.". In regard to the question of the general type of training or job as raised by these subpoena items, Table 3 is prepared separately by program: JOP and JOBS are those programs which are basically on-the-job type training; Institutional and Job Corps are essentially classroom type training programs; CEP and WIN provide a variety of services which may include "either on-the-job or classroom training or both, or whatever alternative services may be needed to help the client become employable; finally, the PEP program is essentially an income maintenance program providing transitional employment--structured on-the-job training may or may not be provided.

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Table 3 also provides more specific information on the type of training and/or job. The stub lists the major occupational categories as described in the Dictionary of Occupational Titles (DOT). For the CEP and WIN programs the DOT data is for the post-training employment occupation. Data is not generally available on occupation of training in these programs; however, it is felt that in substantially all cases the occupation of training would fall within the same broad category as that of employment.

For all other programs the DOT's for the occupations of training are used since that data was more extensively available than data on DOT of employment. Here also the DOT of employment in all, or nearly all, cases would be in the same broad category as the DOT of training. In other words, by and large, trainees become employed in the same occupational fields for which they trained. Thus the data in Table 3 generally provides the requested information on both type of training and type of job, by sex, race, and with the average hourly wage of employment.

Table 4: This series of tables supplies data for Subpena items 1, 4, and 5, for training programs funded under the MDTA, EEA, EOA and SSA. Unless otherwise noted Fiscal Year 1974 data is for two quarters only--July 1, 1973, to December 31, 1973. For item 1, "total placed in jobs," we have provided data on "number employed" each fiscal year, obtaining data on total enrollments from the monthly progress reports and on sex and race breaks from the characteristics file as noted earlier.

For item 4, "duration of training", data was obtained from the characteristics file based on all terminations during the fiscal year cited. Data for terminees were used rather than enrollees in order to eliminate bias in the summaries for Fiscal Year 1974 and possibly Fiscal Year 1973; i.e., where some 1973 and 1974 enrollees may still be in training there would be a disproportionate number of early terminations on the file. For item 5, "average hourly wage of those placed", data is taken from the characteristics file.

Table 5 provides data for subpena item 6 "number of people who are reentries into program: The only program for which data is readily available is PEP. As the numbers indicate, reentry has been minimal in this program. Data has been provided beginning in Fiscal Year 1972 when the program was begun.

Exhibit No. 27

This exhibit was unavailable
for publication.

Exhibit No. 28

This exhibit is on file at
the U.S. Commission on Civil
Rights.

CHARGE OF DISCRIMINATION		EEOC CHARGE NO.	FORM APPROVED OMB NO. 124-R0001
INSTRUCTIONS If you have a complaint, fill in this form and mail it to the Equal Employment Opportunity Commission's District Office in your area. In most cases, a charge must be filed with the EEOC within a specified time after the discriminatory act took place. IT IS THEREFORE IMPORTANT TO FILE YOUR CHARGE AS SOON AS POSSIBLE. (Attach extra sheets of paper if necessary.)		CAUSE OF DISCRIMINATION <input checked="" type="checkbox"/> RACE OR COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGIOUS CREED <input type="checkbox"/> NATIONAL ORIGIN	
NAME (Indicate Mr. or Ms.)		DATE OF BIRTH	
STREET ADDRESS		COUNTY	SOCIAL SECURITY NO.
CITY, STATE, AND ZIP CODE		TELEPHONE NO. (Include area code)	
THE FOLLOWING PERSON ALWAYS KNOWS WHERE TO CONTACT ME			
NAME (Indicate Mr. or Ms.) [deleted]		TELEPHONE NO. (Include area code) [deleted]	
STREET ADDRESS [deleted]		CITY, STATE, AND ZIP CODE [deleted]	
LIST THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT WHO DISCRIMINATED AGAINST YOU (If more than one, list all)			
NAME Illinois Bureau of Employment Security		TELEPHONE NO. (Include area code) (312) 793-3500	
STREET ADDRESS 165 N. Canal St.		CITY, STATE, AND ZIP CODE Chicago, Illinois 60606	
OTHERS WHO DISCRIMINATED AGAINST YOU (If any)	Illinois Dept. of Labor, 160 N. LaSalle St., Chicago, Illinois		
	Illinois State Civil Service Commission, Springfield, Illinois		
Illinois Dept. of Personnel, Springfield, Illinois			
CHARGE FILED WITH STATE/LOCAL GOV'T. AGENCY <input type="checkbox"/> YES <input type="checkbox"/> NO	DATE FILED	AGENCY CHARGE FILED WITH (Name and address)	

Exhibit No. 29

APPROXIMATE NO. OF EMPLOYEES/MEMBERS OF COMPANY OR UNION THIS CHARGE IS FILED AGAINST

DATE MOST RECENT OR CONTINUING DISCRIMINATION TOOK PLACE (Month, day, and year)

Continuous

Explain what unfair thing was done to you and how other persons were treated differently. Understanding that this statement is for the use of the United States Equal Employment Opportunity Commission, I hereby certify: **Employment Security Manpower Technicians I & II, and Employment Security Manpower Representatives I, earned less than Employment Interviewers II, although all performed substantially the same work: interviewing and referring applicants for employment. The majority of EI's II were promoted Oct. 1, 1973, through in-service training to Employment Security Manpower Representatives II, which means a further pay increase. Most EI II's were white males. ESMT's and ESMR's I were not offered this opportunity. Similar unequal pay for equal work exists for Unemployment Compensation Manpower Technicians and Unemployment Compensation Manpower Representatives I vis-a-vis Unemployment Compensation Manpower Representatives II. These titles all handle claims for unemployment compensation. The Employment Service and Unemployment Compensation are Divisions of Ill. Bureau of Employment Security. Most Technicians & Representatives I in IBES are black, Spanish-speaking, or other "minority", and most are women.**

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I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

DATE

CHARGING PARTY (Signature)

Subscribed and sworn to before this EEOC representative.

DATE

SIGNATURE AND TITLE

NOTARY PUBLIC

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)

SIGNATURE (If it is difficult for you to get a Notary Public to sign this, sign your own name and mail to the District Office. The Commission will notarize the charge for you at a later date.)

Exhibit No. 30

3700 East-West Highway
Suite G-101
Hyattsville, Maryland 20782
June 10, 1974

Mr. Arthur S. Flemming
Commission Chairman
University of Illinois
Chicago, Illinois

Re: Public Hearings
U. S. Commission on Civil Rights
June 17 to 19, 1974

Dear Mr. Flemming:

We, the students of the WIN Program of Prince George's and Montgomery Counties, Maryland, need your help. As of July 1, 1974, our GED component will be cut to 80 slots. This will mean that we have to accept jobs with hardly any job mobility and very little—if any—future. Because we live close to D. C., we can find good jobs if we have passed the GED test and if we take the Civil Service training. Without the GED we cannot be given a rating and we get locked into positions which don't pay enough to sustain us and our children.

We realize that WIN has not been very successful nationally but feel that instead of saying that WIN is "no-good", the individual program should be looked at and evaluated. The program here is good for many reasons, one of them being the fact that both GED and Civil Service are located on the same premises as the job developers and social workers. If we have any problems, they can be taken care of immediately without loss of study time.

After having dropped out of school and being confronted by many daily problems which forced most of us to apply for welfare, we need that extra touch we get in our program. Everybody there from the secretaries to the community workers, from the supervisor to the manager, from the social workers to the job developers and the teachers, treats us as the individuals we are. Already we suffered a cut last year when it was decided to make training time in each component only 6 months, and many of us need more than 6 months. We cannot keep still any longer since it is becoming obvious in which direction the WIN Program is headed. Just any job won't do—we want to get a job with a future so that we will soon be taxpayers, not tax-takers. We have notified the public officials of our state but need more help to convince our leaders at the federal level (Senators Beall and Mathias, Congressman Hogan).

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Find included several of our accomplishments. If you wish additional information, please contact Mr. Mel Cole, 3700 East-West Highway, Suite G-101, Hyattsville, Maryland, 20782. The telephone number is 301-864-4982.

In the hope that you and the Commission will help us to get 400 slots, we remain,

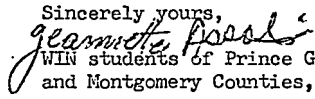
Sincerely yours,

WIN students of Prince George's
and Montgomery Counties, Maryland

Exhibit No. 31

**THE COMPREHENSIVE EMPLOYMENT AND
TRAINING ACT OF 1973**

EQUAL EMPLOYMENT OPPORTUNITY GUIDE

TRAINING DRAFT

MAY 9, 1974

**U.S. Department of Labor
Manpower Administration**

PREFACE

The Equal Employment Opportunity Guide is one in a series of publications on various functions which compose a Comprehensive Employment and Training Act (CETA) program. The purpose of these guides is to assist prime sponsors in perceiving the range of options available under CETA, as well as to present strategies, models, and techniques which may be employed.

The specific content of the Equal Employment Opportunity Guide provides techniques and suggestions on how the prime sponsor can carry out the non-discrimination provisions of CETA and avoid acts and practices which discriminate against both staff and program participants. It contains information which applies to a number of functions discussed in other guides, particularly organization and staffing, management information systems, and program assessment.

In addition to this guide, the series consists of the following:

- Program Activities and Services Guide. A description of the types of activities available to participants and communities under CETA, with suggested options for the content and mix of these activities.
- A New Approach to Manpower. An introduction to the legislation, a description of Federal, State and local roles, and a presentation of prime sponsor's opportunities under CETA.
- Manpower Program Planning Guide. A discussion of manpower planning concepts, with suggested approaches to establishing a planning system and description of a logical planning process for CETA prime sponsors.
- Organization and Staffing Guide. Discussion of logical approaches and considerations in organizing, staffing, and managing the prime sponsor's CETA program.
- Fiscal Activities Guide. A description of the fiscal controls and internal reports which prime sponsors may need to supplement their existing financial systems, and illustrations of grant fiscal administration, including subgranting and contracting considerations.

- . Management Information Systems. A presentation of a system to track the movement of CETA clients through the program, including methods for meeting record-keeping and reporting requirements.
- . Program Assessment Guide. An explanation of the assessment process, including suggested evaluation techniques.

Operating requirements for a CETA program are specified in Federal regulations. These publications contain no additional requirements, but offer suggestions on how prime sponsors can meet the requirements that do exist.

EQUAL EMPLOYMENT OPPORTUNITY GUIDECONTENTS

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CHAPTER I

INTRODUCTIONA. Purpose

The purpose of this Guide is to assist the prime sponsor and its staff in meeting the equal employment opportunity requirements of the Comprehensive Employment and Training Act of 1973. Equal employment opportunity is of major importance to the successful administration of this Act, in that persons for whom the Act was written -- the economically disadvantaged, unemployed, and under-employed -- are frequently those who are victims of discrimination. Therefore, it is not surprising that CETA is very clear in its pronouncement of prohibition against discrimination. For example, Section 603(1) of the Act states:

"The Secretary shall not provide financial assistance for any program under this Act unless the grant, contract, or agreement with respect thereto specifically provides that no person with responsibilities in the operation of such program will discriminate with respect to any program participant or any applicant for participation

in such program because of race, creed, color, national origin, sex, political affiliation, or belief."

Throughout the Act, prohibitions against discrimination and artificial barriers to employment are clearly stated, as in:

Section 108 - which requires the Secretary to revoke a prime sponsor's plan if it maintains a pattern or practice of discrimination or otherwise fails to serve equitably the economically disadvantaged, unemployed or underemployed in the area it serves;

Section 205 - which demands assurances that the program will contribute to the elimination of artificial barriers to employment and occupational advancement;

Section 208 - which prohibits the Secretary from providing financial assistance to any prime sponsor unless the grant, contract, or agreement provides non-discrimination assurances;

Section 314 - which directs the Secretary to develop guidelines designed to remove artificial barriers to employment and advancement within CETA agencies;

Section 612 - which authorizes the Secretary not only to terminate financial assistance to a discriminatory

program but goes even further and specifically authorizes the Secretary to exercise his powers and functions provided by Title VII of the Civil Rights Act of 1964, and any other action as may be provided by law.

The Congress was also explicit in its determination to prohibit discrimination, as seen in the "Joint Explanatory Statement of the Committee of Conference" which advises that both branches of Congress, in passing CETA, included provisions for enforcing compliance against discrimination.

The rules and regulations 1/ also provide "non-discrimination and equal employment opportunities" to "handicapped individuals" in §98.21(a) and (g), and also §96.26(f)(2). §98.32 directs the Secretary to determine the "extent to which artificial barriers restricting employment and advancement opportunities in agencies receiving funds under the Act have been removed." To do this, the Secretary is instructed to collect information based on enrollee characteristics and other matters.

The provisions against discrimination which appear in several other pieces of existing legislation are compressed into this Act and its regulations. (See exhibit "Comparison of non-discrimination provisions" in the back of this Guide.)

1/All references to Regulations in this Guide are to those which appear in the Federal Register No. 54, Part III dated Tuesday, March 19, 1974.

Clearly, non-discrimination is the law. To aid the prime sponsor in carrying out its responsibilities under the law, this Guide provides information and suggestions on how to avoid acts, patterns and practices of discrimination. This Guide should help the prime sponsor establish a CETA program which will not become beset with discrimination difficulties, and will successfully lead those who are economically disadvantaged toward self-sufficiency.

B. Overview of Contents

Chapter II contains a check-list of activities which will help the prime sponsor to meet its EEO responsibilities under the law. Details of "how to do it" are included under each activity:

- . How to plan an Equal Employment Opportunity (EEO) Program which will aid the prime sponsor in making available equal employment opportunities to both CETA staff and CETA program participants... what support data are needed...what constitutes an "effective mechanism".
- . How to implement an affirmative action plan as an effective mechanism for assuring that no discrimination occurs in a CETA program...

discusses recruitment techniques...selection and assignment...counseling, training and career development.

- . Administration of the EEO program and the specific functions served by the CETA program's EEO officer.
- . The purpose and implementation of staff training in matters affecting equal employment opportunities.
- . Building certain factors into the internal reporting system to enable the prime sponsor to continually monitor and evaluate its CETA program in terms of equal employment opportunity.
- . The various review processes: the pre-award review, which aids the prime sponsor in selecting subgrantees who are both able and willing to enforce EEO principles in their operation; the compliance review, which is an indepth assessment of all program activity relating to equal employment opportunity; monitoring, which is a more frequent assessment which keeps prime sponsors informed of EEO strengths and weaknesses within the program; and complaint reviews or investigations.

- . EEO evaluation and its use as a yearly management tool.

Chapter III offers additional recommendations to assist the prime sponsor:

- . The forms of technical assistance available to the prime sponsor, as well as the technical assistance that should be provided by the prime sponsor to subgrantees and to community organizations.
- . The benefits and methods of keeping open lines of communication to community organizations.
- . The kinds of information and assistance which are available from the State Employment Security Agencies.

CHAPTER II

SPONSOR'S RESPONSIBILITIESA. Planning the Equal Employment Opportunity Program

The sponsor's primary responsibility is to see that discriminatory practices are not used in selecting people for employment on the CETA staff or for training in the CETA program. CETA rules and regulations (§98.21) state:

"The prime sponsor or eligible applicant shall be responsible for assuring that no discrimination prohibited by this section occurs in any program for which it has responsibility, and shall establish an effective mechanism for this purpose."

The important item here is that an effective mechanism shall be established to assure non-discrimination.

Whether the prime sponsor chooses to use the method suggested by this Guide or some other method, compliance with the Act will be adjudged by the effective mechanism and whether it accomplishes its goal.

The regulations go on to state that "the prime sponsor or eligible applicant may, as one means of establishing

this mechanism, assign the responsibility for administering the Equal Employment Opportunity program to one individual and require subgrantees and contractors to prepare affirmative action plans. In such cases, the prime sponsor or eligible applicant may include in its comprehensive manpower plan a description of its EEO program and the related affirmative action plans of its subgrantees and contractors, including the procedures established for monitoring these activities."

/ This Guide recommends the affirmative action plan as a means of achieving the "effective mechanism" required by the Act. Past experiences of the Manpower Administration and the Equal Employment Opportunity Commission attest to the effectiveness of the affirmative action plan.

An affirmative action plan is simply a program of goals and timetables designed to avoid under-utilization of women and minority groups in training or in staffing. Under any other name, the sponsor's plan will be equally effective if it contains the elements outlined below, and if the prime sponsor makes the commitment to apply every good faith effort. Procedures without effort to

make them work are meaningless, and the effort undirected by specific procedures is inadequate.

A good affirmative action plan includes:

1. The method by which minorities and women 2/will be utilized in all major job and/or training categories in all program areas anticipated within the program. In determining how minorities and women will be utilized in any job category, the prime sponsor should consider the following factors:
 - . The minority and female population of the labor market area.
 - . The size of the minority and female unemployment force.
 - . The percentage of minority and female labor force as compared with the total labor force.
 - . The general availability of minorities and women.

2/ It is not obligatory but it is recommended that data be obtained by-sex-by-race, i.e., black male, black female, white female, etc. Without sex-by-race data there is danger that either minority women will continue to suffer from a double handicap and be discriminated against while minority men and white women benefit or, conversely, that a minority woman will be counted twice to prove compliance with an affirmative action plan.

- . The availability of minorities and women having requisite skills in an area in which the prime sponsor and subgrantee can reasonably recruit.
 - . The availability of promotable minorities and women within the prime sponsor's and subgrantee's organization.
 - . The anticipated expansion and turnover of the total labor force.
 - . The existence of training institutions capable of training minorities and women.
 - . The degree of training which the prime sponsor is reasonably able to undertake as a means of making all job categories available to minorities and women.
2. The method by which the prime sponsor and all subgrantees will put forth a good faith effort to assure that there will be no discrimination based on race, creed, color, national origin, sex, political affiliation or beliefs. (CETA, Sections 603(1), 612(a); Titles VI and VII, Civil Rights Act of 1964; Equal Employment Opportunity Act of 1972.)

3. The method by which the prime sponsor will coordinate the EEO responsibilities with the subgrantees and planning councils.
4. The CETA agency's organizational structure indicating the position of the person responsible for EEO matters. Ideally, each CETA agency would have one person responsible for EEO activity who reports directly to the director of the program. (See Section C., "Administering the EEO Program.")
5. Goals and timetables for utilizing recruitable minorities and women to the maximum extent possible in the CETA program.
6. The method by which the prime sponsor will measure the effectiveness of the total affirmative action plan.

All support data 3/ mentioned in 1. above, become an integral part of the affirmative action plan. Such information should be maintained and expanded as certain other data become available, such as seniority rosters, applicant rejection ratios indicating minority status and sex, progression line charts, etc.

3/ FPM 713-1 2-5 Revised Order No. 4-60-2.1 60-2.11

The written plan should be maintained both at the prime sponsor's establishment and the establishment of each subgrantee.

B. How to Implement an Affirmative Action Plan

It is important to remember at this point that the prime sponsor's EEO responsibilities apply equally to the people it trains in its program and the people it hires for the CETA staff. Just as it is necessary to promote equal employment opportunity for the CETA program's clientele, so it is necessary to ensure that applicants for employment on the CETA staff are selected and treated during employment without regard to race, creed, color, national origin, sex, age, political affiliation or belief. The size, composition and location of a CETA agency staff in the prime sponsor's organizational structure are decisions appropriately left to the discretion of the prime sponsor. However, the following guidelines will be helpful as illustrations of steps which can be taken to ensure equal employment opportunity throughout the program --- for both program participants and for CETA staff.

1. Leadership

The first and perhaps most essential ingredient is the prime sponsor's personal leadership in establishing and maintaining a continuing program to promote equal employment opportunity. The responsibility for ensuring the success of the program must also be shared by each manager and supervisor in the sponsor's agency who is directly involved in the CETA program.

2. Recruitment

Recruitment whether for staff or program participants is one of the primary means of offering equal employment opportunities as required by CETA. Simply stated, the more qualified minority and female individuals contacted, the more will be selected and placed in the program or on the payroll.

Positive recruitment rather than passive reliance on posting announcements is necessary for effective recruiting. Following are some specific techniques which will aid the prime sponsor:

- . All solicitations and advertisements concerning positions in the program and jobs on staff should state that qualified applicants will receive consideration without regard to race, creed, color, national origin, sex, age, political affiliation or beliefs.

For example, when placing job orders or training notices at employment agencies, emphasize your policy of selecting applicants on the basis of merit and your interest in the referral of qualified minorities (male and female) and women. The State employment service, which likely will have a computerized job bank, should also be a good source of minority applicants as well as applicants in general.

- . Avoid recruitment which is primarily by word-of-mouth or "walk-ins."
- . Use minorities and women on all recruitment teams. Train recruitment teams to use objective standards. (See following discussion of artificial barriers to employment.) Keep them continuously aware of recruitment goals.

- . Direct recruitment efforts to all segments of the population, fully utilizing all special interest groups and all recruitment sources. Solicit recruitment suggestions from them. Make personal visits to the groups to stress equal opportunity and explain testing and hiring procedures, training, and career appointments.
- . Contact agencies and consultant firms that specialize in minority and female applicants (Urban League, SER, NOW, State or local Commission on the Status of Women, etc.)
- . For staff recruiting, contact educational institutions -- high schools, vocational schools, and career development centers. Establish and maintain personal contacts with counselors and principals of schools in your jurisdictions, also schools with large minority enrollment. Schedule recruiting visits and/or write to colleges, not neglecting minority colleges and those with high female enrollment.

- . Other recruitment sources are minority,
women's, and community organizations;
public training programs; community
action agencies; model cities agencies;
and apprenticeship information centers.
- . Advertise in media directed toward
minorities and women. Emphasize
interest in recruiting both sexes
especially for jobs which have been
stereotyped as "male" or "female."
Place classified ads under "Help Wanted -
General" or "Help Wanted - Male and
Female" listings.
Use neutral terms to describe position.
Refer to the revised D.O.T. listings which
have removed references to sex (e.g.,
"salesman" or saleswoman" is now
"salesperson").
All advertisements should include the
phrase "Equal Opportunity Employer
(male/female)." "EEO Employer" still suggests
only racial non-discrimination.

3. Selection and Assignment

Once there is an adequate pool of qualified applicants from groups formerly discriminated against, it follows that selection for the particular job should be on a non-discriminatory basis. To ensure that discrimination is not a factor in selection or assignment, the prime sponsor should attempt to identify and eliminate any artificial barriers to the employment of disadvantaged persons.

All selection criteria should be reviewed to determine if they have a disproportionate negative effect on minorities or women. If found so, the criteria should be analyzed to determine how relevant they actually are to the duties of the particular position. For example,

- . Are there indications of bias or discriminatory practices in selection for certain jobs, or in certain segments of your organization?
- . Do agency requirements block equal consideration for minority groups, or women, or the disadvantaged?
- . Are job qualifications realistic and relevant? For example, do they require educational credentials that are unrelated to the actual job? Do they rigidly insist on experience of a strict kind when experience in a somewhat different field would be equally useful? Are there restrictions that are unrelated to job performance? For example, height and weight restrictions may be traditional in certain jobs, but not actually essential to the performance of the job. Arrest records may preclude employment even though the nature of the arrest may have no bearing on job performance.

- . Do marital status, age and number of children, or employment of the spouse have any relevance to the job requirements? If not, such information should not be sought (even though it may be customary to ask these questions of both sexes) because experience indicates it has a disproportionate negative effect on the employment of women.

By removing artificial barriers to employment, such as those outlined above, an employer is better able to establish and follow a merit staffing system, which provides for the selection and promotion of employees based solely on their ability to do the job.

Once valid selection criteria are established, they should of course be applied equally to all persons. It may be necessary to provide selecting officials with additional training in merit principles and EEO policy. Also desirable may be provision for reviewing and improving interviewing techniques.

An exception to the above rule might be applied to aide or similar positions. Often aide positions are the only

entry level jobs which employers will offer to disadvantaged persons. Therefore competition for such positions could be limited to disadvantaged individuals, provided upward mobility is indicated.

4. Counseling, Training and Career Development

CETA guidelines place special emphasis on the development of in-service training and career ladder development to promote upward mobility of staff to higher level jobs. Employee performance and potential should be evaluated systematically in order to improve the individual's effectiveness, to assess training needs, and to provide the basis for promotions and salary advancements. The following actions are recommended:

- . Develop effective counseling to aid the staff in making decisions regarding their own training, self-development, and career direction.
- . Arrange and conduct training programs designed to upgrade clerical and professional skills, to enable all employees to increase their individual capabilities and enhance their opportunities for advancement.

- . Analyze career ladders to determine changes necessary to improve career opportunities for all persons.
- . Consider restructuring career ladders to provide more flexibility in entrance requirements for various jobs.
- . Coordinate career ladder requirements with employee development courses.
- . Make opportunities available for lateral movement into related career fields.

See the CETA "Organization and Staffing Guide" for additional information on recruitment, selection, equal employment opportunity in staffing, training, and avoidance of artificial barriers.

C. Administering the Equal Employment Opportunity Program

CETA regulations suggest that one means of establishing an effective mechanism to prohibit discrimination is to assign responsibility for administering the EEO program to one individual (§98.21). Several Federal and State agencies have established very successful programs utilizing this concept. If the prime sponsor decides to appoint someone as EEO officer, that person may have

greater impact if he or she operates directly from the office of the director of the CETA program, perhaps as special assistant, with the necessary staff to carry-out all EEO responsibilities.

Some of the functions that may be assigned an EEO officer are:

- . Act as the focal point for all sponsor EEO activities particularly development and implementation of affirmative action plan.
- . Take the lead in the development of policies, objectives, and guidelines for a unified and integrated program of equal employment opportunity for the prime sponsor and subgrantees.
- . Encourage adequate review of the prime sponsor's comprehensive manpower plan by community groups to ensure responsiveness to various minority groups.
- . Initiate and conduct pre-award compliance reviews and investigations of any existing complaints against a potential subgrantee.
- . Implement a system for monitoring compliance with EEO standards in both the prime sponsor and subgrantee organizations.

- . Advise the prime sponsor of equal employment opportunity activities within its own operations and among subgrantees, review and analyze management data and operating reports for the purpose of initiating and/or recommending appropriate actions.
- . Direct, conduct, and/or coordinate negotiation and conciliation activities with CETA subgrantees.
- . Implement a system for receiving and investigating complaints of discrimination.
- . Provide training and technical assistance to CETA staff and subgrantee staff concerning their responsibilities in the equal employment opportunity program.
- . Establish and maintain liaison with Manpower Administration regional EEO staff and other agencies and private organizations concerned with equal employment opportunity.
- . Maintain records of all EEO activities.

Prime sponsors may encourage their subgrantees to follow the prime sponsor's example and designate a person

to be an EEO officer within the subgrantee operation. The EEO officer at the subgrantee level should perform for the subgrantee the same functions as the prime sponsor's EEO officer.

D. Providing Staff Training in EEO

If the prime sponsor's EEO program is to succeed in meeting its goals and objectives, it requires a staff which is fully aware of the prime sponsor's EEO policies and the Federal requirements relating to equal employment opportunity and CETA non-discrimination assurances.

An EEO training program, directed to both prime sponsor and subgrantee staffs, should be designed to inform staff of the provisions of and reasons for the prime sponsor's and subgrantees' EEO plans, policies, goals and timetables; the role of the EEO officer and the administrative procedures for resolving complaints or grievances; and individual responsibilities of the staff to see that performance meets planned goals.

Regional Department of Labor staff stand ready to provide technical assistance in developing and implementing a training package at the request of the prime sponsor.

Training in EEO serves to reemphasize the prime sponsor's commitment to its staff and program participants. It should be updated regularly and scheduled at frequent intervals so that staffs are kept apprised of latest developments in EEO activities.

E. Building EEO Requirements into the Reporting System

Under the CETA program each prime sponsor and eligible applicant is responsible for three periodic reports to the Secretary of Labor. Two of these reports are the Quarterly Progress Report and the Summary of Client Characteristics Report (§98.7). The Quarterly Progress Report will contain, among other items, a statistical report of the prime sponsor's distribution of services among significant segments of the population. The Summary of Client Characteristics Report will contain aggregate characteristics data on all participants in the program. The Summary is to be submitted to the ARDM with the Quarterly Progress Report. Together they will assist the regional office in measuring certain accomplishments of the prime sponsor's EEO program, and may alert the ARDM and the prime sponsor to the need for technical assistance from the regional office.

CETA regulations require that each prime sponsor or eligible applicant establish an internal reporting system (§98.31). Such system will not only support reports to the Secretary, it will also provide the prime sponsor with basic internal management information, which will aid the prime sponsor in measuring the progress being made toward meeting goals and objectives, including those for equal employment opportunity.

The system, if it is to provide a valid means of assessing program performance in equal employment opportunity, should contain:

1. Records on the flow of all applicants for both staff and program participation, broken out according to race, national origin, sex, and handicap if any. The statistics should include a further break-out on women to separate minority females from the overall female count. (See footnote 2/, Section A.)

The flow includes:

<u>Program Participant</u>	<u>Staff Member</u>
entries	hires
rejections	rejections
training programs	job classifications
transfers	transfers
placements	promotions
resignations	resignations
layoffs	layoffs
terminations	terminations

In the case of resignations and terminations, exit interviews are advisable. They can provide valuable insight into program operations, and may suggest required corrective action.

2. Records of EEO compliance reviews of both prime sponsor operations and subgrantee activities. These should include the corrective action implemented, where appropriate, and the results of such action.
3. Records of complaints against the prime sponsor and subgrantees, including details of the investigation, followup, and effectiveness of the resolution of the complaint.

F. Conducting Reviews

A prime sponsor or eligible applicant is responsible for seeing that its own program and that of its

subgrantees are in compliance with all of the certifications and assurances of the Act, including those relating to non-discrimination and equal employment opportunity (§98.31(c)).

This may be accomplished by establishing a review procedure which consists of four major components:

The Pre-award Review

The Compliance Review

Compliance Monitoring

Complaint Investigation

1. The Pre-Award Review

A prime sponsor is responsible for the development and approval of all subgrants under its sponsorship and for assuring that its subgrantees adhere to the requirements of the Act and other applicable law (§95.41(c)). Pre-award reviews are recommended for this purpose.

A pre-award review enables the prime sponsor to determine, prior to the award of a grant, the ability of a potential subgrantee to comply with the EEO assurances and provisions of the Act. Its purpose is to avoid unlawful discrimination

on the part of subgrantees which could adversely effect the ability of the prime sponsor to fulfill its commitments under the Act, therefore affecting its future funding. A pre-award review can take the form of a desk audit or an onsite review.

A desk audit is a review of a prospective contractor or subgrantee on the basis of its proposal, plus any other relevant information the prime sponsor has available. Particular attention should be paid to:

- . Proposed plans. Do the plans of the prospective contractor or subgrantee contribute to the prime sponsor's intention to serve all significant segments of the community?
- . Staffing pattern. Does the prospective contractor indicate a intention to follow merit principles in staffing and to recruit from groups formerly discriminated against?
- . Signed list of certifications and assurances.
- . Mechanism for assuring that no discrimination occurs in the programs, e.g., an affirmative action plan.

- . Experiences with such agencies as the Equal Employment Opportunity Commission (EEOC), the Office of Federal Contract Compliance (OFCC), the State Fair Employment Practices Commission or the city Human Relations Commission to determine whether the prospective contractor has been found guilty of discrimination in the past or has entered into certain affirmative action agreements.
- . Procedure for reviewing and resolving complaints. If after reviewing all available information it appears that the potential subgrantee has the ability and desire to comply with EEO standards, no further review is required. However, if questions still remain an onsite review may be necessary.

The onsite review is conducted at the prospective subgrantee's place of operation. It enables the prime sponsor to resolve outstanding questions and also to evaluate the staff's sensitivity and knowledge of EEO matters, the proximity of the prospective subgrantee to the clients, and the facilities and working conditions.

2. The Compliance Review

This is an indepth comprehensive assessment of all prime sponsor and subgrantee activity relating to equal employment opportunity. Its purpose is to determine whether the program is complying with all applicable EEO requirements of CETA as they pertain to both program participants and CETA staff. It identifies problem areas and indicates forms of technical assistance which may be required. In conducting an EEO compliance review of a subgrantee by the prime sponsor the following steps are recommended:

- . Obtain a thorough knowledge of the subgrantee program.
- . Review Quarterly Progress Reports and the Summary of Client Characteristics Reports.
- . Determine whether any complaints have been filed against the subgrantee, with the prime sponsor or with other agencies. If some complaints have been substantiated, determine whether they are symptomatic of overall problems.

- . Evaluate the subgrantee's EEO performance against its planning goals and objectives as it relates to staffing and the delivery of services to the client population.
- . Interview minority and female community leaders, staff members, and clients of the subgrantee.
- . Review subgrantee records covering all component activities to determine whether services, benefits, wages, allowances, working conditions and placements are provided without discrimination.

At the conclusion of the compliance review, if deficiencies are identified, corrective action plans should be developed. The prime sponsor and subgrantee should arrive at negotiated agreement with respect to the proposed corrective action, which should be implemented within a period of 60 days or less. The prime sponsor then should determine if the subgrantee has complied with the agreements reached.

It is recommended that the prime sponsor conduct two full and complete EEO compliance reviews of each subgrantee annually. The information gained

through these reviews will be very useful for future planning and for determining whether a particular subgrantee should be refunded.

3. Compliance Monitoring

Various sections of the regulations under CEPA call for regular monitoring of prime sponsor activities. For instance, §95.13(c)(2) states that the prime sponsor's Manpower Planning Council should monitor all manpower programs under the Act. Likewise, State Manpower Services Councils should continuously monitor the operations of programs conducted by prime sponsors in the State (§95.13(d)(4)). §98.31(c) states that the prime sponsor or eligible applicant shall monitor all activities for which it has been provided funds under the Act to determine whether the assurances and certifications made in its plans are being met. Each of these monitoring efforts should include a review of performance as it relates to non-discrimination and equal employment opportunity.

Some of the specific items a prime sponsor should monitor on a continuing basis are:

- . The proportion of minorities and women enrolled, their numbers in the various program components, and numbers placed, as compared to the prime sponsor's plan and the percentage of minorities and women in the eligible population.
- . The percentage of minority and female staff at all levels within the prime sponsor's organization, and their upward or lateral movement over a period of time.

In addition, periodic interviews with a representative sample of staff and clientele are advisable.

By regularly monitoring its own and its subgrantee programs, a prime sponsor can identify potential EEO problems before they result in formal complaints or allegations, class action suits, and the like. When EEO problems are identified technical assistance can be requested of the ARDM to deal with them.

4. Complaint Investigations

Each prime sponsor is required to establish procedures for resolving any issues arising between it and a participant. Such procedures shall include an opportunity for an informal hearing, and a prompt determination of any issue which has not been resolved (§95.37).

The EEO officer (or comparable person charged with conducting the investigation) should take the following steps:

- . The complainant should be notified of the receipt of his complaint and the approximate date of the planned investigation. Prompt handling of complaints is important.
- . A complaint file should be established. Previous complaints pertaining to the same matters should be assembled in the same file.
- . Facts should be gathered from records and/or interviews, depending on the nature of the complaint. In all cases, the complainant should be interviewed and detailed facts obtained.

In interviewing others, general questions should be asked concerning practices of the agency or organization which are relevant to the complaint.

- . The data collected should be reviewed to determine a course for future action. The investigator should consider three basic questions:
 - What discriminatory acts, incidents, policies, or practices are alleged?
 - What evidence has been offered in support of each of these allegations?
 - What data are essential to determine the validity of the allegations?

Detailed basic information for complaint investigation principles can be found in the Compliance Officer's Manual, published by the Civil Rights Commission in 1966.

Program participants should be advised of a prime sponsor's complaint resolution system as well as their rights and responsibilities prior to entering the program (§95.31(e), §96.35(c)).

They should be encouraged to discuss any problems or grievances they may have with the EEO officer or other designated staff, so that these may be resolved before formal complaint procedures are invoked.

The effective handling of participant complaints can preclude the escalation of relatively minor issues into major compliance issues.

G. Evaluation As A Yearly Management Tool

Evaluation is a study of the total program, including all components. It should measure EEO program performance against goals and timetables as set forth in the prime sponsor's affirmative action plan, and should evaluate good faith efforts to achieve goals.

Where there is a failure to meet planned performance or goals, the prime sponsor has the responsibility to identify the specific causes for these failures and to develop and implement appropriate corrective action (§98.31(e)).

The tools that can be used to pinpoint causes for failure to meet equal employment opportunity goals are reports of compliance reviews conducted during the year,

monitoring reports received during the year, a study of the nature and validity of discrimination complaints, and the personal observations of the prime sponsor's EEO officer.

Sometimes it is possible to locate reasons for failure only over a long period of time. Therefore, in addition to the on-going evaluation which is so important for effective management of the EEO program, this Guide recommends that a yearly evaluation of EEO activities be undertaken. While it is not required, an annual review would be good practice if the prime sponsor is to obtain a complete and continuing measurement of the effectiveness of the original EEO plan.

CHAPTER III

ADDITIONAL RECOMMENDATIONS TO ASSIST THE PRIME SPONSORA. Technical Assistance

It is expected that technical assistance in three different forms will be required for a successful CETA program.

1. For Prime Sponsors

Federal personnel, both regional and national, are available for the provision of technical assistance at the request of the prime sponsor. The types of technical assistance available include, but are not limited to:

- . Development of affirmative action plan or or other effective mechanisms for assuring non-discrimination.
- . Development of EEO internal reporting systems.
- . Development of techniques for evaluating performance in regard to EEO goals.
- . Procedures for conducting compliance reviews and complaint investigations.
- . Planning training programs.

- . Methods of establishing and maintaining contacts with community based organizations.

2. For Subgrantees

The prime sponsor is expected to keep abreast of its subgrantees' operations on a continuing basis, and, when inadequate performance becomes evident, to be ready to provide the necessary technical assistance to its subgrantees. If the prime sponsor wishes, regional DOL staff will conduct a joint review of a subgrantee with the prime sponsor.

3. For Community Organizations.

The prime sponsor may wish to provide technical assistance to community organizations to enable them to establish participant support services. Organizations representing minority groups or women could be especially helpful to program participants but only may need guidance in setting up their support programs.

B. Community Relations

It is very important that CETA prime sponsors and subgrantees keep open lines of communication between themselves and community organizations, especially those which represent minorities, women, young people, and the aged. These are

the organizations which reach many of the people for whom CETA services are intended. These organizations need to be kept informed on such matters as progress being made to resolve special employment problems, progress in developing equal employment opportunity, and the availability of CETA training and employment opportunities.

The prime sponsor and subgrantee should consider using minority newspapers, radio and television, and the Manpower Advisory Councils to keep community groups informed. In addition, posters and literature are available and should be distributed where they can reach potential program participants.

An effective community relations program will go a long way toward enhancing the image of the prime sponsor (or subgrantee) in the minority community and will provide positive assistance in achieving overall goals.

C. Assistance Available from the State E.S. Agency

Prime sponsors and subgrantees may find State Employment Security Agencies of particular value to them in providing:

- . Information essential to the construction of their affirmative action plan, such as summary manpower indicators, current

unemployment statistics, availability of minorities and women in certain job categories, etc.

- . Lists of affirmative action employers who are actively seeking minorities and women.
- . Information to aid in developing job training programs.
- . Assistance in establishing and operating an effective equal employment opportunity program, utilizing the expertise of the agency's EEO officer.

See the "Guide for Prime Sponsors on State Employment Security Agencies in Conjunction with CETA" for a detailed description of available services.

