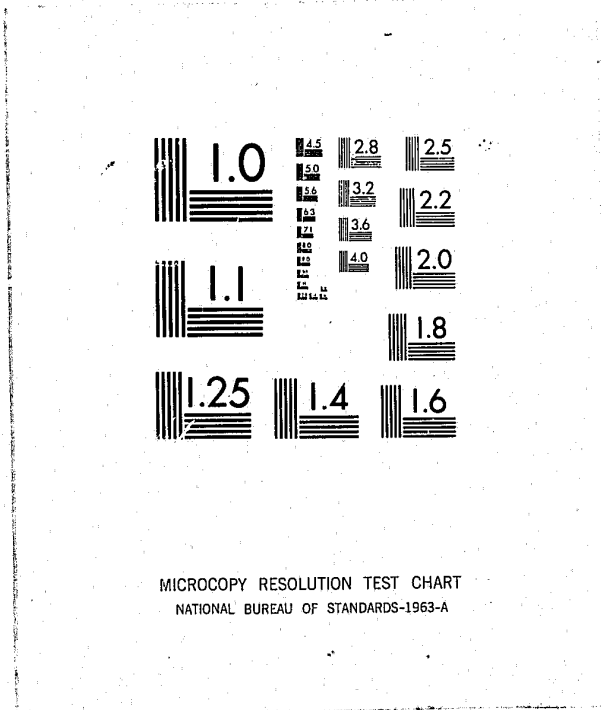


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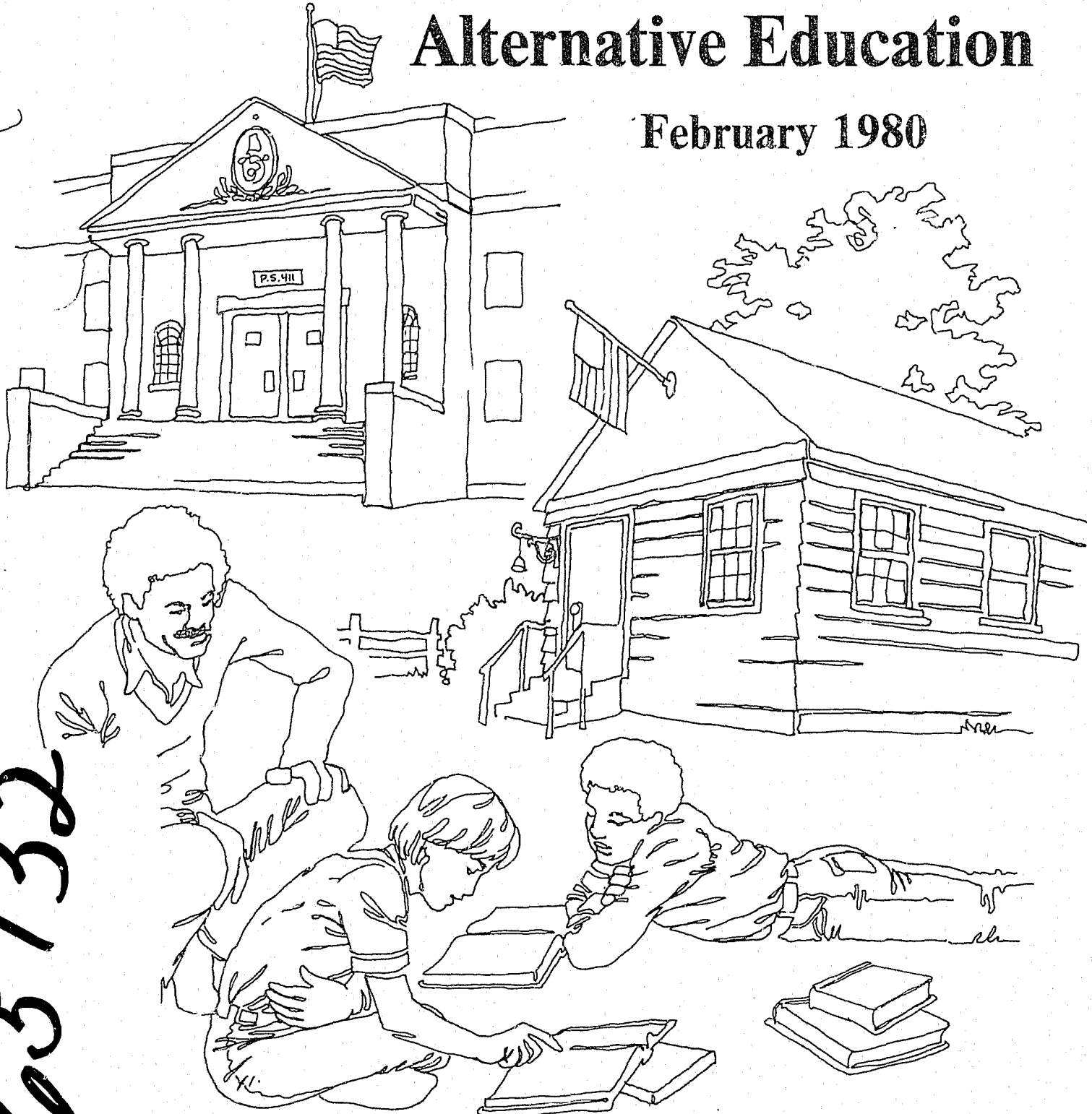
National Institute of Justice
United States Department of Justice
Washington, D. C. 20531

September 24, 1980

Program Announcement:

Prevention of Delinquency Through Alternative Education

February 1980



65132



**UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION
WASHINGTON, D.C. 20531**

PROGRAM ANNOUNCEMENT

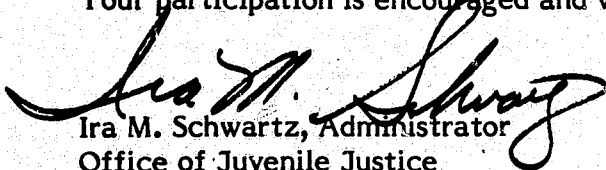
Pursuant to the authority of Section 224 of the Juvenile Justice and Delinquency Prevention Act of 1974, as amended in 1977, the Law Enforcement Assistance Administration is giving major priority to Prevention of Delinquency Through Alternative Education in this Special Emphasis National Scope Discretionary Grant Program. Only a limited number of programs can be funded through this effort. Careful evaluation will be initiated at the beginning of the program in order to provide information about the most workable approaches. This effort will assist communities and jurisdictions in planning and implementing similar programs in the future.

Because of your interest in the welfare of youth, we felt it important to notify you of the effort. This packet contains necessary information pertaining to the development of a full application for Federal Assistance under this National Program. Applications should be sent to the cognizant State Criminal Justice Planning Agency and Central Office of OJJDP based on the specifications and guidelines provided in this packet. Applications will be rated and judged on the basis of all selection criteria outlined in the enclosed guideline.

It is perhaps useful to note that funds for this initiative are allocated solely under the authority of the Juvenile Justice and Delinquency Prevention Act of 1974, as amended in 1977, and cash match requirements are not required.

In making this program announcement it is recognized that no one single school, agency or program can unilaterally ameliorate the diverse and complex conditions which are manifested in the educational system and its services to youth. It is the intention of this program to assist community agencies, private-not-for profit and public schools in implementing programs which promote the positive potentials of young people, thereby reducing the likelihood of juvenile justice system involvement. Should you have any questions concerning application submission, please contact Ms. Monserrate Diaz at (202) 724-7755, Office of Juvenile Justice and Delinquency Prevention.

Your participation is encouraged and welcomed.


Ira M. Schwartz, Administrator
Office of Juvenile Justice
and Delinquency Prevention



UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION
WASHINGTON, D.C. 20531

ANUNCIO DE PROGRAMA

Conforme a la Sección 224 de la Ley de Justicia Juvenil y Prevención de la Delincuencia de 1974, según enmendada, la Administración para la Ayuda del Mantenimiento de la Ley (Law Enforcement Assistance Administration - LEAA) está dándole prioridad al programa de Educación Alternativa Para La Prevención De La Delincuencia mediante la utilización de fondos discrecionales. Al inicio del programa una evaluación cuidadosa será llevada a cabo para así poder determinar la metodología más efectiva. Dicha evaluación permitirá a jurisdicciones locales y estatales, planificar e implementar programas similares en el futuro.

Debido al interés que hay en el bienestar de los jóvenes, entendemos que debemos informarle sobre este esfuerzo. Adjunto encontrará información sobre como realizar las gestiones pertinentes para solicitar fondos bajo este programa nacional. Solicitudes deberán ser sometidas a la Agencia Estatal de Planificación (State Planning Agency) aplicable, y a la Oficina de Justicia Juvenil de la LEAA en Washington, D.C., conforme a los requisitos incluidos en los materiales adjuntos. Las solicitudes serán examinadas y evaluadas conforme a los criterios de selección que se enumeran en el manual (panfleto) adjunto.

Los fondos disponibles para este esfuerzo son hechos disponibles bajo la Ley de Justicia Juvenil y Prevención de la Delincuencia, según enmendada, la cual no necesariamente requiere fondos de pareo en especie.

Mediante este programa, reconocemos que ninguna escuela, agencia o entidad en particular puede unilateralmente minimizar o reducir las circunstancias que contribuyen en los sistemas que proveen servicios a jóvenes. Este esfuerzo está encaminada a ayudar agencias y entidades públicas y privadas que proveen servicios a jóvenes, a llevar a cabo programas que promueven el desarrollo y la participación de dichos jóvenes en actividades positivas, así reduciendo la posibilidad de contacto de dichos jóvenes con el sistema de justicia juvenil.

Si tienen alguna duda o pregunta al respecto, favor de comunicarse con Ms. Monserrate Diaz, teléfono (202) 724-7755.

Fomentamos y exortamos su participación en este programa.

Ira M. Schwartz
Administrator
Office of Juvenile Justice
and Delinquency Prevention

PREVENTION OF DELINQUENCY THROUGH ALTERNATIVE EDUCATION

- a. **Program Objectives.** Pursuant to Section 224 of the Juvenile Justice and Delinquency Prevention Act of 1974, as amended in 1977, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) is sponsoring a major demonstration program to prevent juvenile delinquency through the development and implementation of projects designed to keep students in schools, to prevent unwarranted and arbitrary suspensions and expulsions, dropouts, pushouts and truancy. The specific objectives are:
- (1) To develop and implement strategies and techniques in Alternative Education in public and private not-for-profit schools which improve those educational policies, practices and procedures which impact services to youth.
 - (2) To upgrade the quality of existing alternative education programs by improving curriculum development, staff training, youth and parent participation, and administrative policies and practices of schools and school districts.
 - (3) To reduce the number of student dropouts, truants, suspensions and expulsions in schools and school districts where these programs operate.
 - (4) To prepare students for employment and/or successful participation in post-secondary training or education.
- b. **Program Description**
- (1) **Background.** The Office of Juvenile Justice and Delinquency Prevention, in carrying out its overall mandate to prevent delinquency, has the responsibility for facilitating and stimulating changes in those institutions which have the greatest impact upon the maturation and socialization of youth. Following the family, the school is the major socializing institution in the experience of young people, and positive and supportive experiences in schools are critical to the development of constructive social behavior patterns. Conversely, a significant number of youth involved in delinquency reflect a history of negative school experiences.
 - (2) **Problem Addressed**
 - (a) Educators and non-educators alike continue to be critical of present day education programs which fail to meet the social, emotional, academic and vocational needs of all students. The failure to provide adequate support in these areas leads to high rates of suspensions, truancy, dropouts, disruptive classroom behaviors, violence, vandalism, alienation and general student disinterest in learning. A study by the National Parent Teachers Association for the 1974-75 school year indicated that each day some 2½ million students were not present in school. Some school systems report absenteeism rates of 30% or higher.

- (b) Recent statistics revealed that over 26% of the nation's 14-year-old boys and 18% of the 14-year-old girls were in grades lower than the national modal level of first year in high school. Further, according to the U.S. Commissioner of Education, 25% of the high school students in the U.S. leave before they graduate. The rate of unemployment among high school dropouts is two to three times that of high school graduates.
- (c) In its 1977 report, the National Institute of Education (NIE) estimated the cost of school vandalism to be more than \$200M per year. The NIE reports that although only 25% of a student's waking hours are spent in school, 40% of the robberies and 36% of the assaults on urban students occurred in schools. The risks are especially high for youths aged 12 to 15--a remarkable 68% of the robberies and 50% of the assaults against youngsters of this age occurred at school.

(3) Program Target

The program targets are schools and school districts with youth in grades 6 through 12 serving communities characterized by high rates of crime, delinquency, suspensions, expulsions, dropouts, absenteeism, and youth unemployment. The major focus of this program is intended to be on youth making the transition from elementary to junior high and from junior high to high school in order to support continuity in their learning experience.

(4) Results Sought

- (a) A reduction in the number of delinquent acts committed in and around schools.
- (b) A reduction in student dropouts, suspensions, expulsions and truancy.
- (c) An increase in the daily attendance rate in schools and school districts impacted by this program.
- (d) An increase in the number of students experiencing academic success and graduating from school.
- (e) An increase in the number of students making a successful transition to employment or post-secondary training and education.
- (f) Adoption and implementation of school policies, procedures and practices which:
 - 1 limit referrals by schools to the juvenile justice system;
 - 2 provide for due process, fairness and consistency in disciplinary actions;
 - 3 reduce student alienation and sense of powerlessness through increased youth, parent and community agency participation in school decision making processes;

4 prevent grouping (according to non-academic criteria) and racial segregation of students while enhancing the overall learning environment; and

5 organize and structure learning in ways which enhance continuity and maturational development.

(g) Development and implementation of alternative educational options which increase the opportunity for cognitive, affective and practical learning, and the integration of these options into the regular school curriculum and program.

(5) Working Assumptions

(a) Delinquent behavior evolves from social environments which limit positive youth development in the areas of social competence, a sense of belonging and usefulness.

(b) School experiences can be altered to minimize the school's contribution to delinquency by changing the structure and the educational processes of schools.

(c) The availability of alternative educational opportunities is a viable means of enabling students to experience academic success, improving the quality of interaction between adults and youths, and strengthening student commitment to schools.

(d) Students who have little stake in achievement in schools, and in conformity to the rules of conventional schools, often become alienated are more likely to engage in delinquent activities, and are more likely to be unemployed.

c. Program Strategy. Applications are invited for action projects which impact the school climate, organizational structure and educational process. It is expected that the development and demonstration of more effective alternative educational options will ultimately be adopted by existing school systems. Projects are to reflect the following characteristics:

(1) Schools must provide youth the opportunity to receive alternative educational experiences geared to developing constructive interests relevant to their environment while meeting the need for cognitive and affective learning which contribute to positive growth and development. The options must be open to students on a volunteer basis from grades 6 through 12, with the major program focus on those transitional grades from elementary to junior high, and from junior high to high school. Programs must allow for continuous contact between the problem student and the regular student to avoid labeling, stigmatization, tracking and racial segregation of students.

(2) Specific goals and objectives must have significant impact upon the results sought in paragraph b(4)(a) through (f).

- (3) Project models must incorporate the following key elements:
- (a) Individualized instruction in which curricula are tailored to students' cognitive, affective, and work related skills development commensurate with their learning needs and interests.
 - (b) The establishment of a clear system of support and rewards for individual improvement. Both differential reinforcement for different amounts of personal progress and range of reward options beyond traditional grades are important.
 - (c) The formation of coalitions between school leadership and policy bodies, community organizations, business, labor, parents and youth to improve the educational environment.
 - (d) A comprehensive approach for the improvement of schools and school districts in coordination with community groups, organizations, juvenile justice system, parents, youth and concerned citizens.
 - (e) Utilization of peer group experience and parents in as many aspects of the learning situation as possible.
 - (f) Training of existing school personnel aimed at changing how they perceive and relate to troubled and non-conforming youth in the daily routine of the regular school environment; and the development and implementation of more responsive procedures and techniques for positive interaction with students.
 - (g) Small program size and low student/adult ratio.
 - (h) Strong and consistent school administration support committed to ensuring that each student realizes his/her potential and capable of establishing and maintaining a climate of respect for students through the application of fair and consistent discipline.
 - (i) Involving caring, competent teachers which will establish warm relationships of mutual respect with students.
- d. Application Requirements. These requirements are to be used in lieu of Part IV - Program Narrative Instructions in the standard Federal Assistance Form 424. In order to be considered for funding, applications must include the following information in the order outlined in this guideline and include a Table of Contents. Please number the pages so that they correspond to the Table of Contents. This will facilitate the review and insure that the required information is not overlooked.
- (1) Project Goals and Objectives. Outline specific project goals and objectives in measurable terms with respect to the development and implementation of strategies and techniques in alternative education options which stimulate improvement of the policies, practices, procedures, leadership structure and school climate. This should include the projected reduction of dropouts, truancy, suspensions and expulsions, an increase in academic

performance levels, and other skills relevant to preparation for work and post-secondary training. These projections are to be based upon the most recent data available, and related to the specific results sought.
(Paragraph b(4)(a)-(f))

(2) Problem Definition and Data Needs

- (a) A socio-economic profile of the community served by the school or school district with such demographic data as are necessary to document crime rates, racial/ethnic population, employment rates, school enrollment and the actual level of truancy, dropouts, suspensions and expulsions for 1977, 1978 and 1979 school years (or the latest data available).
- (b) A description of the applicant school and the local school system, inclusive of school policies and procedures regarding suspensions, expulsions, absenteeism and discipline for disruptive behavior.
- (c) The number and kind of agencies, schools or institutions providing alternative education to youth in the target community, including a description of the available programs.
- (d) A description of the relationship of community agencies, schools, businesses, and institutions to the proposed project.
- (e) A description of the manner in which present school policies, practices and procedures impede or facilitate the ability of school personnel to provide a healthy educational environment.
- (f) A description of how the project will impact those problems which impede the ability of students to succeed.

(3) Program Methodology. Based on the information provided in program strategy, Paragraph c(1)-(3) of this guideline, develop a project design which provides a clear description of the following:

- (a) The strategies to be employed and the activities to be used to effect change or to ameliorate the problems in the school system.
- (b) The Alternative Education model that will be used and indicate why it is best suited to meet the needs of youth in the target community. Indicate how it is expected to create situations that expand access to desirable educational opportunities. (For additional information regarding different models, refer to Appendix 3 in the guideline.)
- (c) A sample of the curriculum which would be representative of the total school community.
- (d) The methods of maximizing the participation of youth, parents, and citizens of the community in the planning, implementation and evaluation of the project and in school decision making procedures.

- (e) The techniques to be used to build staff capacities consistent with the characteristics defined for the target of this program. Include descriptions of the types and amounts of training and technical assistance that will be available. Develop criteria and procedures for selecting the staff.
 - (f) The required organizational structure and personnel to support the proposed program. This should be presented in detail, specifying the tasks for each key position, resumes of key staff, and criteria for selection.
 - (g) The educational and public relations activities that are required to gain and maintain public understanding and support for the program.
 - (h) The criteria and procedures for selecting those youth who will participate in the program, and the methods which assure that an appropriate mix of students will participate in the program.
 - (i) The methods of protecting the legal rights of youth served and confidentiality of records, and the methods that will be used to avoid negative labeling.
- (4) Workplan. Prepare a detailed work schedule which outlines specific program objectives in relation to milestones, activities and time frames for accomplishing the objectives. The workplan and budget should be prepared to allow for a two month start-up period.
- (5) Budget. Prepare a detailed budget for the first two years of the project. This should be reflected on the Federal Assistance Form 424, page 3, for the first year, second year and two-year total budget. A detailed budget narrative must be included in the application which provides a thorough justification for the two-year budget. A third-year projection of the project (if continued) should be indicated on page 5 of Form 424 as a total only. Except where specified otherwise, all budget figures should reflect the proposed total project costs (i.e., Federal plus non-Federal share). Include in the budget funds for travel for three (3) staff persons (at least one must be a youth participating in the planning and implementation of the program) to attend four (4) technical assistance and training sessions for the first grant period (two years) for an average of three (3) days per trip. For the purpose of budget preparation, assume that these sessions will be held in Midwest, U.S.A. Budget up to 15% of the total projected outlays to cover the costs of a management information system. Travel budgeted for coordination with other alternative education projects must be confined to not more than two (2) trips over the two (2) year project period.
- e. Dollar Range and Duration of Grants. The duration of this program is three years, with awards made in increments of 24 months and 12 months. Third-year continuation awards are contingent upon satisfactory grantee performance in achieving stated objectives in the two previous years, availability of funds and compliance with the terms and conditions of the grants. Grants will

range up to \$350,000 for each project year with the size of each grant based upon the extent of the problems to be addressed and the realistic improvement expected to result in schools, number of juveniles served, the cost-effectiveness of the project design, and the jurisdiction's capacity to absorb the program after this funding terminates. However, grants for multiple sites (see definitions) will range up to \$600,000 for each project year with the same specifications as above. Total funds allocated for this program is \$11 million; \$8 million from OJJDP; and \$3 million from OYP/DOL. Funds for this program are allocated under the Juvenile Justice and Delinquency Prevention Act of 1974, as amended in 1977, and require no cash match. Grants may be terminated at any point for failure to meet program process objectives and grant requirements.

