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In recent years, the Office of Education's educational assistance program for neglected or delinquent children has emphasized academic skills instruction. Older children generally do not continue schooling once outside of institutions; younger children, however, are more likely to return to school following release. The program is unique because it provides assistance annually to over 100,000 children in institutions, but it needs to be reexamined in relation to the broader national issues of juvenile delinquency and child abuse and neglect. Educational assistance may be the top priority for institutionalized youth. Findings/Conclusions: A nationwide survey of institution administrators to determine the importance of academic educational needs in comparison with other problems faced by youth in institutions indicated that the administrators consider academic education important but secondary to mental health needs. Responses to other questions raised concerns as to whether academic educational needs should be the exclusive or top priority of a Federal service program. Funds for the program should be distributed on a more selective basis than at present, but to do so, existing legislation would have to be amended. Recommendations: The Congress should direct the Department of Health, Education, and Welfare and the Department of Justice to examine the appropriateness and/or exclusiveness of academic educational services as the top priority of Federal assistance. Such an undertaking is consistent with the need for a responsive Federal effort to address the national issues of juvenile delinquency and child abuse and neglect. (Author/SC)

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REPORT TO THE CONGRESS

BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

Reevaluation Needed Of Educational Assistance For Institutionalized Neglected Or Delinquent Children

In recent years the Office of Education's educational assistance program for neglected or delinquent children has emphasized basic skills instruction. Older children generally do not continue schooling once outside of institutions; younger children, however, are more likely to return to school following release. Greater progress could be made if funds were distributed more selectively to longer term institutions and those that serve younger children.

The program is unique because it provides assistance annually to over 2,000 institutions, but it needs to be reexamined in relation to the broader national issues of juvenile delinquency, and child abuse and neglect. Educational assistance may not be the top priority for institutionalized youths.



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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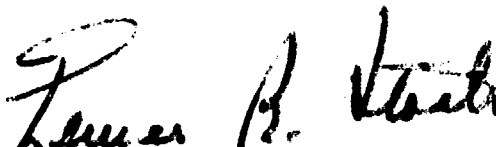
To the President of the Senate and the
Speaker of the House of Representatives

This report describes the problems faced by institutionalized neglected or delinquent youths and suggests ways to enhance the effectiveness of Federal educational assistance made available for them.

The report also questions the appropriateness of academic educational services as the exclusive service or top priority of a Federal service program. The service program is administered by the Office of Education, Department of Health, Education, and Welfare.

Our review was made pursuant to the Budget and Accounting Act of 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Acting Director, Office of Management and Budget; the Secretary, Department of Health, Education, and Welfare; and the Attorney General.


Comptroller General
of the United States

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

REEVALUATION NEEDED OF
EDUCATIONAL ASSISTANCE FOR
INSTITUTIONALIZED NEGLECTED
OR DELINQUENT CHILDREN

D I G E S T

Financial assistance to meet special educational needs of neglected or delinquent youths in institutions is authorized by the Elementary and Secondary Education Act. In fiscal year 1976, \$41 million was provided under title I of the act to assist youths residing in more than 2,000 institutions throughout the country.

This report examines the program from an educational standpoint and how it relates to the broader social issues of juvenile delinquency, and child abuse and neglect.

The legislation expresses the Congress desire that participants make substantial progress. According to the Office of Education, the majority of them are 3 to 4 years below normal expectations in reading and mathematics. Given the severity of these deficiencies, along with the wide range of social, emotional, and behavioral problems that many have, substantial progress will be difficult to achieve. (See pp. 7 to 10.)

The program can be more effective if available funds are concentrated on those youths likely to receive educational services over a longer period of time.

Services under the program are restricted to the period of time that the youths are in residence in an institution. It appears that neglected youths, as a group, have the greatest opportunity to achieve substantial progress because their average residence is more than twice as long as delinquent youths-- about 22 months compared to 10 months. (See pp. 10 and 11.)

Actual exposure to program services is even less according to an Office of Education-contracted study of State institutions. This showed that about 70 percent of youths (1) in institutions for the delinquent and (2) in adult correctional facilities are enrolled in the program for 6 months or less. Conversely, about 60 percent of the students in institutions for the neglected remained in the program for 10 months or more.

Beyond the institution, it appears that the younger a youth is, the more likely the youth will enroll in school following release. GAO's tracking of 170 participants after their release from institutions showed this to be true. The tracking also showed that the younger the youths were, the more likely they would be regularly attending school about 15 months later. (See pp. 12 to 15.)

Older youths, for the most part, appear to be more interested in obtaining employment rather than continuing their schooling. (See pp. 18 and 19.)

Institutions need only meet basic requirements to receive assistance under the program (see pp. 3 and 4.) Funds should be distributed on a more selective basis; but to do so, title I legislation would have to be amended to provide for the awarding of grants by State education agencies on the basis of criteria to be established by the Office of Education. In particular, the criteria would give priority consideration to institutions that serve younger youths and provide services to individual youths over a longer term. (See pp. 22 and 23.)

The Department of Health, Education, and Welfare disagreed with GAO, citing various reasons, e.g., younger children should not be given priority consideration at the expense of older children. (See pp. 23 to 27.)

The criteria should also make provision for addressing the need for adequate transitional services to insure that youths, to the extent possible, receive appropriate educational services following their release from institutions. GAO found that institutions were doing little to assist youths in their transition from the institutions to schools in the community. (See pp. 19 to 21.)

The title I program is the only Federal service program of its kind. Funds are made available annually for institutions to meet a particular need of institutionalized neglected or delinquent youths. Accordingly, GAO conducted a nationwide survey of institution administrators to determine the importance of academic educational needs in comparison with other problems faced by youths in institutions.

Results show that administrators consider academic education important, but second to mental health needs. Responses to other survey questions raise concerns as to whether academic educational needs should be the exclusive service or top priority of a Federal service program. (See pp. 29 to 36.)

The Congress should direct the Department of Health, Education, and Welfare and the Department of Justice to examine the appropriateness and/or exclusiveness of academic educational services as the top priority of Federal assistance. Such an undertaking is consistent with the need for a responsive Federal effort to address the national issues of juvenile delinquency, and child abuse and neglect. (See p. 39.)

The Department of Health, Education, and Welfare was against such an undertaking, but the Department of Justice supported it. (See pp. 37 to 39.)

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ABBREVIATIONS

GAC	General Accounting Office
HEW	Department of Health, Education, and Welfare
OE	Office of Education

CHAPTER 1

INTRODUCTION

Title I of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 241a) authorizes Federal financial assistance to expand and improve educational programs which contribute to meeting the special needs of educationally deprived children. Title I regulations define "educationally deprived children" as children who (1) need special educational assistance to raise their educational attainment to that appropriate for their age and (2) are handicapped.

Title I programs are aimed at several different populations and were funded in fiscal year 1976 at the following levels, excluding special incentive grants and administrative costs.

<u>Target group</u>	<u>Funding</u> (millions)
Educationally deprived children from low-income families	\$1,612
Migrant children	97
Handicapped children	96
Neglected or delinquent children in institutions	<u>41</u>
Total	<u>\$1,846</u>

This report discusses the operation of the program for institutionalized neglected or delinquent children. More specifically, the report examines the program in an educational context, and how the program relates to the broader issues of juvenile delinquency, and child abuse and neglect.

We previously reported on the administration and operation of the program for (1) educationally deprived children from low-income families in December 1975 1/ and (2) migrant children in February 1973. 2/

1/"Assessment of Reading Activities Funded Under the Federal Program of Aid for Educationally Deprived Children" (B-164031(1), Dec. 12, 1975).

2/"Impact of Federal Programs to Improve the Living Conditions of Migrant and Other Seasonal Farmworkers" (B-177486, Feb. 6, 1973).

PROGRAM ADMINISTRATION

The Office of Education (OE), Department of Health, Education, and Welfare (HEW) administers the title I program at the national level. OE is responsible for

- allocating funds,
- developing regulations and guidelines,
- monitoring the program,
- providing technical assistance to States, and
- evaluating and reporting to the Congress on overall program effectiveness.

At the State level, the State education agency's responsibilities include

- applying to OE for funds,
- offering technical assistance,
- approving and monitoring title I projects,
- maintaining fiscal records, and
- preparing evaluations and other reports required by OE or the law.

A State agency--such as a department of corrections, which is responsible for providing free public education to institutionalized youths in State institutions--is eligible to receive funds under section 123 of title I. Also, under section 103, local education agencies are eligible to receive title I funds for children at locally operated institutions. Separate regulations have been developed for each section.

The State and local agencies or applicant agencies are responsible for

- determining special educational needs,
- designing and submitting title I projects to the State education agency for approval,
- implementing and supervising projects,

--maintaining fiscal records, and

--preparing annual evaluations of their title I programs.

In the late 1960s, OE allowed program funds to be used for a wide variety of services, including projects directed toward rehabilitating the children and improving their self-image. In recent years, however, OE has stressed providing basic reading and mathematics instructions, and a recent OE-contracted study has shown that nearly 70 percent of title I funds in State institutions were being spent on reading and mathematics services.

Institutions included in our review generally used title I funds for basic skills instruction. Some, however, provided other services, such as vocational and educational counseling, and diagnostic services. Additional information on the projects we reviewed is provided in appendix I.

The act requires that title I services supplement those educational services already available to institutionalized children. For the most part, institutions for delinquents and adult correctional institutions provide this basic educational program on grounds, while institutions for the neglected often send their youths to public schools. For those institutions we visited, title I services were generally provided on grounds no matter where basic educational program services were provided.

Locally administered institutions eligible to receive title I funds are defined by the regulations as follows: 1/

" 'Institution for neglected children' means a public or private residential facility (other than a foster home) which is operated primarily for the care of at least ten children who have been committed to the institution, or voluntarily placed in the institution pursuant to applicable State law, because of the abandonment of or neglect by, or death of, parents or persons acting in the place of parents.

(45 CFR 116a.2) [Underscoring supplied.]

1/In 45 CFR 116c.2, State institutions are defined somewhat differently, with eligibility requirements including that children be in residence for an average of at least 30 days.

" 'Institution for delinquent children' means a public or private residential facility which is operated primarily for the care of children who have been adjudicated to be delinquent or in need of supervision. The term also includes an adult correctional institution in which children reside." (45 CFR 116a.2) [Underscoring supplied.]

The size of institutions and the age of children in residence vary considerably. The average number of youths under 21 years of age in institutions for the neglected, delinquent, and adult corrections is 70, 86, and 151, respectively. In institutions for the neglected, about 50 percent of the population is under 14 years of age, with about 45 percent being in the 14 to 17 age group. About 85 percent of delinquent youths are 14 or older, with the majority being in the 14 to 18 age group. In adult correctional institutions, the majority of inmates are over 21 years of age; for those under 21 years of age, about 85 percent are in the 18 to 21 age group.

PROGRAM FUNDING

Title I assistance for institutionalized children totaled \$41 million in fiscal year 1976. Funds were allocated for 115,000 children living in more than 2,000 State and locally administered institutions throughout the country. Grants are allocated on the basis of a formula that considers the average per pupil expenditure in the State and the number of eligible children in residence. The table on page 5 provides fiscal year 1976 program data.

	<u>Number of institutions</u>	<u>Number of children (note a)</u>	<u>Funding</u>
State institutions:			
Neglected	28	3,635	\$ 2,084,369
Delinquent	324	29,066	18,090,832
Adult correc- tional	<u>240</u>	<u>12,480</u>	<u>7,284,243</u>
Subtotal	<u>592</u>	<u>45,181</u>	<u>27,459,444</u>
Local institutions:			
Neglected	999	48,706	9,589,198
Delinquent	402	19,571	3,853,122
Adult correc- tional	<u>43</u>	<u>1,549</u>	<u>304,965</u>
Subtotal	<u>1,444</u>	<u>69,826</u>	<u>13,747,285</u>
Total	<u>2,036</u>	<u>115,007</u>	<u>\$41,206,729</u>

a/Represents the number of children used as a basis for allocating funds. (See p. 4.) The number of children actually served is not reported to OE.

Grants for children in the nearly 1,500 locally administered institutions average about \$9,500 per institution, while State institutions received an average grant of about \$46,400. A principal reason for this difference is that when appropriated funds are less than the amounts which local and State agencies are entitled to receive, the law requires that grants to local educational agencies be reduced. Consequently, in fiscal year 1976, State institutions received on the average about \$608 per child, while local institutions received about \$197 per child.

SCOPE OF REVIEW

Our review was made primarily at OE headquarters and in California, Virginia, Kansas, and Pennsylvania. These four States were selected to provide a wide geographical distribution. We did detailed work at 17 institutions for neglected or delinquent children within these States. In consultation with OE, we judgmentally selected the institutions and took into consideration geographical distribution, the type of children served, whether the institution was State or locally administered, and the number of children in residence.

We also tracked the activities of 170 program participants for about a 1-year period following their release from the institutions. The purpose of the tracking was to determine, among other things, (1) if the children returned to school and (2) what assistance they received from the institutions and probation/parole/welfare agencies.

Finally, we sent a questionnaire nationwide to a sample (771 of 2,036) of administrators of State and local institutions, including adult correctional institutions; 562 responses were received. The survey was made to obtain national data on institutions and institutionalized children, and to obtain views on the importance of educational needs as compared to the other needs of the target population. Throughout the report, the questionnaire survey results are projected to within about plus or minus 8 percent for the entire population under study at the 95-percent level of statistical confidence. The questionnaire, along with details of the survey method and design, is shown in appendixes II and III.