Comparison of Non-Discrimination Provisions

Provisions which appear in other Legislation and Regulations listed below...	...are compressed into the Comprehensive Employment and Training Act, as follows:
1. Civil Rights Act of 1964 2. Equal Pay Act of 1963 3. Vocational Rehabilitation Act 4. Emergency Employment Act of 1971 5. Civil Rights Act of 1964 as amended in 1972	Non-discrimination based on race, creed, color, sex, political affiliation, beliefs or handicapped condition - Section 108, Section 603, Section 612, of the Act, and Section 95.14, Section 95.17, Section 95.21, Section 98.21 of the Rules and Regulations
1. Overt Discrimination (29 CFR Part 31)	1. Overt Discrimination 2. Patterns and Practices of Discrimination Section 108, Section 612 of the Act, and Section 98.41 of Rules and Regulations
1. Intergovernmental Personnel Act of 1970 2. Federal Standards for a Merit System of Personnel Administration (45 CFR Part 70)	Basic Personnel Standards Section 603.14, Section 208 of the Act and Section 98.14 of the Rules and Regulations Section 96.37

Exhibit No. 32

This exhibit was unavailable
for publication.

Exhibit No. 33

This exhibit is on file at the U.S. Commission on Civil Rights.

The Spanish version of the booklet is printed as Exhibit No. 34. In addition, Exhibit No. 35 contains some of the same information set out in Exhibits No. 33 and No. 34.

Exhibit No. 34



National Committee on Household Employment

8120 Fenton Street, Suite 300 | Silver Spring, Maryland 20910 | 301/587-3335



COMO
ORGANIZAR
LAS
EMPLEADAS
DOMESTICAS

Como Organizar Las Empleadas Domesticas

1. Hable con los ministros y curas de las parroquias en el centro de la ciudad y en los vecindarios donde las empleadas domésticas generalmente viven.

- a. Pídale su cooperación y ayuda para conseguir que las empleadas domésticas en la parroquia se unan a la organización.
- b. Déles cantidades de folletos anunciando sus planes para organizarse e invitando a las reuniones que se vayan a celebrar.
- c. Póngase de acuerdo con los ministros y curas sobre una fecha para reunirse y hablar de sus planes con los feligreses.

2. Recoja información, anónimamente, sobre salarios, horas de trabajo, etc. entre las empleadas domésticas y entre patronas. (Vea el ejemplo que se incluye).

3. Hable con el Director del Programa de Acción de la Comunidad, con el Director del Programa de Ciudades Modelos, con el Director de WINS, con líderes de la Organización de Derechos de Bienestar, y con los directores de organizaciones cívicas, religiosas, raciales o sociales locales y pídale su cooperación y ayuda.

- a. Si algunos líderes en la comunidad demuestran interés en los planes, tenga una reunión corta con ellos para incluirlos en el programa y obtener sus ideas y cooperación.

4. Organice una reunión de la comunidad donde se discutan planes para establecer una asociación local de empleadas domésticas. Esta reunión deberá celebrarse a una hora conveniente para esas empleadas (por ejemplo, domingo por la tarde o por la noche).

- a. Antes de la reunión, escriba al NCHE pidiendo panfletos informativos y copias del Código de Normas (guía de requisitos y condiciones generales para ese tipo de empleo), formas de contrato y, si es posible, la presencia de un representante del NCHE en la reunión.
 - b. Explique lo que se ha hecho y lo que se está haciendo en otras comunidades (esta información se puede conseguir en el NCHE).
 - c. Pídale a las personas que asistan a la reunión sus ideas para actividades futuras.
 - d. Recoja nombres y direcciones de empleadas domésticas para las solicitudes del NCHE y para su propio uso.
 - e. Aconseje a los asistentes en esta reunión sobre la necesidad de unirse y de vencer el miedo y la apatía.
 - f. Ayude a los asistentes a la reunión a elegir un grupo consejero compuesto mayormente de empleadas domésticas, pero incluyendo, si así lo desean las empleadas, algunos líderes de la comunidad.
 - g. Fijé la hora y el lugar para la próxima reunión, cuando se elegirán los oficiales de la organización, se adoptarán reglamentos, y se discutirán planes específicos y permanentes para el programa.
5. Devuelva las solicitudes (ya llenas) al NCHE. Déjenos saber si tiene problemas y de cómo cree que podemos ayudarle. Nosotras le enviaremos las tarjetas de socia, los códigos, los contratos y los alfileres de identificación como socia.
- a. NCHE publica mensualmente una Carta-Noticiero con información sobre sus actividades y las de otros grupos locales.
6. Haga planes para preparar un boletín informativo para la comunidad sobre sus propias actividades y planes.

¡BUENA SUERTE!



Relaciones de Trabajo

- El horario de trabajo debe ser acordado antes de empezar a trabajar.
- Si un patrono o una patrona no requiere los servicios de una empleada que trabaja por días, en las horas y días acordados, debe notificárselo a la empleada con por lo menos una semana de anticipación o pagarle por ese tiempo.
- Si la empleada no puede reportarse a trabajar, tiene la responsabilidad de notificárselo a su patrono o patrona lo antes posible.
- Las obligaciones del trabajo, incluyendo tareas específicas, frecuencia con que deben realizarse y calidad de trabajo requerida, deben estar claramente establecidas por escrito en un convenio acordado entre el patrono o la patrona y la empleada.
- Tanto el patrono o la patrona como la empleada deben observar puntualidad, integridad y cortesía.
- Los utensilios de trabajo y equipo para limpieza provistos deben estar en buenas condiciones y poder usarse sin peligro alguno. La empleada debe usarlos con el debido cuidado.
- En todo momento se deben mantener medidas de seguridad adecuadas para proveer a la empleada un máximo de protección para su seguridad y salud.
- El tiempo para descanso, horas de comidas, uso del teléfono y tiempo libre para atender asuntos personales (tales como asistencia a la iglesia, en el caso de empleadas que vivan en el lugar de trabajo) deberan ser acordados antes de empezar a trabajar.
- Las labores que se realizan y las relaciones de trabajo deben ser discutidas de vez en cuando con el fin de mejorar la eficiencia y la comprensión entre el patrono o la patrona y la empleada. Se deben alentar las evaluaciones del trabajo con fines constructivos y de provecho.
- A las empleadas que vivan en el lugar del trabajo se les debe proveer cuartos de dormitorio privados y cómodos.
- Ambas partes deben mantener una relación de trabajo profesional. Esto incluye el uso de formas de cortesía en las conversaciones tanto de parte del patrono o la patrona como de la empleada y sus respectivas familias.

Modelo Para Contrato

NOMBRE _____

Contrato para Empleo Doméstico

Las personas que firmen este contrato se comprometen a cumplir con las condiciones que se detallan más adelante. Estas condiciones se establecerán de acuerdo con el Código de Normas.

-
-
1. SALARIO EXACTO
 2. TIEMPO PARA ALMOZAR Y PARA DESCANSAR (Cuánto tiempo y a qué hora)
 3. AUMENTO DE SALARIO POR AÑO
 4. TRANSPORTACION PARA IR AL TRABAJO Y PARA REGRESAR AL HOGAR
 5. SEGURO SOCIAL
 6. VACACIONES PAGADAS (Cuántos días al año)
 7. DIAS DE FIESTA CON PAGA (Cuántos días al año)
 8. VACACIONES POR ENFERMEDAD CON PAGA (Cuántos días al año)
 9. OBLIGACIONES DE LA EMPLEADA
10. PERIODO DE PRUEBA

Firma del Patron o la Patrona

Firma de la Empleada

Fecha

NOTA: Tanto el patron o la patrona como la empleada deben recibir una COPIA DUPLICADA de este Contrato.

Exhibit No. 35

MS. Magazine, February 1973JOSEPHINE HULETT as interviewed
by JANET DEWART**"HOUSEHOLD HELP WANTED"**

I'm going to make a very unfashionable statement: I've been a household worker for 20 years, and I've never been ashamed of it. When I tell people what I do, sometimes they're embarrassed. Or they think it's a joke, and say, "You're kidding, Jo—you couldn't be doing *that!*" Sometimes, I just smile and say, "Why not?" But "Why not?" isn't really enough any more. I'm organizing household workers now—to fight for their rights and their dignity—and I have to explain why I feel the way I do; to really say what my life has been like. First, so that other women who are household workers may be able to connect with my story, and see what we can do together to change our lives. And second, so that employers of household workers, whether it's all the time or just half a day a week, can stop exploiting their sisters, or stop feeling guilty about employing them at all, and start understanding what we need.

A

fter all, there's a sense in which *all* women are household workers. And unless we stop being turned against each other, unless we organize together, we're never going to make this country see household work for what it

really is—human work, not just "woman's work"; a job that deserves dignity, fair pay, and respect.

I got into household work pretty much the way it happens to many young girls.

I was born and raised in the country: on a farm—more like a plantation, really—near Portland, Arkansas. While I don't want to give the impression that my family was like a bunch of happy slaves, we were adequately clothed and housed and fed by the people who owned the farm: the people my family worked for. I even had my own horse to ride from the time I was seven years old.

B

ut my life changed all of a sudden. First, the owner and his wife died, leaving the property to their sons, who turned out to be irresponsible. They squandered their money, and didn't feel they had to provide decently for my family and me as their parents had done—but there was nothing we could do about it. We had felt we were lucky before, but we'd really just been dependent on somebody else's generosity. Now we discovered we had no rights at all. Maybe I got some of my determination to be independent then.

In 1940, when I was 13, my mother died. This made my father feel I would be better off somewhere else, so he decided to send me north to Ohio to live with my oldest sister.

The change almost broke my spirit. I don't blame my sister for my feeling lonely—she was only seven years older than I, but had a family of her own; a husband and a little girl. Her husband was a coal-yard worker, and made very little money; my father sent what money he could, but it wasn't much. In fact, I'm sure I was a burden to them both.

Many nights, I used to cry myself to sleep because I was so homesick. I wanted so much to go back home with my father.

My sister did try to make me feel welcome, and her little girl was a joy to me. I used to baby-sit for all the neighbors and save the money so I could buy my niece a new dress for the school play. I guess I tried to do for her what I wished so much that someone would do for me.

Feeling lonely and wanting a family of my own, I got married when I was too young—before I'd even finished high school. The marriage lasted for a while, but by the time our baby was born, we were separated. We tried to go back together again, but it just didn't work. When I was 20, I found myself divorced and alone again—but this time with a baby son to take care of. My husband lost his job, too. He'd been working in a defense plant, but the war was over and all the plants closed down. I had to support my son and me.

There aren't many choices for a black woman in that situation now, and there were even fewer in 1947. If I'd known someone to help get me a job, I might have been a nurse's aid carrying bedpans all day, or a laundry worker wrestling with heavy loads of clothing. But I didn't know anyone, and besides, I thought household work might be better; you might have nicer surroundings and more chance to learn in somebody's home than you would in a factory assembly line, or even typing boring stuff in some office. Not that I had those opportunities then; I didn't even have a high school diploma.

Besides figuring out how I was going to earn a living, I had to figure out who was going to take care of my son. He wasn't even a year old. Like most women who have to support themselves, I couldn't have paid for good child care. A lot of women go on welfare just so they can stay home and take care of their kids. (Of course, now the Nixons and the Reagans are trying to force welfare women to work full time for even that little check; it's slave labor, really—and there's still no adequate child care. I don't know what women with kids are going to do.)

Some women leave their young children with neighbors, people who may not even be able to feed and take good care of their own kids. If the kids are older, they end up as "latch-key children." That means they have keys hung around their necks so that they can let themselves into empty apartments after school. They're too

little not to lose things out of their pockets, but nobody is around to look out for them. There must be thousands, even millions of latchkey children in this country. It breaks your heart.

I was lucky; my husband's family said they would watch after my son for me.

I wanted to be with him every night and as much as possible, so I decided against a live-in job. I answered an ad for day work.

The first family I worked for paid me \$25 a week for five and a half days. That money had to pay for transportation, too. I was living in Girard, Ohio, at that time, a small town near Youngstown, and it cost 80 cents bus fare just to get to the city line. I'd get off and walk two and a half miles more to my employer's house, and walk back again at night, just to save the second bus fare.

This family had four young children and a big house which I had to clean top to bottom. The husband, I'll call him Mr. S., owned a produce company, but no matter what food was in the house, lunch for me was always a hot dog. The four kids had to be kept spotless in fancy, ruffled clothes that Mrs. S. wanted changed several times a day and that I had to wash and iron. Sometimes, I worked overtime. After all, you can't stop in the middle of ironing a dress, or leave a lot of wash in the basket to mildew. I didn't ask for extra money, and was never offered it.

Then one day I had to quit work 30 minutes early so I could take my

son to the doctor. When Mrs. S. gave me my pay, it was short by 75 cents. The next working day, I started to leave exactly at 5 o'clock. When Mrs. S. complained, I told her that I hadn't charged for overtime, but now that she had docked my pay, I would never work overtime again. She was furious, and went running upstairs to her husband. He came down with the 75 cents, plus two dollars as a token for all the overtime I'd worked. That wasn't the end of it. When I reported for work the following week, Mrs. S. explained that she was sorry but they had to "cut back," and I was out of a job—no notice, no nothing. "Cutting back" is a way of firing people, but I would prefer the truth.

I got another job—by word-of-mouth this time, which is the way most household workers find their jobs—with Mr. and Mrs. B. They paid only \$22.50 for five and a half days, but I accepted it, because their children were grown up and out of the house, and I knew I'd have a better chance of getting home to my own child on time.

Of course, sometimes they would bring their grandchildren for me to care for while they all played golf. Or they would send them out to the kitchen to "help Josephine." The kids weren't well behaved. When they yelled at each other or broke things, the grandparents would chastise me, and say, "What have you done to them?" Some people will trust the word of the youngest child over the grown-up person who works for them. It teaches the children they can

A HOUSEHOLD EMPLOYMENT PLEDGE

I, _____, pledge to maintain and promote the Code of Standards of the National Committee on Household Employment as stated below. As an employer, I will not exploit any household worker employed by me. As an employee, I will pressure my employers and other household workers to establish these standards as a minimum code.

I. WAGES

The hourly wage should be no lower than the minimum of \$1.60 as stipulated in the federal Fair Labor Standards Act. Where the cost of living is higher than average, wages should be raised accordingly.

Higher wages should be paid for jobs requiring previously acquired training or skills.

Days upon which wages are to be paid should be agreed upon in advance.

Gifts of clothing and/or food should not be considered a part of the payment.

II. HOURS

A. Live-in workers. Any hours in excess of 44 hours a week should be paid at 1½ times the regular hourly rate. Hours in excess of 52 hours a week should be paid at double the hourly rate.

B. Live-out workers. Day workers should receive overtime for hours in excess of eight hours a day.

Day workers employed on a full-time weekly basis by a single employer should be paid 1½ times the hourly rate for hours worked in excess of 40 hours a week.

III. WORKING RELATIONSHIPS

Time schedules should be agreed upon in advance of employment.

If an employer does not require the services of a day worker for the agreed upon time, the employee must be notified at least a week in advance or else be compensated in full by the employer.

The employee has the responsibility of notifying the employer as soon as possible if she or he is unable to report to work.

A written agreement between employer and employee should clearly define the duties of the position, including specific tasks and frequency.

Rest periods, mealtimes, telephone privileges, and time out for private activities (such as church or recreation times for live-in employees) should be agreed upon in advance of employment.

The cleaning appliances provided by the employer should be efficient and safe. They should be used carefully by the employee.

Adequate provisions for maximum safety and health should be maintained at all times.

Work and work relationships should be periodically discussed with the intent of improving efficiency and understanding. Constructive and helpful evaluations of work should be encouraged.

Pleasant and private quarters should be provided for live-in employees.

A professional working relationship should be maintained by both parties. This includes equal and agreed upon forms of address for both employee and employer and their respective families.

IV. BENEFITS

A. Social Security. Earnings should be reported and payments made in accordance with the law for Social Security credit toward old age, survivors', and disability insurance. Records of payment should be furnished annually to the employee in compliance with Social Security legislation.

B. Sick leave. Employees working one day a week in one home should receive a minimum of one day paid sick leave a year.

Full-time employees should receive a minimum of six days paid sick leave annually.

C. Vacations. Full-time day or live-in workers should receive two weeks' paid vacations after one year of service.

Employees working one day a week in one home should receive one day paid vacation for each six-month period worked.

For longer service, there should be an agreed upon increase in paid vacation time.

D. Holidays. Live-in workers should receive at least eight paid legal holidays a year.

Full-time live-out employees should receive six legal holidays with pay a year.

A day worker working one day a week in one home should receive one paid legal holiday a year, providing the holiday falls on one of the normal working days.

I would like more information about the National Committee on Household Employment.

I would like to join/help organize a local chapter of NCHE.

Ms.

Name Mr. _____
(Please print)

Address _____

City _____ State _____ Zip _____

Status: employee employer other

(Please send to the NCHE, 1625 Eye Street, N.W. Washington, D.C. 20006.)

get away with anything, and it's one reason household workers don't want jobs with children.

On Friday nights, I cooked for them all—children and grandchildren—everybody. And, of course, there was no extra pay.

I ended up working for Mrs. B. for 10 years, even though the pay was so low that I had to take other jobs on the weekends. I was afraid to ask for a raise for fear they would fire me. Many employers think it's easy to trade one household worker in for another, so they just don't think about paying you more for length of service. They don't seem to think twice about hiring and getting acquainted with strangers all the time. You'd think they would be more careful about who they have in their home, and especially when there are children.

What was left of Saturday and all of Sunday, I'd work at every kind of household job: taking care of children, cleaning, and serving at parties. I did everything—washing floors, windows, cleaning out the basement, even walking the dog. When I arrived on Monday at Mrs. B.'s house—it was a big \$40,000 or \$50,000 home, because Mr. B. was a very successful contractor—I'd find dishes stacked up from the weekend, every ashtray in the house overflowing, and dirty underwear and towels dropped on the floor, even though there might be a laundry chute right next to them. Once when painters came, they stopped cleaning up after themselves as soon as they learned there was a "girl" to do it, but my employers

didn't offer extra pay for the extra work of getting paint off the floors and windows.

There's nothing wrong with this kind of work, but duties should be agreed upon in advance—and extras should also be agreed upon and paid for. And no one should feel free to get *more* messy and careless when there's someone around to clean up.

Then there's the question of hours. Just because a worker lives in doesn't mean she should be at someone's beck and call 24 hours a day. Even for a day worker, sometimes it seems the employer feels he or she owns you. If you're sick, some employers will call up the doctor to make sure you're not lying—something they would be unlikely to do with an office employee, who has a certain amount of sick leave anyway.



Privacy is another right that often gets overlooked. Some employers will discuss your most intimate affairs over the dinner table. They will discuss *their* most intimate affairs around you, too, but you're not supposed to have ears, or to understand. Or they'll discuss racial issues, talking about how "they" are trying to move into the neighborhood. You're not supposed to hear that, either.

Other times they put you on the spot by *expecting* you to comment on their intimate affairs. One woman I worked for was having a bad time with her husband. Whenever they had a fight, she'd ask me what I thought. I never really said: I knew that, once they got back together again, she might reject my opinion, and maybe reject me along with it.

During the first few years I worked, I also studied to get my high school diploma. Then I spent a year and a half studying at night, taking a correspondence course to become a practical nurse. It cost \$225, plus \$60 for a short stay in Philadelphia to take the exams. But when it was all over, I discovered that the course wasn't accredited by the state of Ohio; that I couldn't use the diploma to work in medical institutions there. (There are a lot of schools that misrepresent and prey on people's hopes this way. Even government job-training programs may train you for jobs that don't exist, or train women only for "women's work" jobs that don't pay as well.) Still, I began to look for better jobs on the weekends. Those courses certainly qualified me to be a companion, or a baby nurse.

During this time, I also spent as much time with my son as I could. One day a week, we'd go out for lunch together—a 69-cent lunch at Grant's—and that was an occasion he loved and looked forward to. I'd call and play games with him on the telephone, or just talk whenever I had a few minutes free. When I worked on Sundays, I'd drop him at an Episcopal Sunday school where the priest

had given me a lot of guidance and help. I also began to have ambitions for him. I was seeing a new kind of life in the homes I worked in, and I wanted more for him than just being an assembly-line worker in the local steel plants.

In one way, though, my ambitions caused me to pressure him too much, and that was my fault. When parents are denied so much, they try to live through their kids and often dominate their lives without knowing it. I was no exception, and I've had my son rebel against me for some of the things I imposed on him. But we loved each other enough to work out most of our problems.

Once Richard was old enough to go to school, he became a latchkey child, too. (I worked too late to be able to go all the way to my sister's or my in-laws' house to pick him up.) One of the worst parts of that was teaching him how to protect himself. I had to

teach him to lie. When someone called or rang the doorbell, for instance, I told him to say, "Mommy's in the shower," or "Mommy's sleeping." I was afraid someone might be calling to find out whether I was there or not, because there were robberies in that area. I was also afraid Richard would misbehave and be taken away from me because I was forced to leave him alone. But I was lucky, and he was a good child.

Sometimes I took him to work with me on a weekend, but I always brought food for him. I didn't want people to think I'd brought him along just for a free meal; that I couldn't

THE HARD FACTS

There are between one and a half and two million household workers: 97 percent of them are women. These workers are not protected by the Federal Minimum Wage Law, nor by much of the labor legislation that workers in most other areas take for granted. An attempt to include them under the minimum-wage legislation in 1972 was defeated by a coalition of Nixon Republicans and Southern Democrats.

In 1969, 80 percent of all household workers had an income of less than \$2,000 and 57 percent earned less than \$1,000; median annual income was about \$1,800. By 1972 the median annual wage for such work had risen only slightly to \$2,072.

Understandably, many workers have dropped out of this profession—either to find other work or,

more often, because lack of alternatives forced them on welfare.

The median age of household workers is 46, or six years older than the average for other female workers. Two-thirds are black, and the remaining one-third are white, Puerto Rican, Chicana, American Indian, and other minorities.

Twenty-one percent have completed at least a high school education, 74 percent work in urban areas, and 11 percent live with the families for whom they work.

The National Committee on Household Employment is a non-profit, service organization. It is the first national organization dedicated exclusively to the problems of household workers. NCHE has male members, as well—often chauffeurs, housemen, gardeners, and the like—but the vast majority of its 10,000-strong membership is female.

provide for him myself. I was very proud.

Finally, I got up the nerve to ask the family I'd been with for 10 years for a raise. I got an increase of \$2.50; from \$22.50 a week to \$25. But, even that turned out to be a hollow victory. A week later, I was stunned to learn that the family was moving to Florida—in only one week! They had given me no prior warning, no severance-pay or benefits. I was left with no security. Not only that, but I had to spend that last week helping them to pack instead of looking for another job for myself. Gradually, I understood that the "raise" was only a way of helping them ease their conscience about the planned move.

I had served them well, and I was hurt by their disregard for me. But I'd learned one thing over the years: no one was going to help me unless I helped myself. Even those friends and family who were most concerned with me had problems of their own.

I kept my weekend job, and started looking for others—anything, even being a baby nurse at night. I soon discovered that being a companion or baby nurse were jobs mostly for white women. When I did get a few days as a baby nurse somewhere, they would expect me to do other tasks, too—washing, cooking, cleaning—tasks I'm sure they wouldn't have expected of a white professional. Furthermore, the going rate for a practical nurse was \$125 a week then, but I couldn't get anywhere near that.

So I kept on doing day work, piecing it out with a few temporary nurs-

ing jobs. I also started to work two days a week for Mrs. M. and her husband, who was a young doctor. She was pregnant then, in 1957, and had a 15-month-old baby. They could only afford me part-time, but as his practice began to improve, they employed me five days a week for \$35.

They regarded me as a professional and an adult. They didn't pretend that I was a "member of the

SAMPLE
CONTRACT FORM
FOR HOUSEHOLD EMPLOYMENT

This contract binds each party to the terms agreed upon below. The terms shall be developed to coincide with the code of standards suggested by the National Committee on Household Employment.

1. Wages _____
2. Lunch and Break Time _____
3. Raise Increase (per year) _____
4. Transportation to and from Work _____
5. Social Security payments _____
6. Vacations _____
7. Paid Holidays _____
8. Sick Leave (days per year) _____
9. Employee Duties (use another sheet if necessary) _____
10. Probationary Period _____

Employer's Signature

Employee's Signature

Date

NOTE: Employer and Employee should have duplicate copies.

family," nor did they intrude on my life, and because of that, we became friends. Each time the doctor's income went up, he would give me a raise, too. At Christmastime, they gave me a real gift, not just a leftover or the cheapest thing they could find, but something the two of them and the kids had shopped for together. They didn't think I wanted old clothes or leftover food. (Many household workers just throw away the old clothes they are given, because they're afraid to refuse them or afraid that some future gift might be something they *can* use.) I bought a new coat once, and one of Mrs. M.'s friends said to her, "Look at that, Josephine has a coat that's newer than yours." Mrs. M. just looked at her and said, "Well, why not?"

They gave me a paid vacation and some days for sick leave, as you would any other employee. By the time I left them 12 years later, in 1969, I was getting a top salary and all the normal benefits that a worker should get. And we're still friends. The children loved me, not because I was their mother or tried to be, but because I loved them. We still write to each other and keep in touch.

Of course, some employers are as bad as Dr. and Mrs. M. were good. I learned later that my first employer, the one who had refused to pay me overtime, tried to keep other people from giving me work, saying that I was "lazy" and "not trustworthy." Fortunately, my new employers didn't believe her. I had worked there for two weeks when Mrs. S. spread

these "tales." Dr. and Mrs. M. hadn't observed those faults in me, but looking back on it, I do remember being closely watched. In small towns especially, employers tend to run into each other at country clubs and bridge parties. They soon find out where their former "girl" is working, and they may even tell lies about her so that she will be forced to come back under the same bad conditions that made her quit.

Years later, after I had become well known in the Youngstown area as a child-care specialist, that same Mrs. S. visited the home where I was working, and I told her I was the same one she had given bad references to and called "not trustworthy." I told her she could have caused me to go on the welfare rolls, just because I'd refused to be her slave. That really bothered her. Finally, she realized the damage she could have done.

I've known many household workers who lost their jobs because of lies told by children in the families they worked for. The kids would steal money from their mother's purse, or even bottles of liquor, and blame it on the employee when they got caught. The parents say, "Of course, my kids wouldn't do this"; so they fire the worker instead.

At the same time, some parents are too casual about who they allow to look after their children. They force someone hired to do cleaning or general housekeeping to look after the kids, too, though she may not have the time or qualifications to do it properly. Really, these are two differ-

ent jobs. Employers think they're getting a bargain, but it's their children who are suffering.

I've seen employers who cared less about their kids than I did. If a woman was angry at her husband, she'd take it out on me, too, and sometimes on the children. She would do anything to get out of the house; to get the children off her hands. Someone above oppresses us, and we oppress whoever is below. It's a cycle that must be broken.

Those women had too much time with their children, and I had too little with mine. I know I resented having to deny Richard so much when my employers' children had all the material things they needed. It's these kinds of problems that keep women divided against each other.

One thing I never did, no matter what the economic temptations were for Richard and me, was to borrow money from my employers, or ask for an advance on next week's pay, or get them to co-sign or vouch for credit for me. Many of my friends became absolute slaves to their families because they were so much in debt to them—just like migrant workers who owe their lives to the company store. I would rather pay interest on a loan than have my employer ask me to work on holidays, or keep me from quitting.

All the conditions I had experienced and that my friends told me about made me want to organize other household workers. While I was working for Dr. and Mrs. M., I wrote a letter to Lady Bird Johnson.

telling her about the terrible conditions most of us were working under.

I also wrote to Jane Hart, the wife of Senator Philip Hart (D. Mich.). Then I called five friends, and asked them to come to a meeting.

Well, three of them wouldn't, because they were so scared. Two were afraid they'd lose their jobs, and the third had a husband who didn't want her jeopardizing that income. I met with the other two, and the first thing that happened was that one of their employers called up *my* employer, Mrs. M., and tried to get me fired because "Josephine is starting a union."

Mrs. M. was a little scared at first; her friends really put pressure on her. But I explained that, though she was treating me well, I was still dependent on her generosity. We didn't have rights, and most of the other household workers I knew were working under terrible, inhuman conditions. When she understood how it was, she agreed with me. She encouraged me, and told her friends to mind their own business.

I got an understanding, personal reply from Jane Hart. I never did get one from Lady Bird, but my letter was forwarded to the Labor Department, and from there to the National Committee on Household Employment. Edith Sloan had just taken over to try to make something of the NCHE. (It had been going since 1964, but it had never been controlled by household workers themselves.) Edith came to Youngstown in 1969 to see me, and asked me to become

an organizer. I kept on working with the group in Ohio for a while (by then, we had a lot more than those first two brave women). My son was grown up and on his own, so, in 1970, I was able to move to Washington to join the NCHE staff.

Now I travel all over the country helping household workers to get together, start training courses to professionalize the work, establish decent pay and benefits, and get enough courage not to accept less.

I've run into employers who say, "But how can I pay that? I don't have any money myself." I sympathize with those women. I know we're all pretty badly off, and we all need to make trouble. But if you didn't have the price of a car, you couldn't talk the dealer down—you'd just have to get along without it. And that's the way it should be with household help, too. Maybe if women employers see it that way, they'll make more trouble with their husbands or their own employers, and get proper pay for themselves and their sisters.

I've also met women involved in the Women's Movement who feel guilty about employing another woman, and who even fire their household worker and try to do without. I explain to them that we need the job; it's a *good* job. We just want to be respected—and to be decently paid.

In fact, I'd much rather have a household worker employed by someone in the Women's Movement, because I think she's more likely to get treated like a human being. In some towns, household employers are or-

ganizing support groups for the household workers, and that helps a lot. They can talk better to other women employers, and make sure the workers don't get fired as trouble-makers. If an employer is being especially bad, it's good to have some of her own peers talk to her.

I know some household workers who don't want to have their earnings reported for Social Security; who earn so little that they've always avoided reporting their incomes or paying any tax. I understand the problem, but we can't continue as legal nonpeople and expect to get our rights. We can't keep on being third-class citizens. How can we affect the government if we live in fear that the government will find out we exist? And, for you who are employers, don't let the person who works for you convince you to break the law. If that person was employed by an office, wouldn't you make out all the proper forms as an employer? Of course. So don't make the same mistake at home.

We're setting up special training courses for household workers. After all, a lot of equipment used around the house nowadays is very complicated, and it takes expertise to run it. If there are children involved, you want to make sure that the worker knows how to take a temperature, how to give medicine according to doctor's instructions, and elementary first aid. But there should be courses for both boys and girls in every high school that teach these skills. Then we'd be equipped to take care of ourselves or, if necessary, to get a job

taking care of each other.

Most of all, we've got to organize. We've got to learn, as women, to put pressure where the power is, on the person above us, not the one below. That's the way change happens.

As for me, I'm still learning. I'm taking a business course, so I can understand better how to help women organize and run offices. I'd like to take a journalism course, too. We need to get the message out—through publicity, and through writing from the heart, with our own voice about our own lives. Too many of the existing organizations, even ones with black people who are supposed to be sympathetic, don't want to identify with the lowly household worker, or don't understand our lives well enough to know how to help.

I've found my work. I'm proud to be a household worker—especially now that we are standing up for ourselves. I'm proud to be a woman—especially now that we are fighting together and helping one another.

We've got to stick together. I ask you, any woman reading this, to think about your life. Aren't there similarities to what you've read about mine?

I heard a story about a woman lawyer whose small son was asked in school, "Do you want to be a lawyer, too?" And he said, with disdain, "Oh, no. That's woman's work." So you see, until women are full human beings with full rights and respect, *whatever* it is that we do will just be devalued. In the deepest sense, and whoever we are, we will keep right on being household workers.

Josephine Hulett did domestic work for 20 years, and has been a Field Officer for the National Committee on Household Employment since 1970. Janet Dewart is also with NCHIE, and has worked in television and in community relations.

Exhibit No. 36

SAMPLE
CONTRACT FORM
FOR HOUSEHOLD EMPLOYMENT

This contract binds each party to the terms agreed upon below. The terms shall be developed to coincide with the code of standards suggested by the National Committee on Household Employment.

1. *Wages* _____
2. *Lunch and Break Time* _____
3. *Raise Increase (per year)* _____
4. *Transportation to and from Work* _____
5. *Social Security payments* _____
6. *Vacations* _____
7. *Paid Holidays* _____
8. *Sick Leave (days per year)* _____
9. *Employee Duties (use another sheet if necessary)* _____
10. *Probationary Period* _____

Employer's Signature

Employee's Signature

Date

NOTE: Employer and Employee should have duplicate copies.

Exhibit No. 37



85 CHESTNUT RIDGE ROAD, MONTVALE, NEW JERSEY 07058 • TELEPHONE: 201-972-3100

PRESENTED TO THE
UNITED STATES COMMISSION ON CIVIL RIGHTS
CHICAGO, ILLINOIS
JUNE 19, 1974

BY
JAMES H. ETHRIDGE
ADMINISTRATOR
AIRCO TECHNICAL INSTITUTE
BALTIMORE, MARYLAND

MR. CHAIRMAN, MEMBERS OF THE COMMISSION, MY NAME IS JAMES H. ETHRIDGE, I AM THE ADMINISTRATOR OF THE AIRCO TECHNICAL INSTITUTE, A DEPARTMENT OF AIRCO, INC., LOCATED IN BALTIMORE, MARYLAND

A. AIRCO - A BRIEF DESCRIPTION

AIRCO, INC. -- WITH HEADQUARTERS IN MONTVALE, NEW JERSEY -- IS A DIVERSIFIED COMPANY WITH TEN OPERATING DIVISIONS WHICH ARE LEADING PRODUCERS OF FERROALLOYS - INDUSTRIAL GASES - CRYOGENIC FLUIDS AND SYSTEMS - WELDING AND CUTTING EQUIPMENT - CARBON-GRAPHITE PRODUCTS - ELECTRONIC COMPONENTS - HIGH VACUUM AND ELECTRON-BEAM SYSTEMS - FORGED SPECIALTY METALS - STAINLESS AND SPECIALTY STEEL MILL PRODUCTS - AND MEDICAL GASES AND EQUIPMENT. AIRCO HAS ABOUT 14,000 EMPLOYEES, 43,000 STOCKHOLDERS, AND OPERATES 106 DOMESTIC AND 7 FOREIGN PLANTS PLUS 15 R&D FACILITIES. SALES IN 1973 TOTALLED \$586.0 MILLION.

B. TRAINING PROGRAM RATIONALE

IN 1968 AIRCO RECOGNIZED THAT INDUSTRY MUST PLAY THE KEYROLE IN HELPING SOLVE THE PROBLEMS OF DEVELOPING CAREERS FOR UNEMPLOYED AND UNDEREMPLOYED PERSONS, AS WELL AS VETERANS. AIRCO IS COMMITTED TO A POLICY OF ACTIVE PARTICIPATION IN PROGRAMS DESIGNED TO ALLEVIATE AND EVENTUALLY ELIMINATE, THAT PROBLEM.

DURING 1968, WE CONDUCTED A RIGOROUS EXAMINATION OF OUR MANY BUSINESSES TO DETERMINE IN WHICH AREAS WE MIGHT HAVE EXPERTISE THAT COULD BE DIRECTED TO HELP SOLVE SOME OF THE PROBLEMS FACING OUR INNER-CITIES. WE DECIDED ON OUR WELDING BUSINESS, WHERE AIRCO HAS ENJOYED A POSITION OF LEADERSHIP IN THIS INDUSTRY FOR MORE THAN HALF A CENTURY. BECAUSE OF OUR STRONG POSITION AS A MAJOR SUPPLIER OF WELDING PRODUCTS AND SERVICES TO INDUSTRY -- AS WELL AS DEVELOPING NEW TECHNOLOGIES -- WE HAVE, OVER THE YEARS, DEVELOPED CONSIDERABLE SKILL IN THE TEACHING

FURTHERMORE, OUR WELDING PRODUCTS DIVISION HAS BEEN CLOSELY ATTUNED TO THE NEEDS OF PRINCIPAL EMPLOYERS IN THE METALWORKING INDUSTRY, AND KNEW THESE EMPLOYERS NEEDED AND WOULD HIRE WELL-TRAINED WELDERS. AN ESTIMATED 50,000 QUALIFIED WELDERS ARE NEEDED ANNUALLY THROUGHOUT THE NATION DUE TO INDUSTRY GROWTH, LABOR FORCE TURNOVER, AND ATTRITION. MANPOWER PROGRAMS AND PUBLIC SCHOOLS WERE UNABLE TO PROVIDE INDUSTRY WITH QUALIFIED WELDERS CAPABLE OF QUICKLY BECOMING PRODUCTIVE EMPLOYEES. THUS, WE CONCLUDED THAT WE COULD MAKE A SIGNIFICANT CONTRIBUTION BY DEVELOPING AND OPERATING AN INSTITUTIONAL TRAINING PROGRAM FOR THIS INDUSTRY.

C. AIRCO'S PILOT PROJECT - CLEVELAND, OHIO - 1968

AFTER RESEARCHING SEVERAL MAJOR INDUSTRIAL AREAS TO FIND THE MOST PROMISING LOCATION FOR A PILOT TRAINING PROGRAM, AIRCO SELECTED CLEVELAND. THIS SELECTION WAS MADE PRINCIPALLY BECAUSE ITS MARKET PROFILE IS REPRESENTATIVE OF THE ENTIRE U.S. METALWORKING INDUSTRY, IN TERMS OF WELDING NEEDS AND APPLICATIONS, COUPLED WITH A DEMAND FOR OVER 1500 SKILLED WELDERS DURING THE 1968-1969 PERIOD. AIRCO MANAGEMENT PERSONNEL PERSONALLY CONTACTED KEY EMPLOYERS IN THE CLEVELAND AREA, AND BEFORE OUR WELDING TRAINING CENTER OPENED ITS DOORS, WE HAD COMMITMENTS TO HIRE ALL OF THE WELDERS WE COULD TRAIN IN THE FIRST FULL YEAR OF OPERATION. IN NOVEMBER 1968, WE BEGAN TRAINING IN COOPERATION WITH AIM-JOBS WHICH IS THE U.S. DEPARTMENT OF LABOR'S CONCENTRATED EMPLOYMENT PROGRAM IN CLEVELAND. AIM-JOBS HAS PROVIDED THE MAJOR PORTION OF OUR OPERATING COSTS -- (THE BALANCE IS BORNE BY AIRCO). THEY ALSO SUPPLY THE NECESSARY SUPPORTIVE SERVICES OF RECRUITING, SCREENING, COUNSELING, REMEDIAL EDUCATION, ETC.

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TWO FEATURES OF THE CENTER'S PROGRAM -- FROM THE VERY OUTSET -- WERE UNUSUAL, IF NOT UNIQUE. ONE IS THE FLEXIBILITY OF THE INSTRUCTIONAL PROGRAM. THERE ARE FIVE INTERMEDIATE POINTS AT WHICH A TRAINEE CAN STOP - SHOULD THAT BECOME NECESSARY - AND HE OR SHE CAN STILL QUALIFY FOR PRODUCTIVE EMPLOYMENT IN INDUSTRY, AS OPPOSED TO BEING LABELLED A "DROP-OUT." THE SECOND IS THAT ANY TRAINEE ACCEPTED INTO THE PROGRAM IS VIRTUALLY ASSURED OF JOB PLACEMENT UPON GRADUATION; TOO OFTEN TRAINING AGENCIES MEASURE PERFORMANCE IN TERMS OF THE NUMBER "GRADUATED" AND NOT THE NUMBER PLACED IN MEANINGFUL JOBS. AIRCO, IN ALL OF OUR CONTRACTUAL ARRANGEMENTS WITH THE GOVERNMENT INSISTS ON HAVING THIS RESPONSIBILITY FOR JOB PLACEMENT. THUS, ACCOUNTABILITY IS BUILT INTO THE PROGRAM STRUCTURE FROM THE OUTSET.