- f. Eligibility to Receive Grants: In order to be considered for funding, all applicants must meet the following eligibility and capability requirements.
- (1) Applicant Eligibility. Applications are invited from public and private not-for-profit schools, agencies or organizations proposing to serve disadvantaged youth from rural and urban areas with high levels of juvenile delinquency and serious school-related problems. Private not-for-profit schools, agencies or organizations that apply must have one or more viable linkages with private foundations, state educational agencies, federally and state funded employment agencies, corporations and/or labor for purposes of promoting continued funding of effective program models after OJJDP's support ends. To the extent feasible, there should be linkages or cooperative agreements with local public schools operating in the same areas as the private not-for-profit alternative education programs. Public school systems which apply must demonstrate involvement and coordination with private not-for-profit agencies, community organizations, juvenile justice system, the Comprehensive Employment Training Act (CETA system), parent groups and youth. National organizations are eligible and they must operate in states or communities where they have a local affiliate and/or already established organizational linkages with the school system.
 - (2) Applicant Capability. The applicant must:
 - (a) Demonstrate knowledge of and experience in the field of innovative and experimental education.
 - (b) Have the demonstrated capability and experience to develop and manage fiscal systems necessary for administration of Federal funds, organizational stability to permit program continuity, and ability to comply with Federal grant requirements.
 - (c) Have available experienced administrative and professional staff who demonstrate a commitment to effective alternative educational opportunities.
 - (d) Provide letters of support from public and private sector agencies and organizations regarding their participation in policy formation, planning and provision of opportunities for youth.
 - (e) Private not-for-profit organizations must provide proof of non-profit status.

g. Submission Requirements

(1) Submission Procedures. The Alternative Education initiative has been determined to be of a national impact and awards will be made directly to the successful applicants. Applications must be submitted to the Office of Juvenile Justice and Delinquency Prevention, LEAA, in accordance with the form outlined in Appendix 2, Guide for Discretionary Grant Programs, M 4500.1G, September 30, 1978. Refer to Appendix 5, Parts II and IV, for instructions on how to prepare the budget, budget narrative and program narrative. Applicants must submit the applications to the relevant state planning agencies as provided by M 4500.1G, Appendix 2, Section 2. Prior to submission of applications to the Office of Juvenile Justice and Delinquency Prevention, applicants must also submit applications to appropriate A-95 Clearinghouses in accordance with A-95 requirements. Letters of verification indicating appropriate contacts with state planning agencies and A-95 Clearinghouses must be included in the applications. Addresses are included in Appendices 1 and 2.

(2) Deadline for Submission of Applications. One (1) original and two (2) copies of the application must be mailed or hand delivered to the Office of Juvenile Justice and Delinquency Prevention, LEAA, Room 442, 633 Indiana Avenue, NW, Washington, DC, 20531, on or before April 30, 1980. Applications sent by mail will be considered to be received on time if sent by registered or certified mail no later than April 30, 1980, as evidenced by the U.S. Postal Service postmark on the original receipt of the U.S. Postal Service.

h. Evaluation Requirements. The projects funded under this program will be evaluated by an independent evaluator selected by the Office of Juvenile Justice and Delinquency Prevention under separate solicitation. Applicants must identify information unique to their particular proposed approach to enable the national evaluator to develop a national management information system which would provide uniform information on projects of similar scope and design. The national evaluator will provide training and technical assistance in implementing the management information system.

(1) The major goals of the evaluation are to:

- (a) determine the impact of the program on dropouts, suspensions, expulsions, truancy, delinquency, employment, and further education;
- (b) determine the extent to which policies, practices and procedures of schools and school districts are modified and describe the nature of such modifications;
- (c) determine the impact of the program on school achievements, development of social, academic and vocational skills, and on youth and parent participation;
- (d) determine what types of services appears to be most effective for what types of youth under what conditions; and
- (e) document the planning and implementation processes of different program approaches to alternative education.

- (2) Management Information System. The system should be able to:
- (a) provide consistent and complete information on staffing and numbers and types of youth served in the program;
 - (b) provide consistent and complete information on the types and duration of services rendered;
 - (c) provide consistent and complete information on youth responses to the types of services/activities provided; and
 - (d) provide consistent and complete information on occurrence of school-related delinquency, dropouts, truants and suspensions.
 - (e) provide consistent and complete information on the employment and post-secondary enrollment of graduates.

All applicants must include assurances in their application agreeing to fully cooperate with the national evaluators in terms of the management information system and the requirement of the overall evaluation component.

i. Civil Rights Compliance

- (1) Each recipient of LEAA assistance within the criminal justice system which has 50 or more employees and which has received grants or subgrants of \$25,000 or more pursuant to and since the enactment of the Safe Streets Act of 1968, as amended, and which has a service population with a minority representation of 3% or more is required to formulate, implement and maintain an Equal Employment Opportunity Program (EEO). Where a recipient has 50 or more employees, and has received grants or subgrants of \$25,000 or more, and has a service population with a minority representation of less than 3%, such recipient is required to formulate, implement and maintain an EEO relating to employment practices affecting women. This requirement shall be satisfied prior to the award.
- (2) Applicants that do not meet any of the above criteria, educational institutions and private not-for-profit organizations shall maintain such records and submit to the OJJDP upon request timely, complete and accurate racial and ethnic data establishing the fact that no person or persons will be or have been denied or prohibited from participation in, benefits of, or denied or prohibited from obtaining employment in connection with any program activity funded in whole or in part with funds made available under this initiative because of their race, national origin, religion or handicap status. In the case of any program under which a primary recipient of Federal funds extends financial assistance to any other recipient or subcontracts with any other person(s) or group(s), such other recipient, person(s) or group(s) shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to assure its civil rights compliance obligations under any grant award. EEOs must be approved prior to award and should be submitted with the grant application. Failure to address this requirement will result in rejection of the proposal.

- j. **Federal Interagency Agreement.** All applicants must indicate their willingness to participate in any Federal interagency agreements which may be developed by OJJDP to enhance the impact of the program. An interagency agreement with the Office of Youth Programs, Department of Labor, for \$3 million has been developed to further the objectives of this initiative and prepare youth for skills needed for future employment.
- k. **Technical Assistance.** Ongoing technical assistance in program implementation will be provided by OJJDP to the funded projects.
- l. **Criteria for Selection of Projects.** Each application will be examined for compliance with the mandatory requirements outlined throughout the guideline. Proposals failing any of the requirements will be rejected. Applications will be rated and selected using the following criteria. Only those applications meeting the criteria at a high level will be considered for grant award. In making final selections from this group, where there is duplication in target population, the highest rated proposal will be considered, and not more than two (2) applications per state will be selected. OJJDP will also give consideration to cost-effectiveness and a mix of models.
- (1) The extent to which the proposed project addresses the characteristics of the target schools and neighborhoods as described in b(3). (20 points)
 - (2) The extent to which the applicant shows that the activities, opportunities and methods of proposed projects build upon the cultural background, language, life experiences, and employment needs of the school population. (7 points)
 - (3) The extent to which the selection criteria for choosing participants are well defined and represent an appropriate population mix. (6 points)
 - (4) The extent to which the applicant shows that the project has an adequate budget and is cost effective by:
 - (a) an effective plan of financial management; (3 points)
 - (b) number of youth to be served and project design; and (3 points)
 - (c) an itemized statement of cost that justifies each line item in the proposed budget and indicates that costs are reasonable in relation to the objectives of the project. (4 points) (Total: 10 points)
 - (5) The extent to which the project design provides:
 - (a) a model in accordance with the program goals, objectives and strategies as outlined in the guideline, and the applicant's capability and commitment to achieve them; (10 points)
 - (b) high quality in the overall design for the proposed project as outlined in c(3); (10 points)
 - (c) an effective plan of management for the project; (3 points)
 - (d) an effective plan for training of staff members in needed skills areas; and (5 points)

- (e) the way the applicant plans to use its resources and staff to achieve each objective. (4 points) (Total: 32 points)
- (6) The extent to which the applicant demonstrates:
 - (a) strategies to institute change in the educational system and competence in other aspects of methodology as set forth in d(3); (7 points)
 - (b) an understanding of the problems associated with effecting change; and (6 points)
 - (c) the capability to coordinate with or to coordinate other resources in order to implement a comprehensive plan to institute change. (12 points)

Evidence of capability must include letters of commitment from other agencies, documentation that planning the proposed project has actively involved other agencies, parents and youth, and will continue to involve them over the life of the program. (Total: 25 points)

m. Definitions

- (1) Alternative Education - an education program that embraces subject matter and/or teaching methodology that is not generally offered to students of the same age or grade level in traditional school settings, which offers a range of educational options and includes the student as an integral part of the planning team. The term includes the use of program methods and materials that facilitate student success and are relevant to the students' educational needs and interests as indicated by the student and facilitates positive growth and development in both academic, vocational and social skills.
- (2) Dropout - a student who quits school. Usually a student dropout is beyond the compulsory school attendance age of 16.
- (3) Expulsion - the termination of a student's right to attend school.
- (4) High Risk Communities - communities where youth live that are characterized by high rates of crime and delinquency, high infant mortality rates, high unemployment and under-employment, sub-standard housing, physical deterioration of neighborhoods and low incomes.
- (5) Program - refers to the National Alternative Education Initiative to establish programs supported by OJJDP and the overall activities related to implementing the Alternative Education Program.
- (6) Project - refers to the specific set of Alternative Education activities under a grant at a given site(s) designed to achieve the overall goal of reducing student dropouts, pushouts, suspensions, expulsions and truancy.
- (7) Pushout - is when a student decides to leave school because of frustration from not achieving success or because of pressure exerted by the school through various disciplinary actions.

- (8) Structured - for the purpose of this guideline, refers to a classroom setting that is well organized, has explicit directions, well defined goals and objectives, specific standards for student behavior, flexibility in terms of individual differences, and provides the opportunity for students to experience success.
- (9) Suspension - the exclusion of a student from school for a specified period of time, usually from one to ten days.
- (10) Unstructured - for the purpose of this guideline, refers to a classroom setting that allows students excessive freedom and permissiveness and is loosely run. Directions are usually unclear and in most instances students are not goal oriented.
- (11) Small Program Size - for the purpose of this guideline, is defined as a class size with no more than 15 students.
- (12) School Systems - includes public school systems, private not-for-profit school systems or a combination of both; also includes variations of the above as part of public or private school systems or institutions (e.g., vocational schools, special education schools, including educational programs in juvenile correctional facilities, and alternative education programs).
- (13) Delinquency - is the behavior of a juvenile in violation of a statute or ordinance in a jurisdiction which would constitute a crime if committed by an adult.
- (14) Truancy - is when the student is absent from school without permission.
- (15) High Rates of Crime - OJJDP will be comparing the crime rate using the Uniform Crime Report (UCR) data relative to other communities of the same size.
- (16) Multi-Site - Projects which serve two or more non-contiguous communities or school districts which are not in the same county or SMSA (Standard Metropolitan Statistical Area), or projects which serve six or more schools in the same SMSA.
- (17) Equal Employment Opportunity Program - A written Equal Employment Opportunity Program meeting the requirements as set forth in the LEAA EEO Guidelines, Subpart E, 28 CFR 42.301, as amended.

APPENDICES

- APPENDIX 1 ADDRESSES OF STATE PLANNING AGENCIES
- APPENDIX 2 DIRECTORY OF STATE CLEARINGHOUSES
AND CENTRAL INFORMATION RECEPTION
AGENCIES
- APPENDIX 3 BACKGROUND PAPER ON THE PREVENTION
OF DELINQUENCY THROUGH ALTERNATIVE
EDUCATION
- APPENDIX 4 COMMENTS RECEIVED REGARDING
THE PREVENTION OF DELINQUENCY
THROUGH ALTERNATIVE EDUCATION
INITIATIVE AND LEAA'S RESPONSE
- APPENDIX 5 FEDERAL ASSISTANCE APPLICATION
FORM 424
- APPENDIX 6 APPENDIX 2 OF GUIDE FOR DISCRETIONARY
GRANT PROGRAMS - M 4500.1G, ISSUED
SEPTEMBER 30, 1978, "PREPARATION
AND SUBMISSION OF APPLICATIONS"
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BACKGROUND PAPER

APPENDIX 3

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EXECUTIVE SUMMARY

This paper investigates alternative education for disruptive students as an approach to delinquency prevention. Research indicates that school-related problems of vandalism, violence, disruptive classroom behaviors, truancy, and drop-out are all correlated with individual delinquency. Furthermore, research suggests that certain school-related factors contribute to these problems and to delinquency itself. These include: 1) experiences of academic failure, 2) weak commitments to school and to education, 3) weak attachments to conforming members of the school community (including teachers), and 4) attachments to delinquent peers in the school context. School experiences can be altered to minimize the school's contribution to delinquency by changing the structure and educational processes of schools.

If properly designed and implemented, alternative education programs for youths who have experienced difficulties in school can remedy existing problems and prevent the emergence of new school-related problems among these students. Given the empirical links between school-related problems and delinquency, these programs also hold potential for preventing and reducing delinquency of participating students. However, alternative programs for disruptive students will not prevent the emergence of school-related behavior problems or delinquency among students not served by these alternatives. Alternative education programs which serve disruptive youth represent a form of *secondary* rather than primary prevention. School-based *primary* prevention of delinquency requires fundamental alterations in the structures and processes of schools themselves to minimize the school-related factors which contribute to delinquency.

The specific elements which appear important for alternative education programs seeking to reduce delinquency are:

- 1) Individualized instruction in which curricula are tailored to students' learning needs and interests, educational goals are clearly stated, and each student proceeds at his or her own pace.
- 2) A system of clear rewards for individual improvement in effort and performance. Reinforcement for personal progress, utilizing a range of reward options beyond traditional grades, is important. These rewards can be integrated with, but should not be replaced by, rewards oriented toward minimizing disruptive classroom behaviors.
- 3) A goal-oriented work and learning emphasis in the classroom.
- 4) Small program size, (i.e., a small student population in the program).
- 5) Low student-teacher (adult) ratio in the school and classroom.
- 6) Caring, competent teachers and affective components which enhance positive relationships among students and between students and teachers.
- 7) A strong, consistent, fair, and supportive administrator who is committed to ensuring academic success experiences for students, establishing a climate of respect for students, and maintaining fair and consistent discipline.

The elements listed above should be included in alternative education programs.

A number of issues require further investigation.

They are:

- 1) Student and parent involvement in school decision making. This approach has been advocated to increase attachment and commitment to school. However, problems of ensuring active participation have been identified. Perhaps because of these problems, student and parent participation in school governance has not yet been shown to be strongly linked to delinquency. Both the delinquency prevention potential of participatory approaches and mechanisms for ensuring active involvement require further study.
- 2) Supplemental social services. Support services specifically tailored to facilitating student adjustment and educational success may be beneficial to participants. However, supplemental services such as counseling and casework in alternative programs cannot be presumed to prevent delinquency. If such components are included, their effects should be carefully evaluated.
- 3) Vocationally-oriented components. While these components can increase student interest in and attachment to school, they may also track students into less desirable student statuses and occupational roles, provide students access to jobs they could have gotten even without a vocational component, or prepare students for jobs which are not actually available to them in a tight labor market. Further study of vocationally-oriented components should investigate methods for facilitating the transition from school to work, the integration of academic and vocational training to ensure development of cognitive skills and academic success, and the delinquency prevention potential of vocational components.

- 4) Peer counseling. While some peer counseling programs have shown promise for reducing problem behaviors in traditional schools, potential problems in their use in alternative programs include the reification of deviant values and delinquent attachments and the irresponsible use of peer pressure. If included in alternative programs, peer counseling should be carefully evaluated.

- 5) Student selection criteria and procedures. There is evidence that alternatives for disruptive students contribute to tracking and racial segregation of students. This problem appears especially prevalent where the primary mechanism for selecting students for an alternative is referral by a teacher or administrator as a result of nonconforming school behavior. To assess how problems of tracking and racial segregation can be minimized, a variety of models for participant selection should be implemented and assessed. These should include recruitment processes which seek to insure a student population representative of a cross section of the traditional school population. Though not solely targeted to problem youths, alternatives which serve a cross section of students hold important potential for facilitating attachments among conforming and delinquency-prone youths. This characteristic may be important in preventing delinquency. The effects of different models of participant selection on student problem behaviors and delinquency should be investigated.

- 6) Location. Alternative programs in facilities separate from traditional schools may encourage attachment to school but can also become dumping grounds for troublesome students pushed out of more traditional schools.

"Schools-within-a-school" may facilitate return to regular classes but may increase the negative labeling experienced by participants. "Schools-without-walls" may fail to provide students with a sense of belonging. The relative merits of different locations for alternatives relative to the schools from which their students are drawn require systematic investigation.

- 7) Learning models. Different learning approaches and environments may work better for students with different learning styles and abilities. The promise of approaches which match students to learning environments should be investigated. However, care must be taken to see that segregation of racial minorities and low income students is not the end result of matching efforts.

- 8) Alternatives for primary grade students. Alternative education approaches for primary grade students experiencing academic difficulties or evidencing behavioral problems appear to hold long term promise for prevention of future delinquency. Again, important questions must be investigated. What are the effects of differential treatment on students? How will students be educated over the long term once they have entered an alternative program? How will school district support be secured for alternatives serving students who have not yet caused serious problems for schools? In the interests of maximizing alternative education as a secondary prevention effort, funds should be concentrated on those students between the 6th and 12th grades.

The final section of this paper presents standards for evaluations of alternative education programs. Evaluations should include process monitoring to document program context, student selection procedures, and educational strategies used. An ethnographic research component should be included to provide descriptions of implementation issues and actual program operations. Outcome studies on alternative programs should use standardized measures to assess academic performance; school normlessness (attachment and commitment to school); attachment to teachers and delinquent peers; post program occupational attainment; delinquency (officially recorded, self-reported, and rates of vandalism and violence in schools); and possible cost/benefits. Evaluation designs should include data from comparison or control groups not served by the alternative. Finally, an adequate evaluation time frame should be provided to allow time series assessments of alternative programs' effectiveness in preventing delinquency. Follow-up studies should continue for at least twice as long as the project period.

DELINQUENCY PREVENTION THROUGH ALTERNATIVE EDUCATION

I. INTRODUCTION

Alternative education has been advocated as a means for preventing juvenile delinquency (Gold, 1978). The argument has been that nontraditional educational programs tailored to the needs of students whose educational careers have been marked by academic failure and/or conflict ("disruptive behavior") can increase educational success and thereby forestall delinquent behavior.

This paper examines aspects of alternative programs which appear most promising for preventing delinquency and discusses a number of issues in alternative education that merit further research.

II. ALTERNATIVE EDUCATION: A RESPONSE TO INTERRELATED PROBLEMS

Consonant with the rapid technological advances since the 1940's, secondary education has become a reality for most 14 to 17 year olds. However, concurrent with these developments has been an increase in a number of problems which have led to the advocacy of alternative educational approaches for certain students.¹ Many students have not succeeded in conventional educational settings. Recent statistics reveal that 26 percent of the nation's 14 year old male students and 18 percent of the 14 year old female students are in grades lower than the national mode of ninth grade (U.S. Department of Commerce, 1977:296). According to Ernest Boyer, U.S. Commissioner of Education, 25 percent of the high school students in the

United States leave school before they graduate (Washington Crime News Service, June 1, 1979:2).

A second concern is the problem of school violence and vandalism accompanied by the recognition that most school crimes are committed by current students. Estimates of the annual cost of school vandalism range from \$200 million (U.S. Department of Health, Education, and Welfare, 1978) to \$600 million (Washington Crime News Service, June 1, 1979). Vandalism, burglary, larceny, and arson rates have increased in schools as has the fear of crime (Rubel, 1977: 540). Finally, absenteeism is a major problem. Dr. Owen Kiernan reports that the national absentee rate is about 15 percent and in major cities may range from 30 percent to 50 percent (Kiernan, quoted in Bayh, 1977:23).