CHAPTER 2

MORE SELECTIVE FUNDING

OF PROJECTS NEEDED

Title I legislation expresses the Congress desire that youths participating in the program make substantial progress. However, substantial progress will be difficult to achieve, considering the educational deficiencies of the target population along with the wide range of social, emotional, and behavioral problems that many have.

The effectiveness of the program can be enhanced if available funds are targeted to those youths who are likely to receive a continuum of educational services over a longer period of time. Services under the program are restricted to the period of time that the youths are in residence, and many--particularly delinquents--are in residence a relatively short period of time.

Beyond the institution, it appears that the younger a youth is, the more likely a continuum of educational services will be achieved. Our tracking of 170 program participants after their release from the institutions showed this to be the result. The younger youths were, the greater the likelihood that they would (1) enroll in school after release and (2) be attending school regularly about 15 months later. For the most part, older youths appeared to be more interested in obtaining employment rather than continuing their schooling.

Our review also disclosed that institutions and probation/parole/welfare officers were doing little to assist youths in obtaining a continuum of appropriate educational services following their release. In particular, little effort was made to provide schools that the students would attend after release (receiving schools) with timely information on youths' specific strengths and weaknesses; this information would assist the schools in helping youths successfully adjust after release.

PROBLEMS FACED BY TARGET POPULATION

Neglected and delinquent youths generally have significant economic, social, and psychological problems, as well as long histories of failure and rejection. Also, underachievement in school is a common characteristic.

According to OE, the majority of institutionalized youths are from 3 to 4 years below normal expectations in reading and mathematics. To illustrate the educational deficiency that most delinquent youths exhibit on entering the institutions, several examples of available data are presented below.

- A county in California found that 78 percent of the juveniles institutionalized in its system read below grade level. The county also found that 69 percent of male youths were 3 or more grades below expected grade level, and 47 percent of those tested for intelligence quotient fell within subnormal categories.
- A study of juveniles incarcerated in the California State institutional system for delinquents found that 28 percent were regarded as high school dropouts. Most were between 16 and 20 years of age. Seventy percent were 3 or more years below grade level in reading, and 85 percent were 3 or more years behind in math.
- A State institution in Pennsylvania found that the average age of its delinquent youths was 15, which equates to an expected 9th grade achievement level. However, the average reading and math levels of the youths were grades 6.0 and 5.8, respectively.

A 1972 OE-funded study, performed by the Western Interstate Commission for Higher Education, obtained comments from 381 teachers at 29 correctional institutions in the West. The teachers described, among other things, the students' most significant learning barrier. One constant theme in their descriptions was that institutionalized students were overwhelmingly viewed as being severely disturbed and exhibiting complicated problems, unique needs, and a variety of special characteristics.

Institutionalized neglected youths are often considered "predelinquents" because they exhibit similar behavior, economic, and educational problems as delinquent youths, who generally are older. Our tracking sample of 80 neglected youths, ranging from 7 to 19 years of age, delineates why they were institutionalized:

Uncontrollable behavior	25
Poor or deprived home environment	17
Family problems	15
Abandonment	9
Burglary, robbery, or theft	5
Abuse	4
Emotional disturbances	3
Information not available	<u>2</u>
Total	<u>80</u>

Delinquent youths have, in many cases, had more than one contact with police and the juvenile court system before being placed in an institution; some are institutionalized more than once. Poor economic conditions, broken homes, and a general low level of parental education are frequent descriptions of delinquents' backgrounds. Our sample of 90 delinquents, ranging from 12 to 21 years of age, delineates why they were institutionalized:

Burglary, robbery, theft or possession of stolen property	62
Uncontrollable behavior	10
Assault and/or battery	9
Sale or use of drugs	7
Sexual offenses	1
Information not available	<u>1</u>
Total	<u>90</u>

Behavioral problems can adversely affect educational programs. One particularly graphic example is an institution that experienced a riot the night before our visit which caused the entire population to be locked up. Thus, participants could not attend classes that day. One participant at the same institution had been locked up so often that the teacher could not give him a grade. Some teachers also commented that much classroom time is spent on discipline.

Almost half of the children in institutions served by the program are handicapped according to the results of our questionnaire sent to institution administrators. (See app. II, question 19.) Only those respondents who indicated that they tested for handicapping conditions were considered. The results of the survey, by type of institution, are shown on the next page.

	<u>Institutions serving primarily</u>		
	<u>Adult</u> <u>offenders</u> <u>(under 21)</u>	<u>Neglected</u> <u>children</u>	<u>Delinquent</u> <u>children</u>
	----- (percent) -----		
Physically handicapped	4.1	1.5	1.8
Mentally retarded	12.6	7.4	7.8
Seriously emotionally disturbed	16.9	32.2	32.9
Specific learning disabilities	15.1	19.5	25.0
Other handicapped conditions	<u>17.3</u>	<u>10.9</u>	<u>12.8</u>
Total (note a)	<u>43.4</u>	<u>46.6</u>	<u>48.9</u>

a/The total does not equal the sum of the parts because some children have more than one type of handicap.

The data shows that the most prevalent type of handicap is serious emotional disturbance. Handicaps classified as "other" indicated a wide range of problems, with the most frequent ones cited being related to mental health impairments.

EXPOSURE TO TITLE 1 SERVICES OFTEN LIMITED

According to OE, there is little or no reliable information on the extent of the program's impact on academic achievement. ^{1/} Nonetheless, it appears that the target population, by its very nature, is an extremely difficult group to teach.

Despite common problems among youths and the lack of information on achievement, certain youths have a greater opportunity to make substantial progress than others, particularly those that receive services over a longer period of time. Program services are available to youths only during the time they reside at an institution, and the period of time varies significantly. Generally, for those institutions we visited, neglected youths on the average (23 months) were institutionalized nearly two and one-half times longer than delinquents (10 months).

^{1/}OE has underway a national impact evaluation for State institutions, which is expected to be completed in the spring of 1979. As part of this effort, steps are also being taken to strengthen evaluations for State institutions.

Our nationwide questionnaire of a sample of institution administrators substantiated the length of stay determined by our fieldwork. The average length of stay for institutions serving primarily delinquent youths is only 9.7 months, as compared to institutions for the neglected, where the average stay is more than twice as long--22.4 months. For youths (under 21) residing in adult correctional institutions, the average length of stay is 14.3 months. Also, for about 10 percent of the respondents--most of whom stated that they served emotionally disturbed youths--the average length of stay was 12.4 months. In estimating the average length of stay, questionnaire respondents were asked not to include those youths who were institutionalized less than 30 days. Therefore, the average length of stay is probably somewhat less than that discussed above.

Projecting the questionnaire responses nationally shows that there are about 730 institutions in which the average length of stay is 1 year or less, and about 310 institutions in which the average length of stay is 6 months or less. Most of these are institutions for delinquents.

An OE-contracted study dated September 1977 indicates that actual exposure to program services, as opposed to length of stay, is relatively short for many program participants. The study, which was based on a survey of State institutions, showed that about 70 percent of program participants in institutions for delinquents and in adult correctional facilities are enrolled in the program for 6 months or less. Conversely, about 60 percent of program participants in institutions for the neglected remained in the program for 10 months or more.

UNSUCCESSFUL RETURN TO SCHOOL AND COMMUNITY

Our tracking of program participants after their release from institutions showed that most had an unsuccessful adjustment to school and/or the community. However, the younger the youths were, the better they appeared to adjust.

The tracking was undertaken for several reasons. First, it provides insight into the payoff of rehabilitative/treatment efforts as a whole. Second, from an educational standpoint, the extent to which schooling continues after release has an important bearing on the amount of progress participants will ultimately make. Finally, many educators believe that if educational reenforcement is not received following release, gains realized in institutions may be lost.

Participants selection and methodology

Ten former program participants were selected from each of the 17 institutions we visited. Ninety youths were from institutions for the delinquent, and the remaining 80 were neglected youths. The participants selected were the last 10 released from each of the institutions prior to March 1, 1975.

The March date was selected to coincide with the timing planned for our fieldwork which, for the most part, was completed in April 1976. Beyond this there were other considerations. Generally, the probation/parole/social welfare system has knowledge of the participants' whereabouts and activities for about 1 year after release. An earlier date, therefore, would probably have caused difficulty in locating and obtaining information on the participants. A later date, such as May or June or during schools' summer recess, would have reduced the likelihood that the participants would return to school immediately following release--a critical time in the participant's transition from the institution. An even later date, such as September or October 1975 would have significantly reduced the period of activity covered by our tracking.

In determining the activities of participants after release, we examined available records and talked with (1) institution officials, (2) parole/probation/welfare officers, and (3) officials of the school to which the participants returned. If a youth was reinstitutionalized or entered a mental hospital at any time after release, we did not examine his or her activities beyond that point. Furthermore, if a youth joined the military or left the State, we did no additional followup because of logistical considerations.

For the 170 participants in our sample, 67 were 16 years of age or older at the time of their release; 54 were either 14 or 15; and 49 were 13 or younger. The vast majority were male.

Tracking results

Following release from the institution, 116 (68 percent) of our sample enrolled in school. Forty-five youths (26 percent) did not enroll. Information on nine youths was not available.

For the youths who did not enroll in school, all but nine were 16 or older. The majority of the 45 youths were

beyond the age for compulsory school attendance. ^{1/} According to the officials we interviewed, the most common reason given for their not enrolling was a lack of interest or outright refusal, as shown by the following table.

Why 45 Youths Did Not
Enroll In School

<u>Reason</u>	<u>Number</u>
No interest in school or refused to enroll	15
Needed to work or obtain job skill	9
Unknown	8
Reinstitutionalized before next school session	5
Transferred to mental hospital	3
Parents did not support school attendance	2
School refused enrollment	2
Left town for fear of life	<u>1</u>
 Total	 <u>45</u>

Nine of the 45 youths received a high school diploma or its equivalent during their stay in the institution. It is questionable, however, just how well prepared the youths were to effectively function in society. Test scores were available for five of the youths; the scores showed that on the average, the youths were nearly 4 years behind grade level, with one youth being as far behind as 7 years. One community officer commented that one of the youths--who was in prison at the time of our fieldwork--lacked the most basic educational skills.

The following comments about the 45 participants illustrate the youths' negative attitudes toward school and give greater insight into the remote probability of their returning to school. The comments are for the most part typical.

^{1/}In most States, the age for compulsory school attendance is 16.

<u>Age at release</u>	<u>Comments</u>	<u>Source</u>
15	"A real problem is, and has been, school. I am afraid there will be much more trouble if an academic career is pursued."	Institution official
14	"History of beatings by drunken step-father. Attended summer school for a couple of weeks then dropped out because he could not stand it. Kicked out of a subsequent school for truancy, marijuana, and belligerent behavior. He was put on probation by his mother because she could not control him."	Social worker
14	"No trouble except he did not attend school."	Social worker
18	"Between the ages of 8 and 17, this youth was brought to the juvenile court 25 times. Arrests included burglaries, shopliftings, possession of stolen property, drugs, drunkenness, beyond control of parents, run-away, and fire setting. "Institution told him that further schooling was hopeless. Youth told officer he would not attend school even if forced to do so. Later sent to State prison for raping and beating a victim."	Institution report Probation officer

As discussed earlier, 116 youths did get enrolled in school some time after their release from the institution. Our tracking showed, however, that only half (58 of 116) were enrolled an average of 15 months later. Furthermore, of the 58 still enrolled, 20 (more than one-third) had poor attendance, which was typically characterized by school officials as "terrible absenteeism," "serious truancy problem," and "61 days absent out of 93 school days." The details of our tracking results are on the next page.

Analysis of Enrollments and
Attendance Frequency About 15 Months
After Release

	<u>Total</u>		<u>Number</u>		<u>Number/age at release</u>		
	<u>Number</u>	<u>Per- cent</u>	<u>Neglected</u>	<u>Delin- quent</u>	<u>16 or over</u>	<u>14 or 15</u>	<u>13 or under</u>
Enrolled:	<u>58</u>	<u>34</u>	<u>38</u>	<u>20</u>	<u>7</u>	<u>21</u>	<u>30</u>
Regular attendance	38	22	27	11	5	8	25
Poor attendance	20	12	11	9	2	13	5
Not enrolled:	<u>90</u>	<u>53</u>	<u>24</u>	<u>66</u>	<u>49</u>	<u>29</u>	<u>12</u>
Total known	<u>148</u>	<u>87</u>	<u>62</u>	<u>86</u>	<u>56</u>	<u>50</u>	<u>42</u>
Status unknown (note a)	<u>22</u>	<u>13</u>	<u>18</u>	<u>4</u>	<u>11</u>	<u>4</u>	<u>7</u>
Total	<u>170</u>	<u>100</u>	<u>80</u>	<u>90</u>	<u>67</u>	<u>54</u>	<u>49</u>

a/The status of 22 youths was not known because they either left the State (11), quit school and had not been heard from again (6), or no information on their activities was obtained (5).