THE SUCCESS OF THE CLEVELAND WELDING TRAINING PROGRAM BECAME EVIDENT IN LATE 1969, AFTER ONLY ONE YEAR OF OPERATION. THE CLEVELAND COMMUNITY, INDUSTRY, AND THE U.S. DEPARTMENT OF LABOR, EACH ENCOURAGED US TO CONTINUE -- AND EXPAND -- OUR OPERATIONS. AS A RESULT, WE INCREASED THE TRAINING CAPACITY IN CLEVELAND, WHILE WE WERE ABLE TO REDUCE THE AVERAGE LENGTH OF TRAINING REQUIRED FROM AN ORIGINAL 23 WEEK PROGRAM TO 17 WEEKS. AT THE SAME TIME, THE DEPARTMENT OF LABOR ENCOURAGED US TO EXPAND THE PROGRAM TO OTHER CITIES.

D. BROOKLYN, NEW YORK - 1971

IN APRIL 1971, AFTER MORE THAN A YEAR AND A HALF OF DEVELOPMENTAL EFFORT, AIRCO OPENED A SECOND PROGRAM ON THE SITE OF THE FORMER BROOKLYN NAVY YARD. THIS PROGRAM WAS INITIALLY DESIGNED TO MEET THE NEEDS OF THE MAJOR TENANTS OF THAT NEWLY-FORMED INDUSTRIAL PARK, AND, AS SUCH, THE PROGRAM WAS GEARED TO THE SHIPBUILDING INDUSTRY WHERE WE TRAINED SHIP-

FITTERS, AND WELDERS FOR THE YARD'S PRINCIPAL TENANT. IN JANUARY 1972, WE MOVED OUT OF THE NAVY YARD AND INTO A MORE CENTRALLY LOCATED FACILITY TO SERVE THE NEEDS OF INDUSTRY THROUGHOUT THE NEW YORK CITY AREA.

BASED ON OUR EXPERIENCE IN CLEVELAND AND NEW YORK, WE DEVELOPED CONSIDERABLE EXPERTISE IN THE SUPPORTIVE SERVICES AREA, AND FOUND OURSELVES CAPABLE OF PERFORMING THESE SERVICES "IN-HOUSE" CREATING GREATER CONTROLS, AS WELL AS A GREATER DEGREE OF COORDINATION BETWEEN SKILL AND SUPPORTIVE TRAINING.

E. RE-EXAMINATION OF THE PROGRAMS - 1971

THE SUCCESS THAT WE ACHIEVED IN BOTH CLEVELAND AND BROOKLYN WAS QUITE GRATIFYING. HOWEVER, IN REVIEWING OUR EFFORTS IN THIS AREA, WE FOUND TWO MAJOR FACTORS INHIBITING US FROM MULTIPLYING THESE PROGRAMS NATION-WIDE. FIRST, AS A URBAN AFFAIRS EFFORT, WE HAVE HAD TO EXPEND AN EXTRAORDINARY AMOUNT OF TIME IN ACTIVITIES UNRELATED TO THE PRIME OBJECTIVE -- SKILL TRAINING OF THE UNEMPLOYED FOR SPECIFIC JOBS. WE FOUND OURSELVES HAVING TO PACIFY A MULTITUDE OF COMMUNITY-BASED AGENCIES WHICH VIEWED US AS EITHER COMPETITION FOR THEIR SOURCE OF FUNDS OR AS A POTENTIAL "CUSTOMER" PURCHASING THEIR SUPPORTIVE SERVICES. IN ADDITION, A GREAT DEAL OF EFFORT WAS SPENT IN A MAZE OF ACTIVITIES INVOLVING THE VARIOUS LEVELS OF LOCAL, STATE AND FEDERAL GOVERNMENTS. SECONDLY, THE COSTS INCURRED, BOTH IN A PROTRACTED PERIOD OF DEVELOPMENT AND IN THE ACTUAL OPERATIONS, WHERE WE HAVE MADE SUBSTANTIAL IN-KIND CONTRIBUTIONS ARE PROHIBITIVE WHEN CONSIDERING EXPANDING THESE PROGRAMS TO

SOME 20 TO 30 CITIES NATIONALLY.

AS A RESULT OF THESE TWO MAJOR FACTORS, WE CONCLUDE THAT THE ONLY VIABLE APPROACH WAS TO FOLD ANY FUTURE PROGRAMS INTO OUR BUSINESS OPERATIONS AND DEVELOP THE EXPANSION EFFORTS AS A COMMERCIAL VENTURE.

F. BALTIMORE, MARYLAND - A NEW APPROACH - 1972

IN JULY 1972, AIRCO OPENED A FACILITY IN BALTIMORE WITH A PROGRAM DESIGNED PRINCIPALLY TO MEET THE NEEDS OF THE SHIPBUILDING INDUSTRY, THE PRINCIPAL EMPLOYER OF WELDERS AND SHIPFITTERS. IN THE BALTIMORE PROGRAM AIRCO PROVIDES THE COMPLETE PACKAGE OF SERVICE, - FROM RECRUITING, SCREENING AND TESTING, TO JOB PLACEMENT AND FOLLOW-UP COUNSELING, ALL WITH OUR OWN STAFF.

OUR FIRST GRADUATING CLASS INCLUDED TWO WOMEN, A MOTHER AND DAUGHTER. TO DATE, ALMOST TWO YEARS LATER, SOME FIFTY OF THE 572 GRADUATES HAVE BEEN WOMEN, WITH 40% OF THE CURRENT STUDENT BODY OF 70 ALSO BEING WOMEN. EVENTHOUGH WOMEN HAVE BEEN A PART OF OUR STUDENT BODY SINCE JULY OF 1972, IT WAS NOT UNTIL MID 1973 THAT A SIGNIFICANT NUMBER BEGAN TO MAKE APPLICATION FOR ENTRY INTO THE PROGRAM.

EACH OF THE FIFTY WOMEN GRADUATES HAVE BEEN PLACED IN JOBS AND WE ANTICIPATE LITTLE, IF ANY, PROBLEMS IN PLACING THOSE CURRENTLY IN TRAINING IN EQUALLY WELL PAYING JOBS. /

- 6 -

THE PROGRAM CONFIGURATION IS UNIQUE IN SEVERAL WAYS:

- BASED ON BETHLEHEM STEEL AND ON OTHER INDUSTRY'S NEEDS IN THE BALTIMORE AREA, AIRCO INVESTED IN A NEW TRAINING FACILITY WHICH IS OPERATED ON A COMMERCIAL BASIS, BUT GEARED PRINCIPALLY TO TRAIN THE UNEMPLOYED, UNDEREMPLOYED AND VETERANS.
- THE TRAINING FACILITY IS DESIGNED TO SIMULATE SHIPYARD CONSTRUCTION, AND INCLUDES AN OUTSIDE AREA WHERE A SHIP SECTION HAS BEEN ERECTED FOR TRAINING PURPOSES.
- MEDICAL EXAMINATIONS, WHICH DUPLICATE THOSE GIVEN AT BETHLEHEM STEEL, ARE REQUIRED OF A TRAINING CANDIDATE PRIOR TO ACCEPTANCE INTO THE PROGRAM. UPON GRADUATION, 13 WEEKS LATER, THE TRAINEE MUST MEET ONLY THE SKILL LEVEL REQUIREMENTS IN ORDER TO QUALIFY FOR EMPLOYMENT.
- 80% OF THE TRAINEES, ARE SLATED FOR EMPLOYMENT AT THE BETHLEHEM SHIPYARDS WITH THE REMAINING 20% PLACED IN WELDING AND SHIPFITTING JOBS ELSEWHERE IN THE BALTIMORE AREA.
- AIRCO HAS CONTRACTED WITH THE U.S. GOVERNMENT -- ON A FIXED PRICE BASIS -- WHEREIN THE COST OF TRAINING IS SHARED BY THE GOVERNMENT AND BY BETHLEHEM STEEL ON A PERFORMANCE CONTRACT BASIS WITH AIRCO ----- i.e., BETHLEHEM STEEL REIMBURSES AIRCO ONLY FOR THOSE TRAINEES WHO PASS BETHLEHEM STEEL'S CERTIFICATION TESTS.

THIS ARRANGEMENT RESULTS IN A COST TO THE GOVERNMENT WHICH IS SUBSTANTIALLY LOWER THAN THE AVERAGE COST FOR PROGRAMS WITH LESS THAN THE DEMONSTRATED SUCCESS OF OUR BALTIMORE PROGRAM. BETHLEHEM STEEL BENEFITS BY BEING ABLE TO MEET ITS MANPOWER NEEDS WITH PERSONS FROM AMONG THE UNEMPLOYED AND UNDEREMPLOYED POPULATION, WHO CAN FUNCTION AS PRODUCTIVE WORKERS ON A MECHANICS-LEVEL OF PROFICIENCY. MORE IMPORTANT, OUR GRADUATES ARE TRAINED IN SKILLS REQUIRED BY INDUSTRY AND ARE IMMEDIATELY PLACED IN JOBS WHERE THE AVERAGE STARTING WAGE IS SLIGHTLY HIGHER THAN \$4.00/HOUR.

G. FUTURE PROGRAMS

OUR EXPERTISE -- AS IT HAS DEVELOPED SINCE OUR FIRST PROGRAM IN 1968 -- IS NOT SIMPLY IMPARTING THE SKILLS TO THE UNEMPLOYED AND UNDEREMPLOYED AND PLACING THEM IN JOBS. IN ESSENCE, IT IS THE ABILITY TO IDENTIFY THE CRITICAL MANPOWER NEEDS OF INDUSTRY; TRANSLATE THOSE NEEDS INTO A TRAINING PROGRAM; SELECT THOSE INDIVIDUALS WITH A REASONABLE CHANCE OF MEETING THOSE NEEDS, AND PLACING THE RIGHT PERSON IN THE RIGHT JOB, ONCE TRAINED. WE WILL CONTINUE TO SEARCH FOR OPPORTUNITIES TO EXPAND THIS TYPE OF PROGRAM -- EVEN BEYOND THE CRAFTS OF WELDING AND SHIPFITTING -- TO THOSE AREAS IN THE U.S. WHERE WE BELIEVE INDUSTRY, GOVERNMENT, AND THE COMMUNITY RECOGNIZES THE NEED FOR SUCH A PROGRAM AND WILL RESPOND FAVORABLY TO THIS APPROACH.

MR. CHAIRMAN, AIRCO HAS APPRECIATED THIS OPPORTUNITY TO DISCUSS ITS TRAINING PHILOSOPHY AND PROGRAMS. I AM AVAILABLE FOR QUESTIONING SIR IF YOU WISH.

Exhibit No. 38

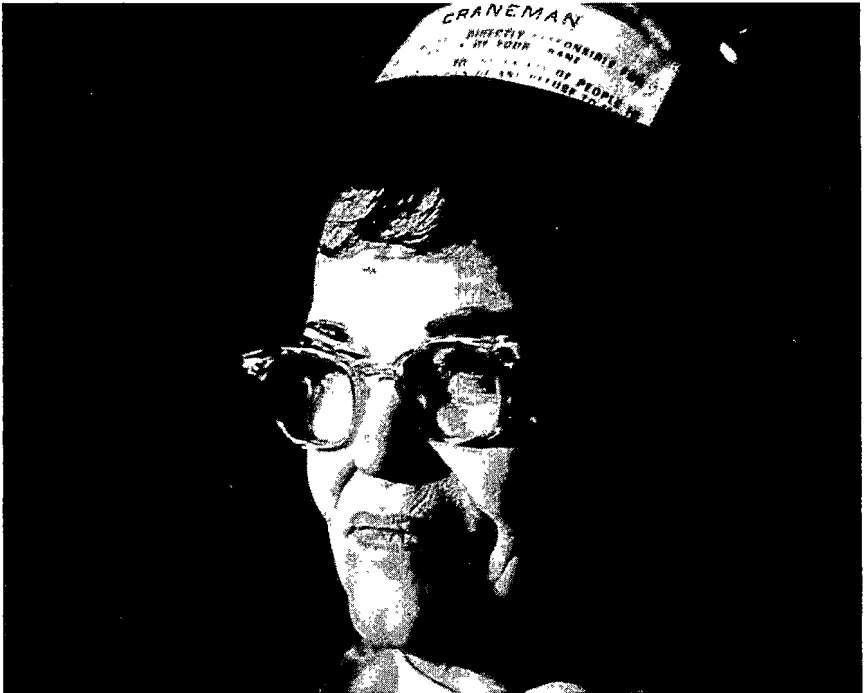
**This exhibit is on file at
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Rights.**

Exhibit No. 39

WOMEN IN APPRENTICESHIP



WHY NOT?



WOMEN IN APPRENTICESHIP -- WHY NOT?

JULY 1, 1970 - JUNE 30, 1973

FINAL REPORT

This report was prepared for the Manpower Administration, U.S. Department of Labor, under research and development contract (grant) No. 92-53-70-17. Since contractors (grantees) conducting research and development projects under Government sponsorship are encouraged to express their own judgement freely, this report does not necessarily represent the official opinion or policy of the Department of Labor. The contractor (grantee) is solely responsible for the contents of this report.

REPORT SUBMITTED BY
PATRICIA MAPP
August 1973

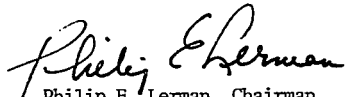
STATE OF WISCONSIN
Department of Industry, Labor and Human Relations
Division of Apprenticeship and Training
P. O. Box 2209
Madison, Wisconsin 53701

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MESSAGE FROM THE WISCONSIN DEPARTMENT OF
INDUSTRY, LABOR AND HUMAN RELATIONS

True to its historic, progressive tradition, Wisconsin, in 1961, enacted the first American law prohibiting discrimination in employment based on sex. During the subsequent decade, many efforts have manifested our state's commitment to equal employment opportunity for all. High among these has been this project, Women in Apprenticeship. We sincerely hope the findings and recommendations of this three-year study will be of benefit to the other states and to the United States Labor Department. Whatever in-kind contributions and follow-up activity our department has put into this endeavor have been more than repaid in statewide awareness and results.

Special thanks for their insight and relentless efforts to educate our Commission and others in the state are due Department of Industry, Labor and Human Relations employees Charles T. Nye, Apprenticeship and Training Division Administrator; Norma Briggs, Project Coordinator (1970-72) and now Director of the Bureau of Community Services, Equal Rights Division; Patricia Mapp, Project Coordinator and the author of this report; and Dr. Kathryn F. Clarenbach, Professor of Political Science, University of Wisconsin Extension and Chairperson of the Governor's Commission on the Status of Women. We are proud of their representation of Wisconsin through this project.


Philip E. Lerman, Chairman
Department of Industry, Labor
and Human Relations

ACKNOWLEDGEMENTS

The preparation of the Final Report, the completion of numerous surveys, and the actual field work on behalf of women apprentices have made special demands on both the field and secretarial staffs of the Division of Apprenticeship and Training. Without their willingness to share their technical skills, knowledge of apprenticeship and salty, good-natured wit and wisdom, the Project goals could not have been approached.

Mary Bach, Project Field Representative in the Target Area, and Dorothy Torres in the Milwaukee District, by their presence on the staff, and by their direct work among employers and women, especially in stabilizing new apprenticeships in the Day Care and Health Occupations, contributed heavily to our common goal.

And, although each has moved in and out of specific "Women in Apprenticeship" assignments during the past three years, Karen Vande Loo, Mary Bruns, Joyce Partowmah, and Kristen Penn, in the Madison central office, lent attention to detail, ingenuity, and cooperation to the promotion and communication aspects of the project -- including showing the project film in high schools, compiling survey data, and typing quarterly and final reports.

I have been grateful for the cooperation of each person and extend warm thanks to the Division for its help and hospitality.

Patricia Mapp, Coordinator
Women in Apprenticeship Project
(1972-1973)

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LIST OF ABBREVIATIONS

1. DAT: Division of Apprenticeship and Training
2. DILHR: Department of Industry, Labor and Human Relations
3. DOT: Dictionary of Occupational Titles
4. EEOC: Equal Employment Opportunity Commission
5. JAC: Joint Apprenticeship Committee
6. JOPS: Jobs Options Program
7. LEAP: Labor Education Advancement Program
8. MDTA: Manpower Development Training Act
9. VIEW: Vocational Information on Education and Work
10. VTAE: Vocational, Technical and Adult Education
11. WIN: Work Incentive Program
12. WISC: Wisconsin Instant Information System for Students and Counselors
13. WSES: Wisconsin State Employment Service

PREFACE

This report of the three-year project, Women in Apprenticeship, records the progress and shortcomings of a Wisconsin based effort to make more acceptable and normal the entrance of women into the skilled apprenticeable trades. Funded by the U.S. Department of Labor, this research-demonstration project was conducted jointly by the Wisconsin Division of Apprenticeship and Training, University of Wisconsin Extension, and in close informal collaboration with the Wisconsin Governor's Commission on the Status of Women. This combination of sponsoring agencies, with its total range of contacts, entrees, and interests, was basically responsible for the high degree of impact this modest undertaking was able to affect both within and well beyond the state of Wisconsin.

Working through the established decision-makers and influential personnel in the most essential public institutions made possible a much wider net than the small project staff could otherwise possibly have produced. By the close of the project it was apparent in many ways -- meeting agendas, policy changes, public issues, representation of women, language used -- that significant public education had been spearheaded. The staff of the Department of Apprenticeship and Training, the State Employment Service, Department of Public Instruction, Vocational Guidance Counselors, Department of Industry, Labor and Human Relations, University of Wisconsin Extension, as well as many employers and unions

actively demonstrate their new "enlightenment."

The concentric circles of project influence have gone beyond the borders of this state. The project's intent, findings, and recommendations have been presented to public officials, continuing education for women conferences, national feminist groups, and many educators, counselors, employers and unions. Again, the breadth and unique combination of project sponsorship opened receptive channels that might have remained unknown or unavailable with more narrow auspices. From the University of Hawaii to Appalachian State in North Carolina, the film-discussion has been presented. The project has been on the agenda of national conferences of U.S. Employment Security Agencies, Interstate Association of Commissions on the Status of Women, National Vocational Guidance Association, National Organization for Women, Urban Research. Preliminary findings and awareness of the project have been incorporated by writers in such publications as Spokeswoman, Manpower and Breakthrough.

In addition to educating the employment world about the potential of women workers, an equally significant effect has been the enlightenment of educators and feminists about the potential of skilled occupations. Many myths and stereotypes of industrial employment and non-academic pursuits have either been laid to rest or at least significantly dispelled as a consequence of these sessions. The importance of training, skills, and union contracts especially for low-or-no paid workers has been brought home and the project has provided a congenial meeting and learn-

ing ground for employers, union women and union men, feminists and educators.

Project co-sponsor, Charles Nye, Administrator of the Division of Apprenticeship and Training, Wisconsin Department of Industry, Labor and Human Relations, and I conceived and developed the project plan and together we have personally participated in the work of the project. Originally designed as a two year research and demonstration effort for one individual to isolate, analyze and minimize the obstacles to women participating in apprenticeship training, the project has had two major amendments since it began in July, 1970. Norma Briggs, the project coordinator from 1970-1972, was the only staff member for eight months, when a request for additional staff funds was approved and Mary Bach assumed responsibilities as project field representative in the selected target area. A modified third year extension to focus on a study of the experiences of women apprentices allowed for the part time employment of Patricia Mapp from 1972-1973. Ms. Briggs, having exposed through project findings an unmet need in Wisconsin for public information regarding equal rights and the law, was called on in 1972 to administer a newly created Bureau of Community Services in the Equal Rights Division, Wisconsin Department of Industry, Labor and Human Relations.

The timing of this research-demonstration has had its pluses and minuses. The high unemployment from 1970-73, the imperative preferen-

tial hiring of Viet Nam era veterans, and the ongoing necessity to provide meaningful training and employment for racial minorities and young people have all magnified the difficulties of commanding attention and action on behalf of women. These are circumstances which face the entire employment world and which confirm the 1963 conclusion of the President's Commission on the Status of Women: the problems of women workers will only be solved in a healthy economy with full employment.

At the same time this three-year period was one in which the national movement of women to be heard and to have a voice in decisions affecting their own lives gained enormous momentum. Public responses to that movement included Revised Order 4 requiring affirmative action for women, the EEOC's 1972 revised guidelines on sex-discrimination, NEA's focus of sex-stereotyping in the schools, HEW's Task Force on Discrimination Against Women in Education, incorporation of a chapter on Women in the President's Economic Report, Congressional passage of the Equal Rights Amendment and states' action on ratification, work of Citizens Advisory Committee on the Status of Women to highlight numerous corrective measure, distribution of President Nixon's Task Force report on Women's Rights and Responsibilities, inauguration of an Interstate Association of Commissions on the Status of Women, action including back-pay awards on charges of sex-based discrimination in employment and in education. These and innumerable additional advances

have made it impossible for all but the slowest learners to ignore the serious, urgent nature of the problem. Certainly they have contributed to a far more supportive milieu than existed in 1970 and consequently to the success of this project.

Dr. Kathryn F. Clarenbach
Professor, University of Wisconsin Extension
Chairperson, Governor's Commission on the
Status of Women

CHAPTER 1. PROJECT OVERVIEW

- I. WHY APPRENTICESHIP ?
- II. WHY WOMEN ?
 - A. Reality and Myth
 - B. "Women's Work:" The Dictionary of Occupational Titles
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 - A. Public Education
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- IV. WHAT MUST BE DONE
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CHAPTER 1. PROJECT OVERVIEW

The easy entry and acceptance of women in the skilled apprenticeable trades is the continued shared goal of the Wisconsin Division of Apprenticeship and Training and the University of Wisconsin Extension, Center of Women's and Family Living Education. A three year project (1970-73) undertaken by the two agencies, in which the obstacles to employment of women through apprenticeship have been isolated, analyzed and, where possible, minimized, has provided a sound base and a flexible springboard for the increased participation of women in skilled trades.

The intent of this report is to provide governmental agencies, employment and education communities, as well as interested women and men, with a complete picture of the previous, current, and potential status of Wisconsin women in apprenticeship. The project, variously described as "applied research" or "research and demonstration" was launched in mid-1970 with an optimistic, simple, yet complex question: "Women in apprenticeship -- why not?" and it concludes with much of the question having been answered in terms of barriers exposed, changes set in motion, and recommendations made.

"Why not?" in 1973, still is an appropriate question, however, as the overall disparities between higher men's and lower women's wages continue in all areas of employment and as competitive numbers of women, in

their social, educational or employment contracts, have not yet been motivated toward apprenticeships -- either with background technical knowledge, or with necessary apprenticeship occupational information.

I. WHY APPRENTICESHIP ?

The apprenticeship route for the integration of women in the skilled trades was selected precisely because the absence of women was so stark and the occupational range of women apprentices so regrettably narrow, and because it confined the project's objectives sufficiently to be both workable and measurable. In addition, the project staff and sponsors became increasingly convinced that the apprenticeship system itself, when properly designed and administered, has real utility and value. It offers to the economically disadvantaged and to those inexperienced in the labor force both paid learning of an employable skill and the virtual guarantee of post-training employment. The skills and broad theoretical training involved are portable in our mobile society and durable in the rapidly changing technologies of industry.

For those unfamiliar with the skilled trades and for those with little experience with on-the-job training, it is often difficult to understand the difference between mastering the many skills involved in such work as opposed to ingesting descriptions of the work from a printed page and practicing the motions a time or two. Obviously the time factor is enormously different in the two approaches as is the final level of proficiency.

Apprenticeships in Wisconsin, divided among the construction, industrial, graphic arts and service trades, are carefully worked out methods of learning the actual operation of the entire range of activity throughout any given trade. The on-the-job learning occurs with the guidance of an experienced journeyman; simultaneous and appropriately timed academic instruction of the necessary theory is provided by the Vocational, Technical and Adult Education system. During the entire work and related instruction process, the apprentice is paid by the employer at an increasing rate and in accordance with a contract signed by employer, apprentice, and the state. An apprenticeship covers a much broader and more intensive training than the usual on-the-job training; the apprentice herself/himself is consequently competent to hold better and more varied positions on completion.

In 1970 in Wisconsin, there were 8,500 male apprentices and 393 females: 224 in cosmetology; 45 cooks, and 24 scattered in 8 other occupations. Given the stability of apprenticeship as a training mechanism, and the existence of formal programs in 360 occupations, there were realistic expectations that significant integration of women could be achieved in many of the trades. Actually the total number of females involved in apprenticeships has not dramatically increased during the span of the project. But while male enrollments have dropped by 1,000, the number of women has been constant, and there has been an important

shift from the two dominant occupations in which women were apprentices in 1970 -- cosmetology and cooking -- to involvement in some 50 different trades. The shift represents an increase of 130 females -- from 69 to 199 -- outside of the field of cosmetology. (See table 1).

Table 1 Wisconsin Active Women Apprentices and Trainees

	March 70	March 71	March 72	March 73
Cosmetology	324	282	173	183
Barber	10	15	16	20
Cook	45	26	6	8
Lithographic Stripper	6	5	2	2
Baker	1		1	2
Lithographic Camerawoman	2	1		
Printer	1	1		
Architectural Draftswoman	1			
Florist	1			
Watchmaker	2		1	
Pharmacy Technician		4	2	1
Rehabilitation Technician		3		
Weekly News Printer		1	1	1
*Policewoman		1	1	
Sign Painter		1		
Day Care Teacher			73	78
Homemaker Home Health Aide			30	30
Cook-Chef			4	
Restaurant Cook			10	9
T.V. Repairwoman			1	1
Health Facilities Cook			6	14
*Central Office Repairwoman			1	1
*Assistant Manager			1	
Medical Records Technician			1	1
Physical Therapy Aide			1	1
Newspaper Printer			2	2
Surface Technician			1	1
*Police Detective			1	1
*Nursing Assistant			1	
Meat Cutter			1	1
*Comm. Dispatcher			1	
*Rubber Engraver			1	1
*Manager			1	
Lithographic Artist			1	1
Public Health Aide				1
Silk Screen Cutter				4
Second Class Engineer				1
Layout Stripper				1
Draftswoman				2
*Deputy County Treasurer				1
Div. of Apprenticeship Trainee				1
Die Maker				1
Optician				2
*Elect. Inspector				1
Case Aide				1
Printer Operator				1
Commercial Artist				1
Dental Lab Technician				1
Printer Composition				1
Musical Instrument Repair				1
TOTAL	393	340	341	382
EXCLUSIVE COSMETOLOGY	69	58	168	199

* On-the-job training programs under the supervision of the Division of Apprenticeship and Training.

II. WHY WOMEN ?

A. Reality and Myth

The project confirmed and confronted both attitudinal and institutional roadblocks as they impeded women, with detailed changes to be noted in this and other sections of the report. Probably the most telling result of the three year effort was the basic and essential sensitizing of a range of institutions and individuals to the existence of the problem: women need to work; women need the same training and employment conditions available to men; and women have capabilities to function satisfactorily across the gamut of skilled occupations. Until such concepts were clearly understood and accepted by all those concerned, other barriers could not be moved.

An underlying assumption of the project, that women can function productively in the skilled trades, is grounded in fact. Wisconsin's history is replete with the 19th century contribution of pioneer women and the 20th century involvement of women in industry. For example, the World War II experience showed significant gains toward full utilization of women workers as they contributed heavily to the economic production of the state: women constituted 28% of the state's war production employees between 1943 and 1946; over 109,000 women worked for 593 non-agricultural Wisconsin firms. "The manpower shortage and the tremendous increase in industrial capacity which necessitated the use of women in

such tasks, proved conclusively that there were few jobs in modern industry which women are incapable of handling."¹ It is notable that women were easily absorbed into the technical tasks demanded by industry, but none of the 109,000 was trained for a long range career through apprenticeship. Most women were quickly taught only one mechanical task; some have continued in those same, entry level jobs for 25 years with no advancement, while young men, veterans, and only recently, minority males, have been expressly chosen to fill the higher paid apprenticeship positions in the same shops.

It was this historical void in the apprenticeship tradition which the project addressed itself to filling. Many of the barriers to women in skilled occupations were initially well known and documented; others were discovered in the course of the research-demonstration. Among the damaging, long-perpetuated myths encountered were, "Women are not serious about jobs; their absenteeism and turnover are disproportionately high; women don't have mechanical aptitudes; women require costly and elaborate restrooms; women are weak and over-emotional; and, the proverbial, women's place is in the home."

The work performance and capability myths were easiest to dispel with facts and examples. But some of the grim statements about the employment potential of women are based in de facto situations where, for example, women do double duty at home and on the job; where child care facilities are inadequate or unreliable; and where reasonable maternity

1 Ruth De Young Kohler, The Story of Wisconsin Women, The Committee on Wisconsin Women for the 1948 Wisconsin Centennial, 1948.

leave has not been available. Therefore, in addition to attacking individual myths with a public information campaign, the project also assumed a wider "women in employment" advocacy role as was anticipated in the original proposal objectives.

B. "Women's Work:" The Dictionary of Occupational Titles

Among the commitments which evolved as the project unfolded was recognition that the employment of women held a two-pronged imperative. Not only must women have completely open access to better paying positions traditionally filled by and reserved for men, but if significant numbers of women are to benefit, so called "women's work" where women now predominate, must be upgraded and given its due. From the traditional, assigned roles which place men in higher paying, technical employment and women in low paying positions have emerged the false categories of "men's jobs" and "women's jobs." Working women, in turn, have accepted both the low expectations of themselves and society's low paying employment. The rock bottom Dictionary of Occupational Titles² skill complexity ratings in the categories of data-people-things in many of the so called "women's jobs" highlight the fallacies that work traditionally done by women reflects little or no skill, requires virtually no training, and commands little remuneration.

Whether or not it was an original intent of its formulators, the Dictionary of Occupational Titles has been used to determine amounts

² Dictionary of Occupational Titles, Volume 1, 3rd Edition, U.S. Department of Labor, 1965.

of federal expenditures for reimbursed on-the-job training programs. When the project attempted to introduce apprenticeship to the day care teacher and homemaker home health aide occupations, the deceptively low Dictionary of Occupational Titles code of 878 (the digit 8 represents "no significant function") assigned to such work served to confirm the beliefs of apprenticeship and employment service staffs that government funding of a training program was impossible because there were "obviously" no skills to be learned in these "women's jobs."

Consequently, the project sought and gained temporary code revisions, and turned to an examination of the DOT codes assigned to other female dominated occupations. A Wisconsin based study designed to analyze the jobs and to question the reliability of the system itself is in the process of challenging and changing the distorted view of "women's work" which has been rigidly perpetuated in the Dictionary of Occupational Titles.³

Among the other ramifications of the question, "Women in apprenticeship -- why not?" were several key issues linked to working women in or out of apprenticeship -- the skill ratings in the Dictionary of Occupational Titles; maternity leave; child care facilities; and career ladders for women employed in the state civil service -- each of which led the project to either specific action or to proposing a separate study.

³ Dictionary of Occupational Titles Research Project, 1971-1973, Wisconsin Department of Industry, Labor and Human Relations and University of Wisconsin Extension, Kathryn F. Clarenbach, Director.

III. WHAT WAS DONE

This project was initially conceived as a two year demonstration and research effort to be conducted statewide by one staff member employed in the Wisconsin Division of Apprenticeship and Training. After 8 months, an additional female staff member was assigned to work in a designated target area "to see what would happen" if apprenticeship placements were secured. A third year extension for a part time staff person was granted specifically to investigate the question of why some women had dropped out of training programs during the first two year phase of the project.

A. Public Education

The methods and objectives included observation, analysis, recommendation and action at all levels of the apprenticeship-employment matrix -- seeking always to expose and remove the obstacles. Through speeches, radio and television presentations, production and frequent showing of the film, Never Underestimate the Power of a Woman, participation in workshops, and preparation and distribution of printed materials, the project undertook a personal persuasion, public education campaign. Target groups were those directly engaged in the promotion and supervision of apprenticeship -- the staff of the Division of Apprenticeship and Training, as well as the State Employment Service, employers, unions, vocational counselors and the general population of women themselves.

B. Surveys

After selecting a geographical "target area" in which to concentrate demonstration attempts, the project devised a series of surveys to gather information which might point the way to recommendations and remedial action.

- 1.) Four minor surveys were designed to trace the enrollment patterns of women in the Vocational, Technical and Adult Education System, and to measure changes in apprenticeship employment patterns as perceived by members of the Division of Apprenticeship and Training. These periodic pollings showed:
 - a.) Little change from 1970-1973 in the pre-apprenticeship preparation of women in the vocational schools;
 - b.) Marked increase in the promotional efforts on behalf of women in the Division of Apprenticeship and Training, and;
 - c.) Concurrence of both the vocational system and apprenticeship staffs that the employment advancement of women is restricted primarily by social custom and discriminatory practices.
- 2.) Two major studies resulted from:
 - a.) Comparative data gathered from personal interviews

among 78 manufacturing employers in the target area in 1970 and 1973. The results confirmed that misunderstandings, ignorance, bias and discrimination in job posting procedures and hiring practices had to be exposed and changed before women could achieve equal apprenticeship opportunities.

- b.) Complementary surveys of the women apprentice and her employer -- specifically interviewing 159 of those women who had entered apprenticeship during the first two years of the project. These investigations provided a complete employment profile of the continuing, graduated and drop-out apprentice. They showed a high level of employer satisfaction (78% believed women apprentices to be equal or better in reliability and job performance to other employees); and a relatively low, 24% drop-out rate among women apprentices. The drop-out rate, when compared with an estimated national average of 50% for the general apprenticeship population is positive encouragement to employers, unions and to women themselves, who have been told that their presumed high work turnover makes them high risk employment liabilities.

C. Background Studies

A study of the relative cost and benefits of apprenticeship to

women was not attempted, but through a review of some of the research on the system itself, the project sought to understand the merits and shortcomings of apprenticeship vis a vis other employment or training processes. For example, the low drop-out rate for women might be rationalized by concluding that women, lacking viable alternatives, readily accept low paying employment (represented by the early stages of training), and that the apprenticeship should not necessarily be coveted.

Both the national Farber Report and the Purdue Study on Apprenticeship verified that the hiring practices, the terms of training, and in many cases, the content of training were in need of revision. In Wisconsin, a 1970 study of the drop-out specifically yielded recommendations along the same line -- that the designated period of training may be too long, beginning salaries too low, and related instruction not relevant. None of the researchers, however, isolated women as a group to analyze their apprenticeship experiences, attitudes and expectations.⁴

Therefore, while the Women in Apprenticeship study set out to reveal and challenge any factors in apprenticeship which preclude or disadvantage women, it was able to confirm or reject the findings of other research. The positive project observations are: a.) that many women, particularly the non-college bound have economic security, job satisfaction, social mobility, and personal fulfillment to gain from the journeyman status conferred by a completed apprenticeship; and, b.) that recommended changes, especially in the stronger enforcement of

⁴ See Appendix A - Apprenticeship Background Studies.

equal opportunity legislation as it applies to apprenticeship, and the provision of waivers for access level restrictions, will only enhance apprenticeship and the economy by producing more broadly trained skilled workers whose ranks will include women.

D. Changes Made

As the project defined problem areas, a series of institutional changes were recommended, accepted, and applied in Wisconsin. Some were more quickly and easily achieved than others; some are short-range, and others represent long-range processes set in motion. All changes have been instituted and are a direct result of Women in Apprenticeship Project intervention.

1.) APPRENTICESHIP RELATED CHANGES

- a.) Changing apprenticeship job titles in Wisconsin to eliminate sex designations and omitting sex references from promotional literature.
- b.) Including women in the affirmative action pledge and in the State Plan for Equal Employment Opportunity in Apprenticeship (Title 29 Part 30).
- c.) Instituting the Day Care Teacher and Homemaker Home Health Aide Apprenticeship Programs, providing apprenticeship opportunities for over 100 women.
- d.) Hiring women and utilizing the apprenticeship method of training women to become members of the once all-

male professional Division of Apprenticeship and Training staff.

- e.) Recommending waivers of collective bargaining agreements so that women could compete for carpentry, painting, and metal engraving apprenticeships.

2.) PRE-APPRENTICESHIP RELATED CHANGES -- EMPLOYMENT AGENCIES AND EDUCATIONAL INSTITUTIONS

- a.) Creation of an apprenticeship liaison position in each Employment Service office in the state to bridge the apprenticeship information gap.
- b.) Work Incentive Program and Apprenticeship staff exchanges to focus on eliminating sex stereotyping from their agency functions.
- c.) Removal of sex designations from job titles recognized by the State Department of Industry, Labor and Human Relations, and used by the Employment Service and the Work Incentive Program.
- d.) Adopting a State Maternity Leave ruling which defines child birth related absences as any health related disability, thereby assuring leaves of absence and job reinstatement.
- e.) Opening of the former Milwaukee Boys' Technical High School to girls and changing the name to Milwaukee Technical High School.

f.) The State Department of Public Instruction eliminating all sex designations from the Wisconsin Instant Information on Education and Work vocational guidance materials, used in 90% of the state's high schools.

3.) WOMEN IN EMPLOYMENT

- a.) Supporting the convening of the AFL-CIO State Women's Conference, 1970-1973.
- b.) Producing a nationally distributed film, Never Underestimate the Power of a Woman, aimed at dispelling the myths of women in employment.
- c.) Initiating the Dictionary of Occupational Titles review and revision of child care and health related occupations.
- d.) Initiating the amendment to federal legislation, via the Wisconsin Congressional delegation, permitting military widows and orphans to use educational benefits for apprenticeship employment.
- e.) Designing the Intergovernmental Personnel Act Project, the Department of Industry, Labor and Human Relations, to investigate hiring and promoting women in the Wisconsin State Civil Service.⁵
- f.) Proposing the Maternity Leave Project, Department of Industry Labor and Human Relations, to research costs and benefits

⁵ A Study to Determine Career Patterns of Women in State Service and to Devise Methods for their Full Utilization, July 1, 1972-June 30, 1973, Intergovernmental Personnel Act, Department of Industry, Labor and Human Relations, Norma Briggs, Director.

to employers of providing insurance benefits for pregnancy and childbirth to women workers.⁶

- g.) Advocating the creation of women's advocacy positions in the State Department of Personnel and in the Bureau of Community Services, Division of Industry, Labor and Human Relations.

⁶ Wisconsin Maternity Leave and Fringe Benefits: Policies, Practices and Problems, October, 1972 - February, 1974, Wisconsin Department of Industry, Labor and Human Relations, Jennifer Gerner, Project Director.

IV. WHAT MUST BE DONE

The future implications of the Women in Apprenticeship Project for federal and state agencies, employers, unions, and women converge on actions leading to greater legal and social sanctions for women to participate in the skilled trades, and thereby in apprenticeship.

Some necessary next steps are:

A. BY THE UNITED STATES DEPARTMENT OF LABOR

- 1.) Sponsoring of apprenticeship outreach programs for women designed to meet their pre-apprenticeship technical and application skill needs. (Such programs as the Labor Education Advancement Program exist in Wisconsin, but by priority and focus, serve only minority males.)
- 2.) Incorporating major revisions in the 1976 edition of the Dictionary of Occupational Titles to a.) eliminate gender specific job titles, and b.) to recognize the substantiated changes in skill complexity codes of those child care and health related occupations which have been reanalyzed.
- 3.) Amending Title 29 (CFR, Part 30, as it governs apprenticeship) to include women in apprenticeship affirmative action plans and also in the goals and timetables for compliance.

- 4.) Providing apprenticeship employers with a subsidy or tax credit to compensate for training costs.
- 5.) Educating through a promotional campaign, both management and labor on discriminatory patterns which might exist in their collective bargaining agreements.
- 6.) Reviewing the criteria for what constitutes an "apprenticeable" trade nationally with a view to meeting the skilled labor shortage in, for example, middle level, technical medical occupations through the apprenticeship system.

B.. BY STATE AGENCIES: EDUCATION AND EMPLOYMENT

- 1.) Re-examining the effects of beginning age restrictions in apprenticeship standards, and advocating waivers when age limitations eliminate women from apprenticeship application.
- 2.) Producing and distributing an apprenticeship information film or video tape addressed to junior and senior high students, and aimed at countering notions of sex-stereotyping in the world of work.
- 3.) Making available with equal promotional efforts to boys and girls, technical-industrial classes and apprenticeship occupational information in the public schools.