There is evidence that academic failure, truancy, vandalism, violence, delinquency, and dropping out are inter-related. Polk and Schafer (1972:78) have noted:

Students who violate school standards pertaining to such things as smoking, truancy, tardiness, dress, classroom demeanor, relations with peers and respect for authority are more likely to become delinquent than those who conform to such standards.

Feldhusen et al. (1973) found that children identified by teachers as aggressive and disruptive in the classroom achieved at significantly lower levels than their peers. Similarly, Swift and Spivack (1973:392) found that students who achieved poorly academically, whether in suburban middle class or urban "ghetto" schools, were those engaged in disruptive or problem behaviors in the classroom.

A substantial body of literature has also shown relationships between poor academic achievement in school and delinquent behavior outside the school. (See Silberberg and Silberberg, 1971, for a review of the literature on school achievement and delinquency; Wolfgang et al., 1972:63; Elliott and Voss, 1974:135-137; Jensen, 1976:384-386.)

Finally, truancy has been identified as an early predictor of school attacks and thefts (McPartland and McDill, 1977:6) and of delinquency and school failure (Silberberg and Silberberg, 1971:27).

III. SCHOOL AS A SOURCE OF ACADEMIC FAILURE, DISRUPTIVE BEHAVIOR AND DELINQUENCY

A number of variables play a role in the problems discussed (see Elliott and Voss, 1974; Feldhusen, 1978; Hirschi, 1969; Klaus and Gunn, 1977). However, studies seeking to identify the relative importance of different factors in delinquency have consistently emphasized the role of immediate experiences. McPartland and McDill's (1977:22) analysis of data from three large surveys of urban and suburban high schools indicates school factors play a direct role in school violence, independent of conditions of employment; family wealth, structure, and size; juvenile law enforcement practices; or other conditions in the larger society.

...lack of success in school as measured by report card grades is correlated with the probability of school disciplinary problems holding constant the conventional measures of student background such as ability level, race, sex, parents' education, family wealth, and family size (McPartland and McDill, 1977:14).

Separate studies by Hirschi (1969), Linden (1974), Polk and Schafer (1972), and Elliott and Voss (1974), as well as Jensen's (1976) reanalysis of data collected by Wolfgang et al. (1972), have also suggested that immediate school experiences are closely related to delinquent behavior.

The link between immediate school experiences and delinquency is given further support by Elliott and Voss's (1974: 119) finding that delinquent youths who dropped out of school were more delinquent *before* they left school than after dropping out, suggesting the possibility that school experiences themselves contribute to delinquent behavior.

IV. SCHOOL EXPERIENCES AND DELINQUENCY PREVENTION

The experience of academic failure or success in school is an independent predictor of delinquency that transcends social class or ethnicity. Regardless of their socioeconomic background, youths who experience academic success are less likely to be delinquent than those who do not (Call, 1965; Jensen, 1976; Polk and Halferty, 1966:95; Stinchcombe, 1964). Students tracked into lower tracks in schools because of low perceived ability or even for nonacademic reasons (Kelly, 1977:205) become increasingly dissatisfied with school, increasingly absent and truant and less committed to school. Providing opportunities for a greater proportion of students to experience success in school appears an important goal for educational programs seeking to prevent delinquency.

Commitment to educational pursuits is a second important factor. Elliott and Voss (1974:151) found where commitment was low, delinquency, school crime, vandalism, and dropout are likely. Hirschi's data (1969:121) suggest the importance of attachment to school. Sakumoto (1978:26) has found this variable independently related to delinquency. When students do not like school, behavior problems and delinquency are more likely. Thus, both Elliott and Voss's and Hirschi's research suggest that educational innovations which encourage students to feel part of the school community and committed to educational goals should hold promise for preventing delinquency.

A third factor of importance in association with delinquent or deviant peers in the context of school. Analysis of data from three separate self-reported delinquency studies² has shown a strong relationship between having delinquent friends and delinquent behavior (Weis et al., 1979 forthcoming). This relationship holds even when other variables are controlled. It is important for both sexes, though the strength of the relationship varies with sex, age, and seriousness and nature of offenses.

Importantly, association with delinquent peers appears to be a school-related variable. Students who like school and have higher grades are less likely to have delinquent friends than students with lower grades and those with less favorable attitudes toward school (Sakumoto, 1978). Moreover, delinquent associations at school are more closely related to delinquency than perceptions of the amount of delinquency in the community or exposure to delinquents or criminals in the family (Elliott and Voss, 1974:163). Young people establish peer attachments at school. If they develop attachments to delinquents or others engaged in problem behavior at school, they are more likely to engage in these behaviors themselves.³ Educational innovations which encourage students to develop attachments with more conventional peers and with teachers or other conforming adults should hold promise for preventing delinquency.

V. ALTERNATIVE EDUCATION ELEMENTS FOR PREVENTING DELINQUENCY AND RELATED PROBLEM BEHAVIORS

Several elements of alternative education approaches appear promising for preventing problem behaviors. However, few programs which combine these elements have been evaluated using research designs and outcome measures adequate for determining program effects in preventing delinquency. This problem and its implications for policy and research will be discussed later. The elements that appear most promising for delinquency prevention are listed below:

A. Individualized Instruction

Disaffected students are usually behind their age peers in development of cognitive skills. To present students with challenging and realistic educational tasks, alternative schools should assess student achievement levels to determine appropriate course work and to obtain a baseline for measuring progress. Since it is likely that student achievement levels

will vary, individualized learning approaches are important. Without an individualized curriculum, the alternative may simply become another environment in which some students will experience failure due to an inability to keep pace with their classmates and other students will be bored and disruptive because they are held to an unchallenging learning schedule.

To the extent that individualized learning programs can be tailored to the interests of students, motivation and commitment to the educational endeavor should increase. Thus, programs such as City High School in Grand Rapids, Michigan, in which students design their own course curricula in accordance with their individual interests and the requirements of the Board of Education, are desirable. Odell (1974) found better student participation in school work and lower delinquency rates in an alternative education program for delinquent youths which integrated high interest materials into a self-paced and individualized programmed learning format. Vocational and academic subjects have also been integrated to teach students basic skills and to maintain their interest in a number of alternative programs.

B. Reward Systems

The rewards offered to students by the school are external indicators of success. To generate commitment and to motivate students effectively, these rewards must be attainable and clearly contingent on their effort and proficiency.

To ensure these conditions are met, realistic, attainable goals must be established for each student (Romig, 1978: 35-36) with clear rewards outlined for different levels of demonstrated effort and proficiency (Bednar et al., 1970; Tyler and Brown, 1968). Contracts without differential rewards attached do not appear to result in improved academic performance (Raffaele, 1972; Romig, 1978:31).

For the most disaffected students, initial contracts may need to reward effort and persistence such as regular attendance, coming to class "straight," or working on a lesson for

a certain period of time (Fo and O'Donnell, 1974). This approach may be necessary to provide basic success experiences which motivate increasing levels of effort (Romig, 1978). However, over time, learning contracts should place increasing emphasis on demonstrated proficiency rather than effort alone. This shift in emphasis over time should be explicitly clarified with students and clear proficiency goals should be established (Webb and Cormier, 1972). Failure to link rewards to achievement (as opposed to effort) can, over time, diminish the value of the rewards as indicators of academic success.

Rewards do not have to be limited to traditional grades. They can be keyed to specific interests and goals of each student. Students who have not obtained good grades in traditional classrooms may have discounted the importance and validity of grades. Varied reward systems, such as token economies or systems in which credits toward desired goals are offered for academic progress, should be instituted.

Long-term educational goals should also be clearly established with each student. These may include admission to GED testing, admission into a trade apprenticeship program, or placement on the job in lieu of or in addition to attainment of a traditional high school diploma. Again, it is important that academic standards not be compromised, but rather that alternative routes to success experiences be developed for all students (Cohen and Filipczak, 1971).

To this point, the discussion of rewards has focused on rewarding academic progress. Rewards for positive classroom behaviors have also been used for classroom management. (See Davidson and Seidman, 1974 and Feldhusen, 1978 for reviews.) Aggressive and disruptive behaviors in classrooms have been decreased by various reinforcement approaches including verbal reinforcers (Jensen, 1975), use of free time, and token economies (McLaughlin, 1976). Teachers (Silverman and Silverman, 1975), parents (Stuart, Jayaratne, and Tripodi, 1976), and peers (Strain, Cooke, and Apolloni, 1976) have

been taught contingency contracting to control classroom behavior problems. However, the ultimate goal of classroom reward systems should be to enhance academic success, not simply to create a classroom of controlled, docile students (Winett and Winkler, 1972). The risk in the use of behavioral reinforcements for classroom management is that alternative classrooms will become "like the controlled, directive classrooms from which the students have been referred" (Arnone and Strout, 1978:22). Careful attention should be given to integrating rewards for academic progress with rewards which maintain the classroom as an orderly environment for learning. Where this occurs, disruptive behaviors should be minimized and academic success enhanced.

Research by Rollins et al. (1974) suggests the promise of contingent reward systems in broad school applications. In "Project Success Environment" sixteen inner city public school teachers were trained to reinforce positive classroom behaviors oriented toward academic success, to ignore inappropriate behaviors, and to avoid aversive responses. These techniques were used over the course of the school year with 730 black students from disadvantaged backgrounds in Grades 1-8 in the Atlanta public schools. These students were compared with students in classes of matched control teachers. The experimental classes were less disruptive and more involved with their task assignments. Additionally, their academic achievement was superior. In reading aptitude, experimental students gained .69 years in comparison to the controls' gain of .34 over an eight-month period. In arithmetic achievement, the experimental students gained .65 in comparison to a .39 control gain. While the design of the study (i.e., use of matched control groups) does not control for all possible variables which could have caused these differences (such as selection factors), it does suggest that contingent reward systems hold promise for increasing students' academic success.⁴

C. Goal-Oriented Work and Learning Emphasis in the Classroom

Individualized instruction with contingent reward systems should not be confused with the concept of "open classrooms" or "open education," which has been described as

...an informal approach to education...involving high degrees of curricular, instructional, and organizational flexibility and premised on the notion that children learn what they want to learn, when they want to learn it, and at their own pace (Duke, 1972:36).

While earlier studies of open classrooms in England reported positive results (Silberman, 1970: 260; Haddon and Lytton, 1971), recent research by Bennett (1976) has shown that students in "open classrooms" performed more poorly on reading and mathematics tests than did students in more formal and mixed classrooms.⁵ Critics have charged that open classrooms fail to provide clear standards of achievement for students and may fail to generate classroom-wide norms favoring educational attainment and, thus, lead to anomie and a loss of community of shared purpose in the classroom (Hurn, 1978). Thus, some authors have suggested that a "work and learning" atmosphere, in which development of cognitive skills is clearly a central task, is an important element in generating academic success (Hurn, 1978; Romig, 1978).

Bennett (1976) provides data to support such a hypothesis within the context of an open classroom. He found that students in one of the open classrooms he studied performed consistently better than would have been predicted from past test scores. This classroom differed from the other open classrooms in that it was "characterized by a high degree of work orientation, a clearly organized and well-structured curriculum, and an orientation towards the cognitive rather than the affective and emotional growth of the students" (Hurn, 1978:244).

A "work and learning" orientation in the classroom can provide a context in which efforts to attain educational goals make sense to students. Individualized learning approaches and rewards contingent on proficiency are likely to require a context in which academic achievement remains valued, if genuine academic success is to be experienced (Odell, 1974; Romig, 1978). Without a clear orientation to work and learning in the classroom, even competent and caring teachers are unlikely to succeed in increasing academic achievement, reducing official delinquency, or affecting school dropout rates of their students (Reckless and Dinitz, 1972). Teachers should structure their classes so that students' attention and effort are clearly focused on working to develop cognitive skills and to attain educational goals.

D. Conducive Physical and Human Factors

1) Small Student Population in the Program

Research has consistently shown correlations between school size and rates of school crime. McPartland and McDill found that smaller schools were characterized by lower levels of student offenses when ability level, racial composition, and economic status of students were controlled (1977: 20-21). The National Institute of Education Violent Schools-Safe Schools Report (U.S. Department of Health, Education, and Welfare, 1978) also found school size to be correlated with the incidence of school crime. Large schools had greater property loss through burglary, theft, and vandalism than schools with smaller student populations.

Alternative schools generally have a small number of students in comparison to the conventional schools from which their students are drawn. Despite the disruptive histories of many of their students, they are usually characterized by "almost a total lack of violence" (Berger, 1974) and discipline problems (Duke and Perry, 1978). Their small size may be a contributing factor (Arnone and Strout, 1978:5).

In attempting to explain this relationship, McPartland and McDill and the authors of the Violent Schools-Safe Schools Report argue that school size is probably important more for its contribution to interactive characteristics in the school than for its direct effect on crime. They suggest that the correlation between school size and school crime reflects the fact that students are less likely to be anonymous in small schools and more likely to establish informal personal relationships with teachers. In turn, personal attachments between students and teachers in the school setting may inhibit school normlessness, increase student attachment and commitment to school, and inhibit school crime. Gold (1970) suggests that warm, accepting relationships between students and teachers can enhance student self-esteem and constrain delinquent behavior. Furthermore, the lack of anonymity in small schools may inhibit school crime by making it more difficult for students to avoid recognition for misdeeds.⁶

These arguments are consistent with evidence on correlates of delinquency reviewed earlier. Alternative schools should seek to facilitate warm personal relationships between students and teachers and seek to minimize student anonymity in the school setting. Limiting the size of the school or number of students served is one mechanism for accomplishing these goals. Although specifying an "optimal" size for alternative programs is a speculative venture, Duke notes that the English "consider schools with more than 320 students too large" (1972:46).

2) Low Student-Adult Ratio in the Classroom

The NIE Violent Schools-Safe Schools Report (U.S. Department of Health, Education, and Welfare, 1978) found that in schools with fewer students in each class where teachers taught fewer different students each week, there were lower rates of student violence. Again, the physical factor of

student-adult ratio is likely to be important for its influence on interactive variables. When teachers work with a small number of students, they have more opportunity to relate to students as individuals, to provide individual attention, and to establish personal relationships.

An optimal "student-teacher" ratio has not been empirically established though a range of from 10 to 1 to 15 to 1 appears desirable. A student-adult ratio of this size does not necessarily demand an exorbitant budget. Alternatives such as Philadelphia's Parkway Program have utilized community business and university resources, parents, and volunteers to supplement the teaching staff. The Learning Alternative Project in Tampa, Florida, has combined the resources of the state Department of Health and Rehabilitation Services (DHRS) and the county school district in an alternative junior high program to achieve a student-adult classroom ratio of 5 to 1. CETA funds have also been used to provide additional staffing in alternative programs.

3) Caring, Competent Teachers

The importance of attachments to conventional others in preventing delinquency suggests the value of promoting caring relationships between teachers and students (Gold, 1978). The NIE Violent Schools-Safe Schools Report (U.S. Department of Health, Education, and Welfare, 1978) indicates that the less students value their teachers' opinions, the greater the property loss due to vandalism and burglary in the school. Process evaluations of alternative schools in Chicago, Dade County, and Grand Rapids (Arnove and Strout, 1978:5), have identified teachers as important elements in students' academic success in alternative schools.

Teachers' personal characteristics and teaching styles are important for establishing warm relationships of mutual respect with students who have become alienated from traditional schools (Gold, 1978:303-304). The most important

characteristic is not special training, but rather a combination of genuine interest in working with troubled students (Arnove and Strout, 1978:6), patience and determination, flexibility, and adaptability to different students (Ahlstrom and Havighurst, 1971). Alternative programs should look for these characteristics in recruiting teachers.

A teacher interviewed at the Opportunity II High School in San Francisco identified one of the most important aspects of the school as the bond of friendship and trust that grows between students and teachers there:

Many of the kids don't have homes to return to, many come from broken families, many of the women have been sexually abused and raped by their fathers...the teachers are very important people in the students' lives (Site Visit Notes, 1979).

At Providence's Alternative Learning Project, individual evaluations of student work often take place at teachers' homes rather than at the school. At the Prologue School in Chicago, teachers are required to live within the catchment area of the school to encourage informal interactions between teachers, students, and their families as members of the same community. These examples illustrate the closeness that can develop between teachers and students and some methods alternatives have used to strengthen bonds between them.

Finally, affective education approaches can enhance positive relationships among students as well as between students and teachers. Numerous affective education curricula, emphasizing decision-making skills, communication skills, conflict resolution skills and, in some cases, clarification of individual values, have been developed.⁷ According to Barr (1976), these approaches have shown promise for improving students' attitudes toward school, increasing attendance rates, decreasing disruption and suspension rates, and decreasing school violence and vandalism. Without a structured learning environment focused on incremental development

of cognitive skills, however, affective approaches and warm student/teacher relations have not been effective in promoting academic success or preventing delinquency (Reckless and Dinitz, 1972; Scheaf, 1972). Warm relationships between students and teachers must be combined with a classroom orientation toward cognitive skill development and academic achievement if the goals of academic success and delinquency prevention are to be achieved.

4) Strong, Supportive Administrator

Finally, strong leadership from the school administrator is essential. The principal, as the director of school activities, sets the "climate" for implementation of the above-listed "success" elements. Moreover, it appears that the principal directly affects rates of vandalism and violence in schools (U.S. Department of Health, Education, and Welfare, 1978:9).

Strong leadership, consistency, and fairness (Arnove and Strout, 1978:33) appear to be more important than a particular administrative or management style. Both cooperative school governance (Van Avery, 1975) and centralized authority (Wint, 1975) have been associated with positive results. The school administrator must encourage implementation of educational approaches which lead to academic success for students, establish a climate of respect for students, and establish fair and consistent discipline procedures.⁸

E. Summary

In this section a number of elements which appear to enhance the delinquency prevention potential of alternative schools have been described. These include:

1. Individualized instruction with curricula tailored to students' learning needs and interests, clear learning goals, and an individually-paced learning program.

2. Clear rewards for individual improvement in academic competency.
3. A goal-oriented work and learning emphasis in the classroom.
4. Small student population in the program.
5. Low student-adult ratio in the classroom.
6. Caring, competent teachers.
7. Strong, supportive administrator.

It is important to emphasize that none of these elements alone is likely to prevent delinquency. It is the combination which holds promise.

VI. ISSUES IN ALTERNATIVE EDUCATION

In the previous section, elements of alternative education programs which appear promising for delinquency prevention were reviewed. In this section, issues which require further investigation are discussed.

A. Student and Parent Involvement in School Decision-Making

Many of the elements already discussed can facilitate commitment to school by enhancing academic success. Another possible vehicle for enhancing student commitment to school is by involving students and their parents directly in school decision-making.

A number of schools have made efforts to increase student participation in school decision-making. After several years of increasing violence, vandalism, absenteeism, and dropout rates, the principal of Cleveland High School in Seattle enlisted the participation of students and teachers to solve school problems. Students recognized as leaders, whether "positive" or "negative," were recruited to form school problem-solving teams. An "I've Got Pride" campaign was initiated

and students designed and painted murals on hallway, classroom, and cafeteria walls. School rules were reduced to six basics: attend class; no alcohol or drugs; no weapons; no gambling; no smoking in the building; treat all with respect for their dignity, welfare, and material goods. Students and teachers participate in interviewing staff applicants and in developing school budgets. Other school policy changes included the elimination of failing grades and the awarding of credit for work completed. According to Howard (1978) the average percentage of pupils absent each period decreased from 35 percent to 5.6 percent, in-school fighting decreased, referrals to the office dropped by 50 percent; student freedom during nonclass time increased without disruptive incidents, and graduating class enrollment in college increased from 35 percent to 60 percent.

Parental involvement in school decision-making may also be a means to increase student commitment to school. In 1973, the Salt Lake City School District initiated a non-hierarchical participatory management system for all the district's schools. In each school a council composed of parents, teachers, and the principal make fundamental decisions concerning the school's curriculum, budget, and staffing. According to Dr. Donald Thomas, the District's Superintendent, vandalism costs in the district have decreased from \$6 per pupil to \$3 per pupil since initiation of the school site management system (Personal Communication, 1979).

Student and parent involvement in school decision-making can potentially increase student attachment and commitment to school and should, therefore, be expected to decrease the likelihood of school-related behavior problems. Unfortunately, the favorable changes at Cleveland High and in Salt Lake City Schools cannot, with confidence, be attributed to participatory school governance. Other factors may have caused the reported improvements in students' behavior. In fact, to date, analyses of school surveys which have controlled for other variables have, at best, documented only

small correlations between student involvement in decision-making and the incidence of student behavior problems (Epstein and McPartland, 1975; McPartland and McDill, 1977).