The above table shows that, for those youths 15 or over, only 12 percent (7 of 56) were enrolled in school as compared to 71 percent (30 of 42) of the children 13 or under. Furthermore, 83 percent (25 of 30) of the younger children who were enrolled in school were attending school on a regular basis about 15 months after their release.

Comparing neglected youth with delinquents shows that 61 percent (38 of 62) of the former were enrolled in school while only 23 percent (20 of 86) of the latter were enrolled. Also, 71 percent (27 of 38) of the neglected youths as compared to 55 percent (11 of 20) of the delinquent youths were attending school regularly about 15 months after release.

The foregoing discussed the status of 80 youths about 15 months after release--58 enrolled in school and the status of 22 unknown. The following discusses the status of the remaining 90 youths in our sample who were not enrolled in school about 15 months after release.

In many respects, the status of the remaining 90 youths parallels the earlier results of our tracking. Of the 90 youths, 66 were delinquents and 24 were neglected. More specifically, 33 delinquents were reinstitutionalized as opposed to 12 neglected youths; also, 14 delinquents were idle as compared to only 2 neglected youths. With regard to age, the incidence of reinstitutionalization and idleness increased with the age of the youths. Our tracking results, which are shown below, also give some insight into why initial school enrollment dropped drastically from 116 to 58.

Status of 90 Youths
Who Were Not Enrolled In School
About 15 Months After Release

	<u>Total</u>		<u>Number</u>		<u>Number/age at release</u>		
	<u>No.</u>	<u>Percent of total sample</u>	<u>Neglected</u>	<u>Delinquent</u>	<u>16 or over</u>	<u>14 or 15</u>	<u>13 or under</u>
Back in an institution (note a)	45	26	12	33	23	16	6
Idle, not working, or enrolled in school	16	9	2	14	10	5	1
Working (note b)	10	6	1	9	8	2	0
Receiving vocational training	7	4	1	6	6	1	0
In mental hospital (note a)	6	4	6	0	1	2	3
Missing (note c)	5	3	1	4	0	3	2
In military (note a)	<u>1</u>	<u>1</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>0</u>
Total	<u>90</u>	<u>53</u>	<u>24</u>	<u>66</u>	<u>49</u>	<u>29</u>	<u>12</u>

a/ Because we did not track these youths after they reached this status, it is possible that the above status may have changed at the time of our fieldwork.

b/ Jobs included: gas station attendant, busboy, trash collector, and janitor.

c/ These youths were still under the court's jurisdiction, but their whereabouts were not known.

The table on the previous page shows that at least 45 youths--about 26 percent of our sample of 170--were reinsti-
tutionalized. This statistic, although accurate, tends to
underestimate the difficulty that youths had in adjusting to
life outside the institution. Our tracking showed that
98, or 70 percent, of the youths (for which information
was available) experienced a wide range of behavioral
problems following release, as shown in the table below.

Behavioral Problems Experienced
Following Release

<u>Type of problem</u>	<u>Total</u>	<u>Delin- quent</u>	<u>Neglected</u>	<u>16 or over</u>	<u>14 or 15</u>	<u>13 or under</u>
Burglary, robbery, or theft	41	32	9	21	15	5
Truancy or school suspension	16	8	8	4	6	6
Assault and/or battery	11	9	2	3	7	1
Running away	9	1	8	-	2	7
Arrested (crime unknown)	6	5	1	2	4	-
Uncontrollable behavior	4	2	2	2	-	2
Unspecified delin- quent activities	3	3	-	1	2	-
Sexual offenses	3	2	1	2	1	-
Sale or use of drugs	2	1	1	2	-	-
Traffic warrant for arrest	2	2	-	2	-	-
Illegal use of alcohol	<u>1</u>	<u>1</u>	<u>-</u>	<u>-</u>	<u>1</u>	<u>-</u>
Total with problems	<u>98</u>	<u>66</u>	<u>32</u>	<u>39</u>	<u>38</u>	<u>21</u>
Total no problems	<u>42</u>	<u>19</u>	<u>23</u>	<u>16</u>	<u>8</u>	<u>18</u>
Total known	<u>140</u>	<u>85</u>	<u>55</u>	<u>55</u>	<u>46</u>	<u>39</u>
Total unknown (note a)	<u>30</u>					
Total	<u>170</u>					

a/The officials we interviewed did not know if the youths were having any problems or not.

The data on page 17 shows that 78 percent (66 of 85) of the delinquent youths experienced problems as compared with 58 percent (32 of 55) of the neglected children, and generally, problems of delinquents were more serious. The age group appearing to have more difficulty was the 14-15 year olds; 83 percent (38 of 46) experienced some type of behavioral problem. The group having the fewest problems was the youngest--13 or under; 21 of 39, or 54 percent, had some type of difficulty.

As previously discussed, older youths in our sample have been significantly less successful than younger children in continuing their schooling following release. Although the reasons they generally do not continue are many and complex, a major reason, apparently, is that many do not want additional schooling.

In our nationwide survey of institution administrators, we asked the following question to gain broader insight into the ambition of youths over 15 years of age.

"17. What are the interests and aspirations of those juveniles over 15 when they leave your institution? (Check all that apply.)

- 1 Go back to school
- 2 Obtain vocational training
- 3 Obtain gainful employment
- 4 Join the service of the Armed Forces
- 5 Return to their former street life styles
- 6 Other (Specify)"

As expected, most respondents checked more than one of the above choices. Nevertheless, an analysis shows a very strong preference for employment and/or vocational training over going back to school. Thirty percent of the respondents said the youths were interested in obtaining a job and/or vocational training, but not in going back to school. Only 8 percent said that the youths would choose the option of going back to school instead of working and 40 percent of these wanted vocational training along with the education received in school.

Although older youths have a strong preference for gaining employment, our tracking showed most had a difficult time holding a job. Forty-five youths had at least one job some time after their release, but only 10 were employed at the time of our fieldwork. Most of the jobs were unskilled, and common reasons for termination were that they (1) quit, (2) were fired, (3) were layed off, (4) had trouble with the law, and (5) were underage.

INADEQUATE BACK-TO-SCHOOL TRANSITION SERVICES

Much more could be done to help youths receive a continuum of appropriate educational assistance after they leave the institution. In particular, the timely receipt of information on youths' specific academic strengths and weaknesses, behavior problems, etc., can greatly assist receiving schools in implementing effective instructional approaches. Such approaches in turn can have an important bearing on how well youths ultimately adjust to and benefit from the educational process beyond the institution. As stated earlier, most youths were not even enrolled in school or attending regularly about 15 months after their release from the institution.

For the youths in our tracking sample, the institutions initiated some type of contact with a potential receiving school in only 16 percent of the cases. The nature and extent of the contacts varied greatly, e.g., from mailing a transcript to taking on an advocacy role by accompanying the youths to the school and discussing their specific strengths and weaknesses.

Comments made to us by various institution officials illustrate the shortcomings at the institution level. A teacher told us that he had never been consulted about the educational needs of youths at release. Some officials said that plans for educational activities after release are not their responsibility. And finally, another official said that probation officers complain that the institution is encroaching on their responsibilities if attempts are made to arrange postrelease activities.

Probation and parole officers were mainly concerned with community safety and spent a great deal of time on crisis situations, trying to keep juveniles out of trouble. Social workers monitoring neglected children usually directed their efforts toward solving family problems. We found that--for those youths who enrolled in school--probation, parole, and welfare officers (continued)

- discussed academic recommendations with the institutions in 38 percent of the cases,
- transferred records to the school in 12 percent of the cases,
- discussed educational recommendations with school officials in 34 percent of the cases, and
- discussed behavioral problems with school officials in 30 percent of the cases.

The most common reason cited by these officers for not assisting in school enrollment was that it was not their responsibility. Some other reasons given were that youths were not interested in school, planned to seek employment, or ran away.

Officials at the receiving school, in some cases, knew nothing about the youths they were to enroll. According to school officials, common problems were that:

- No advance notice of the enrollment was received.
- Records arrived after enrollment.
- Additional records were needed.
- Records did not specify academic needs.

School officials told us that institutions should provide academic information on the child, such as transcripts and test data, in order to (1) help the school to determine the best teaching methods, (2) identify the student's strong and weak points, and (3) tailor the curriculum to meet the student's needs. Some officials also wanted additional information, including psychological, medical, behavioral, and family background data to help make proper educational placement and provide supportive services to encourage continued studies.

A 1973 study made for Los Angeles County, California, also found many problems with transition services provided students upon release. The study recommended that a comprehensive transition program be developed to provide assurance that the students receive appropriate educational placement in public schools after release.

The study found that the period between students' release from the institution and their return to the community

is critical, and released juveniles often are confronted with problems that are beyond their ability to resolve. In a number of instances, regular schools were not enthusiastic about receiving a former problem student and devoted little energy toward integrating the student into the system. The study also found that (1) some returning students were placed in classes without regard to needs and abilities and (2) a variety of problems during this period could result in students having an overwhelming sense of frustration and futility.

The study disclosed little coordination of institutional efforts to prepare students for return to their communities and no coordination between institutions and regular schools. Probation officers reported difficulties in discussing educational factors with school administrators. The officers were often unable to state in precise educational terms the status, problems, learning, and study habits of returning juveniles. Accordingly, the receiving school administrator usually had only the youth's school transcript for use in selecting a school program.

CONCLUSIONS

The target population is an extremely difficult group to teach. The complexity of its problems, including its severe educational deficiencies, raises a question concerning the extent to which certain institutional programs can possibly assist youths in making educational progress or the extent to which certain youths can benefit from the program.

Many program participants are exposed to title I program services for a relatively short period of time primarily because of their short stay at an institution. Generally, neglected children have an opportunity to make greater educational progress than do delinquents because neglected children are in residence twice as long. Furthermore, most delinquent youths only receive program services for 6 months or less while most neglected youths receive program services for 10 months or more.

Although some progress for all program participants is entirely possible, it would nonetheless seem that certain youths could ultimately realize greater benefits from the program. Specifically, those youths who continue schooling after release from the institution have a greater likelihood of building on and sustaining the gains achieved from the program while in the institution, as opposed to those who do not.

Our review shows that younger children have a much higher incidence of returning to school. Older youths conversely do not, and in many cases are not interested in school; they generally appear more inclined towards obtaining a job. Furthermore, many older youths have a greater tendency to get into trouble with the law and are often reinstitutionalized.

Relating the factors of age and length of exposure to program services shows that the bulk of available program resources go to those youths and institutions where a continuum of educational services is least likely to be achieved. Institutions serving delinquent children receive nearly twice the funding that institutions for the neglected receive. Concerning age, the great majority of younger children are in institutions for the neglected, which receive about \$11.7 million or only 28 percent of all program funding.

What then can be done to enhance the effectiveness of the program? For the most part, it seems that factors discussed above are beyond the control of educators. The relatively short exposure to program services is determined primarily by the short period of stay in the institution. The length of stay, in turn, is governed principally by factors which are extraneous to the educational process, e.g., the length of sentence, resolution of behavioral and family problems, location of suitable foster parents, etc.

In comparison, providing older youths a continuum of educational services following release would seem to be a factor that educators could possibly address. At the same time, however, their task would be extremely difficult. How can educators, for example, deal with a situation where a youth beyond the compulsory school age simply will not attend school, or how can an educator address the problems created by a youth returning to crime or the peer group with which the youth chooses to associate?

Legislative changes would be needed to bring about a more effective use of program funds. Under the present legislation, funds are allocated for institutions without considering the extent to which they can possibly meet the children's educational needs or the extent to which certain children are likely to benefit from program services. Available program resources are scarce and should be directed at the target population on a more selective basis, with priority consideration given to institutions that provide services over a longer term and serve younger children.

One way to accomplish this is to provide State educational agencies a lump-sum entitlement on the basis of existing funding formulas for children in State and local institutions. This would assure that individual States obtain the same amount of funding for children in State and locally operated institutions that they are now receiving. Once State educational agencies receive their entitlement, individual grants could then be made on a competitive basis by the State agency for the special educational needs of children in institutions who would most likely benefit from the additional services provided.

State educational agencies would select successful applicants on the basis of criteria to be established by the Commissioner of Education. Such criteria should give priority to younger children and those children who receive services over a longer period of time. Also, the criteria should emphasize that adequate prerelease and transitional services be provided. Such services would provide greater assurance that the children receive a continuum of appropriate educational services following their release from the institution.

Presently, grant funds are generally expected to be expended during a 1-year period. Under the proposed arrangement, individual grants should be permitted to cover a period greater than 1 year, in those cases where program participants are likely to be in residence beyond such a period. Grants made in this way would (1) eliminate the administrative burden that would be created if successful applicants had to compete every year and (2) would provide assurance that institutions would receive sufficient funds to cover the period that the youths are likely to be in residence.

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To accomplish the foregoing, recommended revisions to section 123 of title I, along with other necessary technical amendments, are presented in appendix IV. Also, for comparison purposes, section 123 of title I, as it is presently authorized, is shown in appendix V. It should be noted, however, that the recommended course of action should be considered not by itself but also in light of the findings discussed in chapter 3 of this report.

AGENCY COMMENTS AND OUR EVALUATION

HEW did not agree with our proposal that program funds be distributed on a more selective basis. HEW believes that neglected children should not be given priority in the provision of services at the expense of delinquent youths and that delinquent youths have the greatest educational needs.

