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**REPORT OF THE
COMPTROLLER GENERAL
OF THE UNITED STATES**

090070

**How Federal Programs
Affect Migrant And
Seasonal Farmworkers In The
Connecticut River Valley**

Department of Health, Education,
and Welfare

Department of Labor

Office of Economic Opportunity

GAO examined Federal programs designed to help alleviate hardships of migrant and other seasonal farmworkers in the Connecticut River Valley and makes recommendations for their improvement.

GAO points out that the Federal programs were designed for conditions associated with migrant workers nationally, some of which did not apply to valley workers. GAO recommends, therefore, that Federal agencies identify farmworkers' needs before making future grants.

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

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The Honorable Lowell P. Weicker, United States Senate
The Honorable William R. Cotter, House of Representatives
The Honorable Robert N. Giaimo, House of Representatives

In accordance with your May 30, 1974, request, as modified by discussion with your staffs, we reviewed federally funded programs for migrant and other seasonal farmworkers in Connecticut. We examined programs in education, manpower and prevocational education, health care, and legal services. Two grantees operated programs in both Connecticut and Massachusetts. Because we could not separate grant funds on a State basis, we reviewed the grantees' operations in both States. As agreed, we submitted this report to the agencies involved and their comments are considered in the report.

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Copies of the report are being sent to the Secretary of Health, Education, and Welfare; the Secretary of Labor; the President, Legal Services Corporation; the House and Senate Committees on Government Operations; and the House and Senate Committees on Appropriations 2 days after the date of the report. This distribution will set in motion section 236 of the Legislative Reorganization Act of 1970, which requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House and Senate Committees on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report. 1150
1300

Comptroller General
of the United States

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ABBREVIATIONS

ACES	Area Cooperative Educational Services
CPA	certified public accounting
GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
OE	Office of Education
OEO	Office of Economic Opportunity

COMPTROLLER GENERAL'S
REPORT

HOW FEDERAL PROGRAMS AFFECT
MIGRANT AND SEASONAL FARMWORKERS
IN THE CONNECTICUT RIVER VALLEY
Department of Health, Education,
and Welfare

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2 Department of Labor 9
3 Office of Economic Opportunity 957

D I G E S T

4 55
The Federal Government provided about \$3.4 million in fiscal years 1972-74 for programs to help alleviate hardships of migrants and other seasonal farmworkers employed in the Connecticut River Valley's tobacco industry. (See p. 1.)

Many of those served during this period were Puerto Rican contract workers. For the 1975 season growers relied primarily on local labor and did not recruit workers from Puerto Rico.

The Federal programs were tailored for conditions associated with migrant workers nationally which, in some cases, did not apply to workers in the valley. (See ch. 2.)

EDUCATION PROGRAMS FOR MIGRATORY CHILDREN

Connecticut's migratory children's program--funded by HEW's Office of Education--served about 2,600 children in fiscal year 1974. Proper criteria were not used to establish eligibility for many of the students and, therefore, many of those enrolled may have been ineligible. (See p. 9.)

Neither the Office of Education nor the State department of education established definitive criteria to evaluate educational programs. (See p. 10.)

Certain educational programs made positive achievements, but less than one-half of the students were tested. (See p. 13.)

Most tutorial program students failed to show progress on tests given, apparently due to limited academic course content and generally poor attendance. (See p. 13.)

A major educational program of recreational type activities did not address many of the educational needs of migratory children. (See p. 15.)

The State's funding allocations were based, in part, on data that overstated the number of eligible children. (See p. 15.)

Accounting and internal control procedures over funds provided a subgrantee did not assure Federal funds were properly accounted for. (See p. 17.)

GAO recommends that the Secretary of HEW direct the Office of Education to:

- Insure that only eligible children participate in the migratory children's program.
- Establish definitive criteria to evaluate educational programs.
- Require that all students' academic progress be tested.
- Evaluate the adequacy of the tutorial program's academic course content. (See p. 19.)

Office of Education officials generally agreed with GAO's recommendations and said the Office:

- Is developing models to be used in evaluating migrant education programs.
- Would make recommendations to the States on the frequency and kinds of tests to give.

The officials said that, while the Office is prohibited from exercising control over the curriculum of any educational institution, it does review programs to determine if they are designed to meet the special educational needs of migrant children. In view of the tutorial program's limited achievement, GAO believes the Office should reexamine the program. (See p. 20.)

MANPOWER AND PREVOCATIONAL EDUCATION PROGRAMS

Prevocational education and manpower services provided under grants by the Office of Economic Opportunity for fiscal years 1972-73 and by Labor for fiscal year 1974 did little to enable farmworkers to acquire skills necessary for obtaining and holding nonagricultural employment.

Manpower services were offered to former farmworkers who had settled permanently in the Connecticut River Valley area. No evidence was available to show that they had received educational and vocational training needed for success in nonagricultural employment. (See p. 22.)

The programs' effectiveness was further hampered by minimal classroom achievement, poor attendance, and poor job retention rates of those placed in nonagricultural jobs. (See pp. 22, 25, and 27.)

GAO recommends that the Secretary of Labor, in conjunction with the designated grantee:

--Identify needs of farmworkers in the valley and develop programs to meet those needs.

--Review the past approach to job placement to arrange for prevocational and vocational education and training to assure more successful job placements. (See p. 28.)

Labor officials said they would consider the anticipated farmworker population in the valley and review closely the responsiveness of proposed programs. (See p. 28.)

HEALTH CARE

HEW's support of two independent health programs to serve the same target group in the same area resulted in duplication of medical services, high medical care costs, and underused health clinics. (See p. 30.)

If less reliance on the use of migrant farmworkers, as occurred during the 1975 season, continues, requirements for health care facilities should be drastically reduced.

GAO recommends that the Secretary of Health, Education, and Welfare, before awarding grants:

--Determine present and future health needs of valley farmworkers.

--Consider anticipated use of health facilities and the time and distance farmworkers must travel for care. (See p. 37.)

HEW officials said they had begun to correct underuse of health clinics and to eliminate duplication of health care services. (See p. 38.)

LEGAL SERVICES

Legal services were provided Puerto Rican migrant workers and seasonal day-haul workers--local persons who commute to the fields daily--under grants by the Office of Economic Opportunity for fiscal years 1972 and 1973. (See p. 3.)