The NIE Violent Schools-Safe Schools study reported "no evidence that a more democratic form of government helps to reduce school crime" although "schools in which students feel they have no control over their circumstances are schools which tend to have more violence" (U.S. Department of Health, Education, and Welfare, 1978:134).

This lack of empirical support may result from implementation problems. *Active* student and parent participation is not always easily secured, even when supported by the school administration. An evaluation of the Parkway Program documented the failure of many students to participate actively in "town meetings," and the need to explore "methods...for encouraging broader attendance, inviting participation in forming agenda, designing methods of implementing decisions and rotating responsibility for moderating Town Meetings" (Organization for Social and Technical Innovation, 1972:54).

Duke and Perry have suggested that the key to student participation is to treat students as adults and offer them adult responsibilities. The alternative programs they studied had few rules governing behavior and gave students maximum responsibility for school governance. The authors found that although not all students participated in "town meetings, those who chose not to participate...rarely were found to be behavior problems" (Duke and Perry, 1978:396). This finding complements McKinney's suggestion that a successful participatory government should be judged by "its responsiveness to high interest community concerns, not in its ability to involve all students" (1974:18). In summary, both mechanisms and criteria for successful participatory governance appear to require further development.

Another possible problem in shared school governance is the diffusion of responsibility for decisions. Clear lines of decision-making authority and accountability must be designated if participatory approaches are to be viable.

Student and parent involvement approaches should be considered in alternative programs. Currently, the techniques for maintaining truly representative involvement are rudimentary. Assessments of efforts in this area can add to knowledge about how active involvement can be secured and problems overcome. Evaluations should seek to isolate the effects of student and parent involvement in school governance on behavior problems and delinquency.

B. Supplemental Social Services

Numerous alternative programs include specialized services such as casework and counseling. Students in the Option School in Newark, Delaware, for example, spend 20 percent of their school time in some form of counseling. Although not required, family counseling and Parent Effectiveness Training (PET) are also available. The parents of each student are either seen or spoken to every week to impress the student with the importance of his or her school work.

Other programs offer non-traditional social services for their students. New Directions for Young Women (NDYW) in Tucson, Arizona, an organization established to promote alternatives to the detention of female status offenders, offers an alternative education program for women who have dropped out and who are between the ages of 16 and 18. Free day care is provided, allowing the young women to bring their children to school. In addition to basic education courses directed toward high school graduation or GED attainment, school activities are designed to help young women deal more effectively with the stresses of raising children. Training in

practical life skills such as balancing a checkbook and looking for a job are also provided. Students in the school can participate in NDYW's support groups, which include sessions on assertiveness training, rape prevention, birth control, childbirth, and sexuality.

While such supplementary services as counseling and support groups may be beneficial to participants (Cavan and Ferdinand, 1975; Romig, 1978:26) extensive research has failed to show counseling and casework services to be directly effective in curtailing delinquency (Berleman, 1979; Odell, 1974; Romig, 1978). If counseling and other support services are offered in alternative programs, care should be taken to document the rationale for the model of supplemental services provided, to document and describe the actual supplemental services delivered, and to evaluate the effects of the supplemental services. Without such research, it is not clear that supplemental services justify their costs from a delinquency prevention perspective.

C. Vocationally-Oriented Components

A number of schools have emphasized programs which provide orientation to and preparation for the world of work to enhance both practical skill development and commitment to school experiences. Experience Based Career Education (EBCE), for example, has been integrated into regular high school curricula in forty-five school districts across the country. Students complete some of their academic requirements through exposure to a wide variety of career opportunities. School days are divided between classroom and job sites. Students develop academic as well as job-seeking and job-holding skills and learn, first-hand, about a range of vocational options.

EBCE results are encouraging. EBCE students have lower dropout rates than matched controls, better oral communication and career planning skills than nonparticipants, and

indicate strong positive attitudes toward their schools and the EBCE (Buckman, 1976). EBCE students and comparison students achieved similar scores on the California Test of Basic Skills, suggesting that the approach does not impede cognitive skill development (Bernhardt and Owens, 1978:36). However, student selection factors not controlled in the EBCE evaluations may have contributed to the positive results.

Independence High School in Newark, New Jersey attempts to place students in job situations for a month at a time where they experience general work discipline and job expectations, as well as learn about the nature of the specific job they may be contemplating after graduation (Natriello et al., 1976). An evaluation report claims the program has created an awareness in students of the need to acquire additional skills beyond high school to get a job: "Each year, the proportion of graduates choosing college or technical schools has risen" (Natriello et al., 1976).

The Alternative Learning Center in Morgantown, West Virginia serves a population of "severely school-alienated" youth. The school offers an individualized, self-paced curriculum that emphasizes student strengths, a counseling component, and a career education program. Students receive employment orientation through guest speakers as well as pamphlets and audio-visual materials covering job preparation and occupational opportunities. A seven-session job preparation course of self-paced activities and small group discussion follows orientation. Completion of the program is prerequisite to eligibility for employment placement. Although employment is not a requirement of the program, the career education teacher assists all students interested in obtaining employment or in being placed in a Vocational Technical Center. According to the evaluation of the school, 73 percent of those students who completed the program (N=31) held jobs throughout the school year (Zuckerman, 1978).

Available evaluations of vocationally-oriented programs indicate that student attachment to school is enhanced by this approach. Students appear to like the practical orientation and applied learning experiences (Bernhardt and Owens, 1978). Where vocational exploration and work experience are explicitly integrated with development of cognitive competencies such as reading and math skills, these approaches do not appear to interfere with development of these skills (Owens and Gallegos, 1977).

However, there are other issues to be considered. Supervision of out-of-school field placements requires careful attention to ensure that learning goals are achieved. In addition, to justify costs, vocational programs should prepare youths for jobs which are unobtainable without program participation. Conversely, in tight labor markets, it may be a disservice to provide youths with skills for jobs which they cannot obtain. Vocational programs also may contribute to "tracking" certain youths into less desirable occupational roles (Arno and Strout, 1978:21). Specific plans should be formulated for facilitating the transition from vocationally-oriented school programs to the world of full-time employment for students not continuing formal education.

Finally, it should be noted that vocational approaches are not essential in a successful alternative school. The Harlem Prep High School in New York serves a population of low income black youths, traditionally a group that experiences high unemployment rates. Many of Prep's students have dropped out of school or are on the verge of doing so. Most have had minimal academic success before entering the program. The school focuses exclusively on development of academic skills and good study habits in a disciplined work and learning environment. The goals are completion of high school and college placement. Vocational skills and out-of-school work experiences are not provided. The overall dropout rate from the program is 15 percent per year. According to the director, 95 percent of Harlem Prep's graduates obtain college placement (Dr. Ann Carpenter, 1979: Site Visit Interview).

D. Peer Counseling

Peer counseling (guided group interaction/positive peer culture) has been implemented in a number of schools across the country. Peer counseling is based on a recognition of the strength of peer influences on youths' behavior. The goal of peer counseling is to increase student commitment to school and to increase attachments between delinquent or pre-delinquent youths and more conventional peers by involving both "positive" and "negative" students in processes of discussion and problem solving.

This strategy is exemplified by the School Youth Advocacy Program, headquartered in Lansing, Michigan, which operates in sixteen Michigan school districts. Groups of nine to twelve students, segregated by sex, meet for one period each day, discussing problems and confronting one another regarding behaviors. An adult coordinator leads each group in problem solving activities and is available, when needed, outside the group. The group has decision-making power to impose sanctions for infractions by group members. If, for example, a person in the group is caught smoking in school, group members decide what measure should be taken and the group's decision is enforced.

Partners in Prevention in Oneida, New York; Positive Peer Culture in Omaha, Nebraska; and Peer Culture Development in Rock Island, Illinois have developed similar peer counseling programs which have been widely implemented. Single group, pre-post test evaluations of these programs suggest that delinquency, truancy, disciplinary violations, some types of drug use, absences, and school violence and vandalism have decreased in conventional schools where peer counseling has been implemented (Boehm and Larsen, 1978; Boehm, 1977; Howlett and Boehm, 1975; Shada and Winger, 1978). However,

because of weaknesses in evaluation designs, inadequate statistical analyses and uncontrolled subject attrition, we cannot attribute these results directly to peer counseling programs. The results may reflect chance, regression, maturation, history, or other effects.

Evaluation studies using quasi-experimental designs have shown mixed results for participants in peer encounter groups when compared with nonparticipants. Evaluation of the Positive Peer Culture Program in Omaha, Nebraska showed no significant difference between participants and nonparticipants in suspension rates and school grades. While participants had significantly lower rates of absenteeism than the comparison group before the program, their rates of absenteeism *increased* significantly during the year of the project, while absenteeism rates for the nonparticipants also increased, but not significantly. On the other hand, tardy rates for participants were higher than for nonparticipants during the year before the project and significantly lower for participants during the year of the project. The nonparticipants' tardy rates increased significantly over the two years while the participants' tardy rates decreased, though nonsignificantly (Malcom and Young, 1976). These results suggest that more rigorous evaluations of peer counseling approaches may not reveal such generally positive results as suggested by studies using simple pre-post designs.

Unfortunately, there is only limited evaluation data available on the use of peer counseling in alternative schools. Furthermore, some of the available results are not encouraging. For example, the Berrien County School-Based Peer Group Counseling Program evaluation found positive pre-post results in a number of the county's schools, but the small sample of five students surveyed in the county's Alternative Learning Center showed increases in a number of problem behaviors after program participation (Boehm, 1977).

In some regards, the use of peer counseling approaches in alternative schools parallels the detached gang worker approach to delinquency prevention. Both approaches work with groups composed largely of young people who have become disaffiliated from the mainstream. Detached gang workers have not been effective in turning gangs away from delinquent activities and may simply strengthen attachments among delinquent youths (Klein, 1969). To some extent, the same dynamic may emerge with peer counseling in alternative schools. Where the alternative school population is composed largely of disaffected youths, there will be little opportunity to mix disaffected and more conventional students in peer counseling groups. Thus, there may be limited potential for peer interaction sessions to use the influence of conforming students to encourage development of desired attitudes and values among disaffected students. Group processes may, indeed, reinforce negative behaviors.

Another possible problem with the use of peer counseling to control behavior is irresponsible use of peer pressure. "Without careful supervision, this process can become hostile and destructive, rather than conducive to insight and constructive outcomes" (Arnove and Strout, 1978:22).

Given the growing popularity of peer counseling and the likelihood that some alternative programs will use it, it is essential to rigorously assess its effects in alternative education programs. It cannot be assumed that positive results will be found.

E. Student Selection Criteria and Procedures

○ The "track," or type of academic program a student follows in school, is an important determinant of future academic opportunities, as well as satisfying adult roles. Education serves a:

"gate-keeper function," consigning elite positions to some by means of a complex system of progressive, cumulative credentials, [and] conferring lower status on others through a graded system of progressively lowered credentials (Polk, 1975:321).

When they do not include the elements specified earlier, alternative schools can simply track disruptive students out of the public school system (Cardarelli, 1977:34).

The high proportion of low income, minority students often enrolled in an alternative adds weight to the tracking concern. Arnove and Strout (1978:18) have noted a "dangerous trend toward isolation of minority students and especially blacks" in alternative schools. They note that in 1976, an alternative for troublesome youths in Louisville, Kentucky, had a student body that was 85 percent black. Yet the school was located in a school district with only 20 percent black student enrollment.

On the other hand, some alternatives, such as Harlem Prep High School in New York, have been praised for their sensitivity to meeting the specialized needs of a minority population.

The prevalence of problems of tracking and racial segregation in alternative schools emphasizes the importance of selection criteria and the need for student participation in selection. Many alternatives seeking to deal with learning problems and disruptive behaviors receive students through referrals from teachers or other school staff after the students have misbehaved. Although referred students may be given the opportunity to decline participation, they often have few other options within the school system. Where this is the dominant method of student recruitment, the racial segregation noted by Arnove and Strout can easily occur. This recruitment approach may also limit alternative programs' abilities to encourage attachments between conventional and disaffected youths.

The use of different student selection procedures in some alternative programs has minimized these problems. The Alternative Learning Project in Providence, Rhode Island; the Pilot School in Cambridge, Massachusetts; and the High School

in the Community of New Haven, Connecticut select voluntary student applicants who represent a cross-section of the traditional school population with respect to ethnicity, sex, academic interest, and socioeconomic status. The Marmalade Hill School in Salt Lake City purposely integrates troubled youths into a mixed population of students to avoid negative labeling of student participants. Area D Alternative, originally a school populated by upper middle-class white students, now admits students according to the Los Angeles School District's integration standards of a 40 percent minimum, 60 percent maximum minority population.

While well designed alternative programs for disruptive youths should be continued, tracking and racial segregation concerns dictate that alternative student selection approaches be considered. Careful attention should be given to implementation issues, racial imbalances, possible labeling problems, and the effects associated with different approaches to student selection.

F. Location

The physical location of alternative programs is also an issue for further research. In response to the charge that these alternatives physically isolated from traditional schools simply provide a means for getting rid of disruptive students, some districts have offered alternative programs in the traditional school setting. Other alternatives have been established in separate buildings, with students taking a few courses each day in the traditional school. Still other programs have been developed as "schools-without-walls" with classes held in churches, offices, colleges and public buildings to encourage students to become involved community citizens.

A rationale can be presented for and against each of these models. Separate alternatives are likely to be small. Because they are removed from traditional schools, they may not conjure up negative associations in the minds of disaffected students (Readio, 1977). They can become warm, self-contained learning communities where attachment and commitment are reborn. Yet, separate alternatives may fail to prepare young people to deal with the bureaucratic institutions with which they must cope in the larger society, may limit the potential for mainstreaming students back into regular classes, and may track students to low status futures. Schools-without-walls may provide an opportunity for greater community integration, but they may fail to provide a geographical base for student identification and attachment.

To our knowledge, evaluations of the comparative effectiveness of different locations for alternative programs have not yet been conducted. Both positive and negative results have been reported for alternative programs within the traditional schools (Arnove, 1977; Holmes and Bernier, 1978) and for separate alternative facilities (Readio, 1977 and Readio, 1976). At this point, there is not sufficient evidence to recommend one location or type of facility over another. Again, consideration should be given to the strengths and weaknesses of various models in planning alternative programs. A range of models should be implemented so that their relative merits can be compared in evaluation studies.

G. Learning Models

Alternative schools for disruptive youth often serve students with markedly different learning needs and behavior problems (Arnove and Strout, 1978:27). This fact has led to recognition of the importance of individualized instruction discussed earlier. However, motivated by concerns about the practical difficulties of individualizing programs for all

the students in a classroom and by a belief that a limited number of distinct student "learning styles" can be identified, some researchers have attempted to develop typologies of learning styles. Their ultimate goal is to identify teaching methods best suited to different types of learners and to match students with the most appropriate learning environments to maximize their academic successes.

Fizzell, for example, has identified fourteen academic and social-psychological variables that he believes determine the type of environment in which a student can best achieve (1979:L1-L10). He has operationalized the variables in a 92-item "Schooling Style Inventory" (Fizzell, 1979:Appendix M). Fizzell suggests that twelve to fifteen different environments may be sufficient "to educate all students in atmospheres which lead to maximum gain with minimum problems, such as truancy, vandalism and poor personal relations" (1979:L9). Unfortunately, Fizzell's research has not been sufficiently rigorous to test his suggestions. He studied students in an alternative school he ran and found that 80 percent of those whose "learning profiles" were appropriate for the environment of that school were achieving academically in that environment (Fizzell, 1979). However, this result does not preclude the possibility that these students would have succeeded in other environments nor that students with "inappropriate" profiles would have succeeded in his alternative school. Thus, it is currently impossible to determine the effectiveness of his approach of matching learner and learning environment for preventing delinquency.

Hunt has also developed a model which links the conceptual level of students with learning environments. Conceptual levels (CL) are derived from Piaget's work on the stages of cognitive development. They reflect the student's ability to comprehend material ranging from simple and concrete to complex and abstract. Learning environments are identified by the amount of external structure imposed by the teacher

on the student's acquisition of knowledge. They range from traditional, teacher-centered lecture approaches to self-directed student-centered approaches. Hunt's research has let him to conclude that

low CL learners (i.e., simple, concrete) profit more from high structure and high CL learners (i.e., complex, abstract) profit more from low structure or, in some cases, are less affected than low CL learners by variations in structure (Hunt, 1974:321).

Again, however, the effectiveness of this approach as a delinquency prevention strategy is untested.

The technology of matching students with learning environments is still in a developmental stage. One potential problem with the approach is that establishing a number of different learning environments into which students are placed via a preference inventory may create a new form of an old problem: tracking. Arneve and Strout (1978:29) warn

We...fear that the labels of student learning style or conceptual level may be translated into iron-clad categories and that students, so classified, will receive instruction geared primarily to a preconceived notion of capability or preference. Implementation of policies aimed at early identification, separation, and homogeneous grouping of students for special treatment conceivably may operate to the detriment of individuals--whose total range of capabilities and talents are not challenged--and to the detriment of racial minorities and low income groups.

On the other hand, it cannot be assumed that either allowing students voluntarily to choose among learning environments or assigning them to classes on the basis of subjective judgments of school administrators will match them with environments most likely to promote academic success and prevent delinquency (Duke, 1978:354). Student learning style assessments may ultimately provide a basis for more rational matching of students and learning environments though, as indicated, there is not enough evidence available to adequately evaluate the effectiveness of these approaches.

H. Primary Grade Alternatives

This paper has focused on alternative programs for students identified as disruptive or troublesome. Alternatives of this type have typically been offered to junior or senior high school-aged youths. Yet, academic failure (poor school achievement), disruptive behaviors, and truancy are often first manifested in the early school experiences of students who will later become delinquent (Feldhusen et al., 1976; Silberberg and Silberberg, 1971). Teachers' behavioral assessments of students in primary grades combined with other variables (sex, IQ, home location, an aggressive behavior index, and scores from the "K.D. Proneness Scale") have predicted long term social adjustment and delinquency with 79 percent accuracy (Feldhusen, 1978:7). This finding suggests the desirability of intervening when trouble signs first appear in school and before serious problem behaviors and disaffection must be remedied. To this end, some schools have provided alternative learning environments for primary grade school students.

The Sweet Street Academy (Arnove and Strout, 1978) is a program for "unmanageable" students in grades 3-7. It emphasizes the development of warm relationships between students and teachers and development of affective interpersonal skills. Individualized instruction is used for cognitive skill development. A 1975 evaluation of the program, using a single group pre-post design, showed substantial student gains in reading and mathematics, improved attendance rates, substantial improvements in behaviors of students previously noted as being troublemakers, and positive student and parent attitudes toward the school (Walizer et al., 1975a). Unfortunately, these changes cannot be directly attributed to the program since outcomes for comparison or control groups not served by the program were not measured. Given the evaluation design, we cannot rule out the possibility that maturation, or other causes were responsible for apparent student improvements while at Sweet Street.

Several issues must be considered regarding alternative programs for primary grade school students. First is the problem of identification. While teachers can correctly identify many students with academic and behavior problems, their predictions regarding subsequent delinquency are wrong in some cases (Feldhusen et al., 1976). The risks associated with such "false positive" identifications depend both on the type of subsequent behavior being predicted and the nature of the response to those identified. These risks are especially salient when attempting to identify "pre-delinquent youths" for special treatment. Being labeled and sorted for special treatment as a pre-delinquent may itself be an experience which encourages subsequent delinquency (Lundman and Scarpitti, 1978:214). Given the track record of predictive instruments and crime prevention interventions based on early identification of pre-delinquents (Monahan, 1975; Monahan and Cummings, 1975; Ray and Jeffery, 1967; Reckless and Dinitz, 1972), it is probably unwise to use teacher ratings, psychological tests or other tools to identify primary grade school students as pre-delinquents for special treatment.

On the other hand, teacher ratings can be used with less risk and greater confidence to determine which primary grade students need additional assistance to succeed academically. If the alternative education program offered these students focuses explicitly on increasing academic success and is not viewed or operated as a program for "predelinquents," it may assist these students and may, in some cases, help to prevent delinquency. It should be made explicit that the students included in such a program are *not* all likely to become delinquents without the program simply because they have had difficulties in school during early grades.