HEW, in effect, has stated that delinquent youths should be given funding priority because they have the greatest educational needs. The question of who has the greatest need, however, is a very difficult one. Delinquent youths are generally older and, therefore, frequently further behind in grade level than neglected children; and for this reason, an argument could be made that they should receive priority in the provision of services. At the same time, an equally valid argument could be made that younger children should be given priority for the simple reason that they are young. In essence, why should they have to wait until they are older and further behind grade level before they receive priority attention? It may be better to intervene at an earlier age.

Regardless of which group it is decided has the greatest need, the point of the report is that neglected children tend to have a greater opportunity to make substantial progress than delinquents because the former are exposed to program services over a much longer period of time. Furthermore, younger children are more likely to continue their schooling after release from an institution.

The report does not argue for increased assistance per se for neglected children at the expense of delinquent youths, although neglected children generally would tend to receive a larger share of program funds under our proposal. There are short-term institutions for the neglected, and there are neglected youths who are older. Our proposal makes no distinction between neglected or delinquent youths; the point is that priority should be given to younger children and longer-term institutions.

HEW states that the program may be the "last chance" for older youths, and this may be a reason for not giving priority consideration to younger youths. It would appear to us that the "land of opportunity" is outside the institution and not within. For example, other Federal programs exist which provide educational and training opportunities, such as adult education, vocational rehabilitation, and programs under the Comprehensive Employment and Training Act.

HEW states that the average length of stay for delinquents in an institution (10 months) is sufficient time to benefit from the program. HEW states that:

"According to the report * * *, an average length of stay for delinquent youths is about 10 months. For a youth confined to an adult correctional institution, the average stay

is over 14 months. The two groups tend to be the oldest children served by the program and represent 72 percent of Title I expenditures. GAO recommends that older youth, because they generally are institutionalized a shorter period of time and thus receive less program exposure than younger youth, be given a lower priority in receiving services.

"If one compares the two averages cited above with the length of a regular school year, it appears that more than an academic year of instructional exposure is available to these older students. Considering that the instruction of children in regular schools is disrupted annually, it seems that the average institutionalized, delinquent child (who is also probably older than the average neglected child) has enough exposure time to benefit from a Title I program. Again, for many of these children, this may be the 'last chance' to receive this type of service."

The answer to how much time is needed to benefit from the program is one of definition and degree; presumably, a youth could "benefit" with as little as 1 week's participation. Furthermore, the answer as to what "substantial progress" is (the desired effect on program participants intended by the Congress) is also one of definition and degree. We did not attempt to define either "benefit" or "substantial progress;" our position is that the longer the exposure to program services, the more likely the benefits to be derived or the progress made will be greater.

HEW's comparison of institutionalized delinquent youths with children in regular schools is hardly valid. First of all, children in regular schools more than likely will return to school the following year (most title I programs in regular schools are targeted at children in kindergarten through grade 6). Older institutionalized youths more than likely will not return to school. Secondly, the two groups are not comparable considering the wide range of problems that institutionalized delinquents have.

Finally, although HEW is correct in citing the average length of stay for delinquents as 10 months, OE's recently completed survey of State institutions shows that most delinquents' actual exposure to program services is 6 months or less.

HEW states that:

"Presently, grant funds are generally expected to be expended during a one year period. Under the proposed arrangement, individual grants should be permitted to cover a period greater than 1 year, in those cases where Title I participants are likely to be in residence beyond such a period.

* * * * *

"It seems this suggested multiple-year funding would be inconsistent with the Department's view that Title I services are to be tailored to the individual needs of the children served. Since participants change from year to year and annual needs assessments are required (including the identification of those most in need in local institutions), multi-year projects for all Title I grantees would be inappropriate. Secondly, under Section 412(b) of the General Education Provision Act, applicant State and local agencies may "carry-over" Title I funds from one fiscal year to the succeeding year providing in effect a two year funding period."

We agree that participants can change from year to year or, for that matter, even more frequently. Regardless of the length of the grant period, institutions should be held responsible for periodically assessing the educational needs of the children and directing program services accordingly.

Designing projects to run for longer than 1 year would not inhibit an institution's flexibility in providing services to children. On the contrary, we believe that multiple-year funding, where appropriate, would provide more flexibility to the institutions and would relieve them of the administrative burden of applying for grants every year.

The carryover provision can provide some flexibility to State and local agencies in expending program funds appropriated for a given fiscal year. However, it does not negate the desirability, under a competitive arrangement, for funding beyond a 1-year period, where appropriate.

HEW states that:

"We would agree that services that facilitate the transition of children from institutions to normal

community life, including school, are needed. We would point out, however, that such transitional services even those that are educational, involve the efforts of other agencies as well as the Title I applicant agencies. Transitional services for children leaving institutions and returning to some form of placement are being provided, although often inadequately, by State and local institutions, as well as other State or local agencies such as parole, probation, and public welfare offices and juvenile courts. To address the need for transitional services intended to insure the child's continued education without attending to his or her needs for other types of community based services is unrealistic.

"In view of the wide variety of agencies currently involved in providing services for youth upon their release from institutions, Title I should not be the vehicle for Federal assistance for the purpose of enhancing those services."

The report points out that the children need assistance to make a successful transition from the institution back to school and that the social services and probation/parole systems are generally preoccupied with other matters. Because of this, we believe that the institutions should provide receiving schools timely information on a youth's specific strengths and weaknesses to help the schools design an effective program of instruction.

We share HEW's concern about the inadequacies in the existing systems. However, we do not believe that this is a good reason for not taking some action to assist the children. Furthermore, what we have proposed--the forwarding of timely information to receiving schools--can hardly be viewed as a significant burden to title I institutions or being outside the scope of the title I legislation.

CHAPTER 3

SHOULD ACADEMIC EDUCATIONAL ASSISTANCE FOR INSTITUTIONALIZED YOUTH BE THE HIGHEST PRIORITY FOR FEDERAL ASSISTANCE?

Chapter 2 examined the program in the context in which it was authorized, that is, as an educational program. This chapter looks at the program in the context of broader social issues.

In 1974 legislation was enacted which underscored the concerns of the Congress and the executive branch that there be a responsive and coordinated Federal effort to address the problems of juvenile delinquency, and child abuse and neglect. Because of these expressed concerns, the many problems faced by the target population, and the fact that the program is the only Federal service program for institutionalized neglected or delinquent children, our review included a comparison of the importance of academic educational needs with other needs of the target population.

Our analysis of responses to our questionnaire sent to a nationwide sample of institutions that receive program assistance showed that while academic educational needs are important, it is questionable as to whether providing services to meet these needs should be the exclusive service or top priority of a Federal service program.

1974 LEGISLATION

Two major pieces of legislation were enacted in 1974 to address the problems of juvenile delinquency, and child abuse and neglect. The first, enacted on January 31, 1974, was the Child Abuse Prevention and Treatment Act (42 U.S.C. 5101). The second, the Juvenile Justice and Delinquency Prevention Act of 1974 (42 U.S.C. 5601) was enacted on September 7, 1974.

Child Abuse Prevention and Treatment Act

The act became law in response to the need for a coordinated Federal effort to assist in solving the complex and nationwide problem of child abuse and neglect. Specifically, with regard to coordination, the law states that

"The Secretary [HEW] shall promulgate regulations and make such arrangements as may be necessary or appropriate to ensure that there is effective coordination between programs related to child abuse and neglect under this Act and other such programs which are assisted by Federal funds."

To carry out the legislation, the act created the National Center on Child Abuse and Neglect as a focal point for Federal efforts aimed at identifying, treating, and preventing the problem. The center was placed under HEW's Office of Child Development.

Juvenile Justice and Delinquency Prevention Act of 1974

According to the Juvenile Justice and Delinquency Prevention Act of 1974, the Congress found that

"* * * the high incidence of delinquency in the United States today results in enormous annual cost and immeasurable loss of human life, personal security, and wasted human resources and that juvenile delinquency constitutes a growing threat to the national welfare requiring immediate and comprehensive action by the Federal Government to reduce and prevent delinquency."

To carry out this critical mandate, the Congress established the Office of Juvenile Justice and Delinquency Prevention within the Law Enforcement Assistance Administration, Department of Justice. The Administration has been given broad authority to carry out the act, which includes establishing overall policies and priorities for all Federal juvenile delinquency programs and activities.

NATIONWIDE SURVEY OF PROBLEMS OF INSTITUTIONALIZED YOUTH

During our fieldwork, few local and State officials told us that educational needs were clearly the highest priority of institutionalized children. The vast majority felt that other needs exceeded or were at least as important as educational needs; those most often cited were social and emotional needs. Also, the program is the only Federal service program of its kind. Funds are made available annually for institutions across the country to meet a particular need of institutionalized, neglected, or delinquent youths.

For these reasons, we sampled the opinions of institution administrators nationwide as to the highest priority needs of the target population. More specifically, our purpose was to examine the appropriateness of providing Federal assistance to meet the academic educational needs of the target population, as opposed to providing assistance to meet their other needs. In brief, our analysis of questionnaire responses shows that, while academic educational services are important, it may be more appropriate for Federal assistance to be focused on other rehabilitative/treatment services.

Methodology

Our survey questionnaire was addressed to the top administrative official at the institution, e.g., the warden or director. These officials were selected because we believed they were in the best position to assess the overall needs of the children and the capability of the institution to respond to these needs. Furthermore, we felt that to address the questionnaire to an individual responsible for providing a specialized service (such as vocational education) would run a high risk of introducing bias into our survey results.

In the questionnaire, institutional administrators were offered six types of services to consider in addition to academic educational services. These were

- health and developmental services;
- mental health services (social, psychological, psychiatric, and counseling services);
- vocational services;
- family services;
- diagnostic services; and
- drug/alcohol abuse services.

All of the services are common rehabilitative/treatment services found in an institutional setting. The services also cover a broad range of activities, but this was considered necessary, given the broad age range of the target population and the diversity of its problems.

To test the appropriateness of academic educational needs as the top priority for Federal assistance, we asked institutional administrators six questions. The questions, our rationale for asking them, and the survey results, are discussed below.

It should be noted that our survey results, with a few exceptions, were essentially the same, regardless of (1) whether the institution served adult offenders, neglected, or delinquent children; (2) what organization (e.g., State or local) administered the institution; and (3) the age or sex of the youths that the institutions served. Consequently, results displayed in the following section do not give consideration to these factors.

A copy of the questionnaire is shown in appendix II. We also included additional information on our methodology and the technical aspects of our survey in appendix III.

Survey results

Question No. 11

This question focused on the high priority needs of institutionalized youth. The results show that mental health services and academic educational services were rated by institutional administrators as being the highest priority needs of institutionalized youths, with the former being rated somewhat higher than the latter. The table on the next page shows our survey results. The highest possible rating for each of the services is 5; that is, if all respondents checked "essential" for a particular service, it would be rated "5."

Relative Importance of Needs
of Institutionalized Youth

<u>Needs</u>	<u>Importance rating</u>	<u>Rating score</u>
Mental health services: social, psychological, psychiatric, and counseling	Essential	4.8
Educational (academic) services	Essential	4.7
Family services	Very important	4.2
Diagnostic services	Very important	4.0
Health and develop- mental services	Very important	4.0
Vocational services	Very important	4.0
Drug/alcohol abuse services	Moderately important	2.9

The above table shows that the relative importance of the services falls into three distinct categories. Mental health and educational services, with ratings of 4.8 and 4.7, respectively, are in one category and are the highest priority needs of the target population. The next grouping, all of which are considered "very important" needs, consist of family, diagnostic, health and developmental, and vocational services. The rating for all of these services is tightly clustered around a score of 4.0. And finally, drug/alcohol abuse services, with a rating score of 2.9, are in an independent class and are felt to be the least important.

Question No.12

Because our field testing of the questionnaire showed that administrators were often inclined to rate many services as essential in question number 11, we then asked them to rank those services in order of importance, i.e., the most important would be ranked "1," the second most important would be ranked "2," etc. The ranking of mental health and educational services shows that the former is clearly felt to be the highest priority need of the target population. Mental health

services received a score of 1.3, while educational services received a score of 2.2

Question No.13

Institutions face many obstacles in attempting to address the problems of youth. Some of the more common are a lack of resources; relatively short periods of incarceration; undeveloped state-of-the-art for treating and rehabilitating youth; and underlying causes often being external to the institution, i.e., the schools, home, community, etc.

To obtain an idea of how serious each of these obstacles is in attempting to meet the needs of the youths, we asked the administrators to rank them. Our concern was to determine those needs of youths where the lack of resources or money is perceived to be the greatest obstacle. Conversely, the concern was also to identify those needs where money or resources would tend to have a lesser impact because other obstacles were felt to be more serious.

Our survey results, which are presented below, show the seriousness of lack of money or resources as an obstacle. If money was felt to be the biggest obstacle by all respondents in meeting a particular need, it would then receive a rating of 5, which is the highest possible score; 1 is the lowest possible score.

<u>Seriousness of money as an obstacle to</u>	<u>Rating</u>
Correcting for lack of basic vocational training or job-entry-level skills	4.7
Providing appropriate diagnostic services	4.7
Correcting mental health problems	4.6
Correcting health and development deficiencies	4.5
Correcting deficiencies in basic educational skills, i.e., reading and math	4.0
Resolving home, environmental, and family problems	3.9
Providing appropriate drug and alcohol services	3.9

The above table shows that the seriousness of money as an obstacle falls into basically two distinct categories.