Because of a lack of documentation concerning the authorization of expenditure of funds for providing legal services, GAO is recommending that grantees provide services under grants that have been formally approved. (See pp. 39 and 44.)

GAO is also recommending that grantees maintain time and attendance records for all employees. (See pp. 43 and 44.)

Legal Services Corporation officials concurred. (See p. 44.)

CHAPTER 1

INTRODUCTION

The Federal Government provided about \$3.4 million in fiscal years 1972-74 for programs to help alleviate hardships of migrants and other seasonal farmworkers employed in the Connecticut River Valley's tobacco industry. In Connecticut, this industry is the largest employer of farm labor, and it is a major agricultural enterprise in both Connecticut and Massachusetts. According to Shade Tobacco Growers Association officials, the shade tobacco industry contributes about \$80 million annually to the Connecticut River Valley economy --\$28 million in salaries and wages and \$52 million in purchases of supplies, services, and equipment. The tobacco growing and harvesting season begins in early March and ends in late November, reaching an employment peak in August.

Tobacco is grown on farms in a 61-square-mile area along the Connecticut River. Growers employ (1) local adults as supervisors and in permanent year-round jobs, (2) local adults and youths who commute to the fields, referred to as day-haul farmworkers, (3) adults recruited under contract from southern States and Puerto Rican adults hired through contracts with the Government of Puerto Rico, and (4) students between ages 14 and 17 recruited under contract from other States.

As of August 15, 1974, growers employed 13,611 farmworkers. The Puerto Rican workers represented 13 percent of the shade tobacco work force as shown below.

<u>Worker group</u>	<u>Number</u>	<u>Percent of total</u>
Day-haul youths	5,754	42
Contract domestic youths and supervisors	2,799	21
Day-haul adults	2,322	17
Contract Puerto Ricans	1,736	13
Permanent employees	1,000	7
Total	<u>13,611</u>	<u>100</u>

The association and individual growers provided housing for the Puerto Rican and contract youth workers. During the 1974 season, the Puerto Rican workers lived in 14 farm labor camps between Glastonbury, Connecticut, and South Deerfield, Massachusetts. Contract youth workers lived in about 28 youth camps. These camps were generally supervised by teachers from schools the youths attended.

FEDERAL PROGRAMS FOR MIGRANT
AND SEASONAL FARMWORKERS

The Office of Economic Opportunity (OEO),¹ the Department of Health, Education, and Welfare (HEW), and the Department of Labor funded programs to provide (1) health care, economic upgrading, manpower, and legal services for migrant and other seasonal farmworkers and (2) remedial education programs for children of migratory agricultural workers living in the Connecticut River Valley.

Title III, section 310, of the Public Health Service Act, as amended, authorized projects that deliver high quality, family-centered health care services to migrant and seasonal farmworkers and their families. Authorized services included ambulatory patient care, arrangements for referring serious medical cases to specialists, and adequate followup to insure continuity of care.

Title III-B of the Economic Opportunity Act of 1964, as amended, authorized programs to help migrant and other seasonal farmworkers and their families improve their living conditions and develop skills necessary for a productive and self-sufficient life in an increasingly complex and technological society. Authorized services included legal advice and representation, consumer training and counseling, and education and training to enable unskilled migrant and seasonal farmworkers to meet the changing demands of agricultural employment and to take advantage of opportunities to gain permanent employment.

Title I of the Elementary and Secondary Education Act of 1965, as amended, authorized projects to meet the special educational needs of children of migratory agricultural workers. Funds may be used for such purposes as bilingual instruction, remedial courses, and individualized instruction and for recreational, cultural, and library services.

GRANTEE ORGANIZATIONS
AND FUNDING

During fiscal years 1972-74 the New England Farmworkers Council, the association, and the Connecticut Department of Education were awarded Federal funds to operate programs for migrant and other seasonal farmworkers. The grantees, responsible Federal agencies, and funding levels follow.

¹On Jan. 4, 1975, the Community Services Administration was established as the successor to OEO.

Grantee	Federal agency	Fiscal Year			Total
		1972	1973	1974	
New England Farmworkers Council	HEW	\$ -	\$ 125,482	\$ 161,839	\$ 287,321
New England Farmworkers Council	OEO (note a)	250,000	299,999	-	549,999
	LABOR	-	-	376,481	376,481
		<u>250,000</u>	<u>425,481</u>	<u>538,320</u>	<u>1,213,801</u>
Shade Tobacco Growers Association	HEW	-	125,481	161,839	287,320
Connecticut Department of Education	HEW	574,141	643,628	708,987	1,926,756
Total		<u>\$824,141</u>	<u>\$1,194,590</u>	<u>\$1,409,146</u>	<u>\$3,427,877</u>

^a Responsibility transferred from OEO to Labor in fiscal year 1974.

The council and the association both were awarded migrant health grants of the same dollar amount to provide health care services to migrant agricultural workers in the Connecticut River Valley. The council is an independent, nonprofit agency established in 1971 to offer programs to improve the education, living, employment, and health conditions of farmworkers. The association is a nonprofit, cooperative organization established in 1942 and represents practically the entire shade tobacco industry in Connecticut and Massachusetts. It is responsible for recruiting, contracting, transporting, housing, feeding, and providing medical care for farmworkers employed by its grower members.

The council was also awarded grants for economic upgrading and legal services. The council allocated \$23,750 of its 1972 economic upgrading grant to Neighborhood Legal Services, Inc., a private, nonprofit corporation established in 1966. In fiscal year 1973, the council received a separate legal services grant for \$50,000, which it contracted to Neighborhood Legal Services.

The Connecticut Department of Education received funds to administer educational programs for children of migratory agricultural workers in Connecticut. It subgranted the 1972 and 1973 funds to the University of Hartford. In 1974, the department subgranted \$515,549 to Area Cooperative Educational Services (ACES) and the remaining \$193,438 to five local school districts. ACES is a nonprofit agency established in 1968 to provide a variety of special educational services to approximately 125,000 public and non-public-school students in 17 cities and towns comprising greater New Haven.