- 4.) Eliminating sex designations from vocational guidance materials as in the Vocational Information on Education and Work series, and from the promotional literature of the Vocational, Technical, Adult Education System.
- 5.) Achieving a balance of males and females on state guidance, employment service, and apprenticeship staffs.

C. BY WOMEN

- 1.) Challenging through the Federal Equal Employment Opportunity Commission and State Equal Rights Divisions, existing discriminatory hiring and employment practices.
- 2.) Organizing within existing labor unions to bargain for equal access to training opportunities (including open job posting and eliminating preliminary, irrelevant, "bull-work"), and for management level awareness training to help ease the transition of women into previously all male shops.
- 3.) Enrolling in pre-apprenticeship technical training courses and actively seeking apprenticeship information through vocational guidance, state employment or apprenticeship staffs.

CHAPTER 2. PROJECT INTERVENTION TECHNIQUES

IN THE DIVISION OF APPRENTICESHIP AND TRAINING

PUBLIC INFORMATION

TARGET AREA ACTIVITIES

EMPLOYER ATTITUDES IN THE TARGET AREA: COMPARATIVE SURVEYS

Survey of Prospective Employers: 1970

Survey Group and Method

Recommendations: 1970

Comparative Survey: 1973

Similarities in Data

Differences in Data

Target Area Survey Conclusions

TOWARD TARGET AREA PLACEMENT

TAYCHEEDAH: INTRODUCING APPRENTICESHIP IN THE "WISCONSIN
HOME FOR WOMEN"

Rationale

Process

Observations

CHAPTER 2. PROJECT INTERVENTION TECHNIQUESIN THE DIVISION OF APPRENTICESHIP AND TRAINING

The project sought to have as broad an impact as possible. Initially, one female was selected to be the project co-ordinator. The personality and characteristics of this key individual proved to be one of the strongest forces in exposing resistance and discrimination where well meaning employers, union members and state employment staff had not recognized it. She assumed the Women in Apprenticeship assignment as the first female professional on a staff of male apprenticeship field representatives, many of whom themselves had served as apprentices, and therefore were well steeped in the apprenticeship facts of life.

Her early analysis of the task at hand in eliciting the support of the 16 industry and training representatives was, "There were varying shades of acceptance and skepticism which led me to conclude that while I was learning the basics of apprenticeship, it was also part of my job to assemble and present the facts of women in employment so that the representatives would not only know what they were now expected to accomplish because of Division fiat, but would themselves be sufficiently convinced of the merits of moving women into

skilled trades to be able to handle constructively the anticipated reluctance of employers to this new idea." Her dilemma is illustrated by her early attempts to refer a strong woman, in good health, to fill a business machine repair apprenticeship. The employer rejected the idea of a woman because the job was "too heavy." The DAT representative on the spot was not prepared to counter the employer's arguments. A few days later another field representative placed a male apprentice in a business repair position because he had medical problems and was only able to do "light work."

It was with a high level of enthusiasm and determination that she set out to learn the theory and practice of apprenticeship and to conduct continual consciousness raising among staff colleagues. Male assumptions, for instance, about putting more "fellows" on programs, about male only occupations, or about the inability of women to endure long arduous years of training and schooling, were encountered daily. Where living examples of successful female models in the trades did not exist, and when challenged with the questions, "Why would a woman ever want to become a plumber?", her simple response was, "Why not?" Or more directly, "Why would a man want to become a plumber?", until many of her adversaries were gradually converted to also question, "Why not?"

Her main intervention tool was personal persuasion, coupled with facts with which to dispel the victimizing myths. Sensitizing

the DAT staff appeared to be the most immediate step in unearthing obstacles. It was the most obvious institutionalized, yet unintentional detriment to including females in apprenticeship. The task was continual, with a fine line necessarily maintained between professional challenges and petty gadflying which might cause negative personal repercussions. The risk of losing vital co-operation while exposing misconceptions and thereby stepping on some toes was very real.

The subject of women's equality has been a popular news item during the life of the project, and has had a full range of both positive and negative reaction. The arguments of equal pay for equal work or of females having equal training potential often have been discredited with jokes about bra burning, rampant sexual freedoms or mothers abandoning their children to become steeple jacks. Dislodging the hidden prejudices among co-workers so that they could seriously accept the prospect of women in the trades was a major project challenge, not to be ignored in its importance in the total project evaluation.

PUBLIC INFORMATION

The need for public information materials extended from DAT staff to employers, unions, and to women themselves. A film, Never Underestimate the Power of a Woman, was produced and completed in

early 1971 to show women successfully participating in the labor force in Wisconsin. The females driving trucks, operating a crane, drafting and working on the assembly line dramatize the capabilities of women while a researched narrative provides skeptical employers with the reality of female work and production statistics.

The film has been one of the most effective concrete promotional tools developed by the project.⁷ Employer and union conferences initially provided the greatest demand for the film. Women's groups throughout the country currently request the film from the University of Wisconsin Bureau of Audio Visual Instruction 4 to 5 months in advance, since even with four copies in circulation, requests and use are continual. The film, for its purpose, is an adequate first of its kind. However, high school girls are almost universally reluctant to identify with the majority of middle aged women depicted. Another film or video tape which is equally persuasive and non-didactic, yet which aims specifically at undoing the unique sex-stereotyping which many high school girls experience and internalize should be produced. Such a visual instrument for increasing the numbers of potential apprenticeship applicants before their career or non-career plans are solidified would assuredly receive wide distribution since the project itself has helped create a demand through sensitizing vocational counselors to the need for unbiased occupational reference materials. The 1971 Women in Apprenticeship

⁷ See Appendix B - Partial List of Film Distribution.

proposals to develop a second film for use in the project were regrettably denied by both the United States Department of Labor and the Department of Health, Education and Welfare.

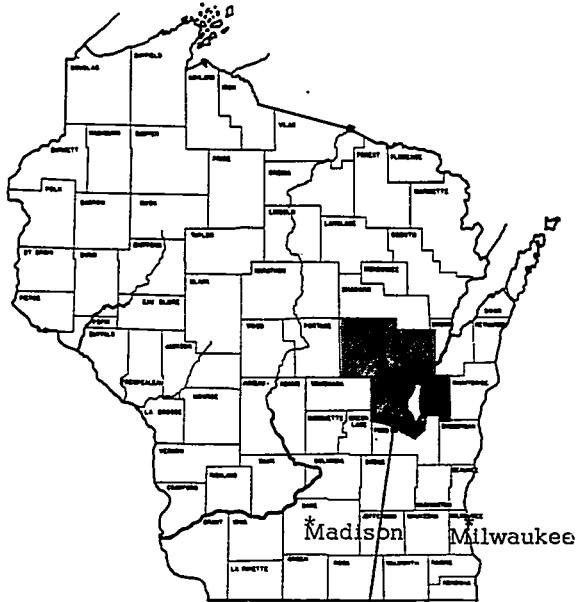
TARGET AREA ACTIVITIES

The project's investigative function included analyzing employer attitudes and practices to discover any misconceptions which could be dealt with forthrightly, and to capitalize on any situations where women might be employed as apprentices. A target area, the Fox River Valley, presented the greatest potential for an initial employer survey in 1970 and for a continued demonstration effort linked to the project goals.

The area includes the cities of Appleton, Neenah, Menasha and Oshkosh. The existence of a range of small and large employers in both urban and rural settings was part of the criteria used for selection of the target area. A well established vocational system which had served apprenticeship needs exists in Appleton, the geographic center of the region. The high concentration of industry and the relative absence of formal employment projects added to the desirability of the area as a project location. There also was a higher proportion of apprentices per capita than in any other area of the state. The only adult women's prison in Wisconsin in nearby Taycheedah might allow for apprenticeship program expansion. Other

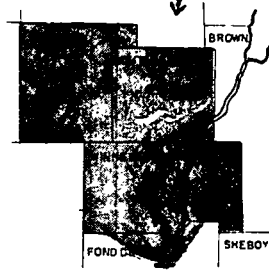
WOMEN IN WISCONSIN APPRENTICESHIP

TARGET AREA



CITIES

- 1 Appleton
- 2 Fond du Lac
- 3 Menasha
- 4 Neenah
- 5 Oshkosh
- 6 Taycheedah
- 7 Waupaca



urban centers were systematically eliminated for reasons of distance, or in the case of Milwaukee, because there was a multiplicity of programs and organizations which would require complex management and co-ordination with a new program.

Nevertheless, concentration of the project effort in the chosen geographical area predictably was difficult to co-ordinate because of the distance between the project co-ordinator, located in Madison, and the project field representative situated 120 miles away in Appleton. The field representative was selected to begin her varied tasks eight months after the project began. She was not involved in the 1970 survey of manufacturers and other employers of apprentices which was designed to provide useful base information for her work. She did, however, conduct the identical survey in 1973. Because the formal interviews were frequently followed by open discussions, she believes the process should have been an initial as well as concluding point of exposure to potential employers for her.

EMPLOYER ATTITUDES IN THE TARGET AREA: COMPARATIVE SURVEYS

Survey of Prospective Employers: 1970

The 1970 Fox River Valley survey yielded information on employer attitudes which pointed the way to recommendations for init-

iating social change. The recommendations were 1.) that both management and labor needed to be made aware of what practices are discriminatory in effect and specifically what the federal and state guidelines for equal employment are, and 2.) that employed and unionized women in the surveyed plants should provide the impetus for change in attitudes toward training opportunities for females.

Survey Group and Method

The survey population included 78 service and manufacturing firms which had registered apprentices.⁸ Not included were service trades where women already were apprenticed as cooks, cosmetologists and barbers -- as well as the construction trades where lay-offs in 1970 were up to 18%, ruling out prospects for immediate female employment. Five male representatives of the Division of Apprenticeship and Training conducted the interviews. While their exposure to employers throughout the state might have prepared them to be diplomatic, appropriate and acceptable interviewers, a few revealed that some of their own misgivings about women in the trades could have been projected to employers, who might have been inadvertently reinforced in their prejudices. It is not possible to speculate on the degree of bias either a male or female interviewer would inject into the conduct of the survey. A female staff member associated with the Women in Apprenticeship Project interviewed the iden-

⁸ See Appendix C - Women in the Trades: Fox River Valley Survey.

tical employers in 1973 and reported that many were co-operative, if not cautious and guarded, lest they give an offensive response.

Recommendations: 1970

The 1970 survey findings indicated that, contrary to popular myth, the absence of women in skilled trades has little to do with their inability or unwillingness to work under conditions which are dirty, messy, noisy and so on -- since an average of 40% of the employers had women working under these conditions, but in an unskilled capacity. Sexual bias was less evident in those shops where women were already employed. A larger proportion of those who did (62% of those which employed females) than those who did not (45% of those who had no female employees) thought that women and men made equally good employees in production work. None employed female apprentices. The project concluded that those shops where females were already employed, small paper mills and other small manufacturers, would be the best "starters" for female apprentices. The second conclusion was that to hasten the recruitment of females, employers needed to be informed of the specifications of state and federal equal opportunity legislation. Given a declining economy, apprenticeship advancements for women could not be immediately secured. The dissemination of information, ultimately aiming at a saturation of the employment community with the facts of women's work potential became the real-

istic approach to the longer range goal of achieving actual apprenticeship positions for women.

Comparative Survey: 1973

Again in 1973, the project sought to assess changes in attitude among owners, managers or personnel officials, as well as to compare actual employment patterns in the target area. The identical questionnaire used in 1970 was administered in 55 of the original 78 apprenticeship establishments. Three key variables should be mentioned as possibly affecting the slight differences in attitudes reflected by responses. Twenty-seven percent (15) of the respondents had not personally participated in the 1970 polling; the 15 new training directors, with the exception of one female personnel official, were generally under 30 years of age, and were not alarmed at the suggestion that women might enter the trades. (The only female respondent was negative because she presumed child rearing and home responsibilities to be major interferences with serious employment.) Another previously mentioned variable was the identity of the interviewer as the target area female staff member. She concludes that because some respondents perceived her role as one of exerting outside pressure as a female posing legally threatening questions, they gave evasive responses. The third, and most significant variable, was the combined influence of the Equal Employment Opportunity Commission,

the State Equal Rights Division and the state apprenticeship affirmative action pledge. Although not a part of the formal questionnaire, at least 50% of the respondents volunteered either direct (three were currently involved in sex discrimination suits against them) or indirect knowledge of government activities in behalf of equal employment or affirmative action for women.

Similarities in Data

The second survey in itself reflects no substantial change in attitude regarding willingness to train a female through apprenticeship. There continues to be a high proportion (45% in 1973; 66% in 1970) of employers who claim that there are apprenticeship positions for which women are unsuited. Those apprenticeships, as stated, include:

Maintenance	Machine repair	TV business - service calls
<u>Pressmen</u>	Tool-die	Farm equipment mechanic
Foundry <u>man</u>	Welding	Erection of signs
Millwright	Patternmaker	Pipefitters
Mechanic	Machinist	All of them
Auto mechanic		

And the main reasons offered for the blanket exclusion were:

Heavy lifting involved	No female restrooms
Physical requirements	Too dirty
Hard, grinding work	Too dangerous

The other reasons were either of a judgmental nature such as, "Women should be on repetitive work where they don't have to think much;" "They are not dependable -- want maternity leave, time off;" or of a "protective" nature, "This shop is no place for women;" "Language in service department is too rough;" and "We do not want women to put up with (dirty, messy) conditions." Even while making such assertions, 65% of the employers acknowledged that they knew of women who did work which was dirty, messy, involved heavy lifting and required technical abilities.

Differences in Data

While their expressed attitudes had not shifted in two years, the internal shop practices of apprenticeship recruitment have changed slightly, to the extent that 5 females had applied for, and three were being considered for apprenticeships in printing and machine shops. As in 1970, there were no female apprentices employed by respondents. The total ratio of males to females employed in skilled work was 123 males to each female in 1970; in 1973 the proportion is 90 males to each female.

Among the shops which are large enough to fall under "open posting" procedures for apprenticeship training positions, 76% (compared with only 56% in 1970) said that they advertised in the plant where both production (mainly male) and office (mainly female) employees could learn of the openings. Because the numbers of women who have access to such open posting is still relatively insignificant, some plants, in order to comply with EEOC regulations, are seeking waivers to that procedure so that specific recruitment of females outside of the plant is possible. Only two employers ever used the newspapers to acquire apprenticeship applicants. With such "closed circuit" (yet liberalized over the 1970 conditions) recruitment procedures, it is not surprising that 20% (27% in 1970) of the employers claimed to have difficulty in getting qualified apprenticeship candidates.

Another liberalized trend was in the decreased use of maximum age limits for apprenticeship positions. The effects of the Wisconsin Fair Employment Practices and federal Age Discrimination in Employment Acts obviously have been interpreted by the manufacturing and printing trades to include apprenticeship. Sixty-five percent of those interviewed (59% in 1970) stated they had no maximum age limits for apprentices.

Target Area Survey Conclusions

The project concludes that the expressed knowledge of equal

rights laws is an important employer prerequisite to the active recruitment and training of female apprentices. But, since as with the dispelling of other social prejudices, changes in attitudes and practices appear to lag behind knowledge of laws and facts, the project recommends further education of employers and unions to coincide with a proposed outreach, recruitment effort directed at prospective women apprentices. Such a practical outreach approach to achieving social change, if it involved employers and unions as well as interested women, could insure that a supply of qualified female candidates would have access to employment-training opportunities in the trades.

TOWARD TARGET AREA PLACEMENT

The one-woman efforts to demonstrate possible ways to integrate women in the trades in the Fox Valley were dramatically affected by massive lay-offs in industry in 1970-1971. Many employers in tool and die making, machine shops, wire works and paper mills when initially contacted, expressed a theoretical willingness to employ female apprentices, but expecting compliance and the active recruitment of females was unrealistic when once-active apprentices and journeypersons had already been laid off. The Farber Report hypothesis that apprenticeship enrollment and drop-out rates decrease with recession economies, apart from union or employer practices, is totally verified by the project experience in the Fox Valley.⁹

After publicizing the project goals to all civic and social organizations through an introductory letter, the project representative responded widely to speaking and film showing invitations. While for 18 months, she contacted all high schools in the area, met with individual students, sociology classes, counselors, and participated in career days, there was a simultaneous dearth of employment opportunity related to apprenticeship. Her discussions focused on the historical absence of women in the skilled apprenticeable trades and, idealistically, on the demands of a modern society for the full utilization of all of its workers. All of the personal contacts

⁹ David Farber, "Apprenticeship in the U.S.: Labor Market Forces and Social Policy," Research in Apprenticeship Training, Proceedings of a Conference, (Madison, Wisconsin: The Center for Studies in Vocational and Technical Education, University of Wisconsin, 1967.) Passim.

served the long range purpose of broad public education, but could not lead to immediate apprenticeship placements for women where no jobs existed.

When job opportunities were scarce, verbal commitments and theoretical endorsement of the recruitment and placement of women in apprenticeship by the Work Incentive Program (WIN) and the Wisconsin State Employment Service (WSES) were easily secured. But, as the economy gradually regained momentum in late 1972, in terms of production and manpower needs, WIN and WSES placed applicants indiscriminately, while the Veteran's Administration urged preferential hiring of Viet Nam era veterans. Each of these agencies, in its policies, practices and general attitudes, is treated in Chapter 3, where the institutional obstacles are discussed.

TAYCHEEDAH: INTRODUCING APPRENTICESHIP IN THE "WISCONSIN HOME FOR WOMEN"

Rationale

Observing that a full range of apprenticeship programs were offered to inmates at both the Green Bay Reformatory for Boys and Waupun Men's Prison, the target area staff person explored the training possibilities for female inmates at the Women's Prison in Taycheedah. With a population ranging from 70 to 120 females, Taycheedah, as a training site, was subject to the same rationale used for justi-

fication of apprenticeship programs in male institutions. Paroled or released females also had to make a living in the outside world. Their prospects for reassimilation and rehabilitation would be enhanced if they acquired trade skills, or were engaged in a transferable training program that could be completed through work and related classes in other parts of the state.

Process

Although the prison officials fully agreed, establishing trade training shops such as exist in male institutions was ruled out because of lack of funds and personnel. Instead, it was pointed out, the day to day maintenance of the prison population required cooks and bakers. Both of these occupations are apprenticeable, and both had on-going related instruction classes established in the local vocational school. The prison agreed to function as employer, providing a minimum salary and released time for related instruction for fourteen females who began in 1971 as cooks and baker trainees. Seven of the original group have left the prison: two continued their apprenticeships after securing employment in Milwaukee; two others were employed as cooks, but the employers were unwilling to enter into an apprenticeship agreement; three others had their indentures cancelled by mutual agreement before they finished their terms at Taycheedah; and the remaining 7 continue in training. As a pilot program, the training sys-

tem showed promise for expansion, but while the existence of the institution itself is currently challenged by the Governor's Commission on the Status of Women, and it is undergoing severe budget cuts, the possibility of extending the apprenticeship system to other occupations is not great.

Observations

Perpetuating the ongoing cook/baker programs will require a more precise plan on the release of women for their successful transfer of credit and employment in an apprenticeship situation. Consequently, parole officers need apprenticeship information and DAT staff need to fill an outreach function which they are presently not funded or authorized to do.

The project staff member had responded monthly to requests from the institution for advice and consultation on conducting the apprenticeship training, helping to mediate scheduling conflicts for related instruction and serving to maintain motivation among the trainees. The small scale apprenticeship and employment guidance service provided by the project to the women at Taycheedah demonstrated a greater need for such an apprenticeship-counseling function to be situated where groups of women needing employment could be isolated for attention -- as in the WIN programs or in large urban centers. The advantage of such a comprehensive outreach program focusing on the preparation for apprenticeship employment for women is a continuing project observation.

CHAPTER 3. OBSTACLES ENCOUNTERED: WHY WOMEN HAVEN'T BECOME APPRENTICES

APPRENTICESHIP SYSTEM

- Outreach Programs
- Age Limitations
- Internal Changes
- State Plan for Equal Opportunity in Apprenticeship

LABOR UNIONS INFORMED

- AFL-CIO Women's Conference
- Some Progress

THE PUBLIC SCHOOL SYSTEM

- Inadequacy of Vocational Materials
- Breaking the Boy's Tech Barrier
- The Guidance Community
- Project Suggestions

WISCONSIN VOCATIONAL, TECHNICAL, ADULT EDUCATION SYSTEM

- Vocational System Surveys: 1970 and 1973
- Enrollments of Women
- Attitudes and Practices

WISCONSIN STATE EMPLOYMENT SERVICE

- Aptitude Tests
- Job Referrals
- Job Counselors
- WSES Future

WORK INCENTIVE PROGRAM

- Signs of Co-operation
- Toward Mutual Efforts

EMPLOYERS NEED INCENTIVES

VETERANS' PREFERRED STATUS

DECLINE IN TOTAL ECONOMY - INCREASE IN PROJECT SCOPE

CHAPTER 3. OBSTACLES ENCOUNTERED: WHY WOMEN HAVEN'T BECOME APPRENTICESAPPRENTICESHIP SYSTEM

The apprenticeship system, having its roots in the medieval Western European and modern American manpower needs, has traditionally accommodated the male employer and the male apprentice, either informally or on a formal, legal basis. In Wisconsin the feeder systems to apprenticeship roles have been: families where one or more sons were groomed to practice the craft of the father; the public school system, where non-college bound males have been channeled into those technical, industrial courses such as drafting, woodshop, auto mechanics and graphics, which give a broad orientation to apprenticeable occupations; the vocational system, which has developed technical courses, as well as high school equivalency courses, leading to favorable consideration in application for apprenticeship; the employment agencies such as Wisconsin State Employment Service, where aptitude tests are administered and referrals to employers take place; the Work Incentive Program, where individuals in the recent past have been counselled to seek and train for gainful employment which occasionally has included apprenticeship; and the Community Outreach Programs, such as the Labor Education Advancement Program (LEAP), which were designed spe-

cifically to compensate for the lack of preapprenticeship skill and knowledge among minorities.

The percentage of a sample of the apprenticeship population (including female cosmetologists) and their referral sources to apprenticeship are estimated as follows:¹⁰

Table 2

Relative/friends	183 (39.7%)
Employer/unions	30 (6.5%)
High school/voc. school	28 (6.1%)
Personal decision	210 (45.6%)
Other	10 (2.2%)

Women who became apprentices during the project years 1970-72 reported the following as their first source of apprenticeship information:¹¹

Table 3

Relative/friends	15 (12.5%)
Employer/unions	107 (67.3%)
Wis. State Employment/ WIN/DAT	8 (5.0%)
Other	22 (15.2%)

Employers in the project target area, when surveyed in 1971 gave their main sources of apprentices as indicated below:

¹⁰ Thomas A. Barocci, The Drop-out and the Wisconsin Apprenticeship Program: A Descriptive and Econometric Analysis, the Industrial Relations Research Institute, the University of Wisconsin, Madison, Wisconsin, 1972, p. 115.

¹¹ Wisconsin Women in Apprenticeship Survey of Female Apprentices, 1972

Table 4 Where do you get your apprentice applicants? (Asked of 78 industrial trade employers. Multiple responses allowed) ¹²

	<u>No. of mentions</u>	<u>% who mentioned source</u>
From within the plant	32	(41%)
Vocational/high schools	38	(48%)
Employment Service/WSES	17	(21%)
Word of mouth referrals	17	(21%)
Other	16	(19%)

Although the family and social sources of information could not be traced, the project systematically has been able to isolate each institution or agency, including employer and union practices, as representing to some degree a barrier to the apprenticeship application and employment of females. The apprenticeship law itself is not discriminatory, and up until 1965, when minority groups -- blacks, chicanos and Indians -- pressed for equality of access to apprenticeship, the DAT did not view itself as an advocate of any group, except those already incorporated, either as employers or apprentices, under its jurisdiction. It was a system tightly designed to perpetuate the status quo, even to the point of deriving most state administrative staff members from skilled tradesmen who had personally experienced apprenticeship training. It is unfortunate that the analogies between minorities and females vis a vis their exclusion from appren-

¹² Women in the Trades: Fox River Valley Employer Survey, 1970

ticeship were not seen more clearly in the design of the Women in Apprenticeship Project.

Outreach Programs

The DAT had helped to fund and administer, since 1967, compensatory community outreach programs located in Green Bay, Milwaukee, Racine, Madison and Beloit which would recruit and train candidates in apprenticeship application skills. Following the dictates of Title 29, Part 30, requiring the apprenticeship agency to intervene in the recruitment and application process, the Division was able to alter its former posture of aloofness to recruitment and to take on direct, affirmative intervention before filing of the indenture. It is, however, contradictory with the Women in Apprenticeship goals of minimizing obstacles and placing women in apprenticeship that, with the support of the apprenticeship agency, the LEAP outreach programs focused on minorities, yet in practice and priorities, excluded females. The positive advocacy for females in the form of Women in Apprenticeship Project sponsorship does indeed represent a divergence from traditional DAT function, yet it does not extend to the referral and placement process, as specified in the LEAP goals.

Age Limitations

The extra-legal status of apprenticeship with respect to age

limitations placed on prospective apprentices in itself defines the apprenticeship system as a barrier to females applying. The median age of the females who became apprentices from 1970-72 was 31. Therefore, the project experience has been that many of those females who have sought apprenticeship training are over the age limits set by the higher paid trades, particularly those in the construction industry. Carpentry, with the most liberal upper limit, for example, has a maximum cut off age for apprenticeship applicants of 27. During the project, the only female accepted by a Joint Apprenticeship Committee (JAC) for carpentry was 31 when she applied, and an exception to the rule was made.

Another female with previous work experience in drafting was denied an opportunity to apply for a drafting apprenticeship with a prominent machine tool making firm because she was in her mid 40's. The training director (also in his mid 40's) refused to consider an apprenticeship for anyone over 35 even though he expressed specific willingness to hire a female. The two DAT field representatives who made the recommendations did not have the force of law behind them, and, facing certain rejection, the female did not choose to apply.

The project has publicized the injustices of the age limitations, as well as the inconsistencies in priorities within the Department of Industry, Labor and Human Relations and the Federal Department of Labor -- both of which theoretically encourage the entrance

of women into apprenticeship programs -- yet, both justify the exception of apprenticeship to age discrimination laws because apprenticeship implies an educational training program.

Internal Changes

In response to project awareness campaigns, symbolic changes have occurred in the DAT, such as changing the male-only references in job codes and in employment literature, as well as abandoning the motto, "Today's Apprentices: Tomorrow's Key Men," in favor of "Wisconsin's Apprenticeship System: Geared to Progress." The Division itself is also moving toward more visible employment of females outside of the clerical domain on a permanent basis. One female is employed as an apprentice field representative; another as a field representative and a third as a veteran's specialist. To a great degree, the project director was able to raise the level of language and attitude consciousness among male Division staff members on the subject of sex stereotyping, but few of them claim to be ready to act as promotional agents, except as decreed by Division policy or law. Currently the allocation of time does not rank "promotion" of apprenticeship a high priority activity, nor is it within the legal charge of the Division to perform outreach and placement functions. One positive area of agency staff jurisdiction, however, is in the enforcement of federal and state equal opportunity in apprenticeship

laws. It is in that realm of authority that the project sought to insure the inclusion of women.

State Plan for Equal Opportunity in Apprenticeship

The project director, backed by the project goals, served as a catalyst to the recognition of women in the design of the State Plan for Equal Opportunity in Apprenticeship adopted in 1972. Within limitations of law, apprenticeship employers and joint apprenticeship committees, made up of employers and union representatives, have been free to develop any selection procedure for apprentices which meets their specified needs and requirements.

The Federal Equal Employment Act of 1972 which eliminates sex as a determining factor for employment is also central in the state minimum compliance expectations. In addition, Revised Order #4, applying to employers who hold federal contracts, states that the employer must demonstrate the active recruitment and employment of minorities. Specifically, where apprenticeship employment by the government contractor is practiced, Federal Title 29, Part 30 as it is incorporated into the State Plan for Equal Opportunity in Apprenticeship in Wisconsin does further specify that the active recruitment of minorities and women is required by employers of five or more apprentices. The Wisconsin provisions mandating explicit affirmative action for women and minorities alter the passive, non-

discrimination implications of Federal Title 29, Part 30.

The project efforts to have even stronger measures on behalf of women in the State Plan for Equal Opportunity in Apprenticeship have not been adopted, in that the employer goals and timetables for compliance in the actual hiring of minorities do not specify women. A blanket pledge of intent (all too often signed after a training agreement is reached) stands as the strongest enforceable measure on behalf of women in the State Plan for Equal Opportunity in Apprenticeship. Each bona fide apprenticeship employer signs the following statement:

This firm will recruit, select, employ and train apprentices during their apprenticeship without discrimination because of race, color, religion, national origin or sex.

This firm will take affirmative action to provide equal opportunity in apprenticeship program (s) as required under Title 29 of the Code of Federal Regulations, Part 30 and the equal employment regulations of the State of Wisconsin.

The Wisconsin Apprenticeship Administration emphasizes the significance of the pledge, since no other state apprenticeship plan does explicitly prohibit discrimination because of sex. Enforcement of the regulation since April, 1972, has resulted in no direct placement of women. The documented, fruitless attempts at recruitment of female applicants in Wisconsin by major industrial employers as they seek to comply with existing regulations highlights the need for women to take advantage of a favorable hiring situation, especially

where government contracts obtain.

But the project cannot logically thrust the burden for their apparent non-availability on women alone. Concerted social, educational and occupationally oriented outreach measures are called for to insure a.) that women will have access to knowledge about apprenticeship opportunities and b.) that they have the necessary application and pre-apprenticeship skills.

Further, the project emphasizes that a.) the Wisconsin apprenticeship pledge should not be viewed as an after the fact formality, but should be rigorously enforced by the Division of Apprenticeship and Training, and b.) that goals and timetables for employment of women should become a part of the existing Wisconsin State Plan for Equal Employment Opportunity in Apprenticeship.

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LABOR UNIONS INFORMED

Apprenticeship has been subject to both industry and organized labor influence with apprenticeship application and training often being included in the terms of union bargaining agreements. In the industrial trades, where a union exists, "in-plant only" posting of training opportunities is common, a practice which automatically excludes women from application simply because they lack access to the job posting. A clear case of access discrimination (not necessarily related to the union bargaining agreement) existed in a factory employing women where the apprenticeship openings were routinely placed in the men's washroom.

Labor contracts also routinely specify that union members are to be given first choice for training positions, with seniority rights being a distinct advantage. In addition, some paper mills in the target area have height requirements and designate physically demanding "bull work" as the first job assigned a new employee. The injustice of such a practice is dramatized in the case of the instrument repair apprenticeship positions which demand no significant strength, but are recruited from among those employees who have survived the hazing of lifting and hammering into shape heavy and unwieldy cartons.

AFL-CIO Women's Conference

As such practices and their effects on women became evident,

the project turned directly to union women and men, urging remedial actions. The target area survey recommendations to turn over to women already employed in industry the responsibility for their own advancement to equal opportunity through apprenticeship training was reiterated when the project offered concerted support to union women as they organized a women's coalition within the AFL-CIO.

The first state AFL-CIO Women's Conference in 1970 emphasized the challenges to the union membership in promoting the apprenticeship training of females. The Women in Apprenticeship Project sponsor was a featured speaker, delineating steps to be taken by interested females. Concrete results of constant project communication and publicity among union women in terms of increased numbers of females apprenticed do not yet exist. What does exist is an expressed formalized receptive attitude among male and female union leadership for the active recruitment of female apprentices. The height and rigorous physical work prerequisites are gradually being challenged and eliminated by both male and female union members. Since the inception of the Women in Apprenticeship Project, the State Council of AFL-CIO unions has consistently supported the general policies leading to improved employment conditions for females -- equal pay for equal work; maternity leave directives; and the National Equal Rights Amendment. And the AFL-CIO Women's Organization will again focus on apprenticeship possibilities and strategies for action at its 1973 autumn conference.

The female leaders within the Wisconsin United Steel Workers and Communication Workers of America unions are spokeswomen of record who see their roles as motivating women already in plants to move into trainee positions, as well as to bargain for management training which will sensitize those in supervisory positions, including journeypersons, to accept and provide support for those females who do take on apprenticeship training. The existence of the apprenticeship project has given the DAT and the University of Wisconsin Extension access to union conferences and strategy sessions for the expressed purpose of promotion of the dormant concept that women have economic and personal rewards to gain from skilled trade training.

Some Progress

By 1973 the union bargaining agreements which at the beginning of the project had limited the apprenticeship training announcement to in-plant posting had changed enough so that in at least two examples, women who formerly would not have had access to the apprenticeship posting were able to compete equally for training positions.

In an automotive parts plant, the job posting which had not been viewed by women workers previously was shifted to a central location at the directive of the DAT field representative. A 23 year old female machine sweeper who saw the posting successfully applied

for a tool-die making apprenticeship and subsequently raised her salary from \$3.00 to \$4.30 an hour, to be increased to \$6-7/hr. during the course of training.

In the target area specifically, a metal products company with all male employees in the shop felt pressure to avoid an EEOC suit and was compelled, with union blessings, to waive its in-plant posting procedures to recruit a female engraving apprentice from the open labor market. The direct impact of the project on such actions is felt only through the greater force of federal affirmative action regulations and enforcement. Concerted efforts in the future toward maximizing opportunities for advancement of females in the labor market via apprenticeship must be backed by the force of laws which can override any accommodations, such as honoring age limits and in-plant posting procedures, which state apprenticeship law has previously made.

Project recommendations for necessary future data gathering:

- 1.) An analysis of a large number of labor contracts and plant rules for overt instances of sex discrimination and clauses specifically prohibiting sex discrimination.
- 2.) A review of federal and state equal rights case files on sex discrimination.
- 3.) A questionnaire administered to labor and management representatives in selected plants to determine patterns of contract administration and possible sex discrimination in

company procedures. The questionnaire should be supplemented by an in-depth interview concerning attitudes toward sex discrimination and any means used by union or management to eliminate it.

- 4.) A comparison of practices in plants covered by Revised Order 4 and those not, to determine possible differences in patterns and practices in non-unionized plants.

The findings from such studies would ideally be communicated to employer groups and unions via labor-management teams sponsored by the United States Department of Labor.

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THE PUBLIC SCHOOL SYSTEMInadequacy of Vocational Materials

The widest opportunity to reach potential apprenticeship applicants was found within the public school system. However, the curriculum tracking patterns which have reinforced and perpetuated the mother-homemaker and secondary financial responsibility of females appeared to be at their most restrictive in 1970. The project director discovered that a recently developed (1970) vocational counseling tool, Vocational Information on Education and Work - VIEW (known in Wisconsin as Wisconsin Instant Information System for Students and counselors - WISC), was blatantly sexist in categorizing jobs as open only to males, females or occasionally both. Most technical, industrial trades such as welder, tool and die maker, plumber, carpenter or electrician were indicated on the face of each information card as being open only to men, while detailed microfilm descriptions of the occupations and training processes assumed a male participant. The Governor's Commission on the Status of Women, with the guidance of the Women in Apprenticeship Project co-ordinator made formal protest of this violation of the spirit of the Equal Opportunity Law to the State Department of Public Instruction. The response acknowledging the deficiency was immediate. Further investigation of the cards revealed that apprenticeship as an avenue for training had been omitted from the system.

Two changes in the WISC system were in process by 1972, one to eliminate sex designations in job descriptions and the second to alert students to apprenticeable opportunities where applicable. Such visual career information is used in an estimated 40 states, with each state developing its own job definitions and descriptions. In Wisconsin the cards are the major source of career information for 90% of the state's high schools. It is likely that most states have not yet removed the sexist references, and it would seem timely that each should review the contents of such literature. The individual charged with instituting the changes in Wisconsin, on being interviewed, commented, "Our two year commitment to change the terminology of the WISC system started with questions raised by the Women in Apprenticeship Project."

The project's attempt to challenge set cultural mores reflected in the public school curriculum offerings included developing and distributing a career newsletter focusing on non-traditional career choices women have made, and inviting further inquiry. Useful, widely distributed publications from the Women's Bureau were pamphlets #52, Why Not Become An Apprentice? and #54, Changing Patterns in Women's Lives. The information vacuum further prompted the project director to prepare a brochure, How to Become an Apprentice,¹³ and How About Women?¹⁴ One of the state's prominent newspapers, the Milwaukee Sentinel, published

¹³

See Appendix D: How to Become an Apprentice.

¹⁴ See Appendix E: How About Women?

a series of articles, "Women in Apprenticeship," highlighting the personal experiences of women who entered apprenticeship training. A formal pamphlet, Earning and Learning: Wisconsin Women in Apprenticeship, containing brief, journalistic vignettes is being reproduced for distribution to all high schools in the state, thus providing young women with apprenticeship success stories replete with psychological satisfaction and fulfillment -- realistic and appealing enough to emulate.¹⁵

Beyond investigating the vocational guidance sources used throughout the state, the two project staff members regularly visited public high schools, seeking to motivate young women through presenting the facts vs. the myths of women's changing role in society. It was during such sessions that the project film, Never Underestimate the Power of a Woman, and raw economic statistics frequently met with flat, uninterested responses from most teenage girls. Their resistance to counter what they perceived to be society's expectations seemed to have been cultivated and reinforced to an impenetrable degree by the time they were seniors. Guidance counselors had virtually no printed material which would have led them to propose that girls seek careers in the trades. Girls had not had the same exposure to the industrial arts in junior high or middle school as boys who routinely were required to take them, and who without question would take them again in high school.

¹⁵ See Appendix F: Earning and Learning: Wisconsin Women in Apprenticeship Excerpts.

The Department of Public Instruction has released the following statistics, reflecting greater state and federal financial support for vocational training and indicating the degree of participation of female students. General technical, industrial enrollments of young women in 103 high schools in the state have increased six-fold during the life of the project, compared with an also dramatic threefold increase of male enrollments. However, the continuing disparities between male and female enrollments are still dramatic when the participation is compared by percentages: in 1973, 98.5 % of the enrollees are males; 1.5%, females.

Table 5

Wisconsin Trade and Industrial Education Enrollment -- Grades 9-12 *

	<u>1969-70</u>	
	<u>Male</u>	<u>Female</u>
Drafting	1060 (98.1%)	20 (1.9%)
Electricity	692 (99.9%)	1 (0.1%)
Graphics	746 (98.0%)	15 (2.0%)
Woods	914 (99.1%)	8 (0.9%)
Metals	2166 (99.6%)	8 (0.4%)
Power Mechanics	1932 (99.6%)	7 (0.4%)
Aviation	<u>15</u> (100.0%)	<u>0</u> (0.0%)
Total	7525 (99.2%)	59 (0.8%)

	<u>1972-73</u>	
	<u>Male</u>	<u>Female</u>
Drafting	2415 (95.9%)	102 (4.1%)
Electricity	2377 (99.8%)	5 (0.2%)
Graphics	3075 (96.1%)	125 (3.9%)
Woods	4089 (98.4%)	68 (1.6%)
Metals	6948 (99.4%)	42 (0.6%)
Power Mechanics	4870 (99.5%)	23 (0.5%)
Aviation	<u>50</u> (92.6%)	<u>4</u> (7.4%)
Total	23,754 (98.5%)	369 (1.5%)

* 103 of 429 Wisconsin high schools

Breaking the Boy's Tech Barrier

The project identified a major anachronism in the public schools where one entire high school was dedicated to providing technical training for boys only. The prestigious Milwaukee Boy's Technical High School in its total focus on male students -- in name, practice and intent -- excluding female participation, stood out as a glaring barrier to apprenticeship opportunities for young women in the state's most populous urban area. A personal inquiry on behalf of pre-apprenticeship training for girls by the project yielded an institutional resistance defending the status quo because a.) there were no washrooms for girls; b.) faculty could not teach mixed groups effectively; and c.) the boys' motivation and learning abilities would suffer.*

Through alliance with a co-operative guidance counselor, the project recommended testing the resistance with a qualified 8th grade female applicant who was primarily interested in pre-plumbing classes in mechanical drawing and welding. The school held true to its name by refusing to send an application to a female. The young woman and her family, members of the Mexican American community were readily discouraged and chose not to pursue the interest. However, women's groups, the National Organization of Women, AFL-CIO Women's Organization, the Governor's Commission on the Status of Women, the American Civil Liberties Union and a female counselor in the Milwaukee Spanish

* Informal survey conducted by Milwaukee NOW chapter.