In summary, primary school alternatives should be implemented as programs to enhance academic success rather than as prevention programs for "predelinquents." This approach requires local districts to make commitments to expanding

opportunities for student academic success even though the potential for preventing subsequent school problems of violence and vandalism cannot be guaranteed. The delinquency prevention potential of such alternatives may only be demonstrable over a relatively long period.

For these reasons, special emphasis grants focused on delinquency prevention should not be used to create new alternatives for primary school students. The risks are that districts initiating primary school alternatives under such grants might focus primarily on preventing or controlling problem behaviors among students they identify as "pre-delinquents," rather than on ensuring academic success of students identified as needing academic assistance. This risk is less likely in districts where a commitment to primary school alternatives has already been made before Federal funds earmarked for delinquency prevention become available. Therefore, in the interests of maximizing the special emphasis funds available to answer the key research questions discussed here and to assess alternative education as a secondary delinquency prevention strategy, funds should be concentrated on programs for students in grades 6 through 12.

I. A Program Example, Evaluation Problems and Implications for Delinquency Policy

We have discussed elements which should be included in alternative education programs and issues which require further assessment. In this section, we present an example of an alternative education program which contains many of the elements we have discussed and which has been evaluated. The program is discussed, in part, because it represents a promising and reasoned approach to alternative education for disruptive youth. Its evaluation is discussed because, like most evaluations of alternative education programs, it does not tell us whether this promising and reasoned approach is effective in preventing delinquency or, for that matter, in

increasing academic success and decreasing rates of truancy and suspensions among its students.

The Learning Alternatives Program (LAP) in Tampa, Florida, is an alternative junior high program for students identified as needing specialized educational and behavioral services as a result of a history of problems such as truancy, learning difficulties, or law violations. In the program, a teacher and a counselor are assigned to each class of ten students.

Students attend LAP classes for four periods each morning. They attend two regular school classes (physical education and an elective) in the afternoon. This arrangement seeks to ease the transition back to the traditional school and to lessen the negative labeling attached to being in a special program. The last period of the day is set aside for the group to meet as a whole with the teacher and counselor to review activities, deal with problems, set short term goals, and reinforce achievements.

An individualized academic program is developed for each student. All students are pretested and post-tested in English and math and are assessed on attitudinal and behavioral measures. The goal is to provide a learning program where students experience success. In addition, coping and problem solving skills, skills for seeking and holding employment, respect for authority, and responsibility are emphasized.

The counselor works with students and their parents on any nonacademic problems that arise and is available to provide support after school hours. Weekly sessions are held in the students' homes or the community, so that youths experience support in these environments. The counselor meets regularly with parents to teach parenting and communication skills. Faculty contacts are made following student absences and trancies.

Evaluation of LAP has shown a 91 percent reduction of court-recorded delinquent offenses and a 23 percent reduction in status offenses although, as discussed shortly, these figures are misleading since the baseline period was the youth's

entire life before program entry. More valid indicators of student changes are a 52 percent reduction in suspensions and a 72 percent reduction in unexcused absences during LAP participation when compared with the previous school year. Aggregate student scores on the California Test of Basic Skills increased at a rate of .20 per month, above the .18 specified by the E.S.E.A. Title I Supplementary Education Grant (DeVolentine, 1978). Unfortunately, as is the case with many evaluations of alternative programs, the LAP evaluation is not sufficiently rigorous to allow conclusions to be drawn regarding the program's effectiveness in bringing about any of these changes.

The problems in the LAP evaluation illustrate the general weakness of many existing evaluations of alternative education programs. They are described here both to highlight the dilemma currently facing those who seek to use existing research on alternative education as a basis for planning for delinquency prevention and to demonstrate the need for more rigorous evaluation of alternative education in the future.

There are three major problem areas in the LAP evaluation which have appeared repeatedly in the evaluations of alternative education programs we have reviewed. The first problem is the research design. A one group pretest/post test design was used. This design does not control for statistical regression toward the mean. Many students were moderately to highly delinquent at the beginning of their participation in LAP. Lower rates of delinquency may have been likely even without the program. The one group pretest/post test design also fails to control for changes due to maturation. Students may have outgrown some of their delinquent or troublesome behaviors. Both regression and maturation may have been responsible for observed changes in LAP participants. The results reported cannot be attributed to the program on the basis of one group pretest/post test design. Yet this design

is commonly used in evaluating alternative education programs (Clark, 1978; DeVolentine, 1978; Holmes and Bernier, 1978; Walizer et al., 1975b; Zuckerman, 1978). This concern with evaluation design rigor may seem a rather fine point. However, less rigorous pretest/post test studies have repeatedly produced positive results in contrast to the less optimistic conclusions resulting from controlled studies in which other possible explanations for observed outcomes are assessed (Lundman and Scarpitti, 1978:210).

The second problem is in measures used. Some evaluations fail to specify and assess any delinquency variables at all. Yet even where these are specified they are often poorly operationalized. In the LAP evaluation, for example, official court-recorded delinquency and status offenses were the only delinquency measures used. There are two problems in LAP's use of these measures. First, all officially accumulated delinquencies and status offenses prior to LAP admission were used as the baseline for comparison with officially court-recorded delinquencies during a single school year of LAP participation. The two time frames (lifetime before the program and a maximum of eight months during the program) are vastly different. Pretest/post test comparisons based on percentage reductions in official delinquency during these two time periods are likely to vastly overestimate changes in delinquency. Yet, the LAP evaluation used this comparison as the indicator of delinquency outcome.

Secondly, court-recorded delinquents are not adequate measures of youths' actual behaviors. Court-recorded offenses reflect criminal justice system variables including police and court discretion in processing cases (Piliavin and Briar, 1964; Lundman and Scarpitti, 1978:217). Law enforcement or court decisions as to whether an encounter with a youth will lead to a court record may be influenced by a number of factors unrelated to delinquent behavior (William and Gold, 1972), hence biasing official delinquency rates. Furthermore,

court records reflect only a small proportion of actual delinquent behavior (Gold, 1966). To assess changes in delinquent behavior, self-reports of delinquent activities should also be secured in evaluations. Again, this problem of inadequate delinquency measures is common in evaluations of alternative programs. Where alternative school evaluations look at delinquency outcomes at all, they generally rely solely on officially recorded delinquency (Clark, 1978; Grady, 1978; Zuckerman, 1978).

The third major problem in alternative school evaluations is in data collection and analysis procedures. In the LAP evaluation, adequate care was not taken in data collection and analyses to insure confidence in either the accuracy or significance of results. For example, positive change scores were reported on achievement tests from the pretest to the post test. Yet only students who had remained in school until May of the intervention year were post tested. A substantial number of LAP participants (32 of 74) were no longer in LAP by May to be post tested. Thus, the loss of the least academically successful students from the post test may account for the apparently positive results on the California Test of Basic Skills. Finally, null hypotheses testing was not conducted on any of the reported changes to assess the extent to which observed results were significant and not attributable to chance alone.

The LAP evaluation is typical of many alternative school evaluations. The methodological weaknesses in the evaluation do not allow a determination of whether the program actually generated the desired effects. As a result of such weaknesses in research on alternative education, we are left recommending elements to be included in alternative education programs on the basis of conceptual logic and correlational evidence regarding delinquency causation. Policy regarding alternative education for delinquency prevention must currently be

formulated without certain knowledge of the effectiveness of such programs.⁹ If this situation is to be remedied and a reliable knowledge base developed for future policy, alternative education programs funded to prevent delinquency must be evaluated using designs which allow assessment of program effects. It is with the goal of encouraging more rigorous evaluations of new alternative education programs that we present the final section of this report.

VII. STANDARDS FOR EVALUATION OF ALTERNATIVE EDUCATION

In this final section, minimal criteria for evaluation designs for alternative education programs are outlined.

A. Process Monitoring

Alternative programs should develop procedures for describing and monitoring the following program elements (adapted from Walker et al., 1976).

- 1) Context
 - a. The historical antecedents of the program.
 - b. The organizational structure of the program
 - c. A description of the physical facility and location
- 2) Student Identification
 - a. Criteria for eligibility
 - b. Student selection procedures used
 - c. Referral sources
 - d. Student characteristics (age, ethnicity, dates of admissions and termination from the program, attendance, etc.)

3) Intervention Strategies

- a. The theory base of an alternative education program which states the presumed causes of delinquency the program seeks to address and the rationale for the approaches used in the program
- b. Actual activities of the alternative program
- c. Duration of services
- d. Intensity of services
- e. Characteristics of the alternative learning environment¹⁰

Without documentation of these program elements, outcome evaluation studies are relatively useless for policy making even if they yield positive results, since they do not describe what generated observed results, making replication impossible.

An ethnographic component of the process evaluation which provides narrative descriptions of the program, implementation issues, problems encountered, and solutions found can also provide important data and should be considered.

B. Outcome Studies

1) Standardization of Measures

Standardized measures of the outcome variables of interest should be used in evaluations of alternative education programs. Standardized measures will facilitate cross-program comparisons of results, allowing assessments of the relative effectiveness of various alternative education approaches. This will clearly be beneficial as a basis for future policy decisions. Given the importance of standardized outcome measures, funding agencies should specify, in advance, those measures which should be used in evaluating programs. Clearly, programs should have the latitude to add

evaluation measures relevant to their particular approaches. However, clear specification of minimal evaluation criteria and measures will assist those who respond to grant solicitations in developing goals and objectives consistent with the funding agency's expectations.

The following outcomes should be assessed in alternative education programs for disruptive youths.

a. Academic performance. Standardized achievement or competency tests (such as the California Test of Basic Skills) should be used to evaluate academic achievement. Use of these standardized measures is particularly important in alternative programs where traditional indicators of achievement, such as school grades, are themselves manipulated or eliminated as part of the intervention. For those students working toward the goal of high school graduation, attainment of a diploma or GED can also be used as a measure of academic success. Finally, students' perceived academic competence should be assessed on a time-series basis using a survey instrument.

b. Student commitment to educational pursuits and attachment to school. Student commitment and attachment to school should be evaluated using a survey instrument (see Elliott and Voss, 1974 for an example). Withdrawal rates and reasons for withdrawals; attendance and tardy rates; and average percentage of pupils absent from class during each period can also be used as unobtrusive measures of commitment to school (Webb et al., 1966).

c. Attachment to conventional others and delinquent peers. Student attachments to others in the school can be assessed using a survey instrument which includes items which ask how much students like their teachers and how many of their friends have been picked up by the police for delinquent activities.

d. Occupational attainment. "Academic experiences are to be treated *instrumentally* as means to further

ends, rather than intrinsically in terms of interest or enthusiasm with the substance" (Polk, 1975:321). Longitudinal follow-up studies on students' occupational attainment should be conducted in part to investigate the possibility that alternatives "track" students into lower socioeconomic status labor market positions.

e. Prevention of delinquency. Three sets of delinquency-related measures should be used. First, official records of involvement with the criminal justice system should be collected for participants. Although these data do not validly represent delinquent behavior and cannot be reliably compared across jurisdictions due to differences in policies of various components of juvenile justice systems, they can be used for pre-post comparisons of official legal processing and to assess the costs incurred or saved by the criminal justice system.

Second, a confidential self-reported delinquency data collection tool should be used (see Hirschi et al., 1979 for sample items). Self-report measures will provide information on student behaviors from pretest to post test periods and should be comparable across jurisdictions and programs. While self-report measures appear to produce reliable estimates in descriptive studies (Hirschi et al., 1979), it should be noted that such self-report measures may be subject to halo effects and other threats to validity (Campbell and Stanley, 1966) when used in evaluations of programs which seek to prevent delinquency (Gould, 1969). For example, participants who are aware of the goals of the program may report lower rates of delinquency after program participation, though their actual behaviors have not changed. The possibility of validity problems underscores the importance of using multiple measures of delinquency in evaluating program outcomes (Lundman and Scarpitti, 1978).

Third, the incidence of school violence and vandalism over time should be used as a measure of delinquency. Comparison of the costs of vandalism between experimental and comparison schools may itself yield an indication of the effectiveness of alternative schools.

f. Cost measures. Finally, evaluations should include measures which allow assessment of cost-effectiveness or cost-benefits. Although a school may be found to be successful in delinquency prevention, high costs may militate against replication. Efforts should be made to assess possibilities for the alternative to become self-reliant. Successful programs with budgets grossly over the traditional schools' allotment per pupil may not be continued or replicated.

Cost-benefit studies should evaluate direct school operational costs and indirect benefits accrued to the schools and the criminal justice system (if any). These studies should assess the cost-effectiveness of enrolling disruptive students in alternative schools as opposed to hypothetically processing them through the criminal justice system at a later point in time. Studies should also investigate projected cost savings from reduced school vandalism, possible savings from the reduced need to invest in more expensive designs and construction to make a school "secure," savings from the need to hire security guards, savings from more task-oriented uses of school staff (e.g., teachers as faculty members as opposed to security guards), and other possible benefits. Fizzell notes, for example, in his evaluation of the Truant's Alternative Project, that in one school "there was substantial increase in state aid due to improved attendance" (Fizzell, 1979:4). Finally, possible community benefits derived from a demonstrably safer school and community should be considered in selecting evaluation measures.

2) Research Designs for Outcome Evaluations

Research in alternative education has been impaired

by inadequate sample sizes and the lack of control or comparison groups. The reasons for this have been manifold. As noted by Shorr et al. (1979:30), most alternative school programs are not "experiments designed solely, or primarily, to increase our knowledge about school-based delinquency prevention programs." Rather, they seek to control and prevent immediate problems in schools. As a result, they work with the students most in need of their services. A comparable unserved group for study is often unavailable. Rigorous evaluative research may simply not be a priority in the face of immediate school and student needs and problems.

Nevertheless, if the effectiveness of alternatives for delinquency prevention is to be determined, it is imperative that those who fund alternative education programs for delinquency prevention earmark adequate resources for rigorous evaluation. To assess program effectiveness, evaluations should use quasi-experimental or experimental designs in which participants are compared with nonparticipants. Where random assignment to an alternative program is not feasible, time-series designs should be used so that trends in outcome variables of interest can be compared across participants and nonparticipants who may be students on waiting lists for program admission, students in a school not served by the alternative, or youths matched for prior delinquent histories, to name a few possibilities.

3) Research Time Frame

Evaluation studies should include longitudinal follow-up studies to assess alternative schools' effects on student behavior and academic achievement over time. Students should be pretested on standardized academic competency tests and surveyed for self-reports of delinquent acts prior to admission into the program. Academic achievement, delinquency, and other variables discussed above should be investigated at periodic intervals during the program and immediately after program completion. Follow-up data on delinquency, academic

success, and labor market achievement should be gathered at least one year after program completion. Ideally, the follow-up should last at least twice as long as the treatment period (e.g., a one-year-long program should have at least a two-year follow-up) (Fizzell, 1979, Appendix K).

Without standardized measures, rigorous evaluation designs, and adequate follow-up time frames, we will continue to be unable to assess the effectiveness of alternative education for delinquency prevention. Policy and funding decisions will continue to be made without such knowledge. 13 11

VIII. CONCLUSION

In conclusion, it should be noted that the success of alternative education programs depends on a number of implementation factors not discussed here. For example, in order for public alternative schools to succeed, school districts must make commitments to the value of alternative education. Where alternative programs for disruptive youths include the elements outlined earlier, they should increase academic success and commitment to educational pursuits and prevent delinquency among participants. Where programs are not designed with attention to these elements, they can become "dumping grounds" for disruptive students and unlikely to prevent delinquency. School districts will ultimately need to finance alternative projects at a per-student rate at least equivalent to that of other schools in the system. Yet, sufficient autonomy must be given to the alternative program to experiment and diverge from the traditional system in areas such as staff hiring, student grading, and evaluation (Arnove and Strout, 1978). Support from the community will have a major impact on programs. An active constituency of students, teachers and administrators, parents, criminal justice system members, and other concerned citizens can

help a program survive (Arnové and Strout, 1978). Implementation issues and approaches in alternative education are extensively discussed in *Alternative Education Options* (Fenrich et al., 1979).

NOTES

1. See Feldhusen, 1978 for a more extensive review of the literature on school related problems.
2. Data cited are from Weis's (1974) Lafayette data set, a cross-sectional study of eighth and eleventh graders in California; Hindelang's Somerville data set, a cross-sectional study of students in the tenth, eleventh, and twelfth grades in an east coast high school; and Elliott and Voss's (1974) San Diego data set, a four-year longitudinal study which followed a group of California high school students from ninth through twelfth grades, maintaining dropouts in the sample.
3. While the correlation between having delinquent or deviant friends and self-reported delinquent behavior has repeatedly been shown to be strong, there is currently much debate as to whether delinquent behavior precedes association with delinquent friends (i.e., delinquents flock together) or association with delinquent friends leads to delinquency (i.e., delinquent peers cause delinquency) (Weis et al., 1979). While more longitudinal research is needed to provide definitive answers regarding the causal ordering of the relationships, available longitudinal studies on marijuana use among adolescents suggest that association with others involved in use precedes use itself and, thus, may contribute to this form of delinquency (Jessor et al., 1973; Krohn, 1974).
4. A number of alternative programs have implemented individualized learning programs and/or contingency reward systems as discussed in this section. The Aurora Street Academy in Aurora, Colorado offers a nongraded curriculum and utilizes learning contracts, signed by student and teacher involved, to enable students to earn points for school credit. To emphasize student responsibility and participation in the decision-making process, unmet contracts are reviewed quarterly by a student-dominated appeal board (Flaxman and Homstead, 1978:34). At the Alternative Learning Project in Providence, Rhode Island "Social Contracts" are drawn up by students with help from teacher-advisors and signed. The contracts define each student's curriculum package (concentration in the Visual Arts, Performing Arts, Education, Law and Justice, Medical Care, or Communications), personal learning goals, and methods of obtaining the goals. These methods may include regular coursework offered through the school, courses taught by volunteers, site placement in local businesses or agencies, and courses at other academic institutions in the Providence area (McKinney,

n.d.). In the contingency contracting system of the Hilo Hukilike Alternative Junior High School in Hilo, Hawaii, each student contracts with his or her teachers on a daily basis to attend class on time, perform routine tasks, complete 80 percent of his or her assignments with 90 percent accuracy, and be respectful to his or her teachers. Students receive points which are usable for purchasing privileges or paying fines for inappropriate behaviors. Points give students the right to participate in school trips, including overnight campouts. Contracts also place conditions under which students are eligible to participate in an off-campus work-study program.

5. Open classrooms in Bennett's study were characterized by nonassigned seating arrangements, freedom for students to move around the classroom, freedom for students to talk to each other, and greater proportions of teacher time spent working with students individually or in groups compared with time spent addressing the class as a whole.
6. The advantages of small school size are described in an evaluation of the City School in Madison, Wisconsin which averaged between 105 and 120 students during the first four years of its existence (1971 to 1976). The evaluation cited the following advantages of this size: greater opportunities to know everyone in the school, to form close relationships with the teachers, to participate in democratic decision-making, to individualize instruction, to institute changes, and to build teacher cohesion.

...A crucial factor lies in the greater educational opportunities and demands for involvement in certain areas. At City School activities such as plays involve a great percentage of the student body at one time or another. This involvement cuts across all lines and the activity is, thus, not dominated by a certain group of people. People in a small setting can be involved and are often required to be involved in a great many activities just so they can happen (Evaluation Management Group, 1976:3).

7. Examples include *Magic Circle* (Palomares, 1974), *Curriculum for Meeting Problems*, and *Values Clarification* (Harmin et al., 1973; Howe, 1975).
8. Though not an alternative school, the Blauvelt Elementary School in Cottage Lane, New York provides an example of the importance of the administrator in establishing overall school climate and promoting academic success among students.

The Blauvelt Principal, Dr. Jo Ann Shaheen, instituted a school-wide program, Esteem PACT, which was designed to unify the efforts of parents, administrators, students, and teachers toward raising children's self-esteem. She revitalized the Student Council by creating two Student Advisory Councils, Big SAC for the pupils in grades 3, 4, and 5, and Little SAC for those in grades K, 1 and 2. Both Big SAC and Little SAC members have been taught problem-solving techniques for addressing real school problems. Students are encouraged by the faculty and principal to express their feelings about their school through letters or direct conversations. Furthermore, Shaheen has worked to make the school a place where students never lack something to do by sponsoring school "Read-a-thons," "Metric Week," Saturday Fairs displaying the children's work, a project to study mass production in which assembly lines were organized to create sandwiches, and other activities.