BEST DOCUMENT AVAILABLE

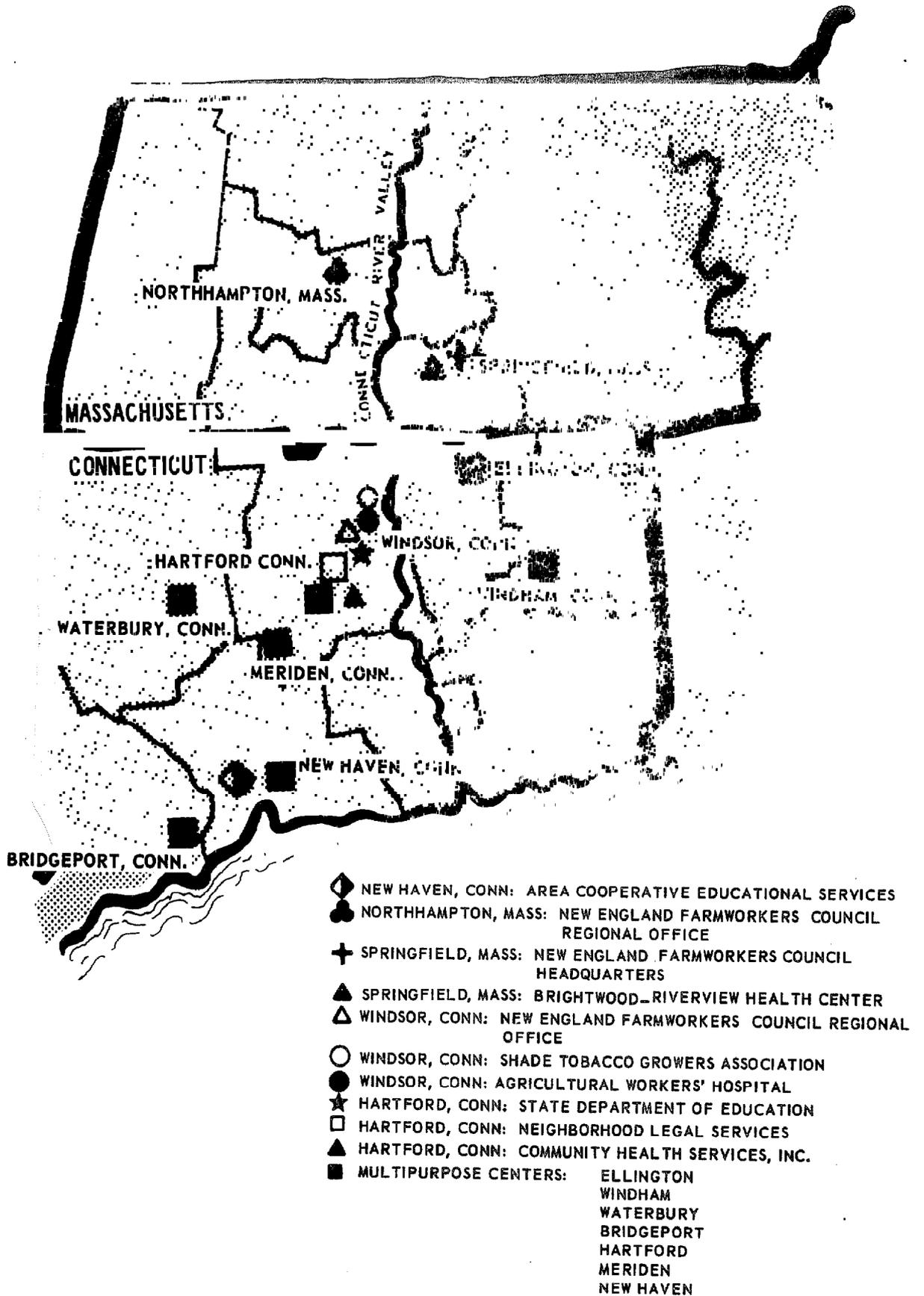
SCOPE OF REVIEW

Because we could not separate grant funds on a State basis, our review included association and council operations in both Connecticut and Massachusetts. We made our review primarily at council headquarters in Springfield, Massachusetts; the council's two regional offices in Northampton, Massachusetts, and Windsor, Connecticut; the association's office in Windsor; Neighborhood Legal Services in Hartford, Connecticut; and ACES in New Haven, Connecticut. We visited the council's two health clinics--Community Health Services in Hartford and Brightwood-Riverview Health Center in Springfield.

We reviewed legislation, grant proposals and agreements, available statistical reports showing the type and extent of services provided by grantees for fiscal years 1972-74, and the financial records each grantee kept.

We held discussions with officials of Federal agencies responsible for aiding migrant and other seasonal farmworkers. We interviewed individuals, responsible for the programs being reviewed, associated with each grantee and 53 Puerto Rican contract farmworkers, and we toured the camps where these farmworkers lived. We reviewed the migrant health programs administered by both the council and the association to determine if the facilities, equipment, scope, and program content were adequate to provide a health program to the migrant farmworkers.

The following map shows the locations of the grantees and the sites of certain program activities.



CHAPTER 2

MIGRANTS' CONDITIONS IN CONNECTICUT RIVER VALLEY

DIFFER FROM THOSE OF MIGRANTS NATIONALLY

Federal programs for migrants and other seasonal farmworkers in the Connecticut River Valley were tailored for conditions associated with migrant workers nationally which, in some cases, did not apply to valley workers.

Nationally, more than 1 million migrant and other seasonal farmworkers form three major agricultural streams.

- The main stream flows north and west from Texas in the spring, covering most of the North Central, Mountain, and Pacific Coast States before the agricultural harvesting season ends in the fall. These workers are mostly Americans of Mexican descent traveling with their families.
- A second stream flows from the Southeastern States to the Florida citrus and winter vegetable harvest and then works northward during the spring and summer through the Atlantic Coast States. Blacks constitute a large portion of this stream.
- A third stream starts in southern California and flows northward. Many Mexican-Americans work along this route.

Most migratory farmworkers come from seriously disadvantaged groups, principally Mexican-American and black. In following the agricultural harvests, they encounter more severe problems generally than permanent labor forces. Problems include

- serious disruption in family life,
- low wages and seasonal work,
- unemployment,
- lack of job opportunities,
- job displacement caused by increased mechanization of harvesting,

--undereducation,¹ and
--critical health needs.