Center acted in behalf of other potential applicants and their parents by filing a complaint with the Milwaukee School Board. The net effect of persistent demands in the face of obvious discrimination in a public facility was the "desexigration" and changing of the name of the school in September, 1972. Twelve young women were enrolled in the first year, taking advantage of the broad range of technical classes available only at that school. The school reports an anticipated 1973-74 enrollment of 150 females.

The Guidance Community

The project sponsors and staff believe they have gained a few committed allies among the state's guidance counselors, but their attempts at penetrating the fixed tracking assumptions of organized guidance counselors have been futile. Both state and national conferences (1970-1973) of organized guidance counselors have invited project speakers, yet have done little to promote interest or commitment among participants. "Symptomatic" of complacency or malaise in the guidance community is the diagnosis of the project in observing the sparse attendance at guidance workshop sessions labeled, "Women in Apprenticeship - A Way Out of the Job Ghetto." Social change within the public schools which would motivate females to prepare for changing economic roles must be supported and reinforced by the vocational guidance staffs. The options for females must be intentionally

expanded beyond the traditional alternatives of either a college preparatory curriculum or home economics-secretarial preparation which lock young women into roles not always reflecting their interests and aptitudes, and certainly not representing their best economic interests.

Project Suggestions

The project has submitted recommendations to the effect:

- 1.) That changes be made in the standardized WISC cards, eliminating any sex designations for occupations. The change, requiring concentrated Wisconsin Department of Public Instruction attention, has been made.
- 2.) That public schools post apprenticeship information for both boys and girls. This has been done to the degree that the project itself has been the source of the materials.
- 3.) That a female be included among the all male guidance counseling staff of the State Department of Public Instruction. The Governor's Commission on the Status of Women has undertaken a close study of the policies and practices of that staff.
- 4.) That teachers and counselors be required to participate in human relations courses, which would include facts on the damaging effect of sex stereotyping, as well as prac-

tical suggestions for building positive self images.

Such a human relations course has been developed in Madison as a pilot program. A state wide course offered by the University of Wisconsin Extension, "Sex Stereotyping in the Public Schools," was attended by 50 teachers in its first semester.

- 5.) That promotion of apprenticeship to both boys and girls at the high school level be a high priority within the DAT. Because of budget restrictions, the allocation of staff time during the project has permitted only token promotional efforts and participation in annual "Career Day" conferences in the high schools. In the Green Bay area a university student doing an independent project on affirmative action is co-operating with the DAT field representative in leading a series of workshops in the public schools to promote the greater understanding of apprenticeship training possibilities among females, their teachers and vocational counselors. The motivation of such a committed feminist is an ideal complement to the technical apprenticeship knowledge represented by most DAT staff members.
- 6.) That a project be conducted to train several open minded young women who know (or will learn) something about the

real world of work; have them explore in further depth high school myths; give them funds to design and complete a professional survey of what (1) students, girls and boys, (2) teachers, and (3) counselors do and do not know about labor market limitations and opportunities. Use this information to design a film and accompanying course curriculum (or a series of videotapes that can be widely used on educational television) that can accurately dispel high school myths, fill information gaps, and portray attractive role-models for non-college bound girls.

- 7.) That a research and demonstration project be designed to place a researcher-observer in a cooperating school system to isolate, analyze and minimize factors and practices operating in elementary, junior high and high school that adversely affect the breadth of girls' vocational horizons and realization that the majority will need to prepare both for marriage and an extended period of paid employment.

WISCONSIN VOCATIONAL, TECHNICAL, ADULT EDUCATION SYSTEM

The state Vocational, Technical and Adult Education System (VTAE), a sister agency in fulfilling apprenticeship regulations, has been a vital contact throughout the state. Although providing apprenticeship related instruction is an obligation, and there is very little opportunity for that provision to be discriminatory, the VTAE also offers technical courses apart from apprenticeship, but which often are interpreted as being "pre-apprenticeship" in nature. It is through participation in such courses that individuals gain a competitive advantage over those having had no previous exposure to requisite trade skills.

Vocational System Surveys: 1970 and 1973 Enrollments of Women

A 1970 Women in Apprenticeship survey among vocational schools showed a low rate of female involvement in technical training, in that women were enrolled in graphic arts, mechanical design, mechanical drafting and other technical course at a rate of one female to each 7 males (296 females to 2,148 males). In 1973 an identical poll revealed an enrollment of females at an even more unfavorable rate of one to 13 (205 females to 2,695 males), indicated in the following table, with 19 schools represented in 1970 and 20 in 1973. ¹⁶

¹⁶ See Appendix G: VTAE Survey.

Table 6 Vocational School Enrollment: Technical and industrial classes

	<u>1970</u>	
	<u>Male</u>	<u>Female</u>
Graphic Arts	142 (74.3%)*	49 (25.7%)
Mechanical Design	317 (96.9%)	10 (3.1%)
Mechanical Drafting	132 (89.8%)	15 (10.2%)
All Other	<u>1557</u> (<u>87.5%</u>)	<u>222</u> (<u>12.5%</u>)
Total	2148 (87.9%)	296 (12.1%)

	<u>1973</u>	
	<u>Male</u>	<u>Female</u>
Graphic Arts	121 (89.0%)	15 (11.0%)
Mechanical Design	284 (98.6%)	4 (1.4%)
Mechanical Drafting	270 (96.1%)	11 (3.9%)
All Other	<u>2020</u> (<u>92.0%</u>)	<u>175</u> (8.0%)
Total	2695 (93.0%)	205 (7.0%)

* Percent in courses

There is some indication in both surveys that females did complete courses and became employed because they picked fields in which there was little social or traditional resistance -- primarily in the graphic arts. About 25% of the technical, industrial directors who responded to both surveys claimed that the main reason women were not enrolled in greater numbers is that they are unaware of technical and industrial opportunities and programs. Another 25% claimed that it is society's traditional view of females which discourages them from entering the technical and industrial fields even when they know about them.

The relationship to successful apprenticeship application and enrollment following vocational school training is not statistically clear where females have been involved. However, both the female carpenter and painter who have been accepted on Wisconsin construction Joint Apprenticeship Committee waiting lists in 1972 had had technical, preparatory courses at vocational schools before they applied for apprenticeships. Fifty-one percent of the females who became apprentices from 1970 to 1972 had some vocational school training beyond high school. According to Division of Apprenticeship and Training staff, males can claim some direct advantage to vocational courses as they have completed full time study and have later been accepted in apprenticeship programs, especially in the machinist and printing trades. However, the Barocci Study of the drop-out apprentice in Wisconsin revealed that only 5% of

sample had vocational training before entering apprenticeship.¹⁷ The project maintains that for women who have not had the same practical, prerequisite exposure to the trades in high school as males, the publicly supported vocational system provides the fullest range of opportunity for "compensatory" pre-apprenticeship trade skill training.

Attitudes and Practices

The state vocational system has responded variously to the project goals, since the regional autonomy among the 16 districts allows for overruling a state recommendation. The greatest resistance the project experienced was in securing related instruction for the newly apprenticeable occupations such as day care teacher, for which full time classroom training programs already existed in the vocational system.

The project methodology in eliciting the co-operation of vocational system staff members in the target area and state wide could have been enhanced had an ally who shared the Women in Apprenticeship Project goals been employed by the vocational administration. A cross-agency focus designed to meet individual institutional challenges could have eliminated much of the conflict brought to other organizations through single handed project intervention. One individual in the Division of Apprenticeship and Training who was to expose obstacles in an attempt to eliminate them

¹⁷ Barocci, p. 123.

could not function effectively when she was outside of the respective systems where problems existed. Rather than co-operate, a network of defenses was mounted, for instance, in the case of the vocational system and the Department of Health and Social Services, when the Women in Apprenticeship team of two sought to expand training possibilities through apprenticeship in the day care and health occupations.

In spite of project attempts to promote awareness of sex stereotyping through seminars and personal interviews with VTAE staff, there remains a stagnant reinforcement of traditional social-economic and sex roles in the promotional literature of the technical schools. The language and visual images in the publications of the Vocational, Technical and Adult Education system should be reviewed for obvious assumptions about male only participation in the apprenticeship trades. At the 1973 Wisconsin AFL-CIO Apprenticeship Conference, a speech-demonstration showing the range of apprenticeship activities available through the vocational system, made no reference to the participation of females outside of cosmetology. It is currently standard practice to portray, for example, auto mechanics, carpenters, small appliance repair personnel as males, thus, by suggestion, inhibiting female inquiry.

WISCONSIN STATE EMPLOYMENT SERVICEAptitude Tests

As part of the application procedure in the construction and industrial trades, aptitude tests based on existing employee responses are routinely administered by the Wisconsin State Employment Service (WSES). Theoretically, the tests do not measure specific knowledge, but both minorities and women who have not had pre-apprenticeship study or experience might interpret the tests as being biased in language and content. Because the test batteries are standardized, employers or Joint Apprenticeship Committees who use them as a screening device are reluctant to see them as discriminatory in effect. The periodic validation of such tests based on responses of representative employees is the responsibility of the WSES.

Because some minorities have had difficulty in passing the tests, the LEAP (Labor Education Advancement Program) outreach centers have acted as intensive preparatory agencies which concentrate on pre-apprenticeship skills, including specific preparation for aptitude tests. Women, as mentioned earlier, are not recruited by such outreach agencies, even though in many cases they experience the same deficiencies at the entry level as do minority males. The project did not attempt to alter the emphasis on, or use of the aptitude tests, but rather has focused on increasing job awareness and preparation in the high schools,

and has, with little impact, insisted on the inclusion of females in the existing employment outreach programs.

Job Referrals

Another primary function of WSES is job referral, or matching applicants to suitable openings. Apprenticeship, because it implies that a training element is included, has not in the past been included among the possible options which a counselor could offer a client. The recorded placement quota system, including the reporting forms of WSES, do not acknowledge a category for the apprenticeship referral. Therefore, the counselor and agency receive no "credit" for apprenticeship placement. The project diagnosed the need for publicity and policy changes within this major conduit for the unemployed, so that women in the job market might routinely be informed of the apprenticeship trades. The project co-ordinator observed that females were being channeled by the employment service to the notoriously low paid jobs as waitress, clerical help or household employment. Occupations were classified into employers requests for "men's work" and "women's work," limiting inquiries by non-professional females to a narrow range of possibilities.

An immediate recommendation, which was fulfilled in 1971, was that a specialist in women's employment be hired to carry the staff development functions with respect to the employment needs and poten-

tials of females to each regional office of WSES. Also, in an attempt to bridge the gap between agencies, the project representatives in Madison and Appleton made concerted efforts to build contacts and to establish harmony between DAT field staff and WSES district offices. A resulting focal point of co-operation throughout the state has been in the preparation of MDTA-JOPS contracts, for which WSES determines the eligibility status of trainees for program funds. Also, official Department of Industry, Labor and Human Relations policy having recently (January, 1973) eliminated sex designations in job titles, WSES no longer accepts job requests classified according to sex. Representative changes include:

Countergirl to counter helper

TV repairman to TV repairperson

Job Counselors

With its major role as an employment placement agency, the commitment of WSES to nondiscrimination practices toward females is essential. The Women's Specialist position which was created in 1971 no longer exists, although a Women's Affirmative Action officer position in the State Department of Personnel oversees the state's commitment to affirmative action for women. In addition, a women's employment advocate position within the Bureau of Community Services, Equal Rights Division of the Department of Industry, Labor and Human Relations pro-

vides the state with a permanent public information source for apprenticeship details, among other equal employment subjects of crucial interest to women. The employment agency has also designated a staff position in each of its district offices to concentrate on apprenticeship information and referrals.

The Women in Apprenticeship Project contributed to exposing the WSES deficiencies in apprenticeship information and specifically the women's employment through apprenticeship information. Although nominal adjustments are recognized, the attitudinal changes among employment counselors, which in turn could accelerate social change leading to freer job selection for women are gradually surfacing in some regional offices. Such attitudes, although difficult to measure, will change even less rapidly without legal and social pressures brought to bear by individual and organized females in their own behalf.

WSES Future

There continues to be a need for an independent, systematic review of employment service office and program procedure which could result in accelerated changes necessary for delivery of services to clients with as little built-in bureaucratic sex bias as possible. Some questions which remain to be answered are: 1.) How much and in what ways do services to employers and requirements of WSES staff to show quantity of placements, affect quality, non-stereotyped service to women

applicants? 2.) What transferable technique and training materials could be inexpensively developed for WSES interviewing counselors, employment relations and administrative staff that could educate them to the changing pattern in women's lives and participation in the work force? Resulting recommendations and informational training kits could be utilized nationwide after the project's completion.

WORK INCENTIVE PROGRAM

The Wisconsin Work Incentive Program, administered variously as a unit within the Employment Service or as a counseling-employment placement service for Aid to Dependent Children welfare recipients, in goals and theory, has a complementary role to the Women in Apprenticeship Project. The advantages of WIN collaboration in the project goals are: a.) the specific placement function of WIN permits "job development" (which is not the apprenticeship agency's legal charge); b.) WIN programs are generally staffed to provide comprehensive social services as well as close personal guidance to an enrollee; and c.) the WIN program is able to offer tax credits and financial aid as incentives to prospective employers of enrollees.

Signs of Co-operation

The project staff members have shared apprenticeship information -- brochures, film and leads on employment and training opportunities with the WIN staff, particularly in the target area and in Madison. The WIN staff in the Fox River Valley made over 25 employment-training referrals to women resulting in apprenticeship placements. Given the natural relationship to the WIN program goals, the Wisconsin Women in Apprenticeship Project anticipated even greater mutual efforts than occurred in practice. WIN has been restricted

in its administrative regulations demanding statistics which show on-the-job employment placement; apprenticeship as a specific category of employment training does not appear in the statistics. Also, since July, 1972, WIN has had a defined priority of placing unwed fathers who are AFDC recipients, thereby de-emphasizing the services to female heads of families.

Although the WIN offices in Madison and Appleton have been generally responsive to project suggestions and make frequent use of project literature and the film, Never Underestimate the Power of a Woman, their staff turnover has weakened the continuity in operations. Where WIN placements have included apprenticeable occupations, the project regrets the absence of inquiry into potential apprenticeship programs. For example, an individual who might have been placed as a carpenter's helper, could have been groomed to become a carpenter apprenticeship applicant. The July, 1972 Talmadge Amendments affecting WIN Program activities make such pre-apprenticeship preparation even more difficult, since WIN records must show monthly on-the-job training placements for 1/3 of its enrollees.

Toward Mutual Efforts

As the formal Women in Apprenticeship Project terminates, Wisconsin WIN and Division of Apprenticeship and Training administrators are designing a plan to allow for staff exchanges among counselors and

field representatives to specifically eliminate occupational stereotyping by sex in either agency. The project recommends that a communication process be established between WIN and DAT offices throughout the state, whereby basic information could be exchanged monthly, with a mutual emphasis on the prospective apprenticeship placement of enrollees, whether male or female. It is inconceivable that should a proposed, female apprenticeship outreach project be created, that it be undertaken without close WIN Program collaboration in referring interested females.

EMPLOYERS NEED INCENTIVES

Again challenging the basic provisions of apprenticeship, the Barocci study of the drop-out, as well as the more general Farber Report and Purdue Studies, cite the continual cost to employers as a major deficiency of present apprenticeship practice.¹⁸ A conservative estimate of the cost to an employer of training an apprentice in Wisconsin in the first year is \$3,350, taking into account the salary paid while the apprentice is in class and the supervisory or journey-person time invested in the apprentice.* It is clear that the apprenticeship employer assumes a good deal of risk, especially since the general drop-out rate of 50% represents a comparable 50% loss of the training cost to the employer.

The project interpreted its goals as being enhanced if apprenticeship employers could be motivated in a practical, financial way through a subsidy or tax credit. And lacking such incentive funds, the existence of Manpower Development and Training Funds (JOPS Options training program) was a carrot that the project quickly identified as being useful in the promotion of minority females. Even with its restrictions that at least half of the employee participants qualify under the federal criteria for being disadvantaged, the percentage of female trainees covered by Wisconsin JOPS contracts has increased from 10% in 1970 to 40% in 1973. Especially in the development of the two new ap-

¹⁸ Barocci, p. 253

* Estimated at 1972 average apprenticeship wages.

prenticeship programs, the JOPS funds have been a vital motivating factor, averaging payments to employers of \$800.00 per apprentice.

Forty-six percent of those employers who had hired female apprentices during the life of the project received supportive funds through the MDTA/JOPS sources. Twenty-seven percent of the employers of female apprentices said that the availability of such funds was the direct enabling factor in their commitment to provide apprenticeship training. The project must necessarily emphasize the crucial need, where other incentives for employers to train females are lacking, for the continuation of the JOPS contract opportunity.

Given the ongoing expense of training, however, the Division of Apprenticeship and Training and the project collaborated in providing information to the State Legislature in support of tax credits for apprenticeship employers. The 1971 proposed legislation, which would have provided an income tax credit of \$80.00 per month of approved apprenticeship training provided to the handicapped, minorities or women, failed to be introduced in the Wisconsin Legislature, and was also rejected at the Congressional Committee level. It has been demonstrated that some measure of training subsidy, whether in the form of JOPS monies or tax credits, serves as an incentive to hesitant, cost conscious employers to assume an increased utilization of skilled females, trained through apprenticeship. The project recommends continued efforts to gain additional sources of financial support for apprenticeship employers.

VETERANS' PREFERRED STATUS

The Viet Nam Era veterans, following publicity and special accommodations by the Veteran's Administration, became an unwitting obstacle to the acceptance of females in apprenticeship training positions. An analysis of the rationale for the existence of training benefits, including some JAC's awarding veteran's "preference points" in competition for apprenticeship positions and routinely providing veterans with maximum age waivers, is not warranted at this juncture in the project. However, the priorities set by government agencies and employers for the rapid reassimilation of veterans into the economy has, in documented instances, meant that higher paying apprenticeable positions are labeled "veterans only;" or that in competition for a single apprenticeship opening, a veteran takes easy preference over a non-veteran or female. It is true that such accommodations exist equally for female veterans, but their relatively insignificant percentage (2%) in society obviously translates into few, if any, apprenticeship applicants.

The project viewed its realistic intervention as suggesting the need for extending apprenticeship training benefits to the widows and wives of veterans, hoping thereby to motivate another group of women to participate in apprenticeship. Again, the project served as an informational source for the Governor's Commission on the Status

of Women which made the specific recommendation to Congress that the training benefits provided to veterans also accrue to widows and wives of deceased or disabled veterans. The Commission has also consistently publicized the decreased opportunities for females when veterans or any group in society are singled out for special employment consideration.

The 1972 Veteran's Readjustment Assistance Act does provide for equal apprenticeship training benefits for wives and widows of veterans. However, it is too soon to note an observable relationship between that act and increased numbers of female apprentices in Wisconsin. There are no female veterans who have become apprentices, although a few participated in on-the-job training programs supervised by the Division of Apprenticeship and Training to become nurses' aides, and one to become a telephone company central office repairwoman.

DECLINE IN TOTAL ECONOMY - INCREASE IN PROJECT SCOPE

A pervasive, unforeseen barrier which affected the total project goals, activities and conclusions was the declining economy, which from 1970-1972 was at such a low level that apprenticeship enrollments dropped by 10% -- from 8,781 to 7,885 during 1970. By 1972, the decline was 15.4% of the 1970 enrollment. The grim apprenticeship market statistics contributed to an early project frustration with having little power to control or alter major economic impediments while attempting to meet project goals. In the first year of the project, the construction industry alone reported a decline of 18%, including massive lay-offs which found skilled journey-persons sharing the bench with a few patient apprentices. In the target area specifically, some apprenticeship waiting lists had as many as 100 individuals not yet placed. While the total state economy was stagnant or declining, the graphic arts showed a consistent demand for services and a slight (4%) growth in use of apprenticeship.

The project responded to the unfavorable hiring conditions with a realistic reordering of priorities and with a concentration of effort designed to yield some visible results. One tack was to ease up on goals for immediate employment of women in the less promising employment areas and to seek to upgrade, via apprenticeship, women in occupations where they were already employed, as described in Chapter 5.

Furthermore, the total advocacy of improved conditions to enhance the full utilization of female employees justifiably became a project priority. In many industrial plants, women had been limited in accruing job benefits, such as insurance coverage or seniority rights because of forced maternity retirement. The presumption of short range employability of women of child bearing age had eliminated them from being considered as apprentices. Working hand-in-hand with the Governor's Commission on the Status of Women, the project drafted a maternity leave resolution urging that pregnancy related absences, including childbirth, be interpreted as any other temporary disability and therefore have disability payments and job reinstatement guaranteed. The Department of Industry, Labor and Human Relations acted positively on the resolution in 1972 making it a part of the administration rules governing the State Fair Employment Practices Act.

The policy now has the effect of a departmental regulation, making a definite separation between "maternity leave" and "leave for child-rearing purposes." Wisconsin thus became the first state in the country to recognize maternity leave as a temporary disability of a medical nature, to be treated by employers as any other temporary disability. A formal Maternity Leave Project proposal was designed by the Women in Apprenticeship staff to investigate the impact on employed women and the actual financial implications to em-

employers of enforcement of the policy. Funded in 1972 by the Manpower Administration, and conducted under the direction of the former Women in Apprenticeship project director; the study will conclude in March, 1974.

Other spin off projects conceived through the direct experience of the project director in promoting Women in Apprenticeship goals have been: a.) the systematized reevaluation of the skill complexity codes for female associated occupations in the Dictionary of Occupational Titles (1971-1972) and an Intergovernmental Personnel Act sponsored study to analyze the underutilization and career patterns of women in the Wisconsin State Civil Service. Both studies share the premise of the apprenticeship project that the economic contribution and skills of women have been unacknowledged -- underrated and underpaid.

While broadening the activities of the apprenticeship project to lay the groundwork for other studies, it was important to recognize that when aiming for equal apprenticeship openings and completions, that "equality between the sexes cannot be achieved by proclamation or decree, but only through a multitude of concrete steps, each of which may seem insignificant by itself, but all of which add up to the social blueprint for attaining the general goal."¹⁹ While the project assumed a broader attack on the general employment pic-

¹⁹ Alice S. Rossi, "Equality Between the Sexes: An Immodest Proposal," p. 646.

ture for females, it gained a vitality which carried it beyond the apprenticeship domain, yet at the same time allowed it to affect apprenticeship issues.

CHAPTER 4. INTERNAL BARRIERS: PROJECT IMPRESSIONS OF THE AMERICAN GIRL

The Problem

The Girls We Met

How They View the Trades

Age and Information Gaps

CHAPTER 4. INTERNAL BARRIERS: PROJECT IMPRESSIONS OF THE AMERICAN GIRL

"But no women ever apply," is the most nearly universal explanation for the absence of women in apprenticeship offered by employers, unions, and the Division of Apprenticeship and Training staff. While systematically exploring and exposing the institutional resistances to apprenticeship opportunities for women in the educational and employment systems, the project co-ordinator turned to the psychological barriers presented by women themselves, and summarized their state of mind while in high school.²⁰

The Problem

"At the bottom of the whole question of the employment of women, we should always come upon their inefficiency through want of education. Until we can get technical training for women equal to the apprenticeship that boys get, we shall be defeated. The women's want of training is so generally called incapacity."

So wrote Josephine Butler in her pamphlet, "Education and the Employment of Women," 1875. The ready, superficial answer of today would be that girls do receive an education that is almost identical to that of boys; that in many schools, they can opt for the technical training

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Norma Briggs, Excerpt from Women in Apprenticeship Quarterly Report, December, 1971.

shop courses, and if they do not, it is a choice of their own making. Such a response, however, ignores the fact that most of a child's school education is basic and general, and not of a technical nature directly relevant to the world of work and that though the general curriculum may, on paper, appear deceptively similar for boys and for girls, the emotional, attitudinal and expectational framework within which it is given is fundamentally dissimilar.

Harriet Taylor Mill, in her essay on the enfranchisement of women, says, "We deny the right of any portion of the species to decide for another portion what is and what is not their proper sphere. The proper sphere for all human beings is the largest and highest which they are able to attain to. What this is cannot be ascertained, without complete liberty of choice." Though we pay lip service to complete liberty of choice, it is evident that we do not, in fact, offer it. The growing girl learns through the media, family and peer expectations, school textbooks and procedures as to what is her proper sphere.

The Girls We Met

The ideal all-American girl is groomed to equate fulfillment with a happy marriage. The ideal marriage produces children. The girl sees from her textbooks that the ideal mother stays at home. If her own mother has paid employment, it is a circumstance of necessity, a compromise or failure in the older generation to be

viewed as a falling away from the ideal in much the same manner as a divorce in the family. A wholesome girl starting out in life does not plan seriously for extended paid employment any more than she plans on a divorce.

Many non-college bound girls sit through project discussions on vocational choice in what they obviously hope are languorously sophisticated positions, stroking their hair or their light-colored, conspicuously consumable garments, trying hard, it seems, to appear as much like the beautiful people they see in advertisements as is possible. From conversations with them, one gathers that there is group pressure not to show enthusiasm or interest in either their current academic studies or their choice of work, once they leave school. If they must work, it will only be for a short while until they marry Mr. Right, so between now and then they will do something that has glamor. Jobs with glamor are those in the entertainment world, cosmetologist, possibly that of nurse, and being an executive secretary to some distant high-powered male figure.

A number of intelligent young women chafing in low-level clerical positions remember, with anger, that when they were in school, there seemed only two options open to them: college track or business. They chose business because their families could not afford college fees or because they were planning marriage. Business for girls seems to consist of typing and more typing, shorthand and more shorthand. It includes, also, such subjects as grooming, how

to be a good secretary, bookkeeping and even how to supervise other office girls. It does not include the kind of courses which are considered appropriate for young men entering business as a career, such as administration and management. Technical and shop courses were offered in their schools, but they described them as being generally considered to be the preserve of boys, and any girl who entered them risked being considered eccentric and had to brave the smiles and snide remarks of her peers and teachers. Several have told of how they wanted to take technical courses and how they were discouraged or refused entry; many, now in their early twenties, feel they were led up the garden path; almost all say of the Women in Apprenticeship Project, "Go to it. Somebody has to tell them."

Some teachers, struggling with a bored and negative class of non-college bound girls have eagerly sought help from project staff in widening their students' vocational horizons, some even joyfully anticipate the shock value of what we have to say. Student reactions are interesting; a few girls in each class are obviously listening hard, and a few more seem to be digesting the information given, even though they pretend they are not affected. The majority are obviously astonished that apprenticeship could be suggested as a possible choice for women at all. They tend to deny that they personally will ever have to take seriously the world of work, but what is most disconcerting is their firm belief that their legal right to equal opportunity in employment will not be protected. "If there is a job in

a gas station, you know the man will give it to a boy and not to one of us," and one session is not enough to sway them, even though we tell them of fair employment practice laws and the availability of the Equal Rights Division.

How They View the Trades

The majority of young women have confused femininity with their idea of romance and glamor, and being at the age when they date and are looking for a husband, are particularly ill-equipped to give any kind of serious consideration to a very large proportion of the traditionally apprenticeable occupations. It is easier for a young black man to defy tradition and see himself as becoming a skilled construction worker than for a young woman of any race. Becoming a sheet metal worker or a carpenter in no way casts aspersions on either the male's blackness or his maleness; to enter either trade is still considered by many young women and many blue collar workers to indicate that the woman is not truly feminine. Though a woman may not be less female because she does "man's work," she certainly incurs the risk of seeming less ladylike and less attractive and desirable, according to the stereotyped norms.

Being one of the first to cross the sex-barrier in employment takes the kind of courage with which not everyone - male or female - is endowed. It is not simply a matter of finding out whether or

not you can do the job - being on trial in a highly visible and often publicized situation - but sometimes, as with the longshoregirl or a woman who enters a construction trade, it means being prepared to cope with an all-male work/social situation, where evolved customs, language and habits have been predicated on a single sex grouping and with the individual reactions (hostile, protective, derisive, ribald, gentlemanly, derogatory -- rarely neutral) of the men whose group has been "invaded."

Various women have told us they would like to be a carpenter, cabinetmaker, painter-paperhanger, or electrician -- but they added hastily, "not in construction work." Most women are ignorant of what happens on a construction site, and most would have trouble identifying the various construction trades, let alone describing their functions. Construction sites, for good reasons of safety, are enclosed shielded areas which are entered only by those who have business there. The onlooker is kept at a distance and perceives little but generalized movement. Many young men who are recruited into the construction trades are, at the outset, scarcely more knowledgeable of the inner workings of construction than are most groups of women. It is a fair conjecture, at least, that ignorance is not the sole reason for women's reluctance to consider the idea of learning a trade on the construction site. The construction industry is, at present, an all-male club or fraternity, initiating only men as new members; and the

barrier to women is not the difficult or dirty nature of some of the jobs, but the breaking of a taboo and the treading onto a territory that is the preserve of its male initiates. The literature of the women's liberation movement often portrays the hardhatted construction worker, grinning and wolf-whistling at the passing girls, as the archetypical "sexist" -- but to the girl of eighteen, who knows no more of abstract feminism, perhaps, than she does of sheet metal work, the wolf whistle is not a symbol but a reality.

Age and Information Gaps

In most cases, because apprenticeship is exempt from age discrimination rules, girls pass beyond the normal apprentice applicant's age before they are psychologically prepared to cross the sex barrier in employment. The majority of the women who have been enthusiastic at the idea of becoming apprentice applicants in trades traditionally filled by men have been in their 30's or college graduates in their late 20's who have realized how little is available to them in the job market today with a liberal arts degree. Yet, construction trade Joint Apprenticeship Committees have set an upper age limit for applicants of 24-27. The 1970 survey in the Fox River Valley of industrial and service trade apprenticeship training establishments showed that almost 80% trained youths between the ages of 18 and 24.

In recent years, colleges have accommodated to the changing patterns in women's lives and their need for education and employment

training after having children. Apprenticeship trainers, on the other hand, tradition oriented, have yet to recognize that significant learning can occur beyond the age of 24 or 30.

At the present time, the majority of women re-entering the work force after having children are automatically precluded from learning a skill through apprenticeship, though (if they have the money) they are welcome to learn through college and full time vocational school courses. At a time when this nation is so concerned about the rise in the number of AFDC mothers, and is passing legislation propelling them into the labor market, it does not make sense to allow the continuation of out-moded rules that disqualify them from meaningful on-the-job apprenticeship opportunities.

Females are not only less likely than males to be told of apprenticeship when in school, to explore and practice skills leading to apprenticeable trades (in shop courses), and to be steered to industries where apprenticeship is non-existent or a rarity, but almost all miss the one major direct apprenticeship informational and promotional mailing that a high proportion of young men receive in their early twenties. Every young man leaving military service in Wisconsin -- just when he is wondering what he will settle on or train for -- is told about apprenticeship and on-the-job training agreements, and informed that he is eligible for monthly educational benefits if he registers in an approved program, in addition to his trainee wages. The effect of this incentive in recruitment of

males to these programs is demonstrable: of the 7,560 total apprentices (male and female) in Wisconsin, December, 1971, 2,043 were receiving veterans educational benefits. All but 10 of the 992 registered on-the-job trainees for that month were veterans. And, in mid-1973, one-half of the 7,600 registered apprentices are Viet Nam era veterans.

There is no easy answer to the resistance offered by society's pressures and by the female herself. Although the trends cited above are not totally reversed or neutralized in 1973, the numbers of female applicants for apprenticeship in the non-traditional fields during the last six months of the project (January-June, 1973) has accelerated, (along with a generally favorable hiring economy) so that there are now pioneer females in painting-decorating; plumbing; metal engraving; tool-die making; and knitter mechanic apprenticeships. As the oddity factor associated with women in the trades diminishes, particularly in the attitudes of parents, teachers, and employers, we can reasonably expect that more young women will be prepared to ignore outdated stigmas and pursue apprenticeship vocational interests which previously have been outside the sphere of social acceptance.

CHAPTER 5. NEW APPRENTICESHIPS IN DAY CARE AND THE HEALTH OCCUPATIONS

Criteria for New Apprenticeships

Background

Dictionary of Occupational Titles Skill
Codes Challenged

Methodology for Stabilizing Apprenticeship
in Day Care

Employers Subsidized and Organized

Related Problems and Related Agencies

Creating a Journeyperson Skill Level

Co-ordination with the National Child
Development Associate

Possible Expansion

Chronology

Health Occupations

CHAPTER 5. NEW APPRENTICESHIPS IN DAY CARE AND THE HEALTH OCCUPATIONSCriteria for New Apprenticeships

The decision to expand the project design to confer "apprenticeability" on selected female dominated skilled occupations was a studied choice on the part of the Women in Apprenticeship staff and the DAT. In 1970, with a dramatic decline in apprenticeship enrollment, an attempt by the project to inject a growth factor in the form of new programs was readily justified. Even more important to project goals, the question was posed as to whether establishing apprenticeships in "traditionally women's" occupations would more firmly link women and apprenticeship as acceptable and "normal" in the public mind. Hopefully, such an association would facilitate the eventual crossover of more women into apprenticeable occupations less familiar to them.

A key consideration for the DAT in the expansion venture was in the selection of occupations where the pitfalls of earlier attempts, apart from the Women in Apprenticeship Project, at introducing the apprenticeship system did not exist. For example, a conflict of interest with apprenticeship training is implied where a union might choose to prevent the influx of more workers via apprenticeship, or where professionals, having invested time and money in their own training, protect the "prestige"

of their positions by excluding apprenticeship. The project had already isolated inadequate child care facilities as a major obstacle to the wider integration of women into the work force. Therefore, the day care industry, providing a vital service to working women, and meeting the criteria of not having either an established professional organization or a labor union related to it, was chosen as an area of apprenticeship expansion.

The health occupations -- homemaker home health aide, medical records technician, rehabilitation and X-ray technician -- although not totally free from interest groups, also presented realistic potential for adopting apprenticeship training, where benefits accruing to women, both as workers and as consumers, complemented the project goals. The "upgrading" of these occupations, increasing the available training and consequently affecting increases in salary for trainees, were the reasonable expectations of the project. The underlying assumption that the apprenticeship system has been under-utilized in occupations where females dominate further motivated the project, with Division of Apprenticeship and Training support, to engage in the day care and health occupations ventures.

Wisconsin's basic requirements for apprenticeship recognition are: a.) that the occupation have definable skills which can be translated into a series of practical work processes to be mastered, and which are founded on a curriculum of related theoretical instruction,

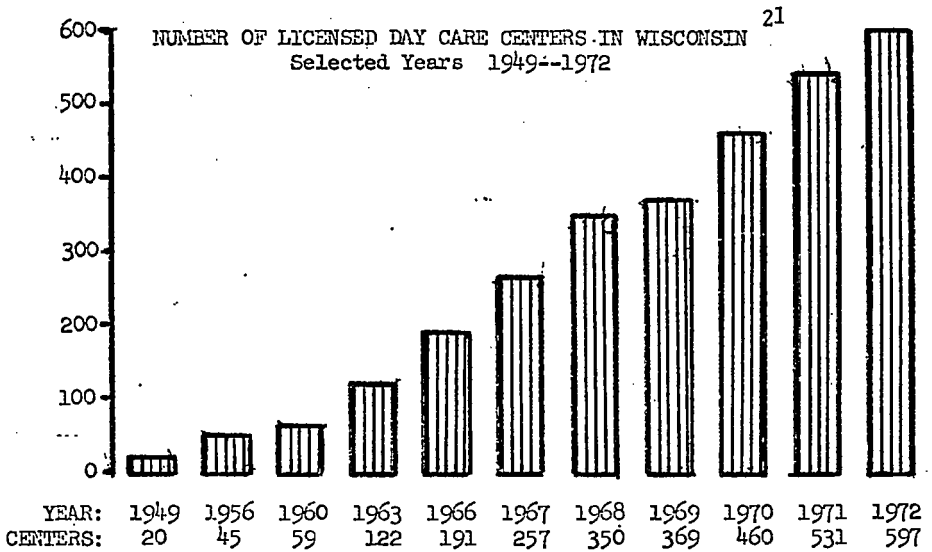
and; b.) that those necessary skills must have industry wide acceptance. It was easily ascertained through consultation with the day care licensing agency, the State Department of Health and Social Services, that, although there were several styles of early childhood programs being conducted in the state, enough common knowledge - both in theory and practice - existed in the day care industry to permit collaboration on an apprenticeship training program.

Background

Preliminary studies of day care in the state in 1970 showed 460 licensed centers, employing 1,600 staff members, 99% of whom were women. National surveys of the day care needs of working families projected an increase in demand for services at a rate far beyond the capacity of existing agencies to train additional staff. Women's Bureau statistics reveal that in 1971 one-third of all working mothers had preschool age children, and by 1980 the number of working mothers of preschool children is expected to increase by over 1 1/2 million. If Federal Interagency Standards for day care centers were followed nationally, 35,000 more trained personnel would be required immediately. The growth of day care services in Wisconsin showed a sevenfold increase in 10 years -- 460 centers in 1970 as compared with only 59 in 1960.

* Used to determine eligibility of a program for Title IV A (1968 Social Security Amendments) funding.

Table 7



Among other child care advocates, the Women's Bureau of the Department of Labor and the Department of Health, Education and Welfare have publicized the facts dramatizing increased day care needs, while Congressional leaders have drafted proposed legislation designed to meet the requirements of middle and low income working families for quality child care. In Wisconsin, the availability of Title IV A (1968 Social Security Amendments) funds began in 1970 to inject supportive dollars into day care programs in Dane and Milwaukee

²¹ Wisconsin Department of Health and Social Services, Division of Family Services graph.

counties. Taking these trends into consideration, the project coordinator made a positive assessment of the growth potential of the day care industry in Wisconsin. The practical demands for day care, reflecting stability in the industry, was an important consideration in the DAT decision to develop an apprenticeship program in that field.

Dictionary of Occupational Titles Skill Codes Challenged

The other essential analysis provided by the project was in justifying among apprenticeship officials the degree of training and skill required to assume the day care teacher position, thus allowing the trade to be deemed "apprenticeable." The relatively minor value traditionally assigned to the skills associated with the education and care of the preschool children is reflected in the low Dictionary of Occupational Titles (DOT) skill complexity code for child care related occupations (kindergartner; nursery school teacher). Confirming the disbelief of some apprenticeship and vocational system administrators that day care could ever be recognized as apprenticeable, the DOT skill complexity code assigned to day care was found to be 878. Each digit represents the degree of skill which the job requires in the areas of data, people, things, with 8 being equivalent to "no significant function." Because of her own previous experience as a director of a nursery school, the project director was able to see beyond the implications of the numerical code, and after acquiring basic training in DOT theory, she devel-

oped a convincing rationale, including current job information, to warrant a temporary change in the day care code to T 228.

The widespread use of the DOT by governmental agencies in organizing the world of work and the consequent suspected injustices to nearly 40% of the state's work force -- females in the service occupations -- surfaced by chance when the project director examined the formula for determining Manpower Development Training Act funding for apprenticeship and on-the-job training grants. Using the prescribed digits in the original DOT code to plan for day care apprenticeship training funding, the formula reflected such a low skill complexity that training funds could be offered for no more than 4 weeks. The changed code, giving a more realistic numerical rating, allows for 44 weeks of reimbursed training. A closer look at the DOT skill quotients of "traditionally female" occupations created a major concern among project sponsors when there appeared to be a definite correlation between low skill codes and other female dominated occupations.