The first four problem areas listed are those where money is likely to have the greatest impact. The last three problem areas listed, which include academic educational problems, are the problem areas where money is likely to have the least beneficial impact because of other obstacles faced by the institution.

Question No.14

In this question, we asked institutional administrators to rate the adequacy of the services that were being provided to the youths. The rationale was to identify those services which were in need of improvement. The results are shown below. The possible ratings range from "very inadequate" (4.5 to 5.0) to "more than adequate" (1.00 to 1.49).

Extent to Which Needs Are Being Met

	<u>Rating</u>	<u>Rating definition</u>
Vocational services	3.2	marginal
Family services	3.1	marginal
Drug/alcohol abuse services	2.9	marginal
Diagnostic services	2.4	adequate
Mental health services: social, psychological, psychiatric, and counseling services	2.2	adequate
Educational (academic) services	2.1	adequate
Health and developmental services	1.9	adequate

The above table shows that the adequacy of vocational, family, and drug/alcohol services are considered by institutional administrators to be "marginal." The other four services, including academic educational services, were considered to be adequate.

Question No.15

In this question, we asked the administrators the extent to which they could solve youths' problems, if sufficient

resources were available. The results are shown below. The ratings range from "little or no extent" (1.00 to 1.49) to "very great extent" (5.0 to 5.4).

Extent to Which Problems Could be Solved
If Sufficient Resources Were Available

<u>Problem areas</u>	<u>Rating</u>	<u>Rating definition</u>
Health and development deficiencies	3.9	Great extent
Mental health problems: psychological, psychiatric, social, etc.	3.9	Great extent
Deficiencies in basic educational skills	3.9	Great extent
Lack of basic vocational training or job-entry-level skills	3.7	Great extent
Inadequate diagnostic screening	3.7	Great extent
Home, environmental, and family problems	2.9	Moderate extent
Drug and alcohol problems	2.9	Moderate extent

With the exception of home, environmental, family, and drug and alcohol problems, administrators felt that they could accomplish a great deal if sufficient resources were available.

Question No.20

Because all of the institutions in our sample received program assistance, it could be argued that institutions would have possibly rated educational services differently had they not been receiving this assistance. To check this possibility, we also asked institutional administrators how they would allocate Federal funds among rehabilitative/treatment services if no strings were attached concerning how the funds should be used. The results are shown on the next page.

How Federal Funds Would Be
Expended if No Strings Were Attached
Concerning Their Use

<u>Expenditure area</u>	<u>Percent</u>
Mental health services: social, psychological, psychiatric, and counseling	24.6
Education (academic) services	19.0
Family services	15.6
Vocational services	15.2
Health and developmental services	10.9
Diagnostic services	7.8
Drug/alcohol abuse services	5.0
Other	<u>1.9</u>
Total	<u>100.0</u>

The results support our earlier findings. That is, educational services, with 19.0 percent of the resources, is second to mental health services, where institution administrators would allocate 24.6 percent of Federal funds.

CONCLUSIONS

The title I program was authorized in recognition of the fact that institutionalized neglected or delinquent children have special educational needs, as well as children attending classes in school systems throughout the country. The program was not specifically created as part of an overall strategy to address the social problems created by juvenile delinquency, and child abuse and neglect, but nonetheless, today it is a significant part of Federal efforts to deal with these social issues, particularly in an institutional setting. The program is the only Federal service program for institutionalized neglected or delinquent children.

Given the findings of our review and the 1974 legislation that emphasizes the Congress and executive branch's desire for a responsive Federal effort to address juvenile delinquency, and child abuse and neglect, the services provided under the program should be examined in terms of their responsiveness to these issues. With the scarcity of resources, it is important that funds be expended in a manner which will do the most good, and the type of services provided should be determined as the result of a conscious examination of the various options available.

AGENCY COMMENTS AND OUR EVALUATION

In our draft report, we proposed that the Secretary, HEW, and the Attorney General examine the appropriateness and/or exclusiveness of academic educational services as the top priority of Federal assistance for institutionalized neglected or delinquent children. HEW disagreed with our recommendation (see app. VI), but the Department of Justice agreed with us. (See app. VII.)

HEW comments

"We do not believe that the joint examination as recommended by GAO would be productive. The recommendation is based upon an analysis of the findings of a questionnaire which, in our opinion, was not broad enough to obtain an accurate picture of the success of the Title I program in institutions. We would further point out that there is an on-going study being conducted under the auspices of the Office of Education. This study is much broader in scope, in that it solicits information not only from administrators, but from program staff and recipients of Title I services, which appears to indicate that the priority assigned to educational services by the Office of Education, is appropriate."

We do not agree with HEW's position that the study would not be productive. Considering such controversial issues as juvenile delinquency, and child abuse and neglect, it is hard to imagine that such a study is not warranted.

The questionnaire survey was not designed to obtain an accurate picture of the success of the program. The survey was designed to gage the relative importance of each of a wide variety of needs of the target population. (See p. 29.)

The ongoing OE study is not broader in scope than the study we have recommended. OE's study intends to

"* * * measure the impact of the title I program on the basic reading and mathematics skills of the participants and on the self-concept of the participants as it relates to gains in achievement."

HEW also points out that neither the legislation nor the regulations require that services under the program be limited to basic skills. HEW states that a wide variety of services may be provided under the program, provided those services are shown to be designed to meet the special educational needs of children in institutions.

Although we realize that other services may be provided under the program, the program as authorized and implemented is basically an education program. Further, as HEW points out, the "wide variety of services" must be shown to be related to an educational goal. The question posed by the report is essentially--Should the thrust of the program be basically education or basically something else?

HEW provided technical comments on our analysis and interpretation of the responses to questions 11, 14, and 20 on the questionnaire survey. HEW concludes that we have introduced a bias into the questionnaire survey results. HEW's conclusion appears to be based on a belief that the top administrator may not be the most unbiased person to report on the needs of the institutionalized children and the resources available to the institution. HEW also bases its conclusion on its interpretation of the responses to the three questions mentioned above.

In our opinion, the top administrator is the single person in the best position to provide an unbiased broad perspective related to the needs of the children served by an institution and the resources available to the institution. In addition, the responses to questions 11, 14, and 20, in our opinion, clearly point out that academic needs, although important, are not the only needs of institutionalized children and may not be their top priority need.

Department of Justice comments

The Department was supportive of our recommendation. It also felt that the Coordinating Council on Juvenile Justice and Delinquency Prevention would be the appropriate forum

for conducting the study. The Council was established by the Juvenile Justice and Delinquency Prevention Act of 1974.

We have no objection that the Council undertake the study; our principal concern is that it be done.

RECOMMENDATION TO THE CONGRESS

We recommend that the Congress direct the Secretary, Department of Health, Education, and Welfare, and the Attorney General to examine and report on the appropriateness and/or exclusiveness of academic educational services as the top priority of Federal assistance for institutionalized neglected or delinquent children. More specifically, the organizations to participate in such an undertaking should include OE, the National Center for Child Abuse and Neglect, and the Office of Juvenile Justice and Delinquency Prevention under the Law Enforcement Assistance Administration.

If it is determined that an academic thrust is not appropriate as the exclusive or top priority, then the thrust of the program should be changed accordingly. Furthermore, if it is felt that the desired thrust is not within the legal bounds of title I legislation, the report to the Congress should include legislative recommendations, if such action is needed to bring about a more responsive program to assist institutionalized youths.

DESCRIPTIVE INFORMATION ON
INSTITUTIONS INCLUDED IN REVIEW

<u>Institution</u>	<u>Number of children</u>	<u>Average age of children</u>	<u>Average months' stay</u>	<u>Title I program</u>
CAMP PAIGE, Laverne, Calif. An institution for juvenile delinquents operated by the county probation department; academic school on grounds, including a special program using audio-visual equipment to teach reading and math to nontitle I students. Eight living units supervised by probation officers.	94	15	7	Reading and math teachers for children achieving below the 5th-grade level; educational aftercare counselor who assists former participants back into the community.
YOUTH TRAINING SCHOOL, Chino, Calif. A State-operated institution for older, "hard core" delinquents; three residential halls (400 wards per hall, each with its own cell); school on grounds provides primarily vocational education, with academic courses available.	1,140	20	18	Remedial teachers in reading, language, and math; typing lab; bilingual instruction and vocational orientation lab. Participants must be below 9th-grade level and/or have a referral from vocational instructor; psychologist, 50 percent title I funded; supervisor and stenographer.
SACRAMENTO CHILDREN'S HOME, Sacramento, Calif. A private institution for severely emotionally disturbed and/or neglected children; residential therapy programs including an intensive treatment center for the most severe cases and group homes in the community. Most children attend an on-grounds school for the educationally handicapped operated by the county. Psychiatric, speech therapy, social work and other supporting programs available.	109	14	18	One resource specialist who supervises remedial reading tutors for 10 children (tutors financed under a Federal College-Work-Study Program) and performs vocational testing, and makes vocational educational placement and employment referrals.
LEEROYS BOYS HOME, Laverne, Calif. Private institution for neglected and emotionally disturbed boys. Most children attend a local public school, however, there is a county-operated on-grounds school for the educationally handicapped. Individual and group therapy; cottage living quarters; and group homes in the community.	81	13	13	One part-time tutor, 3 hours per night, available to any ward needing help. One full-time school liaison worker who checks attendance at local schools, tutors, and administers a behavior modification program in which title I funds buy candy, toys, and other rewards for academic and behavioral achievements.

<u>Institution</u>	<u>Number of children</u>	<u>Average age of children</u>	<u>Average months stay</u>	<u>Title I program</u>
<p>SACRAMENTO COUNTY BOYS RANCH, Sacramento, Calif.</p> <p>An institution for juvenile delinquents operated by the county probation department. Rural "working ranch" setting in which youths perform all maintenance as work experience. Youths work half-day and attend half-day academic classes on grounds. Medical, psychological, religious, and other special services available.</p>	80	16	5	Remedial reading teacher, 50 percent title I funded, serves 30 youths who are achieving below the 6th-grade level. Math teacher 30 percent title I funded, serving youths needing math credit for high school graduation. Partially funded field trips for all youths; testing material.
<p>LOYSVILLE YOUTH DEVELOPMENT CENTER, Loysville, Pa.</p> <p>State-operated institution for juvenile delinquents. Treatment cottages; on-grounds school operated by local school district provides academic and vocational education; individual, group, and family counseling.</p>	100	15	10	Remedial math teacher for youths with the lowest test scores; graphic arts; summer camping program; part of the salary costs of a secretary and retail merchandise training; driver education teacher; equipment purchases; diagnostic and counseling services.
<p>BETHANY CHILDREN'S HOME, Womelsdorf, Pa.</p> <p>A private institution for neglected children. Residential cottages, social services, psychologist, and nurse. Youths attend local public schools for academic and vocational education.</p>	134	15	No diverse	Educational coordinator serves as guidance counselor and in proper school program; tutors in basic subjects; art and craft teacher; summer recreation teacher.
<p>ST GABRIEL'S HALL, Phoenixville, Pa.</p> <p>A private institution for juvenile delinquents. Group living; vocational guidance; professional social services. On-grounds school including academic and vocational technical courses.</p>	170	15	9	Summer half-day sessions taught in reading, language, math, social science, and vocational subjects. All youth participate.
<p>ST. MICHAEL'S SCHOOL FOR BOYS, Hoben Heights, Pa.</p> <p>A private institution for dependent-neglected, and emotionally disturbed boys. Social services; dormitory living; ongrounds school centered around subjects of reading, math, and English.</p>	101	14	14	Teacher aides provide reading assistance individually to all youths for 10 to 30 minutes per day.

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<u>Institution</u>	<u>Number of children</u>	<u>Average age of children</u>	<u>Average months stay</u>	<u>Title I program</u>
LIFELINE CHILDREN'S HOME, Kansas City, Kans. A private institution for neglected children. Group living; recreation; therapy; prevocational education; most children attend public schools. Consultant psychological services available.	31	14	12	Provides school program on grounds for all children who have been expelled or who are failing at public school. The teachers provide instruction in all subjects.
LAKE AFTON BOY'S RANCH, Wichita, Kans. A delinquent detention facility operated by the county juvenile court. County staff provides house-keeping services. On-grounds school provided by local school district; no social, psychological, or guidance services available.	37	15	2	Instruction in basic math and reading skills are provided to all youths for 2 hours each day.
WICHITA CHILDREN'S HOME, Wichita, Kans. A private temporary care facility for dependent, neglected, and abused children. Social worker; counseling. Wards attend local public schools. No psychological services.	43	9	3	Evening reading classes for all children, math classes for those below grade level, and arts and crafts in the summer.
YOUTH CENTER AT TOPEKA, Topeka, Kans. A State-operated institution for delinquents; 11 residential cottages; social workers, psychiatrist, nurses, chaplain; ongrounds academic school operated by the local school district; vocational education (thru Federal vocational rehabilitation program).	190	16	14	Provides teachers in remedial reading, math, social studies, and oral and written communications, 4 teachers' aides; part-time program director. Program serves those with severe academic deficits as determined by tests.
HANOVER LEARNING CENTER, Va. A State-operated institution for younger delinquents stressing academic education. On-ground school providing academic and prevocational classes. Team approach to treatment; medical and recreational services.				Physical education, music, and behavior modification teachers. Materials to support above classes. Participation is by random placement.