For example, a federally funded consultant's report noted that in 1970 63 percent of all migrants were 16 years old or younger. In addition, migrants and other seasonal farmworkers are particularly subject to conditions that foster poor health, but they are less able to obtain needed medical care than permanent residents of a community. Most migrant farmworkers do not participate in public assistance programs because of residency requirements and problems of obtaining required income certification.

To help alleviate these severe hardships, the Government has made grants for programs to assist migrants and other seasonal farmworkers. For example, HEW's Office of Education (OE) has funded projects to meet the special educational needs of children of migratory agricultural workers. HEW's Public Health Service has made grants for improving health services and health conditions of migrants.

Migrants' and seasonal farmworkers' conditions in the valley differed basically from conditions in the three major agricultural farmworker streams. For example, the several thousand day-haul farmworkers generally live year-round in communities next to the tobacco fields and, according to the association and the council, probably are eligible for local public assistance programs. In addition, the education of many youths who received services under the Connecticut Migratory Children's Program was not subjected to the interruptions generally associated with such children.

Married Puerto Rican contract workers did not uproot their households by bringing their families to the valley. Those Puerto Rican contract workers who received prevocational education services under Labor's economic upgrading grant generally returned to Puerto Rico where the skills or knowledge acquired through the project may not have helped them gain permanent nonagricultural employment. Most participants were enrolled in English-as-a-second-language and driver-training courses. According to English course enrollees, English was used minimally in Puerto Rico. Driver training was planned to enable participants to obtain Connecticut or Massachusetts driver licenses.

¹An HEW report stated that 90 percent of migrant children would not finish high school and that the average migrant farmworker has a fourth- or fifth-grade education.

Association statistics showed about 3,600 adult Puerto Ricans were living in the labor camps during some part of the 1974 growing season. About 400 returned to Puerto Rico for emergencies and medical reasons or were fired. About one-third of the remaining 3,200 fulfilled their contracts and were provided return transportation at the association's or growers' expense. An association official said most of those who do not fulfill their contracts eventually return to Puerto Rico at their own expense.

Tobacco growers did not recruit workers from Puerto Rico for the 1975 season, according to an association official. Instead, the growers relied primarily on the local labor force to harvest the crop. This further points to the need for close coordination between Federal officials and grantees to identify the needs of migrant and seasonal farmworkers in the Connecticut River Valley.

CHAPTER 3

EDUCATION PROGRAMS FOR MIGRATORY CHILDREN

The primary purpose of educational programs for migrants is to meet the special needs of migratory agricultural workers' children, whose education is interrupted due to constant moving. In fiscal year 1974, Connecticut's migratory children's program served about 2,600 children. About 1,500 of those served were contract youth workers who enrolled in the tobacco camp program. Many of the youths may have been ineligible for the program, however, because the criteria used to establish their eligibility was inadequate and Connecticut did not obtain information to establish that the youths were children of migratory agricultural workers. For children enrolled in other educational projects, information was often incomplete or too ambiguous to clearly establish eligibility.

Although certain educational programs made positive achievements, overall program achievement for fiscal year 1974 could not be evaluated because of limited student testing. Connecticut's educational programs for migrants received Federal funding, in part, on the basis of data that appears to have overstated the number of eligible children in the State.

PROGRAM GOALS AND OBJECTIVES

Migrants' special educational needs are well recognized. For example, the National Advisory Council on the Education of Disadvantaged Children has stated that the migrant child is constantly moving and has no continuity in education. The child is seldom in school long enough to participate in school activities; some spend only 2 to 6 weeks in any one school district during the harvest season. Consequently, well over half of all migrant children are not achieving at their grade level. Title I of the Elementary and Secondary Education Act of 1965, as amended, authorizes programs to meet the special educational needs of children of migratory agricultural workers.

In fiscal year 1974, Connecticut's department of education, through contracts with ACES and five school districts, planned educational and recreational programs to meet the educational and cultural needs of migratory children. In fiscal years 1972 and 1973, the department of education contracted with the University of Hartford for the operation of these programs. Shown below is a schedule comparing the planned and actual number of children served in each fiscal year.

	<u>Number of children served</u>		
	<u>Planned</u>	<u>Actual</u>	<u>Percent of planned</u>
1972	1,200	1,290	108
1973	2,000	1,434	72
1974	2,301	2,604	113

In 1974 ACES operated two 6-week summer programs and two tutorial programs for about 2,400 children. One 6-week program, the multipurpose center summer project, stressed academic improvement of the children's communication and mathematics skills. The other summer program was primarily for contract youths living in the youth camps and consisted entirely of recreational activities. The 5 school districts operated preschool or tutorial programs for about 200 other children.

The preschool program was designed to improve the children's readiness for learning, to detect learning disabilities, and to provide ancillary services to the participants' families. The objective of the tutorial program was to provide remedial instruction in language arts, mathematics, and science.

Success of the preschool, tutorial, and summer programs was to be measured by administering standardized tests before and after each program. However, definitive criteria were not established to evaluate progress on the basis of test results.

Goals and objectives established by the State department of education in fiscal years 1972 and 1973 were essentially the same as those in fiscal year 1974. Department officials believed these objectives were consistent with national goals. They also appeared to be consistent with the authorizing legislation.

ELIGIBILITY OF EDUCATIONAL PROGRAM PARTICIPANTS

OE has categorized migrant children into three groups--interstate, intrastate, and settled-in. An interstate migrant child is one who has moved within the past year across State boundaries with a parent or guardian who was seeking temporary or seasonal employment in agriculture. An intrastate migrant child is one who has moved within the past year across school district boundaries within a State. A settled-in child is one who, along with a parent or guardian,

has ceased to migrate but is eligible to participate in educational programs for 5 years. HEW requires that first priority be given to enrolling interstate and intrastate children in such programs. Projects for migrants may not be established exclusively for settled-in children.

Tobacco camp program

In fiscal year 1974, the program run by ACES served 2,430 youths. About 1,533 (63 percent) of these children participated in the tobacco camp program. Budgeted tobacco camp program costs totaled about \$37,000, excluding administrative costs. The participating youths were classified by OE as interstate migrant children eligible for educational services on the basis of published HEW guidelines. The guidelines clarify the regulations implementing the Elementary and Secondary Education Act of 1965, as amended, as follows.