Although we have not reviewed the evaluation of the Blauvelt School to assess its rigor, Howard (1978) reports that results have been positive. Parents have been very receptive to the school: Eighty-two percent of the K-2 parents and 75 percent of the 3-5 parents have indicated that their children "almost always like school." Academically, Blauvelt students have scored above average on the New York State Pupil Evaluation Program (PEP) tests. Before Esteem PACT was instituted, 38 percent of the third grade students tested in stanine 7, 8, or 9 in reading, and 47 percent scored in stanine 7, 8, or 9 in mathematics. Since the program has been in operation, the proportion of third graders testing in stanine 7, 8, or 9 has risen to 67 percent in reading and 70 percent in mathematics (Howard, 1978).

9. It should be noted that one group pretest/post test evaluations may be useful for immediate program planning decisions. The results can be used to identify areas in which participants are improving and areas in which the desired improvements have not occurred. They may also be useful in comparing participant outcomes against program goals and objectives (see Zuckerman, 1978, for an example). They are less useful for informing policy decisions regarding types of programs to fund.
10. Standardized instruments can be used for assessing the school environment. See Trickett and Moos, 1974; Epstein and McPartland, 1975.

11. Currently, Martin Gold at the Institute for Social Research at the University of Michigan is conducting a major experimental study of alternative education programs which seeks to overcome research problems common in most available studies of alternative education. His study should provide important information for policy-makers.

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APPENDIX 4

NATURE OF COMMENTS AND LEAA'S RESPONSE

The Office of Juvenile Justice and Delinquency Prevention (OJJDP) received 125 responses to the Alternative Education Initiative Draft Guideline published in the October 15, 1979 Federal Register. An analysis of these comments shows that the majority of the commentors supported the program. Some provided suggestions for substantive and technical modifications, and only a few commentors expressed opposition to the OJJDP becoming involved in educational issues.

Comments were received from 38 private organizations, 12 state planning agencies, 6 state departments of education, 18 school boards, 4 public school districts, 14 private schools, 1 state correctional institution, 4 state governments, 8 city governments, 2 private citizens and 8 churches and community organizations.

There were 77 letters received of a general nature which reiterated the intent of the guideline.

The comments received and LEAA's response follows:

1. PROGRAM OBJECTIVE

a. Two comments were received regarding the following specific concerns:

- (1) It was suggested that Objective Number 1 was more relevant to the strategy section. OJJDP concurs with this comment and the objective has been changed to read as follows:

"To develop and implement strategies and techniques in alternative education in public and private not-for-profit schools which improve those educational policies, practices and procedures which impact the services to youth."

- (2) It was suggested that truancy be added to Objective Number 3. OJJDP concurs with this addition and the objective has been changed to read as follows:

"To reduce the number of student dropouts, truants, suspensions and expulsions in schools and school districts where these programs operate."

- (3) It was suggested that an objective addressing in-service training be added. However, Objective Number 2 of the Guideline provides for any staff training.

2. TARGET POPULATION

- a. Several commentors suggested that the target age should be lowered and that the program should be aimed at students in grades 4 through 12 instead of grades 6 through 12.

- b. The Office of Juvenile Justice and Delinquency Prevention has decided to maintain the proposed target group (students in grades 6 through 12) with an emphasis on those transitional years from elementary to junior high and from junior high to high school for the following reasons:

- (1) Based on research findings, youth between the ages of 12 to 15 experience the most difficulties in school, and are the most at risk of either committing a crime or being the victim. The National Institute of Education 1977 Report indicates that of three-fourths of all attacks and robberies of students, the victims and offenders are roughly the same age and the same sex. With minor exceptions, the risks of being a victim of either attack or robbery in secondary schools declines steadily as grade level increases. Seventh graders are most likely to be attacked or robbed and 12th graders are least so.
- (2) As a result of an assessment on "Delinquency Prevention Through Alternative Education" conducted by the National Center for the Assessment of Delinquent Behavior, several issues must be considered regarding programs for primary grade school students. First is the problem of identification. While teachers can correctly identify many students with academic and behavior problems, their predictions regarding subsequent delinquency frequently are inaccurate (Feldhusen, et al., 1976). The risks associated with such "false positive" identifications depend both on the type of subsequent behavior being predicted and the nature of the response to those identified. These risks are especially salient when attempting to identify "pre-delinquent youths" for special treatment. Given the track record of predictive instruments and crime prevention interventions based on early identification of pre-delinquents (Monahan, 1975; Monahan and Cummings, 1975; Nay and Jefferys, 1967; Neckless and Dinitz, 1972), it is unwise to use teacher ratings, psychological tests or other tools to identify primary grade school students as pre-delinquents for special treatment. Therefore, in the interest of maximizing the special emphasis funds available and to assess alternative education as a delinquency prevention strategy, funds will be concentrated on programs for students in grades 6 through 12, with an emphasis on grades 6 through 9. For additional information, please refer to the background paper (Appendix 1, pp 30-32).

3. RESULTS SOUGHT

- a. There were eight comments that suggested that the OJJDP include Section c(2) which reads, "Specific goals and objectives must have primary impact upon policies, procedures and practices on schools and school districts" under the Results Sought Section. It was argued that it is unreasonable to expect administrators to alter policy until they have seen the demonstrated success of a program.
- b. The OJJDP considered these comments and has made the following clarifications:

- (1) OJJDP has always considered this initiative as a demonstration program, with the ultimate goal being that the models should impact upon the schools' policies, procedures and practices; and that changes in the educational system would occur, both during program implementation and following.
- (2) OJJDP has clarified the language of Objective Number 1 to be more responsive to the Result Sought and Strategy sections. The objective reads as follows:

"To develop and implement strategies and techniques in Alternative Education in public and private not-for-profit schools which improve those educational policies, practices and procedures which impact the services to youth."

- (3) OJJDP has revised Section c(2) to read as follows:

"Specific goals and objectives must have significant impact upon the result sought in paragraphs b(4)(a) through (f)."

- (4) OJJDP has added a statement to Section b(4)(e) in Result Sought that reads as follows:

"Organize and structure learning experiences in a way which enhances continuity and maturational development."

- c. Based on research findings, OJJDP feels that the emphasis on the alternative education delinquency prevention program must be placed on those transitional years of youth education from primary grades to junior high and from junior high to high school.

4. PROGRAM STRATEGY

- a. There were approximately nine comments concerning the Program Strategy section. Some commentors made reference to "the establishment of a clear system of support and rewards for individual improvement" and "differential reinforcement for different amounts of personal progress" as a behavior modification technique. The OJJDP is not recommending behavior modification, but rather a system of rewards and incentives beyond the traditional grading system. Rewards can be keyed to specific interests and goals of each student. Students who have not obtained good grades in traditional classrooms may have discounted the importance and validity of grades. Varied reward systems, such as token economies or systems in which credits toward desired goals are offered for academic progress, should be instituted.
- b. One commentor recommended that in the following statement, "Schools must provide youths the opportunity to receive an educational experience which is relevant to their interests and meets the need for cognitive and affective learning skills which contribute to positive growth and development" should be clarified by adding "an educational experience geared to developing constructive interests relevant to their environment." OJJDP concurs with this suggestion and the statement has been changed and now reads as follows:

"Schools must provide youths the opportunity to receive an educational experience geared to developing constructive interests relevant to their environment while meeting the need for cognitive and affective learning which contribute to positive growth and development."

- c. Some commentators made reference to the "continuous contact between the problem student and the regular student" as unclear. By continuous contact, OJJDP means that the students are not segregated from the rest of the school community if only a portion of the school community is participating in the program. In those schools where the total population is participating in the program, this element would not be necessarily applicable. However, in those schools where a small population of the student body is participating in the program, there should be some academic and extra-curricular activities where the students in the program can participate with the total population.
- d. Some commentators made reference to the "volunteer basis." By volunteer, OJJDP means that the program should be open to anyone who wants to participate. The program should be developed so that students without school problems as well as those with problems are attracted to the program. Criteria should be flexible enough to accept a heterogenous group of students.
- e. Some commentators referred to 3(e), "Utilization of peer group experience in every aspect of the learning situation" as an unrealistic requirement. OJJDP concurs with the suggestion and the statement has been changed and now reads: "Utilization of peer group experience and parents in as many aspects of the learning situation as possible."
- f. There were other comments made about the emphasis of this section. These are key elements that OJJDP would like to see incorporated in the project models. These elements will enhance the delinquency prevention potential of alternative education. It is important to emphasize that none of these elements alone is likely to prevent delinquency. It is the combination which holds promise. Therefore, OJJDP has decided to keep these elements as requirements for the project models.

5. METHODOLOGY

There were two comments on this section regarding appropriate mix of students which will participate in the program. The OJJDP has decided to maintain this requirement to prevent any unnecessary tracking and racial segregation of students. To assess how problems of tracking and segregation can be minimized, a variety of models for participant selection should be implemented and assessed. These should include recruitment processes which seek to insure a student population representative of a cross section of the traditional school population.

6. DOLLAR AMOUNTS

- a. There were several comments concerning the maximum funding levels for each project. The OJJDP, after consideration of these comments, has decided the following:
 - (1) The maximum amount allowable for a grant with only one project site with the size of each grant based upon the extent of the problems to be addressed and the realistic improvement expected to result in schools, number of juveniles served, the cost-effectiveness of the project design, and the jurisdiction's capacity to absorb the program after this funding terminates is \$350,000 per year, for a total of \$1,050,000 for a three-year period.
 - (2) The maximum amount allowable for a grant with multiple project sites with the size of each grant based upon the extent of the problems to be addressed and the realistic improvement expected to result in schools, number of juveniles served, the cost-effectiveness of the project design, and the jurisdiction's capacity to absorb the program after this funding terminates is \$600,000 per year, for a total of \$1,800,000 for a three-year period.

7. APPLICANT ELIGIBILITY

- a. There were approximately 24 comments concerning the eligibility of:
 - (1) Rural areas.
 - (2) National organizations.
 - (3) Trust Territories and off-shore possessions of the United States to be eligible applicants for funding under this guideline.
- b. OJJDP response to the comments are:
 - (1) OJJDP has always had the intent to include rural areas as eligible applicants. In Section f(1), Applicant Eligibility, OJJDP states that "Applications are invited from public and private not-for-profit schools, agencies or organizations who propose to serve disadvantaged youth from rural and urban areas with high levels of serious school related problems."
 - (2) Based on the comments received about the eligibility of national organizations, OJJDP has clarified the intent to include national organizations and has decided they are eligible to participate in this initiative, but those that choose to operate in more than one state must clearly describe the strategy for impact. They must operate in a state or community where they have a local affiliate and/or already established organizational linkages with the school system.
 - (3) Trust Territories and off-shore possessions of the United States have the same opportunities to apply for these funds as the states do.

- c. There were two comments objecting to the heavy involvement of the public schools in sponsoring and supervising alternative education programs and not enough emphasis placed on other agencies who serve disturbed and disruptive youth.
- d. In response to this comment, OJJDP feels that it is made explicitly clear that applications are invited from public and private not-for-profit schools, agencies or organizations who propose to serve disadvantaged youth from rural and urban areas with high levels of serious school related problems. The ultimate goal of the demonstration projects is the impact and the changes these projects will produce in the public educational system.

8. EVALUATION REQUIREMENTS

- a. One commentor recommended OJJDP provide more specific and detailed information regarding the evaluation requirements and design.
- b. In response to the recommendation, OJJDP has reorganized and altered the Evaluation Requirement section. This was done in order to avoid adding additional detailed information in this program announcement. It will be included in a separate solicitation for the evaluation of this project. The Evaluation Section now reads as follows:

1. Evaluation Requirements

The projects funded under this program will be evaluated by an independent evaluator selected by the Office of Juvenile Justice and Delinquency Prevention under separate solicitation. Applicants must identify information unique to their particular proposed approach to enable the national evaluator to develop a national management information system which would provide uniform information on projects of similar scope and design. The national evaluator will provide training and technical assistance in implementing the management information system. The major goals of the evaluation are to:

- (a) determine the impact of the program on dropouts, suspensions expulsions, truancy and delinquency;
- (b) determine the extent to which policies, practices and procedures of schools and school districts are modified and describe the nature of such modifications;
- (c) determine the impact of the program on school achievements, development of social and academic skills, and on youth and parent participation;
- (d) determine what types of services appear to be most effective for what types of youth under what conditions; and

- (e) document the planning and implementation processes of different program approaches to alternative education.
2. The management information system will include but not be limited to the following objectives:
- (a) to provide consistent and complete information on staffing and numbers and types of youth served in the program;
 - (b) to provide consistent and complete information on the types and duration of services rendered.
 - (c) to provide consistent and complete information on youth responses to the types of services/activities provided; and
 - (d) provide consistent and complete information of occurrence of school-related delinquency, dropouts, truants and suspensions.

All applicants must include assurances in their application agreeing to fully cooperate with the national evaluators in terms of the management information system and the requirement of the overall evaluation component.

9. COORDINATION WITH OTHER FEDERAL AGENCIES

- a. One commentor stated that the guideline did not reflect any indication of coordination with the Commissioner of Education.
- b. OJJDP submitted copies of the draft Alternative Education Guideline for internal review to the Commissioner of Education, Teacher Corps, and the Alcohol and Drug Abuse Office. Comments were received and incorporated in the guideline previous to its external clearance. Interagency agreements are anticipated during the implementation phases of the program and applicants are required to fully cooperate.
- c. An interagency agreement has been developed between the Office of Juvenile Justice and Delinquency Prevention and the Office of Youth Programs, Dept. of Labor, for \$3 million to enhance the impact of this initiative in the development of work related skills.

10. TECHNICAL CHANGES

A substantial number of commentors suggested minor technical changes to make the guideline clearer. These changes were made where feasible.

11. DEFINITIONS

- a. There were only a few comments received on the definitions. Some of the comments were accepted, others were rejected, such as the deletion of the structured and unstructured definitions. OJJDP feels that these definitions need to remain since no projects will be funded unless they are task and goal oriented. The following are the changes accepted, and the definitions now read:

- (1) **Alternative Education** - an education program that embraces subject matter and/or teaching methodology that is not generally offered to students of the same age or grade level in traditional school settings which offers a range of educational options and includes the student as an integral part of the planning team. The term includes the use of program methods and materials that facilitate student success and are relevant to the students' educational needs and interests as indicated by the student and facilitates positive growth and development in both academic, vocational and social skills.
 - (2) **Expulsion** - the termination of a student's right to attend school.
- b. Some comments were made on how OJJDP defines high crime rate. OJJDP will be comparing the crime rate using the Uniform Crime Report (UCR) data relative to other communities of the same size.

FEDERAL ASSISTANCE		2. APPLICANT'S APPLICATION <i>Leave Blank</i>		a. NUMBER		3. STATE APPLICATION IDENTIFIER		a. NUMBER		
1. TYPE OF ACTION (Mark appropriate box) <input type="checkbox"/> PREAPPLICATION <input type="checkbox"/> APPLICATION <input type="checkbox"/> NOTIFICATION OF INTENT (Opt) <input type="checkbox"/> REPORT OF FEDERAL ACTION		b. DATE 19 <u> </u> <u> </u> <u> </u>		b. DATE 19 <u> </u> <u> </u> <u> </u>		Year month day		Year month day		
4. LEGAL APPLICANT/RECIPIENT a. Applicant Name : b. Organization Unit : c. Street/P.O. Box : d. City : e. County : f. State : g. ZIP Code : h. Contact Person (Name & telephone No.) :						5. FEDERAL EMPLOYER IDENTIFICATION NO.				
						6. PROGRAM (From Federal Catalog)		a. NUMBER		b. TITLE
7. TITLE AND DESCRIPTION OF APPLICANT'S PROJECT						8. TYPE OF APPLICANT/RECIPIENT A-State H-Community Action Agency B-Interstate I-Higher Educational Institution C-Substate J-Indian Tribe D-District K-Other (Specify): E-City F-School District G-Special Purpose District <i>Enter appropriate letter</i> <input type="checkbox"/>				
						9. TYPE OF ASSISTANCE A-Basic Grant D-Insurance B-Supplemental Grant E-Other C-Loan <i>Enter appropriate letter(s)</i> <input type="checkbox"/>				
10. AREA OF PROJECT IMPACT (Names of cities, counties, States, etc.)				11. ESTIMATED NUMBER OF PERSONS BENEFITING		12. TYPE OF APPLICATION A-New C-Revision E-Augmentation B-Renewal D-Continuation <i>Enter appropriate letter</i> <input type="checkbox"/>				
13. PROPOSED FUNDING		14. CONGRESSIONAL DISTRICTS OF:		15. TYPE OF CHANGE (For 12c or 12e) A-Increase Dollars F-Other (Specify): B-Decrease Dollars C-Increase Duration D-Decrease Duration E-Cancellation <i>Enter appropriate letter(s)</i> <input type="checkbox"/>						
a. FEDERAL	\$.00	a. APPLICANT	b. PROJECT	19. EXISTING FEDERAL IDENTIFICATION NUMBER					
b. APPLICANT		.00	16. PROJECT START DATE Year month day							
c. STATE		.00	17. PROJECT DURATION Months							
d. LOCAL		.00	18. ESTIMATED DATE TO BE SUBMITTED TO FEDERAL AGENCY Year month day							
e. OTHER		.00	19. EXISTING FEDERAL IDENTIFICATION NUMBER							
f. TOTAL	\$.00	20. FEDERAL AGENCY TO RECEIVE REQUEST (Name, City, State, ZIP code)		21. REMARKS ADDED <input type="checkbox"/> Yes <input type="checkbox"/> No					
22. THE APPLICANT CERTIFIES THAT ▶		a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.		b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached:		No response attached				
				(1)		<input type="checkbox"/>				
				(2)		<input type="checkbox"/>				
23. CERTIFYING REPRESENTATIVE		a. TYPED NAME AND TITLE		b. SIGNATURE		c. DATE SIGNED Year month day 19				
24. AGENCY NAME						25. APPLICATION RECEIVED Year month day 19				
26. ORGANIZATIONAL UNIT				27. ADMINISTRATIVE OFFICE		28. FEDERAL APPLICATION IDENTIFICATION				
29. ADDRESS						30. FEDERAL GRANT IDENTIFICATION				
31. ACTION TAKEN <input type="checkbox"/> a. AWARDED <input type="checkbox"/> b. REJECTED <input type="checkbox"/> c. RETURNED FOR AMENDMENT <input type="checkbox"/> d. DEFERRED <input type="checkbox"/> e. WITHDRAWN		32. FUNDING		33. ACTION DATE ▶ 19		34. STARTING DATE Year month day 19				
		a. FEDERAL	\$.00	35. CONTACT FOR ADDITIONAL INFORMATION (Name and telephone number)		36. ENDING DATE Year month day 19			
		b. APPLICANT		.00			37. REMARKS ADDED <input type="checkbox"/> Yes <input type="checkbox"/> No			
		c. STATE		.00						
		d. LOCAL		.00						
		e. OTHER		.00						
f. TOTAL	\$.00								
38. FEDERAL AGENCY A-95 ACTION		a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made.				b. FEDERAL AGENCY A-95 OFFICIAL (Name and telephone no.)				

SECTION I—APPLICANT/RECIPIENT DATA

SECTION II—CERTIFICATION

SECTION III—FEDERAL AGENCY ACTION

SECTION IV-REMARKS *(Please reference the proper item number from Sections I, II or III, if applicable)*

GENERAL INSTRUCTIONS

This is a multi-purpose standard form. First, it will be used by applicants as a required facesheet for pre-applications and applications submitted in accordance with Federal Management Circular 74-7. Second, it will be used by Federal agencies to report to Clearinghouses on major actions taken on applications reviewed by clearinghouses in accordance with OMB Circular A-95. Third, it will be used by Federal agencies to notify States of grants-in-aid awarded in accordance with Treasury Circular 1082. Fourth, it may be used, on an optional basis, as a notification of intent from applicants to clearinghouses, as an early initial notice that Federal assistance is to be applied for (clearinghouse procedures will govern).