<u>Institution</u>	<u>Number of children</u>	<u>Average age of children</u>	<u>Average months stay</u>	<u>Title I program</u>
<p>BEAUMONT LEARNING CENTER, Va. A State-operated institution for older delinquents. On-grounds school providing half-day academic and half-day vocational education programs; behavior modification; cottage living; treatment team approach.</p>	221	16	6	Teachers for human growth and development, math, reading, physical education, general equivalency diploma; and arts and crafts, materials.
<p>VIRGINIA BAPTISTS CHILDREN'S HOME Salem, Va. A private institution for neglected children. Children attend local public schools. Cottage living on grounds; social workers; recreational facilities.</p>	117	15	36	Reading and math tutors available to all wards for 3 hours per week during the evening.
<p>PRESBYTERIAN HOME, INC., Lynchburg, Va. A private institution for neglected children. Children attend local public schools. Primary emphasis on family counseling. Recreation; cottage living; work program.</p>	56	13	45	4th, 5th, and 6th graders performing below grade level are tutored at public school one-half hour per day, 5 days a week in reading and math by a full-time teacher.

QUESTIONNAIRE SENT TO TITLE I INSTITUTIONS

U. S. GENERAL ACCOUNTING OFFICE

SURVEY OF INSTITUTIONS SERVING CHILDREN & JUVENILES

INSTRUCTIONS

The purpose of this survey is to find out what the priority needs of institutionalized children and juveniles are (children and youths under the legal age of 21) and which of these needs institutions can most successfully address. Our ultimate goal is to assist the U. S. Congress in deciding how the Federal Government can best help institutions meet the needs of this population

This questionnaire is designed to be answered by Directors, Superintendents, Wardens or their designees who have an overall view of the institutions' functions and operations. It probably will take only 15 or 20 minutes to complete. Most of the questions can be answered in less than a minute by either checking boxes or filling in blanks.

Be assured that your responses will be treated with the strictest of confidence. The only reason we are asking for respondent and institution identification is in the event we need further clarification and to delete the institution's name from the follow-up procedure scheduled for those who fail to return the questionnaire. In fact, all names of institutions and respondents will be disassociated from this form and all records, as soon as your responses have been analyzed. The respondent's names and the names of their institutions will not be used in this or subsequent reports.

Names are not important to this study, but what you, as a spokesperson for your institution, have to say is. So please give us your most frank and honest assessments. We are most grateful for your cooperation, for we can not make a meaningful report to the U.S. Congress without your assistance and participation.

In answering this questionnaire, you certainly may seek assistance or consensus from key staff or associates on certain questions if you wish. It is important that you provide a reasonable answer to every question. However, we do realize that there may be some instances where the information is difficult to obtain. In these cases, please provide us with your best estimate, rather than delay or fail to respond. Please return the completed form in the self-addressed envelope within 10 days after receiving this questionnaire.

RESPONDENT INFORMATION

(Name and phone no. of person completing form)

(Title of person completing form)

(Address)

FACILITY DATA

1. What type of population do you principally serve? (check one)
 - 1 Delinquent children & juveniles (including status offenders)
 - 2 Adult offenders
 - 3 Neglected children & juveniles (including those dependent and abused)
 - 4 Other (Specify) _____

2. What type of organization administers this institution? (check one)
 - 1 State government
 - 2 County or local government
 - 3 Other: foundation, charity, school, church, etc. (Specify) _____

3. How many children and juveniles is your institution designed, equipped and staffed to serve at any one time?
 _____ (number of children and juveniles)

4. Do you serve males, females, or both?
 - 1 Males
 - 2 Females
 - 3 Both

5. How many full time equivalent staff members do you have?
 _____ (no. of full time equivalent staff members)

6. What is the estimated number of children or juveniles that you usually care for at any one time? (Answer for each appropriate age group)

	Age group	Number of children or juveniles
1	Under 6 years of age	_____
2	From 6 to under 9	_____
3	From 9 to under 12	_____
4	From 12 to under 14	_____
5	From 14 to under 16	_____
6	From 16 to under 18	_____
7	From 18 to under 21	_____
8	Adults over 21 years of age	_____

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7. Do you sometimes keep children or juveniles for a short time (less than 30 days, e.g. for observation, diagnostic or referral purposes)?

1 yes 2 no

If yes, continue; if no, go to 9.

8. About how many children or juveniles do you usually keep for less than 30 days?

_____ no. of children or juveniles

9. What is the average length of stay for children or juveniles in your institution? Exclude those who stay for less than 30 days. Please give us your best estimate for each age group if actual figures are not available.

Age group	Average length of stay in months
1. Under 12 years of age	_____
2. From 12 to under 18	_____
3. From 18 to under 21	_____

10. In general, where are the basic educational services provided (Kindergarden thru grade 12)? (check one)

- 1. On Campus
- 2. Off Campus
- 3. Both on & off Campus
- 4. Not provided

Note: In the following section we are seeking answers to five major questions:

- o-What are the priority needs of the children or juveniles in your institution?
- o-What are your major problems in meeting these needs?
- o-How well are these needs being met?
- o-What needs can you most effectively meet, given the constraint of the institutional setting and an intervention role.
- o-What services are most needed when the children leave the institution.

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11. What are the priority needs of the children or juveniles in your institution? Do not consider whether or not your institution has the capability or authority to address these needs. (Indicate your answers by checking one and only one priority rating column for each row or priority need.)

PRIORITY NEEDS	Priority Rating				
	(1) Of little importance	(2) Somewhat important	(3) Moderately important	(4) Very important	(5) Essential
1. Health and developmental services					
2. Mental health services: social, psychological, psychiatric, and counseling services					
3. Educational (academic) services					
4. Vocational services					
5. Family services					
6. Diagnostic services					
7. Drug/alcohol abuse services					

12. Consider only those needs in question 11 above that you checked as essential. Now rank these essential needs by order of decreasing importance. Do this by selecting the most important of all the needs you considered essential. Rank this 1st by circling. Then do the same for the remaining essential needs, ranking them 2nd, 3rd etc., until you have ranked each of the needs checked as essential. (REMEMBER EACH NEED CAN HAVE ONLY ONE UNIQUE RANKING SCORE. Check for this by making sure you do not have more than one circle in each row or column.)

PRIORITY NEEDS	RANKING						
	1st	2nd	3rd	4th	5th	6th	7th
1. Health and developmental services							
2. Mental health services: social, psychological, psychiatric, and counseling services							
3. Educational (academic) services							
4. Vocational services							
5. Family services							
6. Diagnostic services							
7. Drug/alcohol abuse services							

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13. Rank the following barriers that you face in meeting each specific need area enumerated below. Rank each barrier in order of decreasing seriousness. Do this by selecting the most serious barrier and ranking it first by circling the number 1st. Continue ranking the remaining barriers by circling the numbers 2nd, 3rd, 4th, etc. until all the barriers in the particular need area are ranked. For example if you felt that lack of resources was the most serious barrier to correcting health and development deficiencies you would circle the number 1st in the 1st row under the need area heading. If you felt that the "State-of-Knowledge" was the 2nd most serious barrier to correcting health and development deficiencies you would circle the number 2nd in row 4 of the need area heading. Complete by ranking all the remaining barriers in the need area until all the barriers for each need area are ranked.

I. BARRIERS TO CORRECTING HEALTH AND DEVELOPMENT DEFICIENCIES

	RANKING				
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)	1st	2nd	3rd	4th	5th
2. Relatively brief period of stay in institution.	1st	2nd	3rd	4th	5th
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc..	1st	2nd	3rd	4th	5th
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.	1st	2nd	3rd	4th	5th
5. Other (Specify) _____	1st	2nd	3rd	4th	5th

II. BARRIERS TO CORRECTING MENTAL HEALTH, SOCIAL & COUNSELING PROBLEMS

	RANKING				
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)	1st	2nd	3rd	4th	5th
2. Relatively brief period of stay in institution.	1st	2nd	3rd	4th	5th
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc..	1st	2nd	3rd	4th	5th
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.	1st	2nd	3rd	4th	5th
5. Other (Specify) _____	1st	2nd	3rd	4th	5th

III. BARRIERS TO CORRECTING DEFICIENCIES IN BASIC EDUCATIONAL SKILLS, I.e., READING & MATH

	RANKING				
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)	1st	2nd	3rd	4th	5th
2. Relatively brief period of stay in institution	1st	2nd	3rd	4th	5th
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc.	1st	2nd	3rd	4th	5th
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.	1st	2nd	3rd	4th	5th
5. Other (Specify) _____	1st	2nd	3rd	4th	5th

IV. BARRIERS TO RESOLVING HOME ENVIRONMENTAL AND FAMILY PROBLEMS

	RANKING				
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)	1st	2nd	3rd	4th	5th
2. Relatively brief period of stay in institution	1st	2nd	3rd	4th	5th
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc.	1st	2nd	3rd	4th	5th
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.	1st	2nd	3rd	4th	5th
5. Other (Specify) _____	1st	2nd	3rd	4th	5th

V. BARRIERS TO CORRECTING FOR LACK OF BASIC VOCATIONAL TRAINING OR JOB ENTRY LEVEL SKILLS IF APPROPRIATE.

	RANKING				
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)	1st	2nd	3rd	4th	5th
2. Relatively brief period of stay in institution.	1st	2nd	3rd	4th	5th
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc..	1st	2nd	3rd	4th	5th
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.	1st	2nd	3rd	4th	5th
5. Other (Specify) _____	1st	2nd	3rd	4th	5th

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13. CONTINUED:

VI. BARRIERS TO PROVIDING APPROPRIATE DIAGNOSTIC SERVICE

	RANKING				
	1st	2nd	3rd	4th	5th
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)					
2. Relatively brief period of stay in institution.					
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc.,					
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.					
5. Other (Specify) _____					

VII. BARRIERS TO PROVIDING APPROPRIATE DRUG AND ALCOHOL SERVICE

	RANKING				
	1st	2nd	3rd	4th	5th
1. Lack of resources (money, adequately trained staff, equipment & materials, facilities, etc.)					
2. Relatively brief period of stay in institution.					
3. Underlying causes of the problems are external to the institution, i.e., the home, community, schools, peer pressure, etc.,					
4. "The State-of-Knowledge" in the field of treating for child neglect and delinquency is not well developed.					
5. Other (Specify) _____					

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14. Considering the above problems and the constraints of your institutional setting, in general to what extent is your institution actually meeting the needs of the children or juveniles you serve? (Indicate your answer by checking one and only one adequacy rating column for each row or priority need.)

PRIORITY NEEDS	ADEQUACY RATING				
	(1) More than adequate	(2) Adequate	(3) Minimal	(4) Inadequate	(5) Very inadequate
1. Health and developmental services					
2. Mental health services: social, psychological, psychiatric, and counseling services					
3. Educational (academic) services					
4. Vocational services					
5. Family services					
6. Diagnostic services					
7. Drug/alcohol abuse services					

15. Assuming sufficient resources (money, adequate staff, etc.), to what extent if at all, can you correct the following problem areas? Before you answer this question, be sure you carefully weight the constraints of your institutional setting (except for money) considered in question 13 and your role as an institution for intervention. (Mark your answer by checking one column box which indicates the extent of correction, for each row or problem area.)

PROBLEM AREAS	EXTENT OF CORRECTION				
	To a very great extent	To a great extent	To a moderate extent	Little extent	Little or no extent
1. Health and development deficiencies					
2. Mental health problems; psychological, psychiatric, social, etc.					
3. Deficiencies in basic educational skills					
4. Lack of basic vocational training or job entry level skills					
5. Home, environmental and family problems					
6. Inadequate diagnostic screening					
7. Drug and alcohol problems					

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16. Consider the priority needs of the children or juveniles when they leave your institution. As in the previous question, rank order these needs in order of decreasing importance. That is, indicate the highest priority need by circling the column number "1st", the second highest by circling "2nd" etc.

PRIORITY NEEDS	RANKING						
	1st	2nd	3rd	4th	5th	6th	7th
1. Health and development- mental services							
2. Mental health services: social, psychological, psychiatric, and counseling services							
3. Educational (academic) services							
4. Vocational services							
5. Family services							
6. Diagnostic services							
7. Drug/alcohol abuse services							

17. What are the interest and aspirations of those juveniles over 15 when they leave your institution? (Check all that apply.)

- 1. Go back to school
- 2. Obtain vocational training
- 3. Obtain gainful employment
- 4. Join the service of the Armed Forces
- 5. Return to their former street life styles
- 6. Other (Specify) _____

18. Prior to or during their stay at your institution, are the children or juveniles subjected to a diagnostic screening process designed to test for and identify specific types of handicaps which may be present (i.e., learning disabilities, mental retardation, etc.)

1. Yes 2. No 3. Not sure

If yes, continue; otherwise, go to 20.

19. Consider the problems of the handicapped children or juveniles. Roughly, about what percent of your children or juveniles have the following specific types of handicaps: physical handicaps, mental retardation, serious emotional disturbances, specific learning disabilities?