To attack the total issue at its roots, the project designed a proposal which would analyze the coding of those service occupations associated with health care; child care; and food preparation. Currently sponsored by the U.S. Department of Labor, the Wisconsin based survey of DOT reclassifications is to report its observations and conclusions by September, 1973. It is not possible in this report to detail

the job analysis schedules which acknowledge those skills usually associated with the home, and consequently, with females, which the Dictionary of Occupational Titles has traditionally omitted. In summary, Day Care Teacher, once it had been assigned a numerical description which takes it beyond the equivalent skill level of "parking lot or washroom attendant" (from 878 to T 228) can be viewed nationally as a skilled, and therefore, apprenticeable trade, qualifying it for Jobs Options training funds.

Methodology for Stabilizing Apprenticeship in Day Care

Beyond the recognition by the DAT and the agreement of employers to train skilled staff via apprenticeship, the ideal functioning of a state-wide apprenticeship program in any occupation relies on:

- a.) the willingness of an industry to accept and utilize the concept of practical on-the-job training combined with theoretical related instruction as a major mode of maintaining a supply of skilled workers;
- b.) the acceptance and co-operation of related state agencies: in the case of day care, the licensing agency -- the Department of Health and Social Services, and the source of related instruction -- the Vocational System;
- c.) the organization of a State Apprenticeship Advisory Committee to guide in the development of standards for operation; and
- d.) the participation of local apprenticeship advisory committees wherever apprentices are trained.

Employers Subsidized and Organized

A preliminary investigation of the staff training practices of day care centers in the target area and in Madison indicated that several, including both private and publicly sponsored employers, had a dual commitment to providing quality child care and to developing career ladders for staff members. Therefore, the concept of apprenticeship could be harmonized with the existing and continual in-service training commitments. The project concentrated its persuasion efforts among key employers who could form a core of apprenticeship leadership for the industry. But more than persuasion of apprenticeship's merits and potential contribution to the day care industry was required to extract owner-provider commitments to a formal apprenticeship program.

As a service occupation trapped by society's conflicting values which sometimes espouse a deep concern for high quality, comprehensive child care, yet offer no more, and often less than, subsistence monetary rewards in exchange for that care, day care centers could not afford the apprenticeship financial obligations of periodic salary increments and payment of apprentice and substitute workers' wages during related instruction. Even with beginning wages ranging from as low as \$1.60 to \$2.00 for an inexperienced worker, without a subsidy, day care providers simply could not be burdened with additional training costs. Program start up funds provided by the Manpower Development and Training Act

(JOPS contracts in Wisconsin) averaging \$800.00 for each apprentice, along with assurances of relevant, related instruction provided under apprenticeship law by the Vocational, Technical and Adult Education System, were strong motivating factors which project staff and individual DAT field representatives conveyed to prospective employer participants.

Rather than invite groups of interested individuals and agencies together for information disseminating sessions, project staff, with the technical assistance of DAT field representatives, made personal and separate contacts with day care providers, State Health and Social Services representatives and Vocational School apprenticeship staff members across the state to lay the groundwork for a self-perpetuating apprenticeship program. Each contact predictably responded with a measure of doubt and skepticism, which in a group setting could have easily inhibited the emergence of enthusiasm for this "new idea." Lack of familiarity with apprenticeship, including the terminology of the system -- "indenture," "industry" -- and association in the public mind with union control and exclusivity, together created widely expressed anxieties among employers.

However, the patterns of centers hiring and providing in-service training for individuals with demonstrated child care skills as opposed to four year academic degreed individuals, indicated the industry's preference for a competency based style of training -- precisely what

apprenticeship claims to be. The appeal of an industry based and controlled training system combined with the immediate availability of JOPS training funds far outweighed any skepticism of several providers who eventually created the core of a state apprenticeship advisory committee. The first employer of apprentices formulated a list of on-the-job work processes to be learned during a two year apprenticeship, and in five regions of the state, providers petitioned the Vocational School for apprenticeship related instruction classes to correspond with the on-the-job training. The project contributed personal consultation as well as promotional literature to help stabilize the program.²²

Related Problems and Related Agencies

Unforeseen resistances became a.) the incapacity of the vocational system to provide instruction for day care apprentices as they were indentured; b.) the priority of the State Department of Health and Social Services to be concerned first with licensing and secondly with consultation and training in centers; and c.) the expressed opinion of the Dean of the University of Wisconsin Home Management School on behalf of unemployed Child Development baccalaureate degree graduates that a new training program would be impractical. Underlying the resistances was the question of the "appropriateness" of apprenticeship (largely associated with male trade training) to the human product orientation implied in day care staff training, and the view that appren-

²² See Appendix H: News in Day Care Apprenticeship.

ticeship would be an unnecessary competitor in educating more child care personnel than the market could absorb. It was the industry -- day care providers, including Headstart, Community Action day care centers and private profit making and non-profit agencies -- which prevailed because of apprenticeship's potential responsiveness to their day to day staff development concerns.

The strength of the day care industry as expressed through representative participation on local and state apprenticeship advisory committees resulted in co-operation and allocation of staff time and resources to the apprenticeship program by related agencies. Within eight months, the Vocational System called together consultants to design a competency based curriculum of day care related instruction. The Department of Health and Social Services participated by a.) accepting the apprenticeship training as fulfilling staff training licensing requirements for day care centers; and b.) providing consultants to local and state apprenticeship advisory committees. The University of Wisconsin Home Management School has taken no formal position (beyond initial fear of the job market diminishing for its graduates), but former and continuing University staff members have given support and consultation to apprenticeship committees and individual employers on request.

Creating a Journeyperson Skill Level

The DAT has acknowledged that in most of the day care centers where

apprentices were initially employed, a training gap was obvious between the designated journeypersons who functioned as "person in primary responsibility" in the classroom with children, yet who had never before had to convey their skills to another adult -- the day care apprentice. The DAT sponsored a pilot course, the "Journeyperson Upgrade," through which 16 individual journeypersons received an orientation to the apprenticeship curriculum, gained practice in observation and evaluation methods to be used in the on-the-job portion of the apprenticeship, and generally became more confident in their training roles.

The Community Co-ordinated Child Care (4C) organization in Dane County developed the journeyperson upgrade curriculum as a package which could be modified, individualized and provided elsewhere in the state. Having strengthened the "journeyperson" status of the 16 participants, the course ideally should be offered in the major day care apprenticeship centers in the state -- Milwaukee, Appleton, Beloit-Janesville, Superior-Ashland, for the purpose of upgrading supervisory personnel, and thereby improving the quality of training for the current and future apprentices.

To that end, the project designed a proposal for funding to train more journeypersons who could provide on-the-job instruction to apprentices. A recent evaluation of the progress of the nearly 80 day care apprentices in the state by their vocational school instructor further re-emphasized the need for more co-ordination among the journeyperson,

the apprentice and the instructor -- a function which the journey-person upgrade program helped to fulfill. The apprenticeship instructors and local advisory committees are unanimous in their endorsement of "Journey-person Upgrade" to improve the quality of the on-the-job training in their respective regions.

The DAT Journey-person Upgrade proposal should be resubmitted to the Manpower Administration in light of a.) the obvious relationship between expanded quality day care services and expanded, stable apprenticeship (or other) employment of women; b.) the endorsement by the industry of the pilot Journey-person Upgrade program and subsequent request by advisory committees for its continuation throughout the state; c.) the innovative use of the apprenticeship mode of training represented in the program; and d.) national emphasis on training more day care personnel to meet the Child Development Associate criteria, as established by the Office of Child Development.

Co-ordination with the National Child Development Associate

The announcement in 1971 by the Office of Child Development of its intent to design competency based training programs for day care personnel -- the Child Development Associate -- came several months after the inception of the Wisconsin Apprenticeship program for day care staff. There appear to be no conflicts in the required competencies of the Child Development Associate and the Wisconsin Day Care

Teacher Apprenticeship, although refinements of both statements are in process. The project and the DAT have supported attempts in Wisconsin to co-ordinate, through membership in a quasi child development consortium, the compatibility of the Child Development Associate concept with the Day Care Apprenticeship and other competency based programs.

Possible Expansion

An additional project recommendation to meet the growing need for quality child care for working families is that in-home or family day care services be formally expanded by use of apprenticeship. The 1973 Economic Report of the President indicates that 78% of working women with pre-school children prefer and use in-home child care services; the 1972 survey of women in Wisconsin Apprenticeship shows that 97% of those women who required child care in order to work relied on in-home or family day care facilities. Utilizing the existing day care teacher apprenticeship program to improve the quality of care offered and to elevate the employment status of the providers of care is a realistic goal. Such an expansion of the existing group care apprenticeship program requires the endorsement of the DAT, the Vocational System and the day care center operators, who would act as employer-supervisors in systems of "satellite homes" related to larger training facilities.

Chronology

A summary outline of the progress of the day care apprenticeship program to date follows:

1. September, 1970. The idea to make day care teaching an apprenticeable occupation was expressed in the Wisconsin Women in Apprenticeship Project quarterly report.
2. April, 1971. Official application through the Wisconsin Women in Apprenticeship Project led to a Dictionary of Occupational Titles change in numerical rating for day care teacher from 878 to T 228. This change gave recognition to the skill level involved in teaching pre-school children, thus justifying an apprenticeship term and the use of MDTA-JOPS funds.
3. July, 1971. Child Development, Inc., in Madison submitted "Work processes to be completed by apprentices," and indentured the first six apprentices.
4. October, 1971. The Office of Child Development, through Director Edward Ziegler, announced the concept of a competency based child care worker -- the Child Development Associate -- to be defined and translated into programs receiving federal funds in the future.

5. January, 1972. The state Vocational, Technical and Adult Education Board published the first edition of the Day Care Teacher Apprenticeship Curriculum.
6. February, 1972. The State Day Care Teacher Advisory Committee defined journeyperson status and the role of journeyperson for the day care industry.
7. July, 1972. The first two apprentices, having begun with advanced credits, completed the apprenticeship program.
8. September, 1972. Dane County Community Co-ordinated Child Care and the Division of Apprenticeship and Training began the first "Journeyman Upgrade Program," with the one training director and sixteen participants.
9. November, 1972. "The Wisconsin Way - Training Day Care Teachers through Apprenticeship," is presented at the National Association for the Education of Young Children Convention in Atlanta, Georgia.
10. June, 1973. The State Day Care Apprenticeship Advisory Committee and the Division of Apprenticeship and Training agree on statewide standards regulating the program.
11. June, 1973. Over 100 individuals have been indentured as day care apprentices. Since July, 1971, 10 have completed the program; 80 are continuing.

HEALTH OCCUPATIONS

Simultaneous with the development of the training program in day care, a second, relatively new concept in the health service occupations -- the homemaker home health aide -- was introduced and met the DAT criteria to become an apprenticeable occupation. Through preliminary studies, the project determined that the occupation provides an avenue for skill upgrading for women and that the apprenticeship mode of training could mesh with the proposed "career ladder" concept of the National Homemaker Council. In addition, there were reasonable expectations that the service would grow, especially in relation to home health care for former hospital patients. The project co-ordinator designed a three year training program by translating the homemaker home health aide training -- practical work assignments supported by theoretical related instruction -- as defined by the National Homemaker Council, into apprenticeship's "Work processes to be learned" (an integral part of every indenture).

The need to develop a Dictionary of Occupational Titles skill complexity code for the homemaker home health aide position was also assumed by the project co-ordinator. Since the occupation is a relatively recent concept, designed to function as part of a home health care team, the 1965 edition of the DOT did not include it. The temporary assigned code of T 228 permitted expenditures of JOPS (MDTA)

funds for each homemaker home health aide apprentice.

In the target area, a private homemaker home health service agency developed a complementary course of related instruction to be provided by its own staff or by consultants. A Milwaukee agency dealing primarily with the needs of the handicapped similarly designed a course to comply with its training needs for the homemaker home health aide apprenticeship. Thirty women, 90% of whom qualify under federal criteria as being disadvantaged, have become homemaker home health aide apprentices in the target area and in Milwaukee. Since the occupation itself is not yet established statewide, the need for project and DAT promotion aiming at industry wide acceptance, creation of state and local advisory committees, and co-ordination with licensing agencies has been minimal. With employers able to provide both on-the-job training and related instruction, established related training through the Vocational System has not been necessary.

The target area staff representative also visited health industry administrators to introduce the formalized concept of on-the-job training combined with theoretical related instruction for dietetic cooks. She successfully indentured 14 health facilities cooks and 8 medical records, rehabilitation and pharmacy technicians. The DAT administrator and the social service employers of apprentices expressed optimism that apprenticeship possibilities in these occupations, where there is a

need for formalizing training and upgrading, were limitless. The apprenticeship system could be especially useful in those health industry occupations where federal staff training requirements for reimbursement of the cost of care are of increasing importance.

CHAPTER 6. THE FEMALE APPRENTICE

- I. RATIONALE: WOMEN IN APPRENTICESHIP SURVEY
- II. SURVEY POPULATION
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Conclusions: Women Apprentices and Their Employers

CHAPTER 6. THE FEMALE APPRENTICEI. RATIONALE: WOMEN IN APPRENTICESHIP SURVEY

The most extensive survey effort of the project has been of the females who entered apprenticeship programs during the first two years of the project (July 1, 1970--June 30, 1972). The study was designed to reveal an employment profile of both the continuing or graduate apprentice and the drop-out.²³ We expected to find that the continuing apprentice had favorable work-training conditions, such as adequate salary as perceived by the apprentice; satisfactory related instruction; good employer-apprentice relationship; higher motivation, as measured by initial expectations, and commitment to achieve trade skills and certification.

For the drop-out, the questions of quality of the work-training experience; salary; health; compatibility with the employer and co-workers; child care and transportation problems were the key areas where we expected to find insights into the reasons why women have left apprenticeship training. The questionnaire was designed to extract the total participant perceptions of their employment and training experience in apprenticeship as well as to highlight any differences between drop-outs and those who were continuing or graduate apprentices.

²³ See Appendix I: Wisconsin Women in Apprenticeship Survey, 1972.

II. SURVEY POPULATION

The intent of the study was to survey all women who had entered apprenticeships during the first two years of the project (July 1, 1970--June 30, 1972). A state of flux in the Division of Apprenticeship and Training recordkeeping system caused some difficulty in determining the final sample for the survey. Some apprentices who had enrolled before June 30, 1972 were not yet recorded on the computer terminal by August 1972, when we began to formulate the survey sample. Although the pretest and actual survey were completed by December 1972, a check of women listed on the computer records as having entered apprenticeship in the period in question yielded 54 new names. Of those additional names, we selected as additions to the sample only the women who represented employment in non-traditional female occupations as opposed to the already well-represented day care teacher and homemaker home health aide apprenticeships. With a total sample of 187, including 12 cosmetologists, we acquired data from 159, representing a response rate of 85%. The cosmetology apprentices represent 10% of the women who were indentured in that field during the project. Those who were not reached could not be traced through several changes in address, lack of telephone facilities, or an inability to trace the employer.

The Wisconsin Women in Apprenticeship Project in no way concentrated on particular economic or racial groups, either in isolating

obstacles, or in carrying out demonstration aspects. It may be of interest, however, to note the following ethnic breakdown of the survey population:

Table 8

Wisconsin Women in Apprenticeship Participants - 1970 - 1972		Wisconsin Total Population Census - 1970	
American Indian	4 (2%)	18,872	(0.4%)
Black	24 (13%)	125,772	(2.9%)
Hispano-American	2 (1%)	41,065	(0.9%)
White	157 (84%)	4,162,860	(95.5%)
Other non-white	<u>0 (0%)</u>	<u> </u>	<u>(0.3%)</u>
Total	187 (100%)	4,359,680	(100.0%)

The 25 occupations represented in the Women in Apprenticeship survey are:

Public Health Aide	Layout Stripper
Manager	Lithographic Stripper
Day Care Teacher	Printer Operator
Homemaker Home Health Aide	Process Artist
Police Detective	Rubber Engraver
Cosmetology	Weekly Newsprinter
Central Office Repairwoman	Pharmacy Technician
Draftswoman	Medical Records Technician
Radio TV Mechanic	Surface Technician
Barber	Second Class Engineer

Cook	Nursing Assistant
Health Care Facilities Cook	Meat Cutter
Silk Screen Cutter	

The 15 occupations of the drop-outs were:

Public Health Aide	Barber
Manager	Cook
Day Care Teacher	Health Care Facilities Cook
Homemaker Home Health Aide	Layout Stripper
Cosmetology	Lithographic Stripper
Draftswoman	Process Artist
Radio TV Mechanic	Second Class Engineer
Nursing Assistant	

III. DATA COLLECTION

Under the direction of the project coordinator, a team of interviewers from the University of Wisconsin Survey Research Laboratory gathered the data during October-November 1972. In December when a computer check on the validity of the sample was run, 16 additional females were added to the sample giving a possible total of 187 respondents, 159 of whom completed interviews. The resulting response rate was 85%.

The questionnaire responses were coded and keypunched by the end of January 1973, also under the direction of the project coordinator. Further cross tabulations of information to determine

the specific characteristics of the drop-out were programmed using the University of Wisconsin 1108 Computer Facility and the University of Wisconsin data analysis computer program, STATJOB. Other programming concerns the isolated responses of those females who were employed in the newly apprenticeable occupations as day care teacher or homemaker home health aide apprentices, cross tabulated with variables such as age, reasons for beginning apprenticeship, reasons given for dropping, if appropriate, as well as all questions on the quality of training and relationship with the DAT. All tables are designed to show the responses of the day care-homemaker home health aide apprentices separate from the total respondent figures.

IV. DROP-OUT RATES

Of the 187 sample population, 11 participants graduated, with 38 showing cancellation or suspension. The female drop-out rate is calculated at 24%. According to a recent Wisconsin-based study of the apprenticeship drop-out by Thomas Barocci, 50% constitutes the drop-out rate in general for all apprenticeships.²⁴ His sample included a 90% male and 10% female (40 of 42 of whom were cosmetologists) breakdown and he was able to make a clear comparison between drop-out and graduate apprentices.

²⁴ Thomas A. Barocci, The Drop-out and the Wisconsin Apprenticeship Program: A Descriptive and Econometric Analysis, the Industrial Relations Research Institute, the University of Wisconsin, Madison, Wisconsin, 1972, p. 113.

The Barocci statistic does not include apprentices who were continuing. That is, he studied only drop-outs compared with graduates, whereas the Women in Apprenticeship sample shows 76% to be continuing or graduate female apprentices, and 24% to be drop-outs.

Because the samples and their time spans in apprenticeships are not comparable, we admittedly could not make a precise comparison with his study. However, another calculation of the male drop-out rate, based on Wisconsin construction and manufacturing trade figures for 1970-1972, shows the percentage of drop-outs to be 44%, as opposed to 56% continuing or graduate apprentices.²⁵ Therefore, using both methods of calculation, (male drop-out vs. completers and male drop-out vs. continuing or graduate) we found the figure to be about double that of the 24% drop-out-rate determined in the Wisconsin Women in Apprenticeship study.

All but two of the 42 women apprentices in the Barocci study represent the cosmetology trade where there have been both notably high drop-out rates and a dramatic decrease in total enrollments during the Women in Apprenticeship study. Because apprenticeship in cosmetology was an already well-established training program, the

²⁵

See Appendix J: Method of Calculation of Male Drop-out Rate.

project had not focused either on moving more women into the program or on investigating the reasons for the shift of trainees from apprenticeship to private beauty school training.* For purposes of presenting the full range of occupations in which females have become apprentices, we attempted to reach 10% of the cosmetologists. Of the 12 respondent cosmetology apprentices, 5 were drop-outs and 7 were either graduate or continuing apprentices. The small sample from the cosmetology program in itself represents a higher than average drop-out rate for women at 42%.

V. OBSERVATIONS

We are satisfied that with an 85% response rate, we have a valid reflection of the experience of the Wisconsin female apprentices during the first two years of the Wisconsin Women in Apprenticeship Project (1970-1972). For the purposes of reporting a general overview of the work and related instruction experience of all female apprentices, we have combined the responses of completers, continuing apprentices and drop-outs. All tables indicate the raw number and percentage responses of the drop-out, the continuing or graduate, and the total of those two categories. A separate tabulation of the

* Before terminating the project, we collaborated in a survey to determine the reasons for the decreased enrollments and high drop-out rates in cosmetology apprenticeships. The fact finding interviews with employers and apprentices will continue beyond the project term.

responses of the newly apprenticeable occupations, day care teacher and homemaker home health aide is also included in each table.

Although our original concern was to characterize the drop-out so that remedial action could be set in motion, the explanation of why such a high percentage (76%) of participant apprentices continued provides more evidence with which to dispel the myth of "high female job turnover." The survey, in effect, supports the original hypothesis of the project that women are no greater risk than males in terms of absenteeism, retention rates, punctuality and attendance at work and related instruction. And, if we can accept the Barocci 50% drop-out figure for the total apprenticeship population, the female drop-out record is significantly lower at 24%.

Although when measured by the quality of training (e.g., 27% had no journeyman working directly with them; 20% received no related instruction) and the reported wage rates, their apprenticeship positions are not ideal, we find 99% (157) of the total group answering that the apprenticeship position was personally rewarding to them. And a total of 84% said they believed that the public highly or somewhat respects apprenticeship training. This response, we believe, is based on what the apprentices believe to be traditional, or male dominated programs. That their degree of satisfaction with the work itself is high is significant, when contrasted with the general findings of the 1972 President's Task Force Study on Labor which reports most working people to be disenchanted with their jobs.

Motivation

"Women are not serious about their jobs," hopefully is a myth of the past. National statistics reported by the U. S. Department of Labor, Women's Bureau, indicate that 50% of women who work do so for economic reasons. The Women in Apprenticeship survey showed that 59% (93) of the apprentices chose apprenticeship because it was an opportunity to learn trade skills and another 11% specifically sought a recognized certificate. The range of motivating factors are relatively the same for all apprentices, whether they dropped out, continued or were associated with traditionally female occupations. The satisfaction derived from the work obviously is another strong incentive in itself in that 99% (157) of all respondents said they found the work to be personally rewarding. Personal fulfillment, combined with the acquisition of practical and theoretical training in trade skills, rather than temporary seeking after pin money, is the factual picture of women in apprenticeship. Anticipated financial security did play the main part in leading to apprenticeship employment for 15% of the respondents, a point reflecting confidence in their employers, their chosen occupations, and in the benefits of the apprenticeship system.

All categories of women apprentices polled reflected high initial expectations for completing their apprenticeships. Slightly fewer of the drop-outs (84%), as opposed to those still in, or having graduated from programs (95%) said they expected to complete.

It is in the response of the drop-outs who did not expect to finish that we find a few women (6 of the 159 respondents) whose personal lives were in a state of flux, who were working in apprenticeship only until they moved or could find jobs which paid better wages.

Table 9 - What was the one main factor that led you to become an apprentice?

	Drop-out		Graduate or Continuing		Total		Homemaker Home Health Aide and Day Care	
	No.	(%)	No.	(%)	No.	(%)	No.	(%)
Financial Security	6	15.8	17	14.0	24	14.5	13	14.6
Interest in Trade Skills	21	55.3	72	59.5	93	58.5	46	51.7
Someone Else Though it Was Good	1	2.6	6	5.0	7	4.4	5	5.6
Mobility	0		0		0		0	
Recognized Certificate	4	10.5	14	11.6	18	11.3	14	15.7
Interest in Children	1	2.6	5	4.1	6	3.8	6	6.7
Required for Occupation	2	5.3	2	1.7	4	2.5	3	3.4
Sounded Like Good Idea	1	2.6	2	1.7	3	1.9	0	
Other	2	5.3	0		2	1.3	1	1.1
Not Ascertained	0		3	2.5	3	1.9	1	1.1
Total	38	100.0	121	100.0	159	100.0	89	100.0

Table 10 - Did you consider the work personally rewarding or not?

	Yes		No	Not ascertained	
	No.	(%)		No.	(%)
Drop-out	36	94.7	0	2.	5.3
Graduate or Continuing	121	100.0	0	0	
Total	157	98.7	0	2	1.3
<hr/>					
Homemaker Home Health Aide and Day Care	89	100.0	0	0	

Table 11 - When you began your apprenticeship, did you expect to complete the program?

	Yes		No		Don't Know		Not ascertained	
	No.	(%)	No.	(%)	No.	(%)	No.	(%)
Drop-out	32	84.2	2	5.3	3	7.9	1	2.6
Graduate or Continuing	115	95.0	0		6	5.0	0	
Total	147	92.5	2	1.3	9	5.7	1	.6
<hr/>								
Homemaker Home Health Aide and Day Care	81	91.0	1	1.1	7	7.9	0	

Age - The Female Apprentice

The median age of apprentices surveyed is 31 years, spanning a range from 18 to 61 years. The project has pointed out the social and educational barriers which have worked against motivating younger, non-college bound high school girls toward apprenticeship training. Their lack of information and lack of direct experience with apprenticeable trades has precluded their applications at the age when most men apply (under 25).²⁶ Only thirty-two percent of the women apprentices interviewed were under age 25. According to the Wisconsin Apprenticeship Administrator, removing age limitations from existing apprenticeship standards would not necessarily bring more women into the trades, but would have the effect of compounding the competition. He thinks that the ideal resolution is to solicit more female applicants for high paying apprenticeships under the existing age ceilings and to seek, and realistically expect, waivers for individual exceptions.

Education of Female Apprentices

The flexibility of the apprenticeship standards should be pointed out in relation to educational requirements. Virtually all programs require that a high school diploma or its equivalent be an apprenticeship prerequisite. But, for females, the exception was made in 33% of the applications and, for males, in 9% of the apprentices surveyed by Barocci.²⁷

²⁶ Barocci, p. 91.

²⁷ Barocci, p. 88.

Our survey showed that two-thirds of the apprentices had completed high school. College or vocational training beyond high school (other than apprenticeship classes) had been the experience of 46% of the group. Since nearly half had had course work beyond high school, their choice of pursuing apprenticeship training emphasizes that both college and non-college women should have access to apprenticeship information and opportunities.

A higher proportion of day care and homemaker home health aide apprentices (18 of the 22 with grade 12 education) had taken college courses beyond high school, indicating, perhaps, that apprenticeship--immediate employment combined with relevant related instruction--was the more economically feasible route to achieving their job goals.

Table 12 - Female Apprentices: Years of Education

	0-8		9-11		12		12+		Voc. Training.	
	No.	(%)	No.	(%)	No.	(%)	No.	(%)	No.	(%)
Drop-outs	3	7.9	6	15.8	22	57.9	7	18.4	11	28.9
Graduate or Continuing	12	9.9	21	17.4	73	60.3	15	12.4	40	33.1
Total	15	9.4	27	17.0	95	59.7	22	13.8	51	32.1
Homemaker Home Health Aide and Day Care	7	7.7	11	12.4	53	59.6	18	20.2	28	31.5

Marital Status

Sixty-three percent of the apprentices had been married at one time, with 52% having intact marriages when the survey was conducted. The attitudes of husbands toward wives' employment and training are generally supportive, a factor which we believe plays an important role in the successful pursuit of a non-traditional training route. Forty-seven percent had working husbands who agreed with their wives' choice of training. We did not question the salary of the husband, but asked whether the female apprentice was the main support of her family and, in 59% of the cases, the response was yes. (See Table 14).

In contrast with the Barocci study which showed that only 34% of the male apprentices were married when they began apprenticeship, the higher percentage of married beginning female apprentices and their higher median age (31 as opposed to 25 for males) indicates that more women are likely to view marriage and child rearing as an interruption of their education or work outside of the home.²⁸

²⁸ Barocci, p. 97.

Table 13 - Are you presently married, widowed, divorced, separated or have you never married?

	Married		Widowed		Divorced		Separ.		Never Married		NA
	No.	(%)	No.	(%)	No.	(%)	No.	(%)	No.	(%)	
Drop-out	23	60.5	1	2.6	2	5.3	1	2.6	11	28.9	0
Graduate or Continuing	60	49.6	3	2.5	15	12.4	4	3.3	39	32.2	0
Total	83	52.2	4	2.5	17	10.7	5	3.1	50	31.4	0
Homemaker Home Health Aide and Day Care	45	50.6	4	4.5	12	13.5	3	3.4	25	28.1	0

Public Financial Assistance: Heads of Households

One strong claim made by the Women in Apprenticeship Project has been that women should have the opportunity to achieve economic independence through an apprenticeship position with its assurance of certification and employability. Thirty-seven percent of women interviewed were the sole supporters of their families. On entering apprenticeship, those women who were receiving some form of public financial assistance, such as AFDC, were 26% (42) of the total sample. Over half of them (25) became financially independent of AFDC payments while they were employed in apprenticeship situations. We do not know

whether it is the employment in itself, or the employment through apprenticeship which is the key factor, but the statistic is a dramatic testimony to the willingness of AFDC recipients to become financially independent when opportunities for employment-training exist.

Table 14 - Are you the main support of your immediate family?

	Yes		No		Not Ascertained
	No.	(%)	No.	(%)	
Drop-out	9	23.7	29	76.3	0
Graduate or Continuing	50	41.3	71	58.7	0
Total	59	37.1	100	62.9	0
Homemaker Home Health Aide and Day Care	38	42.7	51	57.3	0

Table 15 - Have you ever received any public financial assistance such as AFDC, WIN Program Fund, or other government sponsored programs?

	Yes		No		Not Ascertained
	No.	(%)	No.	(%)	
Drop-out	12	31.6	26	68.4	0
Graduate or Continuing	30	24.8	91	75.2	0
Total	42	26.4	117	73.6	0
Homemaker Home Health Aide and Day Care	31	34.8	58	65.2	0

Wages

On the whole, the beginning wages of female apprentices averaging \$70 weekly, are comparable to those reported in the general apprenticeship population in the Barocci study: \$71 for drop-outs; \$76 for completers.²⁹ We expected the disparities between male and female beginning wages to be minimal in the apprenticeable occupations (even

²⁹ Barocci, p. 147.

though the Conference Board, a non-profit research organization, reports the overall difference between higher male and lower female median wages to have been 41% both in 1939 and in 1970!)

The apparently low wage for beginners (slightly more than the federal minimum wage at \$64 a week) can be explained by factors which tend to keep the average beginning apprenticeship rate at \$1.80--\$2.00. In rural parts of the state, even plumbers and auto mechanics, as well as day care teachers, may start at a wage of \$1.60 an hour, or one-half of the competitive journeyman rate. The low average is also understood when we note that the beginning rate (exclusive of commissions) for a cosmetology apprentice (7% of the Women in Apprenticeship sample) was legal at \$.60 an hour before December 1972.

The trainee status of the apprentice implies a relatively low beginning wage, with salary increments insured every six months until the journeyman rate is reached. The average journeyman wage in the state is \$4.50 an hour. We estimate the journeyman average of the occupations represented in the Women in Apprenticeship study to be \$4 an hour. It is reasonable to assume that this differential will disappear as there is more overlap of men and women into trades that traditionally were the preserve of the other sex.

With respect to their judgements about the wages received, we observed that some females in the work force, even when they are

apprentices, are resigned to the fact of receiving low wages. Presenting their beginning wage as an apprentice in either hourly, weekly, or monthly rates, 26% (41) of the women reported receiving a beginning salary of less than \$1.60 an hour, the current federal minimum wage. Contrary to expectation, fully 61% (97) of the respondents indicated that they were satisfied with the beginning rate. An additional 10% (16) claimed that they were satisfied only in that they realized that their wage category was a temporary rung on the progressive ladder of apprenticeship.

Those who started at the lowest range (\$1.60--\$2.00) paradoxically were those same respondents who were satisfied with their salary. Generally speaking, those who started apprenticeships at \$2.50--\$3.50 an hour were more dissatisfied with their salary, a characteristic perhaps more readily identified with individuals who have greater expectations because they are in better paying trades (graphic arts, industrial trades, as opposed to the service trades) where it is realistic to expect a high journeyman rate.

Drop-outs, graduates, or continuing apprentices show an even distribution of attitudes toward salary. However, six of the 38 (16%) drop-out apprentices indicated that they left apprenticeship because the salary was not high enough. All six report that they are receiving a higher wage in their present employment, although not in the same trade. Whether their reason for dropping apprenticeship was

salary related or not, fully 70% of the drop-outs were receiving a higher salary than the apprenticeship rate in their new positions, a factor which was immediately true for the general drop-out, as reported by Barocci.³⁰

Table 16 - Weekly Beginning Income of Female Apprentices

	Drop-out		Graduate or Continuing		Total		Homemaker Home Health Aide and Day Care	
	No.	(%)	No.	(%)	No.	(%)	No.	(%)
Less than \$50	5	13.2	10	8.3	15	9.4	4	4.5
\$50 - \$69	17	44.7	38	31.4	55	34.6	38	42.7
\$70 - \$99	9	23.7	47	38.8	56	35.2	34	38.2
\$100 - \$139	1	2.6	8	6.6	9	5.7	5	5.6
\$140 - \$300	0		6	5.0	6	3.8	3	3.4
Commission	2	5.3	3	2.5	5	4.1	0	
Not Ascertained	4	10.5	9	7.4	13	8.2	5	5.6

Quality of Training

The evaluation of the quality of their training, as perceived by the female apprentices presents some points leading to direct recommendations to the Division of Apprenticeship and Training. In the context of the three-year study, our inclination is to interpret the

³⁰ Barocci, p. 152.

current facts of low wages and incomplete related instruction as a verification of the desperate employment picture which women face and tolerate, even in apprenticeship, a presumed area of potential equalization of male and female earning power.

For example, in Wisconsin, apprenticeship, by law, should always include a formal training component, apart from the on-the-job portion of the apprenticeship. At the time of the survey, 32 women (20%) reported that they received no related instruction. One-half of the apprentices represented in that figure were part of the day care teacher apprenticeship program which had been organized for only sixteen months when the survey was made. The delayed response of the vocational system to meet the needs of the day care apprenticeship program is cited elsewhere in the project reports. At this writing, the related instruction is now a part of the training for 21 of those 32 respondents, who, when contacted in a recent group interview, said their view of apprenticeship related instruction has improved significantly now that they have it.

Table 17 - Was classroom related instruction for apprenticeship provided?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	23	60.5	11	28.9	4	10.5
Graduate or Continuing	96	79.3	21	17.4	4	3.3
Total	119	74.8	32	20.1	8	5.0
Homemaker Home Health Aide and Day Care	70	78.7	16	18.0	3	3.4

The provision of paid related instruction is apparently not always assumed by the employer in the occupations where women are employed. Of those who did attend related instruction classes, 20% (25) did not get paid while they attended. Those who participated in incomplete programs answered that they felt the sacrifice to be necessary for them to get the required training for advancement.

Since the 1911 Wisconsin Apprenticeship Law clearly provides for paid related instruction, we believe that women are reluctant, or do not know about the procedure for filing a claim with the DAT. When one inquires how males learn about filing a claim, the response is usually, "They hear about it from a buddy." Since women have had

little or no tradition within the apprenticeship system, it is not unusual that they would not know of their legal recourses. We do observe, however, that 81% of the respondents said they understood the legal provisions of their indentures, and 53% knew how to contact the DAT for help or advice. The crucial role of the DAT in enforcing the legal benefits of apprenticeship training (work experience plus related instruction) is dramatized where both women and minorities are involved since until recent years neither group could claim participants who could pass on an inside knowledge of the system to others.

Table 18 - Do or did you know how or whom to contact in the Wisconsin Division of Apprenticeship and Training if you needed help or advice?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	18	47.4	17	44.7	3	7.9
Graduate or Continuing	66	54.5	54	44.6	1	.5
Total	84	52.8	71	44.7	4	2.5
Homemaker Home Health Aide and Day Care	41	46.1	47	52.8	1	1.1

Table 19 - Was a skilled person or one of journeyperson rank working closely with you?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	24	63.2	12	31.6	2	5.3
Graduate or Continuing	87	71.9	31	25.6	3	2.5
Total	111	69.8	43	27.0	5	3.1
Homemaker Home Health Aide and Day Care	55	61.8	32	36.0	2	2.2

Physical Aspects of Work

As to their personal reactions to the physical tasks involved with their work, 19% (30) reported that there were physical aspects of the job which they found to be too difficult. Lifting for auto body reconditioning and long hours of standing and rigorous activity for a small percentage of day care teachers are representative of the hardships which respondents described. Although the degree of difficulty is not revealed in their responses, no woman left an apprenticeship position with "the tasks were too difficult" as the reason. It may be significant, however, that looking in retrospect at their apprenticeship positions, 32% of the drop-outs said they had to undertake physical tasks which they believed to be "too difficult"

while only 15% (18) of the continuing or graduates mentioned it. The drop-out may have felt freer to emphasize the negative aspects of a past work experience where long hours of standing or heavy cleaning contributed to their present dim view of the apprenticeship experience.

Table 20 - Were there any physical aspects of the job that you found too difficult...such as heavy lifting or standing for long hours?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	12	31.6	24	63.2	2	5.3
Graduate or Continuing	18	14.9	103	85.1	0	
Total	30	18.9	127	79.9	2	1.3
Homemaker Home Health Aide and Day Care	14	15.7	75	84.3	0	

Day Care Needs

Since 37% of the apprentices are the sole support of families and 63% had children, we tried to determine whether the availability of child care in any way related to the job performance of apprentices. Of the 30% of the apprentices who required child care--both for pre-school and after school care for school age children, 92% felt they

had satisfactory child care arrangements.

We should not be surprised at the high rate of success in obtaining child care, since our sample includes only those who successfully entered apprenticeship training and does not account for those who could not enter because they did not have adequate child care arrangements.

Table 21 - How many children do you have?

	Drop-out		Graduate or Continuing		Total		Homemaker Home Health Aide and Day Care	
	No.	(%)	No.	(%)	No.	(%)	No.	(%)
None	16	42.1	42	34.7	58	36.5	26	29.2
One	4	10.5	18	14.9	22	13.8	12	13.5
Two	8	21.1	18	14.9	26	16.4	14	15.7
Three	4	10.5	13	10.7	17	10.7	15	16.9
Four	1	2.6	11	9.1	12	7.5	6	6.7
Five	3	7.9	10	8.3	13	8.2	9	10.0
Six	2	5.3	3	2.5	5	3.1	4	4.5
Seven or Over	0		6	5.0	6	3.8	3	3.4

Table 22 - Have you usually had satisfactory child care arrangements while working?

	Yes		No		Inappropriate		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)	No.	(%)
Drop-out	5	13.2	1	2.6	32	84.2	0	
Graduate or Continuing	30	24.8	1	.5	90	74.4	0	
Total	35	22.0	2	1.3	122	76.7	0	
Homemaker Home Health Aide and Day Care	23	25.8	1	4.2	65	73.0	0	

The Drop-Out: A Summary

The drop-out appears to have had slightly more education (18% had completed grade 12+; 12% of graduate/continuing had completed grade 12+). Predictably, the drop-out experienced a greater degree of resistance to her entering apprenticeship than the graduate/continuing apprentice (21% as opposed to only 12% of graduate or continuing). The source of the resistance varied, but generally was defined as that of expressed negative opinions of close associates: parents and friends, rather than co-workers. As might also have been expected, a higher (albeit, a small raw number) percentage (8% compared to 2% of the graduate or continuing) of drop-outs said they did not have friendly daily relations with co-workers.

Of a practical nature, twice as many drop-outs experienced transportation difficulties in relationship to getting to and from work, as did continuing or graduate apprentices, and two specifically dropped out because transportation was a problem.