APPLICANT PROCEDURES FOR SECTION I

Applicant will complete all items in Section I. If an item is not applicable, write "NA". If additional space is needed, insert an asterisk "*", and use the remarks section on the back of the form. An explanation follows for each item:

- | Item | Item |
|--|---|
| 1. Mark appropriate box. Pre-application and application guidance is in FMC 74-7 and Federal agency program instructions. Notification of intent guidance is in Circular A-95 and procedures from clearinghouse. Applicant will not use "Report of Federal Action" box. | D. Insurance. Self explanatory. |
| 2a. Applicant's own control number, if desired. | E. Other. Explain on remarks page. |
| 2b. Date Section I is prepared. | 10. Governmental unit where significant and meaningful impact could be observed. List only largest unit or units affected, such as State, county, or city. If entire unit affected, list it rather than subunits. |
| 3a. Number assigned by State clearinghouse, or if delegated by State, by areawide clearinghouse. All requests to Federal agencies must contain this identifier if the program is covered by Circular A-95 and required by applicable State/areawide clearinghouse procedures. If in doubt, consult your clearinghouse. | 11. Estimated number of persons directly benefiting from project. |
| 3b. Date applicant notified of clearinghouse identifier. | 12. Use appropriate code letter. Definitions are: |
| 4a-4h. Legal name of applicant/recipient, name of primary organizational unit which will undertake the assistance activity, complete address of applicant, and name and telephone number of person who can provide further information about this request. | A. New. A submittal for the first time for a new project. |
| 5. Employer identification number of applicant as assigned by Internal Revenue Service. | B. Renewal. An extension for an additional funding/budget period for a project having no projected completion date, but for which Federal support must be renewed each year. |
| 6a. Use Catalog of Federal Domestic Assistance number assigned to program under which assistance is requested. If more than one program (e.g., joint-funding) write "multiple" and explain in remarks. If unknown, cite Public Law or U.S. Code. | C. Revision. A modification to project nature or scope which may result in funding change (increase or decrease). |
| 6b. Program title from Federal Catalog. Abbreviate if necessary. | D. Continuation. An extension for an additional funding/budget period for a project the agency initially agreed to fund for a definite number of years. |
| 7. Brief title and appropriate description of project. For notification of intent, continue in remarks section if necessary to convey proper description. | E. Augmentation. A requirement for additional funds for a project previously awarded funds in the same funding/budget period. Project nature and scope unchanged. |
| 8. Mostly self-explanatory. "City" includes town, township or other municipality. | 13. Amount requested or to be contributed during the first funding/budget period by each contributor. Value of in-kind contributions will be included. If the action is a change in dollar amount of an existing grant (a revision or augmentation), indicate only the amount of the change. For decreases enclose the amount in parentheses. If both basic and supplemental amounts are included, breakout in remarks. For multiple program funding, use totals and show program breakouts in remarks. Item definitions: 13a, amount requested from Federal Government; 13b, amount applicant will contribute; 13c, amount from State, if applicant is not a State; 13d, amount from local government, if applicant is not a local government; 13e, amount from any other sources, explain in remarks. |
| 9. Check the type(s) of assistance requested. The definitions of the terms are:
A. Basic Grant. An original request for Federal funds. This would not include any contribution provided under a supplemental grant.
B. Supplemental Grant. A request to increase a basic grant in certain cases where the eligible applicant cannot supply the required matching share of the basic Federal program (e.g., grants awarded by the Appalachian Regional Commission to provide the applicant a matching share).
C. Loan. Self explanatory. | 14a. Self explanatory. |
| | 14b. The district(s) where most of actual work will be accomplished. If city-wide or State-wide, covering several districts, write "city-wide" or "State-wide." |
| | 15. Complete only for revisions (item 12c), or augmentations (item 12e). |

Item

16. Approximate date project expected to begin (usually associated with estimated date of availability of funding).
17. Estimated number of months to complete project after Federal funds are available.
18. Estimated date preapplication/application will be submitted to Federal agency if this project requires clearinghouse review. If review not required, this date would usually be same as date in item 2b.

Item

19. Existing Federal identification number if this is not a new request and directly relates to a previous Federal action. Otherwise write "NA".
20. Indicate Federal agency to which this request is addressed. Street address not required, but do use ZIP.
21. Check appropriate box as to whether Section IV of form contains remarks and/or additional remarks are attached.

APPLICANT PROCEDURES FOR SECTION II

Applicants will always complete items 23a, 23b, and 23c. If clearinghouse review is required, item 22b must be fully completed. An explanation follows for each item:

Item

- 22b. List clearinghouses to which submitted and show in appropriate blocks the status of their responses. For more than three clearinghouses, continue in remarks section. All written comments submitted by or through clearinghouses must be attached.
- 23a. Name and title of authorized representative of legal applicant.

Item

- 23b. Self explanatory.
- 23c. Self explanatory.
- Note: Applicant completes only Sections I and II. Section III is completed by Federal agencies.

FEDERAL AGENCY PROCEDURES FOR SECTION III

If applicant-supplied information in Sections I and II needs no updating or adjustment to fit the final Federal action, the Federal agency will complete Section III only. An explanation for each item follows:

Item

24. Executive department or independent agency having program administration responsibility.
25. Self explanatory.
26. Primary organizational unit below department level having direct program management responsibility.
27. Office directly monitoring the program.
28. Use to identify non-award actions where Federal grant identifier in item 30 is not applicable or will not suffice.
29. Complete address of administering office shown in item 26.
30. Use to identify award actions where different from Federal application identifier in item 28.
31. Self explanatory. Use remarks section to amplify where appropriate.
32. Amount to be contributed during the first funding/budget period by each contributor. Value of in-kind contributions will be included. If the action is a change in dollar amount of an existing grant (a revision or augmentation), indicate only the amount of change. For decreases, enclose the amount in parentheses. If both basic and supplemental amounts are included, breakout in remarks. For multiple program funding, use totals and show program breakouts in remarks. Item definitions: 32a, amount awarded by Federal Government; 32b, amount applicant will contribute; 32c, amount from State, if applicant is not a State; 32d, amount from local government if applicant is not a local government; 32e, amount from any other sources, explain in remarks.
33. Date action was taken on this request.
34. Date funds will become available.

Item

35. Name and telephone no. of agency person who can provide more information regarding this assistance.
36. Date after which funds will no longer be available.
37. Check appropriate box as to whether Section IV of form contains Federal remarks and/or attachment of additional remarks.
38. For use with A-95 action notices only. Name and telephone of person who can assure that appropriate A-95 action has been taken—If same as person shown in item 35, write "same". If not applicable, write "NA".

Federal Agency Procedures—special considerations

- A. **Treasury Circular 1082 compliance.** Federal agency will assure proper completion of Sections I and III. If Section I is being completed by Federal agency, all applicable items must be filled in. Addresses of State Information Reception Agencies (SCIRA's) are provided by Treasury Department to each agency. This form replaces SF 240, which will no longer be used.
- B. **OMB Circular A-95 compliance.** Federal agency will assure proper completion of Sections I, II, and III. This form is required for notifying all reviewing clearinghouses of major actions on all programs reviewed under A-95. Addresses of State and areawide clearinghouses are provided by OMB to each agency. Substantive differences between applicant's request and/or clearinghouse recommendations, and the project as finally awarded will be explained in A-95 notifications to clearinghouses.
- C. **Special note.** In most, but not all States, the A-95 State clearinghouse and the (TC 1082) SCIRA are the same office. In such cases, the A-95 award notice to the State clearinghouse will fulfill the TC 1082 award notice requirement to the State SCIRA. Duplicate notification should be avoided.

PART II

FORM APPROVED
OMB NO. 43-RO528

PROJECT APPROVAL INFORMATION

Item 1.

Does this assistance request require State, local, regional, or other priority rating? _____ Yes _____ No

Name of Governing Body _____
Priority Rating _____

Item 2.

Does this assistance request require State, or local advisory, educational or health clearances? _____ Yes _____ No

Name of Agency or Board _____
(Attach Documentation)

Item 3.

Does this assistance request require clearinghouse review in accordance with OMB Circular A-95? _____ Yes _____ No

(Attach Comments)

Item 4.

Does this assistance request require State, local, regional or other planning approval? _____ Yes _____ No

Name of Approving Agency _____
Date _____

Item 5.

Is the proposed project covered by an approved comprehensive plan? _____ Yes _____ No

Check one: State
Local
Regional
Location of Plan _____

Item 6.

Will the assistance requested serve a Federal installation? _____ Yes _____ No

Name of Federal Installation _____
Federal Population benefiting from Project _____

Item 7.

Will the assistance requested be on Federal land or installation? _____ Yes _____ No

Name of Federal Installation _____
Location of Federal Land _____
Percent of Project _____

Item 8.

Will the assistance requested have an impact or effect on the environment? _____ Yes _____ No

See instructions for additional information to be provided.

Item 9.

Will the assistance requested cause the displacement of individuals, families, businesses, or farms? _____ Yes _____ No

Number of:
Individuals _____
Families _____
Businesses _____
Farms _____

Item 10.

Is there other related assistance on this project previous, pending, or anticipated? _____ Yes _____ No

See instructions for additional information to be provided.

INSTRUCTIONS

PART II

Negative answers will not require an explanation unless the Federal agency requests more information at a later date. Provide supplementary data for all "Yes" answers in the space provided in accordance with the following instructions:

Item 1 – Provide the name of the governing body establishing the priority system and the priority rating assigned to this project.

Item 2 – Provide the name of the agency or board which issued the clearance and attach the documentation of status or approval.

Item 3 – Attach the clearinghouse comments for the application in accordance with the instructions contained in Office of Management and Budget Circular No. A-95. If comments were submitted previously with a preapplication, do not submit them again but any additional comments received from the clearinghouse should be submitted with this application.

Item 4 – Furnish the name of the approving agency and the approval date.

Item 5 – Show whether the approved comprehensive plan is State, local or regional, or if none of these, explain the

scope of the plan. Give the location where the approved plan is available for examination and state whether this project is in conformance with the plan.

Item 6 – Show the population residing or working on the Federal installation who will benefit from this project.

Item 7 – Show the percentage of the project work that will be conducted on federally-owned or leased land. Give the name of the Federal installation and its location.

Item 8 – Describe briefly the possible beneficial and harmful impact on the environment of the proposed project. If an adverse environmental impact is anticipated, explain what action will be taken to minimize the impact. Federal agencies will provide separate instructions if additional data is needed.

Item 9 – State the number of individuals, families, businesses, or farms this project will displace. Federal agencies will provide separate instructions if additional data is needed.

Item 10 – Show the Federal Domestic Assistance Catalog number, the program name, the type of assistance, the status and the amount of each project where there is related previous, pending or anticipated assistance. Use additional sheets, if needed.

No grant may be awarded unless a completed application form has been received.
(Sec. 501, P.L. 93-83)

PART III - BUDGET INFORMATION

SECTION A - BUDGET SUMMARY

Grant Program, Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.		\$	\$	\$	\$	\$
2.						
3.						
4.						
5. TOTALS		\$	\$	\$	\$	\$

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	- Grant Program, Function or Activity				Total (5)
	(1)	(2)	(3)	(4)	
a. Personnel	\$	\$	\$	\$	\$
b. Fringe Benefits					
c. Travel					
d. Equipment					
e. Supplies					
f. Contractual					
g. Construction					
h. Other					
i. Total Direct Charges					
j. Indirect Charges					
k. TOTALS	\$	\$	\$	\$	\$
7. Program Income	\$	\$	\$	\$	\$

INSTRUCTIONS

PART III

General Instructions

This form is designed so that application can be made for funds from one or more grant programs. In preparing the budget, adhere to any existing Federal grantor agency guidelines which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, grantor agencies may require budgets to be separately shown by function or activity. For other programs, grantor agencies may not require a breakdown by function or activity. Sections A, B, C, and D should include budget estimates for the whole project except when applying for assistance which requires Federal authorization in annual or other funding period increments. In the latter case, Sections A, B, C, and D should provide the budget for the first budget period (usually a year) and Section E should present the need for Federal assistance in the subsequent budget periods. All applications should contain a breakdown by the object class categories shown in Lines a-k of Section B.

Section A. Budget Summary

Lines 1-4, Columns (a) and (b).

For applications pertaining to a *single* Federal grant program (Federal Domestic Assistance Catalog number) and *not* requiring a functional or activity breakdown, enter on Line 1 under Column (a) the catalog program title and the catalog number in Column (b).

For applications pertaining to a *single* program requiring budget amounts by multiple functions or activities, enter the name of each activity or function on each line in Column (a), and enter the catalog number in Column (b). For applications pertaining to *multiple* programs where *none* of the programs require a breakdown by function or activity, enter the catalog program title on each line in Column (a) and the respective catalog number on each line in Column (b).

For applications pertaining to *multiple* programs where one or more programs require a breakdown by function or activity, prepare a separate sheet for each program requiring the breakdown. Additional sheets should be used when one form does not provide adequate space for all breakdown of data required. However, when more than one sheet is used, the first page should provide the summary totals by programs.

Lines 1-4, Columns (c) through (g).

For *new applications*, leave Columns (c) and (d) blank. For each line entry in Columns (a) and (b), enter in Columns (e), (f), and (g) the appropriate amounts of funds needed to support the project for the first funding period (usually a year).

For *continuing grant program applications*, submit these forms before the end of each funding period as required by

the grantor agency. Enter in Columns (c) and (d) the estimated amounts of funds which will remain unobligated at the end of the grant funding period *only* if the Federal grantor agency instructions provide for this. Otherwise, leave these columns blank. Enter in columns (e) and (f) the amounts of funds needed for the upcoming period. The amount(s) in Column (g) should be the sum of amounts in Columns (e) and (f).

For *supplemental grants and changes to existing grants*, do not use Columns (c) and (d). Enter in Column (e) the amount of the increase or decrease of Federal funds and enter in Column (f) the amount of the increase or decrease of non-Federal funds. In Column (g) enter the new total budgeted amount (Federal and non-Federal) which includes the total previous authorized budgeted amounts plus or minus, as appropriate, the amounts shown in Columns (e) and (f). The amount(s) in Column (g) should *not* equal the sum of amounts in Columns (e) and (f).

Line 5 — Show the totals for all columns used.

Section B. Budget Categories

In the column headings (1) through (4), enter the titles of the same programs, functions, and activities shown on Lines 1-4, Column (a), Section A. When additional sheets were prepared for Section A, provide similar column headings on each sheet. For each program, function or activity, fill in the total requirements for funds (both Federal and non-Federal) by object class categories.

Lines 6a-h — Show the estimated amount for each direct cost budget (object class) category for each column with program, function or activity heading.

Line 6i — Show the totals of Lines 6a to 6h in each column.

Line 6j — Show the amount of indirect cost. Refer to FMC 74-4.

Line 6k — Enter the total of amounts on Lines 6i and 6j. For all applications for new grants and continuation grants the total amount in column (5), Line 6k, should be the same as the total amount shown in Section A, Column (g), Line 5. For supplemental grants and changes to grants, the total amount of the increase or decrease as shown in Columns (1)-(4), Line 6k should be the same as the sum of the amounts in Section A, Columns (e) and (f) on Line 5. When additional sheets were prepared, the last two sentences apply only to the first page with summary totals.

Line 7 — Enter the estimated amount of income, if any, expected to be generated from this project. Do not add or subtract this amount from the total project amount. Show under the program narrative statement the nature and source of income. The estimated amount of program income may be considered by the Federal grantor agency in determining the total amount of the grant.

SECTION C – NON-FEDERAL RESOURCES

(a) Grant Program	(b) APPLICANT	(c) STATE	(d) OTHER SOURCES	(e) TOTALS
8.	\$	\$	\$	\$
9.				
10.				
11.				
12. TOTALS	\$	\$	\$	\$

SECTION D – FORECASTED CASH NEEDS

	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$	\$	\$	\$	\$
14. Non-Federal					
15. TOTAL	\$	\$	\$	\$	\$

SECTION E – BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT

(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b) FIRST	(c) SECOND	(d) THIRD	(e) FOURTH
16.	\$	\$	\$	\$
17.				
18.				
19.				
20. TOTALS	\$	\$	\$	\$

SECTION F – OTHER BUDGET INFORMATION

(Attach additional Sheets If Necessary)

21. Direct Charges:

22. Indirect Charges:

23. Remarks:

INSTRUCTIONS

PART III (continued)

Section C. Source of Non-Federal Resources

Line 8-11 – Enter amounts of non-Federal resources that will be used on the grant. If in-kind contributions are included, provide a brief explanation on a separate sheet. (See Attachment F, FMC 74-7.

Column (a) – Enter the program titles identical to Column (a), Section A. A breakdown by function or activity is not necessary.

Column (b) – Enter the amount of cash and in-kind contributions to be made by the applicant as shown in Section A. (See also Attachment F, FMC 74-7.

Column (c) – Enter the State contribution if the applicant is *not* a State or State agency. Applicants which are a State or State agencies should leave this column blank.

Column (d) – Enter the amount of cash and in-kind contributions to be made from all other sources.

Column (e) – Enter totals of Columns (b), (c), and (d).

Line 12 – Enter the total for each of Columns (b)-(e). The amount in Column (e) should be equal to the amount on Line 5, Column (f), Section A.

Section D. Forecasted Cash Needs

Line 13 – Enter the amount of cash needed by quarter from the grantor agency during the first year.

Line 14 – Enter the amount of cash from all other sources needed by quarter during the first year.

LEAA Instructions

Applicants must provide on a separate sheet(s) a budget narrative which will detail by budget category, the federal and nonfederal (in-kind and cash) share. The grantee cash contribution should be identified as to its source, i.e., funds appropriated by a state or local unit of government or donation from a private source. The narrative should relate the items budgeted to project activities and should provide a justification and explanation for the budgeted items including the criteria and data used to arrive at the estimates for each budget category.

Line 15 – Enter the totals of amounts on Lines 13 and 14.

Section E. Budget Estimates of Federal Funds Needed for Balance of the Project

Lines 16-19 – Enter in Column (a) the same grant program titles shown in Column (a), Section A. A breakdown by function or activity is not necessary. For new applications and continuing grant applications, enter in the proper columns amounts of Federal funds which will be needed to complete the program or project over the succeeding funding periods (usually in years). This Section need not be completed for amendments, changes, or supplements to funds for the current year of existing grants.

If more than four lines are needed to list the program titles submit additional schedules as necessary.

Line 20 – Enter the total for each of the Columns (b)-(e). When additional schedules are prepared for this Section, annotate accordingly and show the overall totals on this line.

Section F – Other Budget Information.

Line 21 – Use this space to explain amounts for individual direct object cost categories that may appear to be out of the ordinary or to explain the details as required by the Federal grantor agency.

Line 22 – Enter the type of indirect rate (provisional, pre-determined, final or fixed) that will be in effect during the funding period, the estimated amount of the base to which the rate is applied, and the total indirect expense.

Line 23 – Provide any other explanations required herein or any other comments deemed necessary.

INSTRUCTIONS

PART IV PROGRAM NARRATIVE

Prepare the program narrative statement in accordance with the following instructions for all new grant programs. Requests for continuation or refunding and changes on an approved project should respond to item 5b only. Requests for supplemental assistance should respond to question 5c only.

1. OBJECTIVES AND NEED FOR THIS ASSISTANCE.

Pinpoint any relevant physical, economic, social, financial, institutional, or other problems requiring a solution. Demonstrate the need for assistance and state the principal and subordinate objectives of the project. Supporting documentation or other testimonies from concerned interests other than the applicant may be used. Any relevant data based on planning studies should be included or footnoted.

2. RESULTS OR BENEFITS EXPECTED.

Identify results and benefits to be derived. For example, when applying for a grant to establish a neighborhood health center provide a description of who will occupy the facility, how the facility will be used, and how the facility will benefit the general public.

3. APPROACH.

- a. Outline a plan of action pertaining to the scope and detail of how the proposed work will be accomplished for each grant program, function or activity, provided in the budget. Cite factors which might accelerate or decelerate the work and your reason for taking this approach as opposed to others. Describe any unusual features of the project such as design or technological innovations, reductions in cost or time, or extraordinary social and community involvement.
- b. Provide for each grant program, function or activity, quantitative monthly or quarterly projections of the accomplishments to be achieved in such terms as the number of jobs created; the number of people served; and the number of patients treated. When accomplishments cannot be quantified by activity or function, list them in chronological order to show the schedule of accomplishments and their target dates.

- c. Identify the kinds of data to be collected and maintained and discuss the criteria to be used to evaluate the results and successes of the project. Explain the methodology that will be used to determine if the needs identified and discussed are being met and if the results and benefits identified in item 2 are being achieved.
- d. List organizations, cooperators, consultants, or other key individuals who will work on the project along with a short description of the nature of their effort or contribution.

4. GEOGRAPHIC LOCATION.

Give a precise location of the project or area to be served by the proposed project. Maps or other graphic aids may be attached.