	%
Physically handicapped	_____
Mentally retarded	_____
Seriously emotionally disturbed	_____
Specific learning disabilities (e.g., dyslexia, etc.)	_____
Other handicapped conditions	_____
Total % Handicapped	_____

20. If no strings were attached to the Federal monies you are now receiving or you expect to receive, how would you allocate these monies among the following areas? (Indicate your answer by writing the % of the total Federal funds that you would spend in each area.)

Expenditure area	% of Total
1. Health and developmental services	_____
2. Mental health services: social, psychological, psychiatric, and counseling services	_____
3. Educational (academic) services	_____
4. Vocational services	_____
5. Family services	_____
6. Diagnostic services	_____
7. Drug/alcohol abuse services	_____
8. Other	_____
TOTAL	100%

21. If you have additional comments on any of the items within the questionnaire or related topics not covered, please express your views in the space below. (Use the back of this sheet if necessary.) Your answers and comments will be greatly appreciated.

ADDITIONAL INFORMATION ON
QUESTIONNAIRE METHODOLOGY AND RESULTS

The reported results of the questionnaire survey are based on a statistical analysis of questionnaire returns. The returns represent a sample drawn from a universe of institutions prepared by OE and used to compute fiscal year 1976 title I fund allocations. For purposes of our sample, the universe was grouped into six strata--State and locally administered institutions were each classified as institutions serving delinquents, neglected children, or adults.

For local-adult, and State-neglected institutions, the entire population was polled because its size was relatively small. For the remaining four strata, sample sizes were determined to obtain comparable error rates among the strata. The absolute size of the samples was determined by nonresponse and sampling error considerations. The nonresponse rate was anticipated to be 25 percent, and it was not considered practical to have sampling errors greater than 10 percent at the 95-percent confidence limits. The initial sample design yielded sampling errors that ranged from 5 to 8 percent for nonresponse rates varying between 0 and 30 percent. The table below shows our initial sampling plan.

INITIAL SAMPLING PLAN

<u>Population strata</u>	<u>Population size</u>	<u>Sample size</u>	<u>Percent of population sampled</u>
Local neglected	999	250	25
Local delinquent	402	160	40
Local adult	43	43	100
State neglected	28	28	100
State delinquent	324	150	46
State adult	<u>240</u>	<u>140</u>	<u>58</u>
Total	<u>2,036</u>	<u>771</u>	<u>38</u>

In population surveys the implementation of a sampling design does not always proceed as exactly as planned because one does not have complete control of the sample. For example, the population or sampling universe may change; the nonresponse rates may be worse than expected; the response rates and, hence, the sampling errors among the stratifications may vary from their predetermined values; and every respondent may not answer every question.

For our survey, the universe changed between the time the sampling elements were identified and the time our sample was taken. This change did not come as a great surprise because the fiscal year 1976 allocation data that we used to derive the universe was based on fiscal year 1974 attendance data. Consequently, the universe did not consider that, by the time our sample was selected, (1) some institutions had closed and (2) population changes apparently had taken place. With regard to the latter, adult correctional institutions indicated that no youths under 21 were in residence at the time our questionnaires were filled out. Also, a number of the returned questionnaires noted that the addressee was unknown. The following table enumerates the invalid sample units, and shows the sizes of the final samples and the adjusted universe.

ADJUSTED SAMPLE DESIGN

Invalid Sample Elements

<u>Type of institution</u>	<u>Initial universe</u>	<u>Initial sample</u>	<u>closed</u>	<u>Do not serve youths under 21</u>	<u>Address unknown</u>	<u>Adjusted universe (projected) estimates</u>	<u>Final sample size</u>
Local neglected	999	250	2	-	8	959	240
Local delinquent	402	160	1	-	5	387	154
Local adult	43	43	-	4	1	38	38
State neglected	28	28	2	-	-	26	26
State delinquent	324	150	1	-	2	317	147
State adult	240	140	-	41	-	170	99
Total	<u>2,036</u>	<u>771</u>	<u>6</u>	<u>45</u>	<u>16</u>	<u>1,897</u>	<u>704</u>

The deletion of invalid sample elements and the corresponding adjustments decrease the sample and universe sizes. However, the corresponding decrease in the universe size tends to offset the increase in sampling errors that result when the sample size is reduced. For example, a sample of 250 from the local neglected strata had a sampling error of 5.4 percent, while the adjusted sample and universe sizes yielded a sampling error of 5.5 percent.

The overall nonresponse rate to the questionnaire was about 27 percent, which is about what we anticipated. This nonresponse rate increases the sampling error from about 5 percent to near 8 percent; however, this error is still within the upper tolerance level set at 10 percent.

The 27 percent consists, in part, of 20 percent that did not respond either because the questionnaire was (1) returned substantially incomplete, (2) received after our cut-off date, or (3) not returned. The other 7 percent consists of item or individual-question nonresponses. The nonresponse rate ranged from 0 to 18 percent. The most important factor influencing the item-nonresponse rate appeared to be the irrelevancy of the item to the individual instead of the complexity, sensitivity, or position of the item. The response rate, by strata, is summarized below.

Response Rate For Questionnaires
Returned in a Useable Form

<u>Type of institution</u>	<u>Sample size</u>	<u>Useable returned questionnaires</u>	<u>Response rate</u>
Local neglected	240	191	80
Local delinquent	154	124	81
Local adult	38	27	71
State neglected	26	19	73
State delinquent	147	119	81
State adult	<u>99</u>	<u>82</u>	<u>83</u>
Total	<u>704</u>	<u>562</u>	<u>80</u>

RECOMMENDED REVISIONS TO SECTION 123 of TITLE I,
SHOULD IT BE DETERMINED THAT THE PROVISION OF
ACADEMIC EDUCATIONAL SERVICES IS THE APPROPRIATE
PROGRAM THRUST FOR INSTITUTIONALIZED YOUTHS

To provide greater assurance that institutionalized children receive maximum possible benefit from title I program services, the Congress should amend title I of the Elementary and Secondary Education Act of 1965. The amendments should combine, into a single program, that assistance presently authorized for institutionalized children under section 103 (local institutions) and section 123 (State institutions).

Authorization for the new program should be contained in a revised section 123--Programs for Neglected or Delinquent Children. Suggested language for the new section 123, along with other necessary technical amendments, is presented below. Also, for comparison purposes, the current section 123 is shown in appendix V.

PROGRAMS FOR NEGLECTED OR DELINQUENT CHILDREN

Sec. 123. (a) - A State education agency, upon application to the Commissioner, shall receive an entitlement for any fiscal year under this section to supplement existing education programs for neglected or delinquent children residing in State or locally administered institutions, including adult correctional institutions (but only if such entitlements are used only for children in such institutions).

(b). Except as provided in sections 124 and 125, the entitlement which the State Education Agency (other than for Puerto Rico) shall receive shall be an amount equal to 40 per centum of the average per pupil expenditure in the State (or (1) in the case where the average per pupil expenditure in the State is less than 80 per centum of the average per pupil expenditure in the United States, or (2) in the case where the average per pupil expenditure in the State is more than 120 per centum of the average per pupil expenditure in the United States, 120 per centum of the average per pupil expenditure in the United States) multiplied by the aggregate of the number of children in State and local institutions.

(c). For State supported or operated schools, including schools providing education for children under contract or other arrangement for the State, the number of children shall be based on average daily attendance data, as determined by the Commissioner, using the most recent fiscal year for which satisfactory data are available; for locally administered institutions, the number of children shall be determined on the basis of caseload data, as determined by the Commissioner, for the month in which the most recent reliable data is available to him. The entitlement which Puerto Rico shall be eligible to receive under this section shall be arrived at by multiplying the number of children in Puerto Rico counted as provided in the preceding sentence by 40 per centum of (1) the average per pupil expenditure in Puerto Rico or (2) in the case where such average per pupil expenditure is more than 120 per centum of the average per pupil expenditure in the United States, 120 per centum of the average per pupil expenditure in the United States.

(d). To accomplish the purpose of this section, a State education agency shall make grants directly to State or local institutions, local education agencies, or other public and private non-profit agencies. Such grants shall be made in accordance with criteria set forth in regulations established by the Commissioner. Such criteria shall include requirements that (1) priority in the use of funds provided under this section shall be given to programs and projects designed to aid (A) younger children and (B) those children who are provided long-term institutional care and (2) adequate prerelease and transitional services be provided to insure that children, to the extent possible, receive appropriate educational placement following their release from the institution.

(e). Payments under this section shall be used only for programs and projects (including the acquisition of equipment and where necessary the construction of school facilities) which are designed to meet the special educational needs of such children.

(f). Notwithstanding section 412(b) of the General Education Provisions Act or any other provision of law, any funds from appropriations to carry out any programs to which this section is applicable during any fiscal year, which are not obligated and expended by agencies or institutions prior to the beginning of the fiscal year succeeding the fiscal year of which such funds were appropriated shall remain available for obligation and expenditure by such agencies and

institutions during such succeeding fiscal years as the Commissioner may determine.

- - - -

Technical amendments to title I

The effect of the technical amendments is to eliminate the entitlement under section 103 that local education agencies receive for neglected or delinquent youths in locally administered institutions. Such entitlements in turn would be set aside under the new section 123. The amendments are:

- Delete subsection 103(a)(3)(A), and redesignate (3)(B) as (3)(A) and (3)(C) as (3)(B).
- Under subsection 103(c)(1), add the word "and" after the phrase "as determined under paragraph (2)(A)," and, delete paragraph 103(c)(1)(C).
- Under subsection 103(c)(2)(B), delete the phrase "living in institutions for neglected or delinquent children, or" from the second sentence.
- Under subsection 103(c)(2)(C), delete the sentence "For purposes of this section, the Secretary shall consider all children who are in correctional institutions to be living in institutions for delinquent children."

SECTION 123 OF TITLE I OF THE ELEMENTARY AND
SECONDARY EDUCATION ACT OF 1965, AS AMENDED

PROGRAMS FOR NEGLECTED OR DELINQUENT CHILDREN

"Sec. 123. (a) A State agency which is directly responsible for providing free public education for children in institutions for neglected or delinquent children or in adult correctional institutions shall be entitled to receive a grant under this section for any fiscal year (but only if grants received under this section are used only for children in such institutions).

"(b) Except as provided in sections 124 and 125, the grant which such an agency (other than the agency for Puerto Rico) shall be eligible to receive shall be an amount equal to 40 per centum of the average per pupil expenditure in the State (or (1) in the case where the average per pupil expenditure in the State is less than 80 per centum of the average per pupil expenditure in the United States, of 80 per centum of the average per pupil expenditure in the United States, or (2) in the case where the average per pupil expenditure in the State is more than 120 per centum of the average per pupil expenditure in the United States) multiplied by the number of such children in average daily attendance, as determined by the Commissioner, at schools for such children operated or supported by that agency, including schools providing education for such children under contract or other arrangement with such agency, in the most recent fiscal year for which satisfactory data are available. The grant which Puerto Rico shall be eligible to receive under this section shall be the amount arrived at by multiplying the number of children in Puerto Rico counted as provided in the preceding sentence by 40 per centum of (1) the average per pupil expenditure in Puerto Rico or (2) in the case where such average per pupil expenditure is more than 120 per centum of the average per pupil expenditure in the United States, 120 per centum of the average per pupil expenditure in the United States.

"(c) A State agency shall use payments under this section only for programs and projects (including the acquisition of equipment and where necessary the construction of school facilities) which are designed to meet the special educational needs of such children."



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

AUG 1 1977


Mr. Gregory J. Ahart
Director, Human Resources
Division
United States General
Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report entitled, "Educational Assistance for Institutionalized Neglected or Delinquent Children: Major Changes Needed". The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of the report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,


Thomas D. Morris
Inspector General

Enclosure

Comments of the Department of Health, Education, and Welfare on the
Comptroller General's Report to the Congress Entitled, "Educational
Assistance for Institutionalized Neglected or Delinquent Children:
Major Changes Needed" [See GAO note 1, p. 63.]

In order to place the specific GAO recommendation and the Department's response in proper perspective, we wish to comment on some of the assumptions and conclusions contained within the body of the report. These comments are included in an Overview which is followed by our response to the GAO recommendation. The final part of this response contains Technical Comments on the GAO Survey Analysis.

OVERVIEW

The following citations are taken from the draft GAO report. The Department's comments on each are presented as background for the Department's response to the GAO recommendation:

[See GAO note 2, p. 63.]

2. "GAO believes the effectiveness of title I can be enhanced if available funds are concentrated on those youths who are likely to receive a continuum of educational service over a longer period of time." (p. iii; see also pp. 8, 9, 14, 30-31, and 37)

Concentrating funds, as GAO suggests, on younger youth (where educational services are more likely to continue) and on institutions which serve youth likely to be institutionalized longer would have the effect of serving primarily neglected youth. As the report points out (pp. 14, 32), neglected youth in general are in residence more than twice as long as delinquent youth, and the great majority of younger children are in institutions for the neglected.

Narrowing the scope of the program to serve primarily neglected youth at the expense of institutionalized delinquent children would have the
The GAO

[See GAO note 2, p. 63.]

Further, the fact that these students are less likely to return to school upon leaving the institution may be a reason for providing rather than denying Title I services. A more concentrated, enriched instructional program at this time may equip them for better and more lasting employment. As the report indicates, this may be the "last chance" for the majority of these older, delinquent youths.

Current regulations, 45 CFR Part 116c, allow State institutions to provide Title I services to children who are receiving State-supported instruction in vocationally-oriented subjects which may be appropriate for older children.