A higher percentage (61% drop-out; 50% graduate/continuing) of drop-outs were married, having intact marriages at the time of the survey, a factor which, for some, might have allowed for greater variety in job choice and minimizing the risk of the family losing all earned income at least until another job was found. Only 24% of the drop-outs were the main source of income for their families, whereas 41% of the continuing or graduates headed their households financially. The degree of financial responsibility in terms of dependents is also less for the drop-out since 42% reported having no children, while 35% of the graduate/continuing had no children. Only five percent of the drop-outs said they terminated apprenticeship because of leaving the state. However, 50% of the 34 non-respondent apprentices had moved at the time of the survey, and we do not know what the relationship between their mobility and the apprenticeship experience was.

As to the quality of the training received, 29% of the drop-outs did not receive related instruction for apprenticeship (compared with only 17% of those who graduated or continued); and 32% (26% of

graduate/continuing) did not have a skilled person of journeyperson rank working closely with them.

None of the drop-out apprentices discontinued the training program for childbirth or pregnancy-related reasons, although 6 of the total survey group had been absent on a maternity leave basis, each having been reinstated in her apprenticeship position at the time of the survey.

Table 23 - Why did you drop out of training?

	No.	(%)
1. Salary wasn't high enough for my needs	6	15.7
2. Moved out of state	2	5.3
3. I terminated my employment	3	7.9
4. Employer went out of business	3	7.9
5. Job was too far away (transportation)	2	5.3
6. Someone else was hired to fill my place	2	5.3
7. Full program hadn't begun	3	7.9
8. Health reasons	2	5.3
9. Other individual reasons	15	39.4

Table 24 - Did you meet any resistance; by that we mean criticism or unfavorable comments and lack of cooperation from your family, friends, or co-workers when you first decided to become an apprentice?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	8	21.1	30	78.9	0	
Graduate or Continuing	15	12.4	106	87.6	0	
Total	23	14.5	136	85.5	0	
Homemaker Home Health Aide and Day Care	9	10.1	80	89.9	0	

Table 25 - While you were an apprentice, did you generally have friendly daily relationships with co-workers?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	32	84.2	3	7.9	3	7.9
Graduate or Continuing	118	97.5	2	1.7	1	.5
Total	150	94.3	5	3.1	4	2.5
Homemaker Home Health Aide and Day Care	18	20.2	71	79.8	0	

Table 26 - During your apprenticeship, was transportation to and from work a problem for you?

	Yes		No		Not Ascertained	
	No.	(%)	No.	(%)	No.	(%)
Drop-out	9	23.7	27	71.1	2	5.3
Graduate or Continuing	15	12.4	106	87.6	0	
Total	24	15.1	133	83.6	2	1.3
Homemaker Home Health Aide and Day Care	18	20.2	71	79.8	0	

In most respects, the characteristics of the drop-out confirm the project hypothesis that specific steps could be taken to lower the apprenticeship drop-out rate even more if a.) the Division of Apprenticeship and Training were staffed more completely to insure that on-the-job training, related instruction and reasonable wages were provided in all programs; b.) if an outreach or employment guidance function were at the disposal of apprentices who sense social resistance or who experience practical problems such as transportation, which an interested party might help resolve. Twenty-six percent of the drop-outs reported that they would have continued the apprenticeship program if someone had encouraged them. Ideally, a proposed "female in apprenticeship" outreach project would not only motivate more women to begin apprenticeship training, but would also enable more to complete.

EMPLOYERS OF WOMEN APPRENTICES SURVEY

A survey of all those employers who took on female apprentices during the life of the project was intended to provide insights into the apprenticeship employability of women, and into the underlying reasons for females dropping out of programs. We also hoped to learn more about the motivations and attitudes of employers in general with respect to training women.

A questionnaire, designed by the project coordinator with the cooperation of the University of Wisconsin Survey Research Laboratory director, and mailed to the 90 employers of women apprentices resulted in a 61% response rate.³¹ The survey was conducted between March and April, 1973, with the project coordinator directing the mailings and making follow-up telephone calls to encourage employer responses.

The Drop-out: Employer Responses

Employers were divided on reasons for female drop-outs. Twenty-six percent of employers who had female apprenticeship drop-outs

³¹ See Appendix K: Wisconsin Women in Apprenticeship Employer Survey, 1973.

(representing 8 drop-outs) speculated that lack of interest or lack of desire to better themselves was the main factor in non-completion. Twenty-three percent reported that their apprentices had left apprenticeship because they had moved to another area. Sixteen percent said apprentices had left their program to get married. It is interesting to note that no respondents among the female drop-outs gave marriage as a reason for terminating the training, and two of the employers cited "they got married" as the most negative aspect of their experience with female apprentices. The discrepancies in perceptions of reasons for dropping show even more when no employer cited "low salary" as the reason for an individual leaving training, whereas 16% of the drop-outs gave that as the main factor leading to their dropping the program.

Table 27 - For any apprentices with your organization who dropped out of the program (cancelled or suspended), what do you believe to be the reasons for their not completing? (Asked of employers who had female apprenticeship drop-outs)

	No.	(%)
1. Apprentice moved to another area	7	22.6
2. Lack of interest, no motivation, laziness, lack of desire to better themselves	8	25.8
3. Apprentice got married	5	16.1
4. Apprentice quit program	2	6.5
5. Personality clashes	3	9.7
6. Distance involved--too far to travel for the related training	1	3.2
7. Not ascertained	5	16.1

As the project speculated, some apprentices (26% of the drop-outs) did indicate that they would have continued the program if someone had encouraged them. The employer perception of whether someone was available to the apprentice for counselling was extremely positive, with 93% claiming that skilled persons, or journeypersons, were easily accessible to apprentices when consultation was necessary. The reluctance of apprentices to share work related problems with those supervisors points out the desirability for management training to include motivation and counselling for new apprentices, especially if they are among the first women in the shop.

Employer perceptions of the working relationships of apprentices with co-workers are similar to those reported by apprentices themselves, with 97% of employers and 94% of apprentices stating that they believed that the apprentices had friendly relations with their colleagues. There continue to be employers who claim that females tend to disrupt work procedures, or solicit favored treatment by supervisors, but the great majority (78%) rate the on-the-job motivation of women as the same or higher than other employees. Of those employers in the Fox Valley who employ females in the shop, 66% reported that females make equally good employees as males.³²

³² Women in Apprenticeship Target Area Employer Survey, 1973

Table 28 - For what reasons did your organization decide to train female apprentices initially?

	No.	(%)
1. The lack of trained help available, shortage of qualified personnel	12	21.8
2. Females are better qualified in some areas, in certain cases they make better barbers, cooks, etc.	1	1.8
3. To upgrade our staff	2	3.6
4. We just wanted to help the individuals who desired training, NFS	8	14.5
5. Apprenticeship is the best way to learn a trade--to make them effective/competent in their field	8	14.5
6. This type of training wasn't available from any other source, wasn't offered in this area	2	3.6
7. The organization was requested to train females by high school counselors, state department of industry, etc.	3	5.5
8. Equal opportunities for women	4	7.3
9. Financial benefit	2	3.6
10. Other	6	10.9
11. Not ascertained	7	12.7

Table 29 - Generally, did the apprentices have a good working relationship with the other employees?

	No.	(%)
1. Yes	53	96.4
2. No	0	
3. Don't know	2	3.6

Table 30 - Have you ever recommended training female apprentices to another employer in your trade?

	No.	(%)
1. Yes	24	43.6
2. No	29	52.7
3. Not ascertained	2	3.6

Table 31 - How do you rate the on-the-job motivation of the female apprentices as compared with other employees?

	No.	(%)
1. Higher	16	29.1
2. The same	27	49.1
3. Less	6	10.9
4. Not ascertained	6	10.9

Another example of the credibility gap which exists among some employers is the response of one employer of printers and layout technicians who believed no woman could be employed as a surface technician in the printing industry, yet there have been two such apprenticeships filled by women in the last three years. Even among those employers who have experienced the benefits of apprenticeship training, only 46% have definite plans to continue to train female employees through apprenticeship, while 40% are "not sure". The availability of training funds could be a decisive persuasive factor for those employers who are "on the fence" on this point, since 27% indicated that there was a direct relationship between their original decision to employ female apprentices and their receiving reimbursement for training costs. Forty-six percent of all employers of women apprentices had received supplementary governmental funds related to their providing opportunities to training disadvantaged individuals.

Table 32 - Did you receive any funds (for example, Federal Manpower Development Training funds) because you had (or have) apprentices?

	No.	(%)
1. Yes	25	45.5
2. No	29	52.7
3. Not ascertained	1	1.8

Table 33 - Was the availability of such funds a motivating factor in your participation in on-the-job training for female apprentices?

	No.	(%)
1. Yes	15	27.3
2. No	9	16.4
3. Inappropriate	29	52.7
4. Not ascertained	2	3.6

Table 34 - Would you, in the future, ever recommend training female apprentices to another employer?

	No.	(%)
1. Yes	35	63.6
2. Depends	15	27.3
3. No	3	5.5
4. Not ascertained	2	3.6

Conclusions: Women Apprentices and Their Employers

The employer of female apprentices survey findings thus far have been useful in providing data:

- 1.) To reinforce the project contention that employers are positively motivated to assume apprenticeship training roles if monetary compensation for the expense of providing training is available;
- 2.) To confirm the results of the Fox River Valley survey, that prejudice against females as apprentices is likely to be minimal in situations where women have already been employed;
- 3.) To point out the range of motivating factors--most could be incorporated by the DAT in any future promotional attempts--which have led to apprenticeship employment of women. (See Table 28);
- 4.) To encourage employers to train management-supervisory personnel to be sensitive to the feelings and attitudes of individuals breaking employment barriers, whether they be females or racial-ethnic minorities.

The publicizing of the facts of a.) low female apprentice drop-out rates; b.) high employer satisfaction with the work and training performance of women now rests with women's advocates wherever they exist and with the Division of Apprenticeship and Training as it proceeds to pursue the project goals.

CHAPTER 7. CONCLUSIONS: WOMEN IN APPRENTICESHIP -- WHY NOT?PART ONE

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PART TWO

METHODOLOGY AND PROJECT OBSERVATIONS ABOUT OURSELVES

Recommendations

CHAPTER 7. CONCLUSIONS: WOMEN IN APPRENTICESHIP--WHY NOT?

The project conclusions are divided to report in Part One, where we found resistance to the utilization of women in the system of formal apprenticeship employment, what steps have been taken to minimize the barriers, and what our recommendations for future actions are. We have focused our discussions on:

- I. The Apprenticeship Complex, including:
 - A. The State Division of Apprenticeship and Training;
 - B. Employers;
 - C. Unions;
 - D. Realistically, approachable trades; and
 - E. The Expansion of Apprenticeships;
- II. The Pre-apprenticeship Complex, including:
 - A. Public Employment Agencies;
 - B. Public Educational Systems; and
- III. Women Themselves

In Part Two, we have described the design, ideas, and methodology we found to be most effective in carrying out the broad research and demonstration efforts to isolate, analyze, and minimize the barriers which exist to women participating in apprenticeship. Recommendations are included for the consideration of State Apprenticeship Agencies and women's advocacy groups which may wish to conduct similar or related projects.

PART ONE

I. THE APPRENTICESHIP COMPLEXA. Apprenticeship: Supervisory Agency

In brief, apprenticeships are training agreements contracted among an apprentice, an employer or joint apprenticeship committee (composed of employer and union representatives) and either the State Apprenticeship Agency or the Federal Bureau of Apprenticeship and Training. In Wisconsin, the 1911 Apprenticeship Law indicates that the state shall supervise the training agreement while the vocational system provides related instruction. The training agreement specifies:

- a.) On-the-job training: Component activities and paid hours of work;
- b.) Related theoretical instruction: Subject areas and paid hours;
- c.) Length of training period; and
- d.) Specified salary increments as the work and training progress.

While observing the system at work, we found there were resistances in attitudes and practices at all levels of the apprenticeship system which historically had worked against the participation of women. Within the Division of Apprenticeship and Training itself, the project personnel overcame traditional, institutionalized sexism (reflected in

all male references and male assumptions for apprenticeships in the graphic arts, industrial and construction trades) to the degree that many of the permanent staff have assumed the project's public education activities to expose the facts vs. the myths of women in employment.

The very existence of the Women in Apprenticeship Project housed within the Division of Apprenticeship and Training is significant testimony to the willingness of the Division's administration to incorporate women in the trades through apprenticeship. As the project formally concludes, a new understanding among DAT staff members is evident in their individual efforts at guiding women into apprenticeship and in persuading employers to consider women as apprentices. But most do not purport to be advocates of all that the women's movement implies. More manifestly, their activities are tempered by the requirement to be accommodating to apprenticeship employers while attempting to inform them of the dictates of equal rights laws and equal employment in apprenticeship guidelines.

Therein lies a dilemma for the Division of Apprenticeship and Training brought about by its dual function: to supervise a voluntary training arrangement (apprenticeship) and to regulate and enforce equal opportunity recruiting and hiring practices which might not be readily accepted by employers. The legal existence of the apprenticeship agency itself relies on the voluntary use of the apprenticeship training system by employers and joint apprenticeship committees. A self preservation

factor in the Division might quite naturally inhibit its aggressive monitoring or enforcement of the apprenticeship pledge requiring employers to recruit from both sexes and from all racial groups. The clash of the two functions is illustrated in the case of a recent DAT reversal of the decision of a regional joint apprenticeship committee in barbering denying a woman an apprenticeship position because, "Women are not suitable as barbers." The barbers in question have retaliated by supporting state legislators from their area as they propose in the Wisconsin Legislature that training for barbering be removed from the jurisdiction of the Division of Apprenticeship and Training.

A tension of dependency is established between employers who ultimately may or may not choose to train employees via apprenticeship and the DAT which seeks in all programs to insure that industry's training needs, as defined by employers and unions, can be met through apprenticeship.

It has been the inclination of the project to insist on immediate, active enforcement and monitoring of the equal opportunity apprenticeship pledge, adopted in April, 1972. It is the moderate policy of the DAT that more long-range progress occurs by laying a foundation among unions and employers through education and persuasion rather than through coercion. Having observed dramatic gains in the apprenticeship employment of minority males (a tenfold increase in 4 years: from 30 to 300 apprentices), the DAT administrator believes

the same openness to change, tempered by patience, to be the valid stance of his agency in relation to the recruitment of female apprentices.

Notable changes in the Division of Apprenticeship and Training have been:

1. Including women in the affirmative action pledge in State Plan for Equal Employment Opportunity in Apprenticeship and strengthening the provisions of Federal Title 29 (as it applies to affirmative action in apprenticeship) to include women;
2. Changing of apprenticeship job titles so they do not reflect sex designations. Examples: Foundry Man to Foundry Worker; Radio-TV Repairman to Radio-TV Repair Person;
3. Sensitizing present apprenticeship employers to the potential contribution of women as apprentices; for example, suggesting that retiring plumbers and watchmakers consider passing their trades on to the family daughters;
4. Hiring women and utilizing the apprenticeship method of training women to become members of the once all male professional staff. One woman is now an apprentice Training Representative; another is a Veteran's Specialist; and a third is a Field Representative;

5. Omitting sex references from promotional literature;
6. Recruiting both high school girls and boys for participation in high school career day conferences.

Recommendations for the State Division of Apprenticeship and Training

1. That the State Apprenticeship Equal Opportunity Pledge and Affirmative Action commitment be routinely and rigorously monitored among apprenticeship employers to encourage and insure compliance;
2. That age restrictions in apprenticeship either be eliminated or waived to permit more women to be eligible for training opportunities;
3. That the trend toward breaking down sex stereotyping in the hiring patterns of the Division be continued;
4. That the presently all male, fourteen member State Apprenticeship Council, an advisory body to the DAT administrator, include women as representatives of both unions and employers;
5. That especially during years of transition of women into the trades definite steps be taken by DAT staff to insure women's awareness of the regulations and benefits governing their apprenticeship agreements;

6. That continued efforts be made to "desexigrate" the language of apprenticeship literature; for example, the state standards for the carpentry trade asserts: "A sound apprenticeship program for training qualified young men has proven to be the only means of attaining these (required) skills."

Recommendations for the U. S. Department of Labor

1. That action be taken to amend Title 29 Part .30 (federal regulations governing apprenticeship) to include women in apprenticeship affirmative action plans and also in the goals and timetables for compliance.
- B. Apprenticeship: Employers

Employer acceptance in attitude and practice of the equal capacity of women to function in apprenticeship relies on their knowledge of facts, their actual experience, and their understanding of equal employment opportunity laws.

From the comparative target area employer surveys conducted in 1970 and in 1973, it is apparent that hiring and training practices are changing at a slower rate than attitudes or the expressed understanding of federal Equal Employment Opportunity or State Fair Employment Practices regulations. Where women were already employed in a shop, a lesser degree of prejudice against them was registered.

The 1973 survey of employers of women apprentices revealed that 78% thought women were equal (or better) in reliability and production when compared with other employees. The Fox River Valley comparative employer surveys of 1970 and 1973 showed that about 50% of the manufacturing employers said there were apprenticeships for which women were unsuited because the work was too dirty, involved heavy lifting, was too dangerous or simply involved hard, grinding tasks. Yet, 65% of the employers acknowledged that they knew of women who did work which was dirty, messy, involved heavy lifting and required technical abilities.

To close the information gap, the project aimed at saturating the employment community with educational materials, having produced and distributed:

1. How About Women?, a brief descriptive brochure which questions "Have you been looking at sex rather than suitability?";
2. Working Women: Fact vs. Myth, a one page, hard-hitting list of myth vs fact, especially as they relate to women in technical employment;
3. Never Underestimate the Power of a Woman, a 15-minute color film, aimed particularly at employers, presenting women successfully at work in non-traditional jobs;
4. How to Become an Apprentice, a simple guide to the apprenticeship occupations and procedures for application.

Employers are always cautious to weigh the benefits of utilizing apprenticeship against the cost of training. During the three years (1970-1973) of project activity, Wisconsin MDTA-JOPS funds expended to employers of women in training rose from 10% to 40% of the total. Forty-six percent of the employers who employed women apprentices from 1970-1972 had received such funds, and 27% said that the availability of the training funds was a motivating factor in their decision to train women apprentices. Since the financial risk is a reality, even with the lower than average dropout rate of women, the continued availability of the funds is vital to the employer whose participation in a training program is otherwise not feasible.

Some large employers in the tool making and automotive industries for whom funding is not a major consideration, have expressed frustration with not finding women applicants in competitive numbers when they have sought candidates for trainee positions within their plants. The project has urged inplant campaigns to publicize apprenticeship openings and to sensitize management and supervisory personnel to the social and psychological pressures which might discourage qualified women from breaking out of lower paying, traditionally female job slots to compete for higher salaries and skilled training.

Recommendations for Employers

1. That supervisory personnel be trained to help overcome the social and interpersonal resistances which may make the integration of women in the labor force a strain on the pioneering women and on their co-workers.

Recommendations for the U. S. Department of Labor

1. That legislation be designed which would result in financial support to employers to compensate for training costs. The subsidy could take the form of a tax rebate or of "redeemable tokens" to be assigned to the target population, perhaps minority females, whose employers would qualify for training funds as the women were hired.
2. That the U. S. Department of Labor carry out a promotional campaign aimed at educating labor and management on discriminatory patterns that might exist in their collective bargaining agreements. Such a procedure should be conducted to avoid costly, inevitable lawsuits.

C. Apprenticeship: Unions

Closely related to the hiring practices among employers are the apprenticeship stipulations within union bargaining agreements. Specifically, inplant posting, seniority regulations, and preference given to applicants who have survived heavy and demanding "bull work" (which, in most cases, has no bearing on the ability to assume an

apprenticeship) have all had the effect of perpetuating access discrimination.

Regrettably, the project did not conduct extensive surveys or interviews with union members or leaders, but relied heavily on participation in trade union conferences and workshops sponsored by the University of Wisconsin School for Workers, to disseminate information and solicit support for the project goals. The project gained notable organized labor support when the State Council of AFL-CIO unions publicly supported:

- a.) the National Equal Rights Amendment;
- b.) a uniform state maternity leave policy; and
- c.) since 1970, the annual convening of a State AFL-CIO Women's Conference.

The AFL-CIO Wisconsin Women's Conference reflects the concern of union women for addressing basic issues of equal pay for equal work and for equalized training opportunities where they are employed. This organization is pledged to the goals of a more equitable integration of women into the work force.

Recommendations for Unions

1. That teams of labor and management representatives assume an education function among bargaining agents to insure a knowledge of Equal Employment Opportunity laws. The activities, if kept within an information dissemination

realm, would not be threatening in intent but, rather, would focus on eliminating for unions and employers, the possibilities of incurring costly law suits.

2. That coalitions of union women seek to expose and eliminate sex discrimination practices where they exist.
3. That unions routinely grant waivers to the rigid inplant posting and seniority rules so that apprenticeship affirmative action pledges can be realized in occupations and plants where no women have been previously employed.
4. That age limitations for trainee positions be waived for qualified female candidates since it is still true that most women turn to apprenticeship opportunities after marriage and childbearing and, consequently, are beyond the cut off age for most higher paid, construction apprenticeships.

D. Apprenticeship: Realistically Approachable Trades

The project's demonstration efforts were concentrated in Wisconsin's Fox River Valley, a target area where there is a high concentration of apprenticeship employers. Among possible "starter" employers for the integration of women apprentices, the construction industry was eliminated as a first choice early in the term of the project. The decision was based on:

- a.) the high percentage of laid off construction workers--
an 18% decrease in employees in 1970;
- b.) the length of the joint apprenticeship committee waiting
lists of those requiring placement--over 100 on the
electricians' lists in many parts of the state; and
- c.) the simple fact of an anticipated higher degree of
tradition-based bias among the construction contractors
and unions.

Larger manufacturing plants, machine tool companies, paper mills, were not approached directly, other than through the Fox Valley Survey of employer attitudes. The inplant posting and seniority requirements for apprenticeship application in those plants required some basic hiring changes, or changes in the union bargaining agreements. Therefore, the project selected smaller, non-unionized trades as "starters." Tire-retreading and auto-body reconditioning were among the first trades in the target area to accept project suggestions that women be apprenticed. In both occupations, the two females who were referred by the project, although demonstrating on-the-job capabilities, had personal, psychological and social problems for which the project made referrals to social service agencies. The television repair industry and the graphic arts, including photographic processing and lithographic stripping were receptive to indenturing female apprentices.

As important as which trades could be "starters," is the consideration of the state of the economy. Ideally, a focus on placement

of women should coincide with at least a stable or accelerated period of economic growth. The project experience, in terms of receptivity of employers and actual availability of positions was definitely affected by the lagging economy from 1970-1972. Citing an overall apprenticeship enrollment decline from 8,781 in 1970 to 7,433 in 1972, the project notes that women involved in formal training held relatively steady (393 in 1970; 382 in 1972), with a decline in cosmetology and a marked increase in the range of trades where women are apprentices.

Recommendations

1. Small shops in either the graphic arts or manufacturing trades, preferably non-union, may be most receptive to training women apprentices.
2. That government agencies expect higher placements of women during periods of economic stability or growth.

E. Apprenticeship: Expansion

The project determined that the apprenticeship system could be applied to occupations where performing practical tasks, combined with theoretical related instruction would lead to competency in a skilled work process. From that assumption came the idea that not only were women under-utilized in the apprenticeship work force, but so, too, was the apprenticeship method of training under-utilized in the education and employment universe. While studying the feasibility of bringing

women into existing apprenticeships, the project also attempted to introduce the concept of formal on-the-job training to fields where women were already engaged in skilled work.

One probable effect of the expansion of the apprenticeship system to areas where women are traditionally employed will be to more firmly fix apprenticeship and females together in the public mind and thereby facilitate a crossover to the male dominated trades. Hence, were launched the day care and health occupation experiments as well as the project investigation into the Dictionary of Occupational Titles skill code ratings for female dominated trades.

The project concludes that the absence of females from the ranks of apprenticeship field representatives has implied a lack of familiarity by the totally male apprenticeship staff with primarily service occupations which might be recognized as being apprenticeable. Although the day care apprenticeship, with 80 enrollees and 35 employers, is functioning on a statewide basis, the health occupations, with implied credentialing complications, remain largely "beyond the pale."

Recommendations to the U. S. Department of Labor

1. That apprenticeable occupations be expanded to recognize more trades where women have been traditionally employed-- the child care and health related occupations.
2. That statewide model apprenticeship programs be created, perhaps in the nurses' aide, laboratory technician and medical records technician trades to compare the competency results with other existing modes of training.

II. THE PRE-APPRENTICESHIP COMPLEX

A. Employment Agencies: Wisconsin State Employment Service and Work Incentive Program

Both the Wisconsin State Employment Service and Work Incentive Program play crucial roles as referral and vocational guidance sources for women in the job market. In its first year, the project discovered that both agencies categorized their job listings into "men's jobs" and "women's jobs" and that employment counselors on the whole were unfamiliar with apprenticeship as an employment option. WIN Program staff in Madison and in the target area expressed a willingness to harmonize project goals for information dissemination and placement of women in apprenticeship with their own agency priorities. However, high staff turnover and the urgency to make numbers of placements without regard to training and earning potential has limited WIN cooperation throughout the state.

Within the State Department of Industry, Labor and Human Relations the questions of the validity of Dictionary of Occupational Title codes to formulate training funds; the absence of a uniform state maternity leave policy, and internal hiring and promotional practices of state government as they relate to women, were all challenged by the project. Marked changes which have taken into account Women in Apprenticeship suggestions are:

1. Removal of sex designations from job titles recognized by the State Department of Industry, Labor and Human

- Relations, and used in the Employment Service;
2. Creation of an apprenticeship liaison position in each Employment Service office in the state to bridge the apprenticeship information gap;
 3. Staff training sessions held in all Employment Service districts, specifically aiming at sensitizing counselors to sex stereotyping attitudes and practices, as well as exposing the myths vs. the facts of women in employment;
 4. Cooperation with the WIN state administration to exchange apprenticeship and WIN personnel so that each agency can focus on eliminating sex stereotyping from its functions;
 5. Funding by the U. S. Department of Labor of a Wisconsin-based project to study and recommend changes in the Dictionary of Occupational Titles skill complexity ratings for health and child care related occupations;
 6. Sponsorship by the U. S. Department of Labor of a maternity leave study to research the benefits to women and costs to employers of insurance payments and job reinstatement for pregnancy or childbirth reasons to women workers;
 7. Initiation of an Intergovernmental Personnel Act project to study the career patterns of women in state service.

Recommendations for State Agencies

1. That apprenticeship placements be recorded on WIN and WSES records as bonafide employment referrals.
2. That WSES and WIN administrators examine the effects of their striving for quantity of placements on the quality of non-stereotyped service to women applicants.
3. That WSES continue serious monitoring of promotional literature to remove gender specific materials and references.

Recommendations for U. S. Department of Labor

1. That the Department of Labor focus on re-examining the skill complexity rating hierarchy as it has been applied in the Dictionary of Occupational Titles to jobs traditionally filled by women and that sex specific job titles be removed from the 1976 edition of the Dictionary of Occupational Titles.
2. That an extension of the present Dictionary of Occupational Titles project be sponsored to analyze the clerical and nursing fields, and to provide technical assistance to the WIN program.

B. Educational Systems: Public and Vocational Schools

The far-reaching, pervasive influence of the public education system on the socialization and ultimate career choices of women is acknowledged. The project attempted to be a source of informational material for the schools and to broaden the understanding of guidance

counselors of new and non-traditional options for women. Familiarity with several high schools through frequent showings and discussions of the project film, Never Underestimate the Power of a Woman, along with speeches and workshops have led the project to suggest changes so that pre-apprenticeship tracking and exposure to a wide variety of technical classes are not solely the option of male students. Even though their total participation in technical and industrial courses in Wisconsin is ten times as great in 1973 as it was in 1970, young women still constitute only 1.5% of the public school enrollment in pre-apprenticeship classes. Enlightened guidance counselors and teacher encouragement is an obvious prerequisite to enrollments of junior and senior high school girls in technical and industrial classes. Increased enrollments, along with an anticipated decreased social stigma, will unquestionably result in the more "natural" assimilation of young women into the apprenticeship trades.

Likewise, the vocational system, both in the sense of providing pre-apprenticeship, technical classes and in offering the technical related instruction for the apprenticeship trades, has been contacted by the project to trace any trends toward enrollment of women and to aid in the development of a complete related instruction for the newly apprenticeable day care teacher program.

School system changes related to the Women in Apprenticeship Project have been:

1. Opening of the former Milwaukee Boys' Technical High School to girls and changing the name to Milwaukee Technical High School:
2. Eliminating all sex designations from the Wisconsin Instant Information on Education and Work vocational guidance materials;
3. Increased emphasis on presenting non-biased vocational career information at high school career day conferences;
4. Vocational system cooperating throughout the state in providing related instruction for newly apprenticeable occupations, particularly for "day care teacher" apprenticeships;
5. Development, by the University of Wisconsin Extension, of a pilot teacher training course, "Sex Stereotyping in the Public Schools" attended by 50 teachers in its first semester.

Recommendations for Educational Systems

1. That all gender references in occupational guidance tools be eliminated. Nationally, the computerized vocational information system, known as Vocational Information on Education and Work should be reviewed for sexist references.
2. That teachers and counselors be encouraged or required to participate in human relations courses which include

facts on the damaging effects of sex stereotyping.

3. That public schools make pre-apprenticeship training and apprenticeship occupational information available with equal promotional efforts to both boys and girls.
4. That a study be done of what students, teachers and counselors do and do not know about labor market limitations and opportunities and that the results be incorporated into a guidance course curriculum and film aimed at dispelling high school myths and portraying attractive role-models for non-college bound girls.
5. That the promotional literature of the state vocational system portray both male and female models in non-stereotyped occupations and that visible efforts be made to inform women of opportunities to enroll in technical and industrial courses.
6. That an apprenticeship film or video tape for use in junior and senior high schools be produced. Such a film focusing on affirming occupational options should be devoid of stereotyped expectations which have limited male and female career choices in the past.

III. WOMEN THEMSELVES

The first two years of the Wisconsin project showed that women seek skilled training, job satisfaction and security through their apprenticeships, with 76% of those who began apprenticeship since 1970 reported as graduated or continuing at the conclusion of the first phase of the project. The low female dropout rate of 24% (compared with a male dropout rate in Wisconsin of 44%--50%) strengthens the project hypothesis that women do not represent a higher employment risk than males in skilled trade training programs.

The attractiveness of apprenticeship to women who, of economic necessity, must work is pointed out by the 37% of the participants who are heads of households and the 59% of the 42 who were AFDC recipients before becoming apprentices who were able to be free of welfare payments after they became apprentices.

Can the tendency toward women not applying for apprenticeship be reversed? This most pervasive of all the barriers encountered was attacked primarily through informing union women; informing the public schools; helping to open up to females the pre-apprenticeship training facilities in Wisconsin's only technical high school; publicizing through news articles apprenticeships for women as a project goal; distributing quantities of apprenticeship and women in employment literature to individuals and women's groups; and encouraging and persuading high school girls to broaden their vocational choices. If the tendency has not been reversed, at least some changes are visible in the cases of females now

applying to become plumbers, electricians, carpenters, painters and tool makers.

There is evidence of progress, but the socialization of women, we concede, is a "cradle to grave" process in which changes will occur gradually. In Wisconsin, the foundation for application and entry into the trades is laid, but producing numbers of qualified candidates remains to be done. The burden of change cannot be thrust upon girls and women alone. Recognizing the changing roles within families, coming into contact with more enlightened teachers and guidance counselors, increasing exposure to more trade and craft skills, being received by employers as individuals with equal job options--all must contribute to a strengthening of the self image of women so that they can be more readily and equitably utilized in the full work force.

Women who are in the job market currently, or who are organized in unions or advocacy groups can, however, take measures to improve their own status and to help widen the job futures of others.

Recommendations to Women

1. That women themselves, with the assistance of public employment agencies, challenge existing discriminatory hiring and employment practices. Both federal and state equal opportunity laws, as well as specific apprenticeship rules, eliminate sex designation as a basis for hiring. Such suits, if valid, can have significant social repercussions

as in the Fox River Valley where, for example, a manufacturing company which was sued by EEOC in another state for sex discrimination in hiring and promoting practice has actively recruited its first female apprentice in Wisconsin.

2. That women organized within labor unions, by encouraging women applicants and bargaining for management training to be receptive to the reality of women trainees, act as advocates for the integration of women into apprenticeship positions in the skilled trades.
3. That national, state and local women's organizations continue to emphasize the social and economic need for recognition of women as individuals whose sex neither qualifies nor disqualifies them from deserving and demanding equal employment earning and training opportunities.

Recommendations to the U. S. Department of Labor

1. The strongest recommendation derived from project observations is that an apprenticeship outreach experiment should be structured to develop a technique of moving women in greater numbers toward job security--work skills and personal fulfillment through apprenticeship in a trade. Such an outreach project might have some key advantages that the Wisconsin Women in Apprenticeship Project did not:

- a.) It could have a cross-agency identity of sponsorship-- for example, DAT--WIN--Vocational School--AFL-CIO Women's Organization.
- b.) It could concentrate on one population of females; for example, WIN enrollees; high school students in a given area; American Indian women.
- c.) It could provide pre-apprenticeship coaching-training in necessary application skills.
- d.) It could provide follow-up counseling once placements were made.

In effect, it could function with much the same techniques and motivation through which the LEAP programs in Wisconsin have increased the minority male participation in apprenticeship training from 30 to 300 in four years.

The project sponsors and staff are in agreement that each of the concluding recommendations, if accepted, could contribute significantly to national efforts to remove layer upon layer of employment--economic inequities affecting women and specifically deterring women from freely participating in apprenticeship.

PART TWO

METHODOLOGY AND PROJECT OBSERVATIONS ABOUT OURSELVES

1. We met less resistance when personal diplomacy was combined with observing and acting on the internal politics of an institution. It was important to size up an agency, for example, the WIN Program, to identify and cultivate the support of those who would be most receptive to the project goals. Where such personal, supportive contacts did not exist, the project's efforts were thwarted, as in the case of expanding apprenticeships in the health occupations.

Recommendation

That future similar projects have a degree of cross-agency sponsorship and staff representation to enhance cooperation toward common goals.

2. We were able to achieve public interest in the work of the project through having regular widespread news coverage for our activities. In addition, being personally available statewide for informational presentations to unions, employer groups, women's groups (League of Women Voters; American Association of University Women; and the Wisconsin Women's Political Caucus) was a high project priority.

Recommendation

That future similar projects also publicize their goals and

functions through keeping a few key reporters from major news media regularly informed. That the investment in staff time for such activities be acknowledged in the research expectations and fundings.

3. The more the project extended its activities into already existing channels for dissemination of information, the more widespread became women's interest and participation. Serving as a consultant, for example, to union training programs conducted by the Wisconsin School for Workers for two years, has allowed the project access to hundreds of union rank and file men and women who are most receptive to new information and trends. Taking advantage of the newsletter of the University of Wisconsin Extension has periodically placed project-apprenticeship information in the hands of 3,500 women. Using the information dissemination network of the State Department of Public Instruction, the project reached all 459 high schools in the state with three editions of "Women in Apprenticeship News Postings."

Recommendation

That future projects consider and contact early those groups whose established networks of communication could be shared.

4. When sources of information were non-available or incomplete, the project generated its own women in employment--apprenticeship related materials. The project film, Never Underestimate the

Power of a Woman, is requested nationally far in excess of its availability. In Wisconsin, the film is regularly used in counseling enrollees by the Work Incentive Program, in training public school and parole officials by the University Extension Center for Community Leadership Development; and in the Wisconsin State Employment Service staff development sessions provided by the Women's Employment Specialist in the Bureau of Community Services, Division of Equal Rights, Department of Industry, Labor and Human Relations.

Recommendation

The project reiterates its contention that a similar high quality film depicting women performing trade skilled work should be made, aiming the style and narrative at young women whose early career choices could be affected by undoing the sex stereotyping in their view of the world of work.

5. Wisconsin Women in Apprenticeship Project staff and sponsor membership of such committees as the Governor's Commission on the Status of Women, and the State Day Care Advisory Committee to the Department of Health and Social Services has served to extend the influence of the project beyond the sponsoring agencies, the Division of Apprenticeship and Training and the University of Wisconsin Extension. For example, visible gains over existing barriers in relationship to the vocational information available in the public schools, and the

issue of veteran's apprenticeship training benefits accruing to wives, widows and orphans of veterans were made through the dual intervention of the project and the Governor's Commission on the Status of Women. Assignment of the project coordinator to represent the Department of Industry, Labor and Human Relations on the State Day Care Advisory Committee to the Wisconsin Department of Health and Social Services has helped the day care apprenticeship program to achieve statewide recognition among parents, educators, and day care providers as an effective child care personnel training program.

Recommendation

Similar projects which might be undertaken within apprenticeship agencies would increase their effectiveness and influence through collaboration with established women's advocacy groups such as the Governor's or Legislative Commission on the Status of Women in their respective states. The contact should be made early and should continue for the duration of the project.

6. The geographic separation of the project sponsors and coordinator in Madison from the sole project field representative in the target area was a distinct disadvantage in concentrating on any single goal at any one time. The tendency of the coordinator's scope of analysis and planning, taking into consideration the whole state, while the isolated field representative was limited to a defined geographical

area is cited by both as a deficiency they could not resolve. Occasional face to face contact and periodic phone conversations were not sufficient to satisfy either that she was working as an informed member of a team. Their frustration is reflected in their frequent plaint, "It's a lot of work for two people."

Recommendation

That advantages of isolating a target area be carefully weighed in future projects; that, if there is more than one researcher, they be situated so as to offer support and consultation to each other.

7. The design of the project having a dual research-demonstration thrust provided an uneasy course for the staff of two, with a tension existing between the sometimes abstract (research) and sometimes direct (demonstration) goals of the project, and the on-going, practical functions and priorities of the DAT. We were provided every courtesy of full-time staff personnel, yet often because of our commitment to change, we assumed the role of devil's advocate, and in our criticisms, seemed to be "biting the hand that feeds;" occasionally, in the minds of some permanent staff, including female secretarial staff, we were relegated to the lunatic fringe of the women's liberation movement, concerned more about the formalities of language ("journeyman"

or "journey-person"?) than with promoting women based on their equal abilities and potential. We were never victims of maliciousness and, hopefully, we never behaved maliciously, but we knew where there had to be gentle clashes if we wanted apprenticeship's help while we rocked apprenticeship's boat. It was relatively painless for a third staff (albeit part time) female to become integrated into the Division after so much pioneering effort among male Division staff by the original project coordinator.

Recommendation

That females sensitive to and knowledgeable of the facts vs. the myths of women's past, present and potential employment contributions be engaged in apprenticeship projects which will serve to enhance the possibilities for females to gain a fair share of the apprenticeship/employment pie. Such females should expect and be prepared to be challenged in their motives and activities by both males and females in or out of the sponsoring agency.

It has not been our conscious purpose to highlight our successes and to minimize our shortcomings in this report. We wanted to relate what we did and to convey a genuine sense of optimism as we pass the project question, "Women in Apprenticeship--Why Not?" on to other states and to concerned women and men, whose responses may make a difference.

BACKGROUND APPRENTICESHIP STUDIES

1. Thomas A. Barocci, The Drop-out and the Wisconsin Apprenticeship Program: A Descriptive and Econometric Analysis, the Industrial Relations Research Institute, the University of Wisconsin, Madison, Wisconsin, 1972.
2. Alfred S. Drew, Educational and Training Adjustments in Selected Apprenticeable Trades, Vol. 1 (Lafayette, Indiana: Purdue Research Foundation), Purdue University, 1969.
3. David Farber, "Apprenticeship in the U.S.: Labor Market Forces and Social Policy," Research in Apprenticeship Training, Proceedings of a Conference, (Madison, Wisconsin: The Center for Studies in Vocational and Technical Education, University of Wisconsin, 1967.