5. IF APPLICABLE, PROVIDE THE FOLLOWING INFORMATION:

- a. For research or demonstration assistance requests, present a biographical sketch of the program director with the following information; name, address, phone number, background, and other qualifying experience for the project. Also, list the name, training and background for other key personnel engaged in the project.
- b. Discuss accomplishments to date and list in chronological order a schedule of accomplishments, progress or milestones anticipated with the new funding request. If there have been significant changes in the project objectives, location approach, or time delays, explain and justify. For other requests for changes or amendments, explain the reason for the change(s). If the scope or objectives have changed or an extension of time is necessary, explain the circumstances and justify. If the total budget has been exceeded, or if individual budget items have changed more than the prescribed limits contained in Attachment K to FMC 74-7, explain and justify the change and its effect on the project.
- c. For supplemental assistance requests, explain the reason for the request and justify the need for additional funding.

PART V

ASSURANCES

The Applicant hereby assures and certifies that he will comply with the regulations, policies, guidelines, and requirements, including OMB Circular No. A-95 and FMCs 74-4 and 74-7, as they relate to the application, acceptance and use of Federal funds for this federally assisted project. Also the Applicant assures and certifies with respect to the grant that:

1. It possesses legal authority to apply for the grant; that a resolution, motion or similar action has been duly adopted or passed as an official act of the applicant's governing body, authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.
2. It will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and in accordance with Title VI of that Act, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement.
- 3a. It will comply with the provisions of 28 C.F.R. 42.101 et seq. prohibiting discrimination based on race, color or national origin by or through its contractual arrangements. If the grantee is an institution or a governmental agency, office or unit then this assurance of nondiscrimination by race, color or national origin extends to discrimination anywhere in the institution or governmental agency, office, or unit.
- 3b. If the grantee is a unit of state or local government, state planning agency or law enforcement agency, it will comply with Title VII of the Civil Rights Act of 1964, as amended, and 28 C.F.R. 42.201 et seq. prohibiting discrimination in employment practices based on race, color, creed, sex or national origin. Additionally, it will obtain assurances from all subgrantees, contractors and subcontractors that they will not discriminate in employment practices based on race, color, creed, sex or national origin.
- 3c. It will comply with and will insure compliance by its subgrantees and contractors with Title I of the Crime Control Act of 1973, Title VI of the Civil Rights Act of 1964 and all requirements imposed by or pursuant to regulations of the Department of Justice (28 C.F.R. Part 42) such that no person, on the basis of race, color, sex or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity funded by LEAA.
4. It will comply with requirements of the provisions of the Uniform Relocation Assistance and Real Property Acquisitions Act of 1970 (P.L. 91-646) which provides for fair and equitable treatment of persons displaced as a result of Federal and federally-assisted programs.
5. It will comply with the provisions of the Hatch Act which limit the political activity of employees.
6. It will establish safeguards to prohibit employees from using their positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business, or other ties.
7. It will give the grantor agency or the Comptroller General through any authorized representative the access to and the right to examine all records, books, papers, or documents related to the grant.
8. It will comply with all requirements imposed by the Federal grantor agency concerning special requirements of law, program requirements, and other administrative requirements approved in accordance with FMC 74-7.
9. It will comply with the provision of 28 CFR Part 20 regulating the privacy and security of criminal history information systems.
10. All published material and written reports submitted under this grant or in conjunction with the third party agreements under this grant will be originally developed material unless otherwise specifically provided for in the grant document. Material not originally developed included in reports will have the source identified either in the body of the report or in a footnote, whether the material is in a verbatim or extensive paraphrase format. All published material and written reports shall give notice that funds were provided under an LEAA grant.
11. Requests for proposal or invitations for bid issued by the grantee or a subgrantee to implement the grant or subgrant project will provide notice to prospective bidders that the LEAA organizational conflict of interest provision is applicable in that contractors that develop or draft specifications, requirements, statements of work and/or RFP's for a proposed procurement shall be excluded from bidding or submitting a proposal to compete for the award of such procurement.

APPENDIX 2. PREPARATION AND SUBMISSION OF APPLICATIONS

1. SCOPE. This appendix provides information on how to prepare applications and on the process for submitting applications.

SECTION 1. PREPARATION OF APPLICATIONS

2. STANDARD APPLICATION FORMS.

- a. Applications for non-construction projects must be made on Standard Form 424, Application for Federal Assistance with Attachment LEAA Form 4000/3.
- b. Applications for construction projects must be made on Standard LEAA Form 424 with Attachment Form 4000/4, Application for Federal Assistance (Construction Program).
- c. Application forms may be obtained from Financial Management and Grants Administration Branch, Grants and Contracts Management Division, Office of the Comptroller, Law Enforcements Assistance Administration, Washington, D.C. 20531.
- d. Applicants must follow the Special LEAA instructions for Parts III and IV of the application found in Appendix 5.
- e. Some program descriptions require special data, information or evaluation plans from applicants. This should be added to the standard information required by the application forms and instructions.
- f. Because of the variety of discretionary programs, parts of the standard forms may not seem appropriate for certain applications. In such cases, applicants should be as responsive as possible and seek assistance from their State Planning Agencies or LEAA.

3. PREAPPLICATIONS.

- a. Preapplications, concept papers, or preaward site visits are required for some programs. These requirements, where applicable, are included in program descriptions (Chapters 1 through 6).
- b. All applicants are encouraged to contact LEAA for advice and assistance prior to submitting full grant applications. Offices from which information is available about specific programs are indicated in program descriptions (Chapters 1 through 6).

SECTION 2. SUBMISSION OF APPLICATIONS

4. CONSULTATION AND PARTICIPATION WITH STATE PLANNING AGENCIES.

NOTE: The requirements of this paragraph regarding review of applications by State Planning Agencies and award of grants through State Planning Agencies do not apply to applications for the Community Anti-Crime Program (Chapter 1, Paragraph 2). Applicants for Community Anti-Crime projects are encouraged, however, to consult with their State Planning Agency and regional or local planning unit and to submit copies of their applications to them for comment and advice.

- a. Applicants must consult with the State Planning Agency of their State before making application for funds to LEAA. Names and addresses of State Planning Agencies are available from LEAA. Applicants are encouraged to review the most recent Comprehensive State Plan produced by the State Planning Agency and to request a conference with the SPA to discuss the proposed project. The conference should also include regional and/or local planning unit representatives.
- b. When an application is submitted to LEAA for consideration, it MUST BE submitted at the same time to the State Planning Agency for review and comment.
- c. The State Planning Agency has thirty days from the receipt of the application to comment to LEAA. It is not required to provide Certification, as indicated in subparagraph 4e, at this time although it may if it wishes (Certification is required before grant award, if the grant is awarded to the SPA.) It should provide LEAA with its comments regarding the desirability and feasibility of the proposed project. If no comments are received within 30 days, LEAA will assume that the SPA has no major objections to the proposed project.
- d. Grants will normally be made to State Planning Agencies which will in turn subgrant to the applicant unless:
 - (1) The program description (Chapters 1 through 6) indicates that direct award will be made to implementing agencies; or
 - (2) The State Planning Agency declines to accept the award.
- e. If the award is made to the State Planning Agency, the State Planning Agency must certify that it is willing to administer the grant and that:

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- (1) The proposed project is not inconsistent with the overall goals and general thrust of the State Comprehensive Plan;
 - (2) Block grant allocations to the beneficiary agency, unit of government, or region will not be reduced by virtue of the discretionary award; and
 - (3) The State Planning Agency will assist the subgrantee to obtain incorporation of the project's costs in State or local budgets, if the project is successful.
- f. If the State Planning Agency declines to accept the award, LEAA may award the grant directly to the applicant, after consulting with the State Planning Agency.

5. SUBMISSION AND PROCESSING PROCEDURES.

- a. Prior to application, applicant discusses proposed project with appropriate State Planning Agency and regional and/or local planning units.
- b. Prior to submission of applications to LEAA, applicant notifies or submits application to appropriate A-95 Clearinghouse(s) in accordance with A-95 requirements. (28 CFR Part 30)
- c. Applicant sends original and two copies of application to:

Control Desk
Grants and Contracts Management Division
Law Enforcement Assistance Administration
633 Indiana Avenue, N.W.
Washington, D.C. 20531

by the deadline indicated in program description (Chapters 1 through 6).

- d. Applicant sends one copy of application to State Planning Agency (or Agencies in the case of multi-state projects) at the same time as applications are sent to LEAA.
- e. Grants and Contracts Management Division reviews application and refers it to appropriate LEAA program office for program review.

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- f. LEAA program office reviews application and comments from State Planning Agency and A-95 Clearinghouse, if such comments have been submitted.
- g. If necessary, LEAA program office requests additional information from applicant or discusses proposed project by phone or in person with applicant.
- h. LEAA program office recommends approval or disapproval to Administrator, LEAA.
- i. Administrator, LEAA, approves or disapproves application.

6. PANEL REVIEW PROCESS.

- a. In many program areas, LEAA receives more grant applications than can be supported by available funds. The Panel Review Process is intended to promote more effective use of discretionary funds by providing for a comparison of each grant application with all of the other grant applications under the same program. In addition, advisory reviews permit a broader range of judgements about proposed projects to be used in making award decisions.
- b. Applications for grants under any LEAA discretionary programs which employ the Panel Review Process (indicated in Program Descriptions, Chapters 1-6) are to be submitted so as to be received by LEAA at any time up to the deadline stated in the program description. Additional material or replacement material also may be submitted and will be considered, provided that it reaches LEAA before the applicable deadline. Applications will not be processed prior to the deadline but after the deadline, all applications will be reviewed concurrently by a panel of experts; the panel's rankings and recommendations will be forwarded to the cognizant LEAA staff members for consideration in further processing and selection of projects to be funded. Applicants will be informed of LEAA's decision concerning funding as expeditiously as possible within 90 days of the program's closing deadline date.

7. NOTIFICATION.

- a. Applicants will normally be notified of approval or disapproval of their applications within 90 days of the indicated program deadline date for programs utilizing the Panel Review process (paragraph 6) or within 90 days of LEAA's receipt of application for programs not utilizing the panel review process.

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- b. Under certain circumstances, application processing exceeds the 90 day period. In such cases applicants will be notified.
- c. If application is not approved, applicant will be given written reasons for rejection.

APPENDIX 5: SPECIAL INSTRUCTIONS FOR NON-CONSTRUCTION GRANT APPLICATIONS, STANDARD FORM 424: PART I, PART III BUDGET INFORMATION AND BUDGET NARRATIVE, AND PART IV PROGRAM NARRATIVE

1. SCOPE. This appendix provides information to assist the applicants in developing the information required by the instructions for Parts I, III, and IV of the form for application for non-construction grants, Standard Form 424. (Appendix 6 of this Manual) For instructions concerning specific items of content required in applications for grants in program areas, consult the program descriptions in Chapters 1 through 6 of this Manual.
2. PART 1, (STANDARD FORM 424)
 - a. Item No. 5, Federal Employer Identification Number. Enter the employer identification number assigned to the organization by the United States Internal Revenue Service.
 - b. Item No. 6, Federal Catalog Number. The Catalog of Federal Domestic Assistance program number for LEAA discretionary grants is 16.501. Only this number should be placed in block 6.
 - c. Item No. 7, Title and Description. Indicate the title of the program listed in Chapters 1-6 of this Manual from which funding is sought. Summarize the project in one or two sentences.
 - d. Item No. 8, Type of Applicant. Applicant here refers to the State agency, local government unit, institution or department or non-profit organization which will implement the project whether as direct grantee or subgrantee of a State Planning Agency.
 - e. Item No. 23, Signature of Authorized Representative. The signature shown MUST BE that of the individual authorized to enter into binding commitments on behalf of the applicant or implementing agency. He will normally be the chief officer of the agency or governmental unit involved. (Signature is required on original of submitted application copies.)

3. PART III, BUDGET INFORMATION AND BUDGET NARRATIVE. (Pages 7 through 10 of Application)

a. Budget Information. (Section A)

- (1) Section A, column (a). Grant applications requesting only one kind of discretionary funds (either Part C or Part E), should place the designation "DF-Part C" or "DF-Part E" as appropriate on line 1. Grant applications requesting a combination of Part C and Part E funding should place the designation on line 2.
- (2) Section A, column (b). Column (b) will always reflect the Catalog of Federal Domestic Assistance program number for LEAA discretionary grants, 16.501. This is the same number that appears in Item 6 of Part I of the application.

b. Budget Narrative. Applicants for grants must submit on separate sheets a budget narrative. The budget narrative should detail by budget category the Federal and non-federal (in kind and cash) share. The purpose of the budget narrative is to relate items budgeted to project activities and to provide justification and explanation for budget items, including criteria and data used to arrive at the estimates for each budget category. The following information is provided to assist the applicant in developing the budget narrative.

- (1) Personnel Category. List each position by title (and name of employee if available), show annual salary rate and percentage of time to be devoted to the project by the employee. Compensation paid for employees engaged in Federally assisted activities must be consistent with that paid for similar work in other activities of the applicant.
- (2) Fringe Benefits Category. Indicate each type of benefit included and the total cost allowable to employees assigned to the project.
- (3) Travel Category. Itemize travel expenses of project personnel by purpose (e.g., faculty to training site, field interviews, advisory group meetings, etc.) and show basis or computation (e.g., "Five trips for 'x' purpose at \$80 average cost - \$50 transportation and two days per diem at \$15" or "Six people to 3-day meeting at \$70 transportation and \$45 subsistence".) In training projects where travel and subsistence for trainees is included, this should be separately listed indicating the number of trainees and the unit costs involved.

- (a) Identify the tentative location of all training sessions, meetings, and other travel.
 - (b) Applicants should consult such references as the Official Airline Guide and the Hotel and Motel Redbook in projecting travel costs to obtain competitive rates.
- (4) Equipment. List each type of equipment to be purchased or rented with unit or monthly costs.
- (5) Supplies. List items within this category by major type (office supplies, training materials, research forms, postage) and show basis for computation. Provide unit or monthly estimates.
- (6) Contractual Category. State the selection basis for any contract or subcontract or prospective contract or subcontract, (including construction services and equipment).
- (a) For individuals to be reimbursed for personal services on a fee basis, list by name or type of consultant or service, the proposed fee (by day, week or hour), and the amount of time to be devoted to such services.
 - (b) For construction contracts and organization, (including professional associations and education institutions performing professional services), indicate the type of services to be performed and the estimated contract cost data.
- (7) Construction Category. Describe construction or renovation which will be accomplished using grant funds and the method used to calculate cost.
- (8) Other Category. Include under "other" such items as rent, reproduction, telephone, and janitorial or security services. List items by major type with basis of computation shown. (Provide square footage and cost per square foot for rent-provide local and long distance telephone charges separately.)
- (9) Indirect Cost Category. The Administration may accept any indirect cost rate previously approved for an applicant by a Federal agency. Applicants must enclose a copy of the approved rate agreement with the grant application.

In lieu of an approved flat rate, amounts not in excess of five percent of total direct cost or ten percent of salaries and wages, including fringe benefits, may be claimed. If this method is used, the applicant must justify the requested amount.

- (10) Program Income. If applicable, provide a detailed estimate of the amount of program income to be generated during the grant period and its proposed application (to reduce the costs of the project or to increase the scope of the project). Also, describe the source of program income, listing the rental rates to be obtained, sale prices of publications supported by grant funds, and registration fees charged for particular sessions. If scholarships (covering, for example registration fees) are awarded by the organization to certain conferences attendees, the application should identify the percentage of all attendees that are projected as "scholarship" cases and the precise criteria for their selection.
- (11) Matching Funds. Describe the source and amount of matching funds.
- (12) Evaluation. If an independent evaluation is included as part of the project, the cost of the evaluation contract or subgrant should be included under item (6) Contractual Category. In addition, a separate budget narrative for the evaluation grant or contract should be appended to the budget narrative.

4. PART IV - PROGRAM NARRATIVE INSTRUCTIONS.

- a. Standard Form 424 Instructions require applicants to prepare a program narrative. Items 1 through 3 of the instructions essentially require applicants to answer the following five questions:
 - (1) What problems are to be addressed by project activity? (Item 1 of Part IV)
 - (2) What results are to be sought by the project for which support is requested? (Items 1 and 2 of Part IV)

- (3) How is the project expected to work? (Items 2 and 3b of Part IV)
 - (4) What steps will be involved in setting up and operating the project? (Items 3a, 3b, and 3d of Part IV)
 - (5) What arrangements will be made for review of project progress? (Items 3b and 3c of Part IV)
- b. These questions should be used as the basis for preparing the program narrative as discussed below. If a particular section levies a requirement which is not practical or possible given the nature of the grant, a justification for not completing that section must be given. All applicants must follow the format provided.
- (1) Statement of problem addressed. Describe the problem to be addressed in measurable terms. (A listing of key data elements will usually be found in the program description).
 - (2) Statement of results sought.
 - (a) State the objectives of the project indicating the intended impact of the project upon problems of crime or delinquency or improvement of the criminal justice system. General objectives and results sought are usually stated in the program description. This section should relate those general objectives and results to the specific project location and target population or clientele.
 - (b) This section should describe both performance goals and impact goals.
 - 1 Performance Goals. Performance goals help to measure the progress of project implementation. Performance goals relate therefore to the "means" selected to accomplish the project. In a crime prevention project, for example, a performance goal might be "to target harden (lights and locks) one hundred residences within census tract three by month six." (For comparative purposes see the impact goals example for this same type of project given below.)

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- 2 Impact Goal. An impact goal helps to measure the effect that the project is expected to have on crime or the criminal justice system itself. An impact goal relates therefore to project "ends" rather than project "means". To use the crime prevention example again, an impact goal might be "a 5% reduction in residential burglaries within census tract three by month eight."
- (3) How the project will work. Describe the activities that will be undertaken and the resources that will be required to support those activities. Indicate how project elements will be implemented. (A listing of key project elements usually will be found in the program description).
- (4) Steps involved in setting up and operating the project. (Grant Implementation Plan). The grant implementation plan should indicate implementation steps, operating activities, milestones, and a timetable for review of project progress. The grant implementation plan details the major steps which must be taken to carry the grant through to completion and goal achievement. It consists of two parts, a "start-up" plan and a "program operations" plan. The entire grant implementation plan should consist of a step-by-step process for completing the grant and achieving its goals. If the plan does not achieve this, it will not support an LEAA decision to fund the grant application.
- (a) Start-up. For each of the following identify the major activities involved in starting and completing each step. If a particular step will take longer than two months to complete, divide it into substeps so its progress can be measured.
- 1 Contract Staff/Consultant Hiring. List each staff and consultant position which is critical to project start-up program operations. Indicate the target dates for starting to recruit and fill each critical position.
- 2 Space, Major Equipment and Services. Identify the major space, equipment and services items which must be acquired before the grant can become operational. Indicate for each item the target dates for starting and completing acquisition efforts.

- 3 Preparatory Program Steps. Identify and list the program steps that must be accomplished before the grant can become operational. Include target start and completion dates for each step. Examples of preparatory program steps include data or clients to the grant program, design and production of survey instruments, etc.
 - 4 Establishment of Administrative Controls. List critical administrative controls that must be established during the start-up period of the grant. A critical control is one that is essential to the management of resources and project implementation. Include start and completion dates for establishing
 - 5 Anticipated Start-up Delay. Indicate whether a delay can be expected from date of LEAA award to project start-up. For example, the project may be delayed by the requirements that Federal funds be "passed-through" other levels of government before they reach the project. Another delay might be caused by state legislative action required to approve matching funds.
- (b) Program operations plan. Identify the tasks involved in carrying the project through to its objectives once services have begun, the milestones for review of project operations, and the performance targets set for each milestone. If a particular step will take longer than two months to complete, break it down into substeps so progress towards it can be measured.
- (5) Plans for review of project progress. Describe how the achievement of objectives will be measured. Identify what data will be collected, by whom, and on what schedule to assess the progress of the project. This section should serve as the basis for obtaining and analyzing data and information required for progress reporting to LEAA (See Appendix 3, Paragraph 8 and Appendix 16 of M 4500.1F).

APPENDIX 8

INTENT TO SUBMIT APPLICATION

If your agency is planning to submit a proposal under this initiative, please, tear this page and mail it immediately to:

Ms. Monserrate Diaz

Office of Juvenile Justice and Delinquency Prevention

633 Indiana Avenue, N.W.

Washington, D.C. 20531

This will enable OJJDP to estimate how many applications will be received and plan more accurately for the review process and not delay the grant awards.

Yes, I plan to submit an application under the Prevention of Delinquency Through Alternative Education Initiative.

NAME OF ORGANIZATION: _____

ADDRESS : _____

**U.S. Department of Justice
Office of Juvenile Justice and
Delinquency Prevention**

**Official Business
Penalty for Private Use \$300**

**Postage and Fees Paid
U.S. Department of Justice
Jus 436
FIRST CLASS**



Washington, D.C. 20531

END