An interstate migratory child is:

"A child who has moved with a parent or guardian within the past year across State boundaries in order that a parent, guardian or member of his immediate family might secure temporary or seasonal employment in agriculture or in related food processing activities. The parent or guardian and child are expected to continue in the migrant stream."

The contract youths who attended the tobacco camp project were primarily from Pennsylvania, Florida, and West Virginia and attended school full-time in their home States. These youths had not been identified as having special educational needs. Their school principals and/or teachers recruited them for summer employment and accompanied them to Connecticut as camp directors. The children arrived in Connecticut after the end of the school year and returned to their home States before the start of the next school term.

Under the legislation authorizing educational programs for migratory children, eligibility depends on the migrancy status of the children's parents. The Elementary and Secondary Education Act Amendments of 1966 specially provided for educating children of migratory agricultural workers. In recommending adoption of the amendments, both the August 5, 1966, House Report 89-1814 and the October 3, 1966, Senate Report 89-1674 stated:

"The children of migratory agricultural workers present a unique problem for educators. Migratory

workers travel from community to community in order to work. They often settle in a single community for 2 months or less. Consequently, their children are seldom in school long enough to participate in school activities; some spend only 2 to 6 weeks in any one school district during the harvest season. Well over half of all migrant children are not achieving at their grade level; a substantial number of them are 2 years or more behind in their schooling * * *."

The youths in the ACES project were found to be eligible on the basis of OE's belief that the school teachers (camp directors) acted in place of the children's parents when the children were in Connecticut. The children were considered to have moved across State boundaries with their guardians, who were acquiring employment in agriculture.

We disagree with OE. In our opinion, school teachers working as camp directors only during the summer months are not migratory agricultural workers as contemplated by the 1966 amendments, are not legal guardians of the children, and do not stand "in loco parentis" (in the place of parents) to the youths. Furthermore, the children, who return to school in the fall, do not experience the conditions and problems discussed above.

While some of these youths could have been eligible for the program if their parents had been migratory agricultural workers, the registration forms used for enrolling the children did not contain information concerning their parents' employment. Thus, no evidence was available to establish eligibility.

An OE official said OE funds camp youth programs in other States. If eligibility was determined on the same basis used in Connecticut, some youths in other States also may have been ineligible.

Other educational projects

To determine the eligibility of children participating in the other educational projects operated in fiscal year 1974, we randomly sampled the registration forms of 228 youths--43 enrolled in the preschool project, 14 in tutorial projects, and 171 in the multipurpose center project. Forty percent of the enrollees were either ineligible (14 percent) or settled-in (26 percent)--the lowest priority target population for educational services. The registration forms of the ineligible children showed that either (1) they had

not moved across State or school district lines with a parent or guardian who was pursuing agriculture or (2) they had exceeded the 5-year eligibility limitation.

The eligibility of 103 youths (45 percent) could not be established because the registration forms contained either incomplete or ambiguous information. Only 33 youths identified (15 percent) were children of higher priority interstate or intrastate migrants. The schedule below summarizes the sample results.

Youth Eligibility Sample Results

Program	Youth sample	Eligible students				Ineligible	Other (note a)
		Interstate	Intrastate	Settled-in	Total		
Preschool	43	1	1	12	14	7	22
Tutorial	14	4	0	5	9	0	5
Multipurpose center	<u>171</u>	<u>22</u>	<u>5</u>	<u>43</u>	<u>70</u>	<u>25</u>	<u>76</u>
Total	<u>228</u>	<u>27</u>	<u>6</u>	<u>60</u>	<u>93</u>	<u>32</u>	<u>103</u>
Percent	100	12	3	26	41	14	45

^aRegistration forms were either missing or contained incomplete or ambiguous information.

Officials of both the State department of education and ACES agreed that the registration forms used by ACES and school districts did not contain data necessary to adequately establish eligibility. In addition, recruiters registering students did not document any clarifying information they may have received from the responsible migrant families. ACES has designed a new registration form that the State department of education and ACES believe will more clearly and accurately define students' migrancy status. If recruiters properly complete the proposed form, the major inadequacies that occurred in the 1974 project should be corrected.

RESULTS OF INSTRUCTIONAL PROGRAMS

Tutorial program

The tutorial program appeared to be of little benefit to the children it served. Only 32 of the 67 students were tested both before and after the program. In mathematics, 12 students scored gains in the postprogram test while 20 students either regressed or remained the same. In vocabulary, 15 students scored higher in the postprogram test while 17 students either regressed or stayed the same.

The tutorial program in one school district met once a week for less than half the school year with the following activities scheduled.

<u>Time schedule</u>	<u>Minutes</u>	<u>Type of instruction</u>
3:30 p.m. to 3:40 p.m.	10	Arrival and outdoor play
3:40 p.m. to 4:20 p.m.	40	Work session--reinforcement and enrichment games
4:20 p.m. to 4:50 p.m.	30	Crafts period, emphasizing self-concept--children made and collected portraits
4:50 p.m. to 5:10 p.m.	20	Snack--mathematics reinforced as children made snacks.

Classes met once or twice a week in the other two school districts having tutorial programs. The typical program ran for 15 weeks, with academic instruction offered once a week for about 1 hour. Accordingly, a child that attended all sessions received about 15 hours of academic instruction.

Attendance records were available for two of the three tutorial programs. Average attendance was about 69 percent but fluctuated widely from month to month. For example, one program's average monthly attendance ranged between 38 and 90 percent. Low attendance and limited academic content may explain why test scores for many of the participants did not improve.

The State department of education's migratory children's program director said steps were taken to improve tutorial programs for the 1974-75 school year. A major change was integrating the tutorial program into the regular school day rather than having a voluntary, after-school program. The director also said he recognized improved achievement patterns could not be demonstrated until youths received services over longer periods.

Preschool programs

The academic impact of the preschool program as a whole could not be adequately measured because only 67 of 144 preschool youths (47 percent) were tested. Five school

districts offered academic instruction in basic concepts of mathematics and basic tools for language development. Pre-school youths' postprogram test scores improved about 22 percent over the preprogram test scores. An ACES official explained that children may not have been tested if they were not present when the test was given. Attendance records were available for four of the five preschool projects and showed average monthly attendance of about 74 percent.

Multipurpose center summer program

The academic impact of the multipurpose center summer program, as a whole, could not be adequately measured because only 247 of 860 students (29 percent), excluding preschoolers, were tested. According to ACES officials, many students probably were enrolled after the scheduled preprogram testing in the first week. Tested students made gains in standardized tests, with class attendance at about 76 percent. Youths taking the reading test showed an average gain of about 4 months in the 6-week course. Youths taking the mathematics test showed an average gain of about 5 months. An ACES official said a normal gain would be 1 month for every month's school participation. ACES officials stated these higher gains were to be expected because the 6-week course was an intensive instructional program. The program began about July 8, 1974, and ended August 16, 1974.

TOBACCO CAMP SUMMER PROGRAM

The tobacco camp summer program consisted of recreational type activities and, therefore, did not address many of the special educational needs of migratory children.

All activities were voluntary and attendance records were not required or kept. The program lasted approximately 6 weeks, beginning about July 8, 1974, and ending about August 16, 1974. About 1,500 youths participated.

Recreational activities were similar to recreational programs already sponsored by growers. Growers offered recreation equipment at each youth camp, conducted a swimming program, and provided transportation to shopping and recreational areas. Growers, however, considered the ACES summer program supplemental to their recreational program.

ALLOCATION OF FUNDS

OE's fiscal year 1972-74 funding allocations for Connecticut's migratory children's educational programs were based in part on an estimate of the average number of migratory children in the State in 1966 and 1967. According

to OE officials, identifying migratory children is difficult because no reliable data exists at either the State or national level.

In estimating the number of migratory children in Connecticut, OE used data compiled by Connecticut's employment security agency on the number of "full-time equivalent farmworkers" in the State.¹ OE estimated a ratio of .75 children for every full-time equivalent farmworker. The resulting number of full-time equivalent migratory children was multiplied by one-half of Connecticut's annual per-pupil expenditure to arrive at the State's allocation.

According to OE officials, the number of full-time equivalent farmworkers used in the formula included contract Puerto Rican workers and contract youths. As mentioned earlier, contract Puerto Ricans did not bring their families to Connecticut. Also, the eligibility of contract youths served in fiscal year 1974 is questionable. (See p. 10.)

OE officials said the number of full-time equivalent migratory children in Connecticut has decreased each year since 1967. They stated OE continued to use 1966-67 data as the basis for Connecticut's funding allocation because of unreliable and incomplete farmworker data. Using this data base increased the allocation each year because of annual increases in the State's per-pupil expenditure. OE officials stated, however, that the State agency could have received less if its proposals to OE did not justify the level of funds allocated.

Beginning in fiscal year 1975, OE used the Migrant Student Record Transfer System² as a basis for determining State allocations. The system is a national data bank based on information from school districts on the number of children served by migrant education programs. OE officials said the fiscal year 1976 allocation was based on record transfer system information from the fiscal year 1974 program. Accordingly, this data includes ineligible youths identified in our review of that year's program.

¹A full-time equivalent farmworker is the number of part-time farmworkers that would be needed to equal the work of one full-time farmworker.

²On Sept 16, 1975, we issued a report, MWD-76-21, on our evaluation of the Migrant Student Record Transfer System.

ACCOUNTING IMPROVEMENTS NEEDED AT ACES

OE regulations concerning the financial management systems of federally supported activities require all grant funds to be effectively controlled and accountable to OE. During fiscal year 1974, ACES spent about \$495,000 under its contract with the State department of education to provide educational services. About 55 percent was spent for payroll and related costs. ACES allocated some costs to the contract on the basis of estimates, thereby precluding a comparison of actual costs to services rendered. Other costs were misclassified. Because expenditures were understated, ACES' books and accounts showed more funds available for the program than was actually the case.

Estimated and misclassified costs

ACES accumulated and summarized costs under such classifications as evaluation, administration, transportation, communication, staff development, and professional and clerical salaries. Certain of these costs, such as evaluation and administration, were based on estimates of what ACES believed might be reasonable charges for support services; the charges were not allocated to the grant on the basis of actual costs.

We reviewed selected costs totaling about \$110,000, as shown below.

Cost classification

Supplies	\$ 5,388
Rentals	11,699
Evaluation	7,500
Administration	10,000
Staff development	37,425
Transportation	25,590
Consultants	3,491
Food	3,796
Communication	4,000
Travel	2,501
Total	<u>\$111,390</u>

Some costs were misclassified. The \$37,425 classified as staff development costs consisted of accounting, administrative, communication, and evaluation charges. The \$10,000 classified as administration costs actually consisted of evaluation services.

Available grant funds overstated

Expenditures were understated by about \$42,000 in ACES' accounting records. Accordingly, available cash was overstated by the same amount. This happened because about 50 checks issued during August 1974 were not recorded. ACES officials stated this was an oversight and attributed it to their attempt to establish a computerized accounting system. Because of technical problems, the manual accounting system was reinstated, and the oversight took place during the transition. ACES officials stated their bookkeeper had limited accounting skills and they planned to hire a controller or fiscal officer to account for Federal and State funds.

In accordance with OE and State requirements, ACES hired a certified public accounting (CPA) firm to make a financial audit of its Federal and State programs. The audit of migratory children's program grant funds covered the period September 1, 1973, to October 31, 1974. The CPA firm certified in its report that all expenditures were properly reported and accounted for and that there was a \$72,000 cash balance at October 31. As mentioned earlier, however, expenditures were understated, and the cash balance was overstated by \$42,000. The CPA firm agreed with our findings, explaining that, although the certification extended through October 31, 1974, its detailed examination and verification of records included transactions during the ACES fiscal year, which ended June 30, 1974. Expenditures recorded after June 30 were included without examination on the basis of the firm's intent to review interim period transactions in the next year's audit.

Payroll records

Payroll costs of a biweekly payroll were accurately recorded. However, time and attendance policies varied according to the program. For example, full-time staff maintained and signed their own timecards, which in turn were approved by their supervisors. A secretary, however, maintained timecards for the regular summer program staff. Staff employed in the tobacco camp program did not prepare or maintain timecards. The payroll for this staff was established solely on the basis that the employees were accepted for employment.

CONCLUSIONS

About 1,500 youths (58 percent) of the approximately 2,600 served by the migratory children's program in fiscal year 1974 were enrolled in the tobacco camp program. In our

opinion, the criteria used to establish their eligibility--school teachers regarded as migratory agricultural workers and as guardians--was not proper. Also, serious questions existed about the eligibility of many other children who participated in instructional programs.

Improvements already made in the forms used to register instructional program students should help to more accurately determine their eligibility. However, OE needs to revise its criteria for determining the eligibility of tobacco camp youths.

OE based the State's funding allocations partly on data that appears to have overstated the number of eligible children. For fiscal year 1976, OE's use of data recorded in the Migrant Student Record Transfer System will not assure that only educationally needy migratory children will be served, because the data bank includes ineligible children. Action is needed to refine the basis for funding Connecticut's education program.

Neither OE nor the State department of education established definitive criteria to evaluate educational programs. Certain educational programs made positive achievements, but less than one-half of the students were tested. Most tutorial program students failed to show progress on tests given. This appeared to be due primarily to limited academic course content and generally poor attendance. Also, the tobacco camp summer program was comprised of recreational type activities and, therefore, did not address many of the special educational needs of migratory children.

Because of weaknesses in ACES' accounting system and internal control procedures, OE lacks assurance that Federal funds were properly accounted for.

RECOMMENDATIONS

We recommend that the Secretary of HEW direct OE to:

- Take appropriate action to insure that only eligible children participate in the migratory children's program. This should include obtaining information showing that parents or guardians are migratory agricultural workers.
- Review camp youth programs operated in other States to insure that eligibility determinations are proper.

- Establish funding levels on the basis of demonstrated needs.
- Require that all students' academic progress be tested.
- Establish definitive criteria for evaluating the migratory children's program in concert with the State department of education.
- Evaluate the adequacy of the tutorial program's academic course content.
- Reconsider the appropriateness of the solely recreational nature of the tobacco camp program.
- Insure that grantees account for all actual costs and that such costs are properly classified.
- Insure that grantees maintain time and attendance records for all employees.

AGENCY COMMENTS

On December 12, 1975, we discussed the report with OE officials, who generally agreed with our recommendations.

The officials agreed that all students' academic progress should be tested but commented that, because some migrant children participate in many programs during a school year, it may be unwise to test them every time they enter and withdraw from a program. They said OE would make recommendations to the States after it completed its study of kinds of tests to give and when to test. They also said OE is developing models to be used by State and project officials in evaluating migrant education programs.

In commenting on our recommendation on the tutorial program, OE officials referred to Public Law 89-10, as amended, section 604, which prohibits the Government from directing, supervising, or controlling the curriculum or program of instruction of any educational institution or school system. They stated further that State applications and approved programs are reviewed by OE to determine whether the programs are designed to meet the special educational needs of migrant children.

We agree that OE cannot direct or control the program of instruction. However, OE has a responsibility to determine that migrant children's programs that receive Federal

funds are designed to meet the children's special educational needs. As shown by our review, tutorial program students who attended all sessions received only about 15 hours of academic instruction and most students who were tested failed to show progress. Therefore, OE should re-examine the program.

CHAPTER 4

MANPOWER AND PREVOCATIONAL EDUCATION PROGRAMS

DO NOT ADEQUATELY ADDRESS FARMWORKERS' NEEDS

The council's migrant and seasonal farmworker programs for prevocational education and manpower services appear to have benefited the farmworkers little. The programs, rather than being comprehensive, were disjointed and did not appear to address the needs of the different target groups served.

The prevocational education program was geared to Puerto Rican contract workers living in camps. Most of these workers returned to Puerto Rico, where little is known about whether the program's instruction helped them.

The manpower program primarily served former farmworkers who had settled permanently in the area. No evidence was available to show that they had received educational and vocational training needed for success in nonagricultural employment.

The programs' effectiveness was further hampered by minimal classroom achievement, poor attendance, and poor job retention rates of those placed in nonagricultural jobs.

PROGRAM GOALS AND OBJECTIVES

In fiscal year 1974 the council proposed basic prevocational education classes at the camps for 300 Puerto Rican contract farmworkers. These classes consisted of instruction in English as a second language, Spanish literacy, and driver education. They were designed to equip farmworkers with skills necessary if, or when, they decided to use the council's job placement services. The courses actually served about 385 Puerto Rican farmworkers.

English as a second language was offered to help farmworkers adapt to an English-speaking environment. Workers were to be taught how to make phone calls, read and cash paychecks, ask simple questions, and make simple greetings. Spanish literacy was offered to improve farmworkers' Spanish vocabulary so they could function in a Spanish environment. The council planned this course primarily for illiterate Puerto Rican farmworkers. Driver education was offered to enable farmworkers to acquire either Massachusetts or Connecticut drivers' licenses. Students studied driver education manuals translated into Spanish.

The lengths of the three prevocational education courses were not designated; course length depended entirely on workers' interest. Attendance was voluntary. The courses were offered on workdays, after working hours, from 6:30 p.m. to 8:00 p.m. in camp recreational rooms. In several instances, courses were offered at the council's regional office in Windsor, Connecticut.

In fiscal years 1972 and 1973, similar programs were planned for approximately the same number of Puerto Rican workers as were targeted for 1974. However, because rosters of enrolled students were not kept, we could not determine the number of farmworkers served.

The council's manpower services objectives were to offer economic alternatives for migrant and seasonal farmworkers by helping them obtain permanent employment in well-paying jobs having opportunities for upward mobility. The program was to be comprehensive and include recruiting, counseling, and job development services. After job placements, followup services were to be offered to assist workers with employment problems.

In fiscal year 1974, the council planned to place 150 workers in jobs. The council's manpower programs for fiscal years 1972 and 1973 were also geared to expanding job opportunities for seasonal farmworkers and increasing permanent year-round employment. Actual job placements generally exceeded goals. (See p. 26.)

Labor and OEO did not provide financial targets to the council nor use formulas to establish allocations within which the council could prepare its budget requests. The council's funding was based on costs it believed would be incurred for its planned economic upgrading programs and was reviewed and approved by OEO and Labor. Responsibility for the economic upgrading program was transferred from OEO to Labor in fiscal year 1974.

The council's manpower goals and objectives were based on major problems it identified as affecting the migrant and seasonal farmworkers in the Connecticut River Valley. These problems included year-round unemployment and underemployment of farmworkers, little formal education, and a general lack of support services, including communications and transportation. The council's goals and objectives were consistent with authorizing legislation.

PROGRAM RESULTS

The congressional statement of purpose for grants for migrant economic upgrading is as follows:

"* * * to equip unskilled migrant and seasonal farmworkers and members of their families as appropriate through education and training to meet the changing demands in agricultural employment brought about by technological advancement and to take advantage of opportunities available to improve their well-being and self-sufficiency by gaining regular or permanent employment * * *."

The prevocational education program and the manpower placement program operated independently. The education program primarily served Puerto Rican contract workers living in the camps. The manpower program primarily served former farmworkers who had settled permanently in the area.

The council employed a full-time staff of 22 to operate the economic upgrading program. They included an executive director, education specialists, job developers, contact workers, and administrative personnel. Salaries ranged from about \$6,300 for administrative personnel to about \$15,000 for the executive director. In addition, the council employed 14 part-time teachers who taught prevocational education classes at the camps. Teachers were paid \$5 per class plus transportation expenses.

Prevocational education services

During 1974, 385 farmworkers were enrolled in the prevocational education program.

<u>Course</u>	<u>Number of courses</u>	<u>Number of enrolled farmworkers</u>
English as a second language	18	268
Driver education	11	101
Spanish literacy	<u>4</u>	<u>16</u>
Total	<u>33</u>	<u>385</u>

The lengths of English-as-a-second-language courses ranged from about 3 to 21 weeks; driver-education courses from 1 to 12 weeks; and Spanish-literacy courses between 3 and 6 weeks. Each course was generally offered about twice weekly; sessions lasted about an hour and a half.

Teachers believed most workers were already literate in Spanish and others were reluctant to admit their illiteracy; thus, enrollment in the Spanish classes was low. Council officials said that because attendance was voluntary and the length of the course depended on worker interest, attendance records were not regularly kept. Available records showed that average attendance was low in the English and driver-education courses, as shown below.

<u>Course</u>	<u>Number of courses with attendance records available</u>	<u>Average enrollment</u>	<u>Average attendance</u>
English as a second language	16	15	8
Driver education	9	9	5
Spanish literacy	3	4	3

Prevocational education teachers said poor attendance was caused by a variety of reasons. For example, many workers were tired after working in the tobacco fields all day and preferred to take advantage of entertainment offered periodically by the growers. Dining halls and recreational rooms, where the courses were held, were not conducive to learning because of disruptions from workers not in the classes and such distractions as television and pool tables.

The council did not keep records to show the educational impact of the prevocational education program. In the English course, success was determined by the ease with which enrollees could use simple English. In the Spanish-literacy program, success was subjectively determined by the teacher; students had to be able to verbally sound out Spanish syllables and read some Spanish. In driver education, success was determined by acquisition of drivers' licenses. Because most Puerto Rican contract workers return to Puerto Rico, however, little is known of whether the program can help them.

We randomly selected and interviewed 25 farmworkers to obtain their views of the prevocational education programs they attended. The 13 participants in English as a second language indicated they learned little or no English, although most expressed a desire to learn more. Two-thirds of those interviewed said they planned to return to Puerto Rico where English would be of little or no use. The two participants in Spanish literacy said they could not read or write Spanish any better as a result of the course. Only 4 of the 10 participants in driver education took written driver tests; 2 took the road test and qualified as

licensed drivers. Eight said they planned to return to Puerto Rico. Because the driver-education program did not provide road test instruction, only enrollees having previously received road test instruction elsewhere could get licenses. Council records showed that only 20 of the 101 farmworkers enrolled in the program got Massachusetts or Connecticut driver licenses.

Council officials said program effectiveness suffered because part-time teachers were used, who perhaps were not fully committed to council goals and objectives.

Manpower services

Council records showed the following job placements in comparison to job placement goals established for the 3 fiscal years.

	<u>Goal</u>	<u>Placements</u>
1972	25	12
1973	45	138
1974	150	173

Practically all job placements were with Massachusetts employers, and most were in unskilled, assembly line positions. Council officials stated they primarily tried to recruit former Puerto Rican contract workers who either voluntarily left their jobs in tobacco camps or were fired.

The council did not provide professional job counseling. Counseling services consisted of convincing job applicants of the importance of keeping their jobs and getting to work on time and, where necessary, of suggesting housing and transportation resources. The council did not test applicants to determine the kinds of jobs they might be suited for. No evidence indicated that those who received manpower services were given prevocational or vocational training.

Job development services were designed to find non-agricultural jobs for farmworkers. The council's previous employer contacts in the area made finding job opportunities easier. Followup services were planned at intervals of 2 weeks and 2 months after job placement and consisted primarily of telephone calls to employers to determine whether

applicants were still working. A council official said he also made followup visits to some applicants; however, the council did not keep records of these visits.

Council records showed that, of the 173 job placements recorded during fiscal year 1974, followup action with employers was made for 76 (44 percent) of the placements as of September 1974. Council followup actions showed only 25 of the 76 (33 percent) were still working.

Council officials recognized that job applicants were likely to encounter problems on the job. For example, Puerto Ricans would probably find it difficult to adjust to a standard 8-hour workday, have problems in communicating in English with supervisors and, in some instances, desire to return to Puerto Rico.

To determine the status of job applicants placed by the council, we randomly contacted the employers of 64 of the job applicants the council recorded as placed during fiscal year 1974. Employers of 19 reported placements stated they had no record of such employment. Employers of the remaining 45 confirmed the hirings but stated 17 were not hired through the efforts of council job developers. Only 12 were still employed at the time of our employer contacts in October 1974.

Concerning those reported job placements of which the employers had no record, council officials said Puerto Ricans sometimes have two surnames; therefore, the applicants may have used one when applying for council manpower services and another when applying to the employer. We asked council officials to reconfirm the placements but they could provide no further documentation.

Concerning employer statements that applicants were hired without council assistance, council officials stated that job developers sometimes tell applicants to report to employers whom they know have job openings.

FINANCIAL CONTROLS

Our test of payroll and certain other costs, such as travel, rentals, supplies, and consultant services incurred for the council's economic upgrading program, showed they were adequately supported and accurately recorded.