NEVER UNDERESTIMATE THE POWER OF A WOMAN

Partial List of Project Film Showings

- University of Hawaii - 1971 - to U.H. counselors, Employer Service Counselors, High School counselors, U.H. Continuing Education; three purchased copies of the film for wider showing throughout the state.'
- Interstate Association of Commissions on Status of Women - 1971 annual conference in St. Louis.
- Middleton (Wisconsin) High School - 1971 - Students, teachers, counselors.
- AFL-CIO Women's Conference - 1972 (Wisconsin)
- Governor's Conference (Wisconsin) on Vocational Education - 1971 or 1972 Milwaukee, Wisconsin.
- Great Plains Manpower Advisory Council - 1972 - Des Moines, Iowa (Five-state council).
- NOW (National Organization of Women) - 1972 - Midwest Conference on Employment Opportunities for Women, Chicago. (300 women from labor and professions).
- Urban Research Corp. - 1972 - National Affirmative Action Conference, Chicago.
- Wisconsin High School Guidance Counselors State Convention - 1972.
- Drake University (Iowa) - 1971 - Continuing Education of Women Conference
- NOW - 1971 or 1972, Ames, Iowa
- NOW - Buffalo, New York
- NOW - 1972 - Seven State Midwest Conference, Chicago.
- National Vocational Guidance Association on Vocational Training for Girls and Women - July, 1973 - Boone, North Carolina (people from 22 states).
- National Personnel and Guidance Association - 1973 - San Diego and St. Louis

Wisconsin State Apprenticeship Conferences - 1971, 1972, 1973.

Ball State University (Muncie, Indiana) - 1971 - Continuing Education for Women Conference.

Wisconsin Power and Light Co. - 1973 - Affirmation Action for Service Training - several sessions.

Center for Community Leadership Development - UW Extension; uses it often in human relations workshops.

Copies for rental and purchase are available from:

BAVI (Bureau of Audio-Visual Instruction), P.O. Box 2093,
Madison, Wisconsin 53701; (608) 262-1644

Women's Bureau of U.S. Labor Department, Washington, D.C.

WOMEN IN THE TRADES:

FOX RIVER VALLEY SURVEY (SPRING 1973)

1. How many non-office employees do you have now? _____
2. How many of these are women? _____
- 2.a. How many apprentices do you have? _____

SKILLED

- 3) What skilled "blue collar" occupations are there in your plant and how many women and how many men employees do you have in each?

<u>Skilled "Blue Collar" Occupations</u>	<u>No. of Men</u>	<u>No. of Women</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

SEMI-SKILLED OR UNSKILLED

4. Do you have any semi-skilled or unskilled "blue collar" occupations in which you employ?

	<u>Occupation</u>	<u>No. of Men</u>	<u>No. of Women</u>
a. Men and Women	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
b. Men Only	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
c. Women Only	_____	_____	_____
	_____	_____	_____
	_____	_____	_____

5. On the whole, do you find that men and women make equally good employees in the shop, or is this not the case?

Equally good (to question 6) Not the case Depends

5.a. Why do you feel this way? _____

6. With respect to the specific aspect of work that I will read, do you think that men are better, there is no difference, or that women are better?

	<u>Men Better</u>	<u>No Difference</u>	<u>Women Better</u>
6a. First, production	_____	_____	_____
6b. Absenteeism	_____	_____	_____
6c. Turnover.....	_____	_____	_____
6d. Ability to get along with fellow workers	_____	_____	_____
6e. Willingness to accept supervision	_____	_____	_____
6f. Acceptance of various work conditions.....	_____	_____	_____
6g. Making constructive suggestions for production improvement.....	_____	_____	_____

(Write any further comments here)

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MALE SUPERVISORS

7. How many male supervisors do you employ? _____
8. How many of your male supervisors supervise men only? _____
9. How many of your male supervisors supervise women only? _____
10. Are there any sections or occupations for which you prefer men supervisors?

Yes _____

No _____
(to question 11)

10a. What are these?

Sections or Occupations

10b. Why do you prefer men supervisors for these occupations?

WOMEN SUPERVISORS

11. How many women supervisors do you employ? .

None
(to question 12)

_____ (Number)

11a. How many of your women supervisors supervise men only? _____

11b. How many of your women supervisors supervise women only? _____

11c. Do your male workers accept women supervisors as well as they accept men supervisors?

Yes _____

Depends _____

No _____

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11d. Do your female workers accept women supervisors as well as they accept men supervisors?

Yes _____ Depends _____ No _____

11e. Are there any sections or occupations for which you prefer women supervisors?

Yes _____ No _____
(to question 12)

11f. What are these?

Sections or Occupations

11g. Why do you prefer women supervisors for these occupations?

12. Have you had a woman applicant for an apprenticeship in the past five years?

Yes _____ No _____
(to question 13)

12a. Was she already employed by you?

Yes _____ No _____

12b. Did she meet your qualifications?

Yes _____ No _____

12c. In what trade? _____

12d. If no, why not? _____

12e. What trade _____

12f. Did you hire her as an apprentice?

Yes _____ No _____

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12g. Did she complete her training?

Yes _____ No _____
(to ques. 13)

Why not? _____

12h. Why didn't you hire her?

13.) Are there any apprenticeable occupations in which you would hesitate to consider a woman?

Yes _____

No _____
(to question 14)

13a. Which occupations are these? _____

13b. Why? _____

14.) Are there any jobs in your shop that no woman could possibly do?

Yes _____

No _____
(to question 15)

14a. Which jobs? _____

14b. Why not? _____

15.) Why do you think there are so few women in the skilled trades?

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16. Are there any skilled trades that you think women might be particularly suited for?

Yes _____ Depends _____ No _____
(to question 17)

16a. What would these skilled trades be? _____

16b. Why do you think women would do well in these trades? _____

17. Have you had any difficulty filling any apprenticeship openings with good quality candidates?

Yes _____ No _____
(to question 18)

17a. In what occupations have you had difficulty? _____

17b. What do you feel are the reasons? _____

18. Have you had any difficulty filling any skilled job openings?

Yes _____ No _____
(to question 19)

18a. In what trades has this happened? _____

18b. What are the reasons, as you see it? _____

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11. Would you consider hiring a skilled woman if she were available for a 6-hour day, 30-hour week?

Yes _____ No _____

19a. Or part time?

Yes _____ No _____

20. Where do you get your apprentice applicants?..(anywhere else?)

21. When you have an apprentice opening, do you first advertise it to inplant employees?

Yes _____ Depends _____ No _____

22. Do you post apprenticeship openings on company premises?

Yes _____ Depends _____ No _____
(to question 23)

22a. Do you post these openings where both production and office employees may see them?

Yes _____ No _____

22b. Do you post them where both male and female employees may see them?

Yes _____ No _____

23. Approximately how old are your apprentices when they start?

18 - 24 25 - 30 31 - 35 Over 36

24. What is the maximum age for which you will accept apprenticeship applicants?

_____ (age)

25. Would you extend this age limit for...

25a. Veterans? Yes _____ No _____

25b. Women who have completed their families? Yes _____ No _____

25c. Employees? Yes _____ No _____

25d. Anyone else? (who?) No _____

26. a. Do you have any women doing jobs in your plant that:
 b. Do you know of any woman doing jobs elsewhere that:

	26a. <u>IN YOUR PLANT</u>	26b. <u>ELSEWHERE</u>
Are "dirty".....	_____	_____
Are "out in the elements"...	_____	_____
Are noisy	_____	_____
Are "messy".....	_____	_____
Work with dangerously hot materials.....	_____	_____
Involve lifting.....	_____	_____
Precision work.....	_____	_____
Have irregular hours (or shifts).....	_____	_____
Require mechanical aptitude,	_____	_____
Require mechanical skill and experience.....	_____	_____
Require technical ability..	_____	_____

27. Did you (as an individual) respond to this survey in 1970?

Yes _____ No _____

28. Do you have any further comments or suggestions?

HOW TO BECOME AN APPRENTICE

An apprenticeship is a job with a built in formal training agreement involving both on-the-job training and related classroom instruction relevant to that job at the local vocational school.

An apprentice earns while he/she learns. The term of apprenticeship may vary from 2 to 5 years but this is not unpaid time for an apprentice receives wages and regular raises. Wages in the various trades vary.

STEPS

1. The procedure varies from trade to trade, town to town.

The first step is to select a trade.

There are currently 370 apprenticeable occupations. A list of these may be obtained from the Division of Apprenticeship and Training, 201 East Washington Avenue, Madison, Wisconsin 53703 or from the Wisconsin State Employment Service. New occupations are regularly approved. The criteria for approval is the level of skill of the job and course work and the presence of a skilled worker (journeyman) to teach and supervise.

2. Remember, looking for an apprenticeship is like looking for a job.

The second step is to contact one of the following:

JOINT APPRENTICESHIP COMMITTEE (JAC)

If you want an apprenticeship in the construction trades, you would usually contact the JAC of the trade. This committee keeps a waiting list of those applicants who have passed the tests and interviews. Look in the Yellow Pages to find the appropriate craft union or labor temple and ask about the JAC.

EMPLOYER

You would usually apply directly to the employer or the personnel office. Apprenticeship openings are sometimes listed with the Employment Service, vocational school or the help wanted column in the newspaper.

Large industrial plants often have a bargaining agreement with the union that makes apprenticeship open only to workers already employed in their unskilled labor pool.

Often the best chance to obtain an apprenticeship is to find an employer willing to hire you and then persuade him afterward to give more skilled training.

Chances to become highly skilled workers in the various trades are a premium even in times of full employment--there are almost always more applicants than openings--and a young person may have to look hard to find an opportunity or have to wait for it, but it's worth it!

ARE YOU LOOKING AT SEX INSTEAD OF SUITABILITY?

Don't risk your chance of success

AS AN EMPLOYER

by limiting...

AS A WORKER

your pool of training candidates

your choice of a career

because of outmoded myths about
"men's work" or "women's
ability"...

judge workers as individuals

never underestimate the
power of a woman

contact
Department of Industry, Labor
and Human Relations
Apprenticeship and Training
Division
P.O. Box 2209
Madison, Wisconsin 53701
(608) 266-3331

**how
about
women?**

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DID YOU KNOW...

31 million women are employed, yet two-thirds are in dead end, menial jobs?

40% of all employed women have no husbands?

Half of all employed women earn less than \$4,450?

10% of all families are headed by women? Half of these live in poverty?

Women with college degrees earn about the same as men with grade school educations?

The wife's earnings often lift the family above the poverty level?

The high cost of welfare, with the dramatic increase in families on AFDC, might be cut, if more women received skilled training?

TODAY'S TRENDS

The trend is toward greater sharing of work and leisure.

MEN are entering the labor force later because of longer schooling and they also are retiring earlier than in the past.

The average work week is growing shorter.

WOMEN are working in larger numbers and are a greater proportion of the work force than ever before. Nine out of ten young women will be employed some time in their lives.

Employment of MEN has increased by 7.8 million since 1947 -- and employment of WOMEN by 13 million.

Women are now more than one-third of the work force.

"MEN'S JOBS" AND "WOMEN'S JOBS" ARE GOING THE WAY OF THE DINOSAUR...

There are now MEN

librarians
social workers
teachers
nurses
cosmetologists
dental hygienists
secretaries

There are now WOMEN

mechanics
carpenters
machinists
operating engineers
watchmakers
barbers
basketball coaches

Learning and Earning: Wisconsin Women in Apprenticeship *

INTRODUCTION

Everyone needs to be able to make a good living. But you don't have to go to college to do it. One way to gain job security and an interesting life is through apprenticeship.

As an apprentice you earn money while you learn a valuable skill. Your employer pays you for your work, and pays for your education too. You come out of your apprenticeship with a "ticket" to a good job almost anywhere, since the journeyman rating which you receive after successfully completing your apprenticeship, is widely recognized as testimony to good job performance and skill.

More and more, young women of today are realizing life almost always includes work, even though it may include marriage. Most young women, in fact, will work at least 25 years of their lives, according to Department of Labor figures.

If married, you may wish to earn a good salary to help supply some things American families need today--including a good education for the children you may have some day. If unmarried, you will find that a good job which requires skill and training and rewards that skill and training very well will give you not only economic independence but pride and satisfaction as a member of the busy and productive world of work.

Here in this booklet you will see what some Wisconsin women are doing as apprentices. Wisconsin now has at least 23 apprenticeships available to young women as well as to young men.

Look them over. Some will strike you as especially interesting. You can find out more about them by asking your guidance counselor, by asking union people and employers who have apprenticeship programs in your own area, or by contacting the Wisconsin State Employment Service.

Our society now needs more highly-skilled people than it has. You can be one of them. Don't settle for too little in life, too late.

Unskilled work gets duller as the years go by, but skilled work gets more interesting and wins for the worker a better life.

Start now. Look through these pages. See which of these apprenticeships appeals to you, and follow through on this idea. See what an apprenticeship can do to help you build a happy and productive life.

* Printed courtesy of the Milwaukee Sentinel and Dorothy Austin, feature writer.

UNCONVENTIONAL MOTHER TURNED CARPENTER

"If I could sit down and make a list of everything I want, I've almost got it," said Pat Anthony.

The Fond du Lac, Wisconsin woman, 32, was talking about her chosen field, carpentry. She is on the waiting list for an apprenticeship and hopes to be accepted within a year or eighteen months.

"When I am building something, I am completely happy," Ms. Anthony said in an interview. Now she is on the way to achieving her ambition to be a residential carpenter and assist in the building of homes. Like many of us, she was not always so sure of what she wanted. She dropped out of high school at sixteen to marry. Ten years later her husband was killed in an automobile accident and she was left with three children.

She realized then that she would have to create a whole new future for herself and her family. And she would have to start by finishing high school.

Under a new adult education program she obtained her high school diploma at St. Mary's Springs High School. It was at the school, in an industrial arts class, that she discovered that she liked to build things with hammer and saw.

"I like to build and do outdoor work," she said. It has nothing to do with women's lib, she maintained. She added that she once tried office work for six months and "almost died" of boredom and frustration.

While she entered the regular high school program during the day, she took night classes in drafting, advanced drafting and blueprint reading at the Moraine Park Technical School.

Then she passed her carpentry apprenticeship test and appeared before the Fond du Lac Carpenters Joint Apprenticeship Committee. Now she is on the waiting list for an apprenticeship and the estimate is that she will be able to enter the program in the near future.

So far, she has had "absolutely no static" from friends and neighbors, who find that it is helpful indeed to have a skillful woman in the neighborhood to help out occasionally with a household project.

Ms. Anthony lives and guides her family with very strict rules. She buys the food and does 75% of the cooking, and the children, 14, 12 and 10, do the serving and cleaning up. She designs the meals and does the laundry, but they put the clothes away. Her system works.

And now that she is on the way to the kind of job she can thoroughly enjoy, she feels that "the best of all possible worlds" for her is in the exciting future that lies ahead.

NEW DRAFTING APPRENTICE

A surprise career is opening up for Mary B. Cubjati, Milwaukee. Ms. Cubjati, 22, is an apprentice in structural drafting at Harnischfeger Corp., 4400 W. National Ave.

It was a surprise to her because she had never thought of the possibility in her years at Pius High School. She was graduated in 1968.

"If I had thought of it, I would have prepared myself better," she said in an interview.

She enjoyed her four years of art classes in high school, but nothing really prepared her for what she is doing now. She is learning on the job, and taking classes one day a week at Milwaukee Area Technical College, and is drawing the apprentice wage while she learns.

Ms. Cubjati said that she heard that Harnischfeger Corp. was looking for a female apprentice. She called the personnel department and went in for an interview. "I knew absolutely nothing about it," she said, "but I was really interested."

Three days later, she received a telephone call saying that the job and apprenticeship were hers. That was September 5, 1972.

After a few months on the job, she still feels occasionally that she knows little or nothing about structural drafting, but at other times feels that she has been learning a great deal and is making good progress.

"Right now I am doing mostly tracings and changes on some of the drawings, to get me familiar with working on drawings," she said.

She must have had some latent talent all the time, she says, and is happy to have the opportunity to develop it. "Some days I am proud of myself," she said.

She is now the only apprentice in the department, and the others, all men and all professionally qualified, go out of their way to be helpful.

She spends one day a week at Milwaukee Area Technical College in classes. Again she is the only woman. Here the atmosphere at times is a little "stiff" as she puts it.

"There is a small group of men who may resent my being there," she said, "because I get the feeling now and then that I am intruding, somehow."

But she is determined to do her best and to succeed. "No way will I give up," she said.

Her boss, Frank Noruk, Director of Apprenticeship and Training, declared he was pleased with her progress.

"In this job she will be required to help lay out new buildings, and even to help furnish them. She will also help in laying out the remodeling of old buildings," Noruk said.

He consulted with Milwaukee Area Technical College representatives in designing the special curriculum for the new apprentice, so that she would take the courses she needs and skip those she does not need.

In addition, on her own, she is taking interior decorating courses at night to add to her background. She feels she is on her way to a productive and satisfying career.

A NICHE IN PRINTING

After ten years in the world of work, Ms. Lorraine Brinza feels that she has found her niche. An attractive, career oriented woman, she is an apprentice lithographic stripper. May it be said to the everlasting credit of the men with whom she works, there has been no chortling over the stripper title. After all, men are lithographic strippers, too, and nobody says "ho, ho, ho" about that.

Ms. Brinza worked in the art department of Moebius Printing Co., Milwaukee for two years, and then applied for the lithographic stripping job. She got the job, worked a probationary six months, and then was accepted by the union, Lithographers and Photoengravers International Union, Local No. 277.

Ms. Brinza looks and sounds like everything that is called "feminine." But she does not like what she has seen happen to some of her friends. "They marry right out of high school, have children right away, and do not have a chance to develop a personality, likes and dislikes of their own. Their husbands grow and develop skills, but they stay the same," she said.

She is proud of her newfound craft. "It has just enough of the artistic to suit me," she said. As a girl in Cudahy High School she enjoyed art courses, but felt she was not gifted enough to be an artist. She looked for a niche in one of the allied fields and found that she liked the printing industry.

"I have enough flair for making things look the way you want them to," she said.

Now she has finished two years of a five-year apprenticeship. She has attended classes at Milwaukee Area Technical College for three semesters, and has one semester to go. After that, her training will continue on the job.

Ms. Brinza recalled that she felt nervous when she went before the union. "But when I went before the entire board, they were completely courteous," she said. "They just wanted to know if it was really what I wanted to do," she said. It was. To her printing offers a lifetime calling.

She considers that printing is a "marvelous industry," with "so many open doors," and many possibilities for the future.

She is looking forward to the day when she can qualify for the journey-person's card. "With that, you can go anywhere you want and you will be accepted for your skill rather than your gender," she said.

At the beginning of her apprenticeship, she made \$3.32 an hour. By the end of the apprenticeship she will make a journey-person's rate of over \$7 an hour.

She is married to Emil Brinza, who is self-employed as a custom automobile painter. "My husband is satisfied with my working and I enjoy working," she said.

APPRENTICES BECOME DAY CARE TEACHERS

If you like young children, you might like to make a career out of helping them in their vitally important early years.

Since more and more mothers are working, either as the partial or sole support of their families and as the educational needs of preschool children are recognized day care centers are becoming more and more important.

Skilled workers are very much needed in day care centers all over the country. Although there have been many avenues to such work, the two principal routes are either a degree in early childhood education or an apprenticeship. For many thousands of young men and women interested in the development of children, the apprenticeship route is the most satisfactory since it permits earning a living while learning the necessary theory and skills.

In July 1972, two Madison mothers, both the sole support of their children, became the first to receive certificates testifying that they completed their two-year day care teacher apprenticeships.

Because they had worked several years in day care centers, they received a year of credit for their work and thus required only one year to complete their apprenticeships.

Ms. Mary Matthews is now lead teacher-director of the South Madison Day Care Center, and Ms. Doreen Morton is an associate teacher at the same center.

Now about 85 women and a few men are enrolled in day care teacher apprenticeship programs in many parts of the state, including Madison, Janesville, Oshkosh, Ashland, Milwaukee, and Superior.

As a day care teacher apprentice you would learn on the job, with the guidance of experienced teachers and directors, and you would also receive 288 hours of related instruction in classes specifically designed to help you with your work.

Your beginning salary would vary from one part of the state to the other, depending on the pattern in the community, but would usually range from \$1.60 to \$2 per hour. Upon being awarded the apprenticeship certificate by the Division of Apprenticeship and Training, however, your salary would compare favorably with that of other qualified teachers.

School District and Location _____

1. How many women do you have enrolled in trade and industrial education courses in your district at the present? (Do not include apprenticeship related instruction classes.)

Which classes?	Number	
	Male	Female
Graphic Arts	_____	_____
Mechanical Design	_____	_____
Drafting Mechanical	_____	_____
Other:	_____	_____

2. Do you have any comments to make as to:

A. Why so few women apply (if that is the case) in vocational school courses for skilled trades?

B. How those women who have enrolled have succeeded?

C. Suggestions for skilled occupations that you think women might take up successfully?

D. What might be done to increase the numbers of women in trade and industrial courses in vocational schools?

News

IN
DAY CARE
APPRENTICESHIP.

CHILDREN NEED YOU
EMPLOYERS NEED YOU
SOCIETY NEEDS YOU



WHY?

To begin with, there are more parents working than ever before. Their children require competent, kind and qualified individuals to provide day care; to offer a broad range of experiences to children and to understand and appreciate what makes them tick.

Licensed day care centers are trying to provide this service. The providers are keenly aware that the work they do requires sensitivity and skill. They need men and women - day care teachers and teacher's assistants in whom children, parents and society can place their confidence. These individuals are not super-human, and they grow in skill from their daily experiences with children and from continual exposure to ideas, facts, and concepts about children.

ARE YOU INTERESTED IN BECOMING A DAY CARE TEACHER?

HOW?

This is where the Day Care Teacher Apprenticeship Program in Wisconsin is ready to help. Day care employers - agencies, boards and individual proprietors - are encouraged to employ men and women who can learn to be skilled day care teachers via apprenticeship. The apprentice works with an experienced teacher (journeyperson) and receives weekly related instruction for a two year period. The apprentice earns a salary, and learns from both on-the-job training and from the related instruction. Application for apprenticeship is made by both the employer and employee. A local committee made up of day care proprietors and teachers assists in determining who can have an apprentice as well as who can be one. Both the applicant and the employer must meet minimum entry standards.

WISCONSIN
DEPARTMENT OF INDUSTRY,
LABOR AND HUMAN RELATIONS

Division of
Apprenticeship and Training
P. O. Box 2209
Madison, Wisconsin 53701

WHO DOES WHAT?

Once the application is approved an agreement (indenture) is written between the Division of Apprenticeship and Training, the employer and the apprentice. Salary increases, on-the-job training and related instruction are provided according to the agreement, for a two year period. The employer provides salary and on-the-job training while the Vocational, Technical and Adult Education system is responsible for providing related instruction.

WHERE DO FINANCIAL AIDS ORIGINATE?

In many cases employers are eligible for reimbursements and for a tax credit of 20% of wages paid in the first year of employment of the apprentice. The Work Incentive (WIN) and Jobs Optional Programs (JOPS) are the funding sources. WIN enrollees are encouraged to consider apprenticeship as a means of attaining their employment goals.

AFTER APPRENTICESHIP?

The graduate apprentice may be retained as a valuable, experienced staff member (journeyperson) who has had broad training and exposure to the intricacies involved in providing day care services.

WHO BENEFITS?

The apprentice has recognition and a career.
 The employer has a built-in training program.
 The children thrive - learn and grow.
 And society can say "thanks".

For more detailed information, write or call:

Dept. Of Industry, Labor and Human Relations
 Division of Apprenticeship & Training
 310 Price Place, Box 2209
 Madison, Wisconsin 53701
 (608) 266-3331

or contact any of the
 following apprenticeship
 offices:

APPLETON OFFICE
 1825 N. Bluemound Dr.
 Appleton, WI 54911
 (414) 739-1423

KENOSHA OFFICE
 3520 30th Avenue
 Kenosha, WI 53140
 (414) 658-4371

SHEBOYGAN OFFICE
 843 Jefferson Ave.
 Sheboygan, WI 53081
 (414) 458-4183

EAU CLAIRE OFFICE
 620 W. Clairemont, Ave.
 Eau Claire, WI 54935
 (715) 834-3171

LACROSSE OFFICE
 6th St. Vine to Pine
 Lacrosse, WI 54601
 (608) 782-6238

SUPERIOR OFFICE
 805 Belknap St.
 Superior, WI 54880
 (715) 394-6556

GREEN BAY OFFICE
 200 S. Broadway
 Green Bay, WI 54303
 (414) 435-6343

MILWAUKEE OFFICE
 819 N. Sixth Street
 Milwaukee, WI 53203
 (414) 224-4398

WAUSAU OFFICE
 1000 Schofield Ave.
 Wausau, WI 54401
 (715) 675-3331

August 15, 1972

APPENDIX I

_____ Office Number
 Project 552
 September, 1972

University of Wisconsin-Extension
 Wisconsin Survey Research Laboratory

WOMEN IN APPRENTICESHIP

1. We're interested in how people find out about apprenticeship training programs. Who first suggested apprenticeship training to you?

_____ NAME _____ TITLE OR RELATIONSHIP

2. Approximately what month and year was this? (MO.) _____, 19__

3. What was the one main factor that led you to become an apprentice?
- _____
- _____

4. You may have already told me, but which one of the factors I'll read was strongest in helping you to decide to become an apprentice? (READ LIST; CHECK ONE)

___ A. Financial security

___ B. Interest in gaining trade skills

___ C. Someone else thought it was a good idea

___ D. To be able to move from one place to another

___ E. To get a recognized certificate

___ F. Other: (Specify) _____

5. Thinking back, how would you rate your initial expectations of the apprenticeship program . . . were they high, moderate, or low?

/High/

/Moderate/

/Low/

/Didn't care/

6. Had you had any general work experience in the occupation before you became an apprentice?

/Yes/

/No/

7. Had someone in your family or a friend been an apprentice?

/Yes/

/No/
 (TO Q 8)

7a. Who? _____ (RELATIONSHIP)

Interviewer: _____ Date: _____ Sample #: _____

8. Did you meet any resistance, by that we mean criticism or unfavorable comments and lack of cooperation from your family, friends, or co-workers when you first decided to become an apprentice?

/Yes/ /No/
 ↓ (TO Q 9)

8a. Please explain what the resistance was and who it came from? _____

9. While you were an apprentice, did you generally have friendly daily relationships with co-workers?

/Yes/ /No/
 (TO Q 10) ↓

9a. In what way were they not friendly? _____

10. At the time you began apprenticeship, could you financially have afforded full-time schooling?

/Yes/ /No/

11. What was your beginning salary as an apprentice? \$ _____ per _____, or _____

12. Were you satisfied with this salary? /Yes/ /Depends/ /No/

13. How did this beginning salary compare with any previous salary you had received... was it higher, the same, or lower?

/No previous work/ /Higher/ /Same/ /Lower/

14. Were there periodic raises? /Yes/ /No/
 ↓ (TO Q 15)

14a. Were you satisfied with these raises? /Yes/ /Depends/ /No/
 (TO Q 15) ↓ ↓

14b. In what way were you dissatisfied? _____

15. Was a skilled person or one of journeyman rank working closely with you?

/Yes/ /No/
 ↓ (TO Q 16)

15a. Was the journeyman-apprentice relationship satisfactory? /Yes/ /No/
 (TO Q 16) ↓

15b. In what way was it unsatisfactory? _____

Project 552

3.

16. Other than a journeyman, was there ever a shop manager or supervisor at the employment site who worked with you?

/Yes//No/

17. Did you have satisfactory communication with your manager or supervisor?

/Yes/

(TO Q 18)

/No/

17a. Why not?

18. Did you receive fair treatment from your employer as far as sick leave, fringe benefits, and so forth?

/Yes/

(TO Q 19)

/No/

18a. In what way did you not?

19. Were other females employed on the job site?

/Yes//No/

(TO Q 20)



19a. Were they employed in trade skilled work?

/Yes//No/

20. Were other apprentices present at the job site?

/Yes//No/

(TO Q 21)



20a. About how many other apprentices? _____ (#)

20b. About how many were females? _____ (#)

21. Had there been a female apprentice employed at your job site previous to your employment?

/Yes//No//Don't know/

22. Did you consider the work personally rewarding or not?

/Yes/

(TO Q 23)

/No/

22a. Why not?

23. Were there any physical aspects of the job that you found too difficult ... such as heavy lifting or standing for long hours?

/Yes//No/

(TO Q 24)



23a. Could you explain?

24. As an apprentice, do you feel you were given too many menial and distasteful jobs?

Yes/ No/
(TO Q 25)

24a. What were these jobs? _____

25. Were you satisfied that the "on-the-job training" portion of your apprenticeship actually trained you in the required skills?

Yes/ No/
(TO Q 26)

25a. What was lacking? _____

26. Did your employer fulfill the expectations you had for your progress in gaining skills?

Yes/ No/
(TO Q 27)

26a. What was lacking? _____

27. Who encouraged you the most during your apprenticeship experience?

_____ (TITLE OR RELATIONSHIP)

28. Was classroom related instruction for apprenticeship provided? Yes/ No/
(TO Q 29)

28a. Did you attend this related instruction always, most of the time, only some of the time, or never?

Always/ Most/ Some/ Never/

28b. Who provided the related instruction--your employer, vocational school, consultants, or others?

Employer/ Voc. School/ Consultant/ Other:(Specify) _____

28c. Were you paid while you attended related instruction classes? Yes/ No/

28d. Were you satisfied with the content of the related instruction? Yes/ No/

28e. What was the attitude of the instructor toward you as an apprentice ... was it favorable, neutral, or unfavorable?

Favorable/ Neutral/ Unfavorable/

28f. As you were studying, how would you rate your progress in related instruction...was it above average, average, or below average?

Above/ 236 Average/ Below/

Project 552

5.

29. When you entered the apprenticeship program, did your contract or indenture give you credit for previous schooling? Yes No
30. . . . for previous work experience? Yes No
31. While you were in the apprenticeship program, were you aware of standards governing such things as the length of time spent on various work processes, the obligations of employers, and so forth, as stated in your contract or indenture?
Yes No
 (TO Q 32)
- 31a. While you were an apprentice, were you aware of apprenticeship committees which help to make or change apprenticeship rules or standards? Yes No
32. Do or did you know how or whom to contact in the Wisconsin Division of Apprenticeship Training if you needed help or advice? Yes No
33. Did you ever participate in any activity such as local or state apprenticeship committees where you could voice your opinions about your apprenticeship experience?
Yes No
 (TO Q 34)
- 33a. Do you believe you should have participated in this way? Yes No DK
34. Thinking of apprenticeship programs in general, do you feel that the public highly respects them, somewhat respects, or has a low respect for them?
Highly Somewhat Low No opinion
35. . . . how about employers? Highly Somewhat Low No opinion
36. When you began your apprenticeship, did you expect to complete the program?
Yes No Don't know
37. Have you terminated the apprenticeship program? Yes No
 (TO Q 43)
- 37a. Did you graduate, was your contract suspended, canceled, or what?
Graduated Suspended Canceled Other:(Specify) _____
 (TO Q 38)
- 37b. Would you explain? (ASK: WHY? PROBE FOR DETAILS) _____

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37c. Do you have plans to re-enter apprenticeship in the same occupation within the next 5 years?

Yes No

37d. Are you considering re-entering but in another occupation? Yes No

37e. Would you have continued the apprenticeship program if someone had encouraged you?

Yes No

38. Are you presently employed outside your home or are you a full-time homemaker?

Employed



38a. What is your occupation? (TITLE AND DUTIES)

Full-time homemaker



38d. Are you satisfied with what you are doing?

Yes No
(GO TO Q 39)

38b. What is the name of the company or agency? _____

38c. Is your salary now higher, the same, or lower than when you were an apprentice?

Higher Same Lower

39. Did the apprenticeship training help you to get a job? Yes No

40. Did you ever become discouraged with the apprenticeship program?

Yes



No
(TO Q 41)

40a. Why? _____

41. Do you still have some contact with any of your apprenticeship co-workers?

Yes No

42. Do you still have some contact with your apprenticeship employer? Yes No

43. While you were an apprentice, did or do you have off-the-job social contacts with co-workers?

Yes No

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44. During your apprenticeship, was transportation to and from work a problem for you?

Yes/

No/

(TO Q 45)

44a. Why? _____

45. Would you recommend the apprenticeship system to another woman? Yes/ Dep/ No/

46. Now I have just a few background questions which will help us interpret the results of this survey--first, how old are you? _____(AGE)

47. What is the highest grade of regular school or year of college you completed?

_____(GRADE OF SCHOOL) OR _____(YEAR OF COLLEGE)

48. Beside the apprenticeship, what, if any, other vocational training do you have?

None/, or _____

49. Are you the main support of your immediate family? Yes/ No/

50. Are you presently married, widowed, divorced, separated, or have you never married?

Married/

Widowed/
(TO Q 51)

Divorced/
(TO Q 51)

Separated/
(TO Q 51)

Never married/
(TO Q 51)

50a. Is your husband employed now?

Yes/

No/

(TO Q 50c)

50b. What is his occupation? _____

50c. How did your husband react to your involvement in the apprenticeship program...was it favorable, unfavorable; or didn't he care one way or the other?

Favorable/

Unfavorable/

Didn't care/

51. How many children do you have and what are their ages?

None/, or _____ (#)
(TO Q 52)

(AGES) _____

51a. In order to be employed outside the home, do you require child care for pre-school children?

Yes/

No/

51b. Do you require child care for before or after school hours? Yes/ No/

Project 552

51c. Have you usually had satisfactory child care arrangements while working?

Yes/No/Inap/
(TO Q 52)51d. What were they? _____
_____52. How would you rate your health and stamina during your apprenticeship term . . .
was it excellent, good, fair, or poor?Excellent/ Good/ Fair/ Poor/53. Did you experience any unusual health related difficulties when you were an
apprentice?Yes/No/
(TO Q 54)53a. What were they? _____
_____54. While you were an apprentice, were you absent from work because of pregnancy
related reasons?Yes/No/
(TO Q 55)54a. Did you receive any maternity leave benefits? Yes/ No/55. While you were an apprentice, were you absent from work frequently, occasionally
seldom, or never?Frequently/ Occasionally/ Seldom/ Never/

56. . . . were you late to work frequently, occasionally, seldom, or never?

Frequently/ Occasionally/ Seldom/ Never/57. Have you ever received any public financial assistance such as AFDC, WIN Program
Fund, or other government sponsored programs?Yes/No/
(TERMINATE)

57a. About when was this? FROM: (MO.) _____, 19__ TO: (MO.) _____, 19__

Thank you.

COMMENTS: _____

METHOD OF CALCULATION OF MALE DROP-OUT RATE
WISCONSIN APPRENTICESHIP

For the period 1970-72, the sample is the new admittance of 2,700 males each year into apprenticeship programs. The drop-out total from those enrollees is 900 per year (300 suspensions not included). This gives a drop-out rate of $1/3 = 33\%$. In this model, we assume that all those suspended eventually reapply and so graduate.

Realistically, we must assume around 50% never reapply. About 300 a year are suspended and we therefore assume 150 of those drop out. The drop-out rate becomes:

$$\frac{900 + 150}{2700} = \frac{1050}{2700} = 39\%$$

or if they all drop out:

$$\frac{900 + 300}{2700} = \frac{1200}{2700} = \frac{4}{9} = 44.5\%$$

NOTE: In arriving at the female apprenticeship drop-out rate of 24% for the same period, we necessarily defined all suspensions as drop-outs.

APPENDIX K

Project: 580
March, 1973

University of Wisconsin-Extension
Wisconsin Survey Research Laboratory

WISCONSIN WOMEN IN APPRENTICESHIP
QUESTIONNAIRE FOR CURRENT OR FORMER EMPLOYERS OF APPRENTICES

Name of Person Completing Form: _____

Position: _____

Relationship to Apprentice: _____

Trade or Occupation: _____

Date Questionnaire Completed: _____

The following questions refer to your experience with the apprenticeship program during the period of July 1, 1970 to June 30, 1972. (See attached letter)

1. In what month and year did you first employ female apprentices?
_____ (MONTH), 19 _____
2. Between July 1, 1970 and June 30, 1972, how many female apprentices began your apprenticeship program? _____ (#)
3. Of this number (Question 2), how many completed the program?
_____ None, or _____ (#)
4. How many of these (Question 2) are currently continuing in apprenticeship?
_____ None, or _____ (#)
5. How many of these (Question 2) have dropped (cancelled or suspended)?
_____ None, or _____ (#)
(TO QUESTION 6)
↓
- 5a. For any apprentices with your organization who dropped out of the program (cancelled or suspended), what do you believe to be the reasons for their not completing?

6. Do apprentices in your organization usually have a one-to-one working relationship with either a skilled person or one of journeyperson rank?
_____ Yes _____ No

2. _____
7. Have apprentices expressed job-related needs which a counselor or close work associate could help solve? Yes No
8. Is either a skilled person or journeyman available to apprentices as needed for such counseling? Yes No
9. Have you or anyone in your organization requested guidance for apprentices from an outside agency (WIN, Division of Apprenticeship and Training)?
 Yes No Don't know
10. If you need consultation or guidance in your apprenticeship program, do you know whom to contact in the Division of Apprenticeship and Training?
 Yes No
11. With reference to apprenticeship, have you received consultation from the Division of Apprenticeship and Training when you requested it?
 Yes No Never requested
12. Are you planning to continue to train female employees through apprenticeship?
 Yes No Not sure
13. If any, what are the most positive aspects of your experience with female apprentices? None, or _____

4. If any, what are the most negative aspects of your experience with female apprentices? None, or _____

5. Was related classroom instruction available for your apprentices?
 Yes No
 (TO QUESTION 16)
- 15a. Who was responsible for providing related instruction?
 Vocational system Consultants
 Other (PLEASE SPECIFY): _____

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3.

16. Did all, some, or none of the female apprentices attend related instruction classes? All Some None Classes not available

17. Were you satisfied with the results of the related instruction?

Yes
(TO QUESTION 18)

No
↓

17a. Why not? _____

18. Generally, did the apprentices have a good working relationship with the other employees?

Yes
(TO QUESTION 19)

No
↓

Don't know
(TO QUESTION 19)

18a. Why not? _____

19. Did the female apprentices meet your expectations for on-the-job performance?

Yes
(TO QUESTION 20)

No
↓

19a. In what way did they not? _____

20. Did you receive any funds (for example: Federal Manpower Development Training Funds) because you had (or have) apprentices?

Yes
↓

No
(TO QUESTION 21)

20a. Was the availability of such funds a motivating factor in your participation in on-the-job training for female apprentices?

Yes No

21. Would you hire a female with journeyman standing who was an apprentice with another employer in your trade? Yes Depends No

22. Which of the following describes the average monthly attendance record of the female apprentices? 90% attendance or better About 60% - 80% About 50%

23. In general, were apprentices late to work frequently, occasionally, seldom, or never? Frequently Occasionally Seldom Never

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5.

32. Was (or is) your organization represented on any advisory committees which help to determine apprenticeship standards? (For example: Joint Apprenticeship Committee or Apprenticeship Advisory Committee)

Yes

No

32a. On which committee(s)?

32b. Do you believe your organization should participate on apprenticeship advisory committees?

Yes

No

33. In general, are there any apprenticeships in your organization for which women would not be suitable?

Yes

No

(TO COMMENTS)

33a. Which ones?

34. What is the beginning pay rate for apprentices in your organization?

\$ _____ per _____, or _____

35. What is the journeyman pay rate in apprenticeship positions?

\$ _____ per _____, or _____

Comments, if any. _____

Thank you for your cooperation.

DILHR-APT 4379

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