3. "Relating the factors of age and length of exposure to program services shows that the bulk of available resources go to those youths and institutions in which a continuum of educational services is least likely to be achieved. . . . The relatively short exposure to program services is determined by the short period of stay in the institution." (pp. 31-32)

According to the report (p. 32), an average length of stay for delinquent youths is about 10 months. For a youth confined to an adult correctional institution, the average stay is over 14 months. The two groups tend to be the oldest children served by the program and represent 72 percent of Title I expenditures. GAO recommends that older youth, because they generally are institutionalized a shorter period of time and thus receive less program exposure than younger youth, be given a lower priority in receiving services.

If one compares the two averages cited above with the length of a regular school year, it appears that more than an academic year of instructional exposure is available to these older students. Considering that the instruction of children in regular schools is disrupted annually, it seems that the average institutionalized, delinquent child (who is also probably older than the average neglected child) has enough exposure time to benefit from a Title I program. Again, for many of these children, this may be the "last chance" to receive this type of service.

[See GAO note 2, p. 63.]

[See GAO note 2, p. 63.]

5. "GAO's survey results show that administrators consider academic educational needs important, but second to mental health problems. Responses to other survey questions also raise concerns as to whether academic educational needs should be the exclusive or top priority of a Federal service program." (p. 29; see also pp. iii, 3, 9, 34, and 37)

The Office of Education has not prohibited grantees from designing programs which provide supportive services for children. Recent recognition of this intended programmatic flexibility can be found in the Senate Report of the Committee on Labor and Public Welfare on S.1539, March 29, 1974, pp. 30-31:

Title I programs have offered flexible responses to local problems facing disadvantaged; local officials are charged with developing local solutions to meet specific needs. Often the solutions involve remedial educational programs in basic skills. But many local officials have found that their children's educational progress also depends on provision of auxiliary services such as guidance and counseling programs or cultural enrichment. Title I is not basically a social services program; occasionally, however, such social services are necessary if education is to take place.

Thus, for the purposes of Title I, "special educational needs" are broadly conceived and there may be room within the current Title I program to provide certain mental health services beyond those provided with State and/or local funds. However, it does not appear that the case has been made that the current Title I program, which serves children with grave educational needs, should be modified to provide mental health services alone.

6. "Presently, grant funds are generally expected to be expended during a one year period. Under the proposed arrangement, individual grants should be permitted to cover a period greater than 1 year, in those cases where Title I participants are likely to be in residence beyond such a period." (p.34)

This multiple-year funding concept is presented as part of a larger program modification suggested by GAO, and commented upon in other sections of this response.

It seems this suggested multiple-year funding would be inconsistent with the Department's view that Title I services are to be tailored to the individual needs of the children served. Since participants change from year to year and annual needs assessments are required (including the identification of those most in need in local institutions), multi-year projects for all Title I grantees would be inappropriate. Secondly, under Section 412(b) of the General Education Provision Act, applicant State and local agencies may "carry-over" Title I funds from one fiscal year to the succeeding year providing in effect a two year funding period.

7. "GAO believes that . . . provisions [should be made] for addressing the need for adequate transitional services to insure that youths, to the extent possible, receive a continuum of appropriate educational services following their release from the institutions . . ." (pp. ii; see also pp. 25 and 29)

We would agree that services that facilitate the transition of children from institutions to normal community life, including school, are needed. We would point out, however, that such transitional services even those that are educational, involve the efforts of other agencies as well as the Title I applicant agencies. Transitional services for children leaving institutions and returning to some form of placement are being provided, although often inadequately, by State and local institutions, as well as other State or local agencies such as parole, probation, and public welfare offices and juvenile courts. To address the need for transitional services intended to insure the child's continued education without attending to his or her needs for other types of community based services is unrealistic.

In view of the wide variety of agencies currently involved in providing services for youth upon their release from institutions, Title I should not be the vehicle for Federal assistance for the purpose of enhancing those services.

GAO RECOMMENDATION

We recommend that the Secretary, HEW, jointly with the Attorney General, Department of Justice, examine the appropriateness and/or the exclusiveness of academic educational services as the top priority of Federal assistance for institutionalized neglected and delinquent children. More specifically, the organizations to participate in such an undertaking should include HEW's Office of Education and the National Center for Child Abuse and Neglect, and the Office of Juvenile Justice and Delinquency Prevention under the Law Enforcement Assistance Administration.

We do not believe that the joint examination as recommended by GAO would be productive. The recommendation is based upon an analysis of the findings of a questionnaire which, in our opinion, was not broad enough to obtain an accurate picture of the success of the Title I program in institutions. We would further point out that there is an on-going study being conducted under the auspices of the Office of Education. This study is much broader in scope, in that it solicits information not only from administrators, but from program staff and recipients of Title I services, which appears to indicate that the priority assigned to educational services by the Office of Education, is appropriate.

If it is determined that an academic thrust is not appropriate as the exclusive or top priority, then the thrust of the program should be changed accordingly. Further, if it is felt that the desired thrust is not within the legal bounds of the Title I legislation, the Congress should be requested to amend Title I, if such action is needed to bring about a more responsive program to assist institutionalized youths.

Since we do not concur that a joint examination is required, we do not see a need at this time to amend legislation accordingly.

Further, neither the current legislation nor the recently published interim final regulations (45 CFR Part 116c) require the applicant agencies to limit their programs to instruction in the basic skills. What the regulations do require is that the needs of institutionalized children as indicated by their performance in the basic skills be considered in the development of special assistance under Title I. A wide variety of services may be provided under Title I, provided those services are shown to be "designed to meet the special educational needs of children in institutions."

TECHNICAL COMMENTS

GAO's analysis of the survey of institutional administrators indicated the following:

Question #11, pp. 43-44 - Relative Importance of Needs

1. Mental health and educational services rated essential.
2. Family, diagnostic, health and vocational services rated very important.

3. Drug/alcohol abuse services rated moderately important.

Question #14, p. 47 - Extent to Which Needs Are Being Met

1. Diagnostic, mental health, educational and health services rated as adequate.
2. Drug/alcohol abuse, family, and vocational services rated marginal.

Question #20, pp. 49-50 - How Federal Funds Would be Expended if No Strings Were Attached

	<u>Percent of Total Funds Available</u>
Mental Health	24.6
Education	19.0
Family	15.6
Vocational	15.2
Health	10.9
Diagnostic	7.8
Drug/alcohol Abuse	5.0
Other	1.9

Administrators, in response to Question #11, rated all seven areas of needs as important. That is, none of the need areas fell into the two lower categories of "somewhat important" or "little importance". As the report also points out, responses tended to cluster at the "essential" category. While a complete analysis cannot be made, it appears that educational services are viewed as second in priority among the seven service areas.

An interpretation of the results of Question #14, could be that all seven areas could stand some improvement but that none were in drastic need as evidenced by none being rated in the two lower categories. Responses to Question #20, seem to confirm this interpretation since the administrators indicated that they would expend any additional funds in all seven areas.

The relationships between responses to Question #14 (Extent to which needs are being met) and Question #20 (How Federal funds would be expended if no strings were attached concerning their use) are somewhat unclear. For example, administrators elected to expend 62 percent of "no strings attached" Federal money on four service areas rated as "adequate" in Question #14 and only 36 percent on three service areas rated as marginally meeting the needs of children. This raises the question, why would the largest percentage of such funds (24.6) be expended on mental health services which were rated as adequately meeting the needs of children, while drug/alcohol abuse services were rated "marginally" meeting the needs of the children and would receive the lowest percentage of the funds (5.0)?

A final comment concerning the interpretation of the survey results relates to the validity of the population surveyed. Although the report indicates (p. 42) that the top administrators were selected to be surveyed because it was felt they would be the most unbiased persons to report on the needs of the children and the resources of the institution, the questions raised above suggest that a bias was introduced into the survey results. A possible explanation for some of the conflicting responses is that administrators may have a tendency to cite the most obvious and possibly the most popular needs rather than those needs that staff members would identify as critical.

GAO note 1: Page number references in this appendix may not correspond to pages of this report.

GAO note 2: Deleted comments relate to matters which were presented in the draft report but were omitted from the final report.



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

AUG 8 1977

Address Reply to the
Division Indicated
and Refer to Initials and Number

Mr. Victor L. Lowe
Director
General Government Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

This letter is in response to your request for comments on the draft report entitled "Educational Assistance for Institutionalized Neglected or Delinquent Children: Major Changes Needed."

Title I of the Elementary and Secondary Education Act of 1965 gives administrative control in this program area to the Secretary of the Department of Health, Education and Welfare (HEW). However, we generally agree with the main conclusion in the report that the Title I program needs to be reexamined. This is particularly true in light of the findings contained in the report and the 1974 legislative developments in (1) child abuse and neglect, and (2) juvenile justice and delinquency prevention.

Most individuals who have worked with neglected or delinquent children know that educational needs are only one of a number of significant variables, such as health programs, emotional ills, family crises, etc., which must be addressed if the child is to be helped. Simply focusing on education without consideration of the other issues is short-sighted and cost ineffective. If remediation efforts such as those under the Title I program are to succeed, there is a critical need to develop more effective interdisciplinary methods for assessing and treating individual needs.



The Concentration of Federal Effort provisions of the Juvenile Justice and Delinquency Prevention (JJDP) Act assigned responsibility to the Law Enforcement Assistance Administration (LEAA) for establishing policies and priorities for all Federal juvenile delinquency programs. Section 206 of the JJDP Act created the Coordinating Council on Juvenile Justice and Delinquency Prevention to assist in coordinating these programs. The Council is chaired by the Attorney General and is composed of the Secretaries of the Departments of Health, Education and Welfare, Labor, and Housing and Urban Development. We strongly endorse the recommendation for HEW and the Department of Justice, through the Office of Juvenile Justice and Delinquency Prevention in LEAA, to jointly explore the exclusivity of Title I funds for educational purposes and believe that the Coordinating Council would be the appropriate forum for the recommended inter-departmental review and examination of the Title I program. Should modifications to the Title I program be required, we believe that the annual comprehensive planning requirements for all Federal juvenile delinquency programs [JJDP Act, Section 204(b)(6)] be identified as the appropriate vehicle for formally establishing the necessary interdepartmental strategies, roles and responsibilities.

Formula grants to participating States and territories are established under Section 222 of the JJDP Act. Comprehensive plans, which are required to be submitted in order to qualify for funding, must include a detailed study of State needs for an effective, comprehensive, coordinated approach to juvenile delinquency prevention and treatment and the improvement of the juvenile justice system. We believe that any procedures which are established to review the Title I program must include methods to encourage coordination with the juvenile justice and delinquency prevention program at the State level.

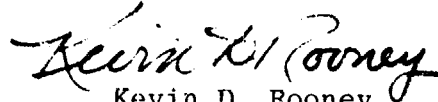
A national policy has been established to remove "status offenders" -- juveniles charged with or who have committed offenses which would not be criminal if committed by an adult--from juvenile detention or correctional facilities [JJDP Act Section 223(a)(12)]. It appears that this mandate would have a significant bearing on the future directions of the Title I program. We believe that any subsequent review of the Title I program must include a specific

assessment of the need to coordinate with activities now underway in implementation of Section 223(a)(12) of the JJDP Act, and the general movement in the field to reduce the number of children sent to secure correctional institutions.

Finally, we believe it is imperative that all States and institutions receiving Federal funds be required to have a transition phase from institution to community programs. The responsible State agency should be required to track children through their respective programs to insure that there is a satisfactory link-up between the institution and community agencies.

We appreciate the opportunity given us to comment on the draft report. Should you have any further questions, please feel free to contact us.

Sincerely,

A handwritten signature in black ink that reads "Kevin D. Rooney". The signature is written in a cursive, flowing style.

Kevin D. Rooney
Assistant Attorney General
for Administration

PRINCIPAL OFFICIALS OF THE
DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
RESPONSIBLE FOR ACTIVITIES
DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
SECRETARY OF HEALTH, EDUCATION, AND WELFARE:		
Joseph A. Califano, Jr.	Jan. 1977	Present
David Mathews	Aug. 1975	Jan. 1977
Caspar W. Weinberger	Feb. 1973	Aug. 1975
Frank C. Carlucci (acting)	Jan. 1973	Feb. 1973
Elliot L. Richardson	June 1970	Jan. 1973
ASSISTANT SECRETARY (EDUCATION):		
Mary F. Berry	Apr. 1977	Present
Philip E. Austin (acting)	Jan. 1977	Apr. 1977
Virginia Y. Trotter	June 1974	Jan. 1977
Charles B. Saunders, Jr. (acting)	Nov. 1973	June 1974
Sidney P. Marland, Jr.	Nov. 1972	Nov. 1973
COMMISSIONER OF EDUCATION:		
Ernest L. Boyer	Apr. 1977	Present
William F. Pierce (acting)	Jan. 1977	Apr. 1977
Edward Aguirre	Oct. 1976	Jan. 1977
William F. Pierce (acting)	July 1976	Oct. 1976
Terrel H. Bell	June 1974	July 1976
John R. Ottina	Aug. 1973	June 1974
John R. Ottina (acting)	Nov. 1972	Aug. 1973
Sidney P. Marland, Jr.	Dec. 1970	Nov. 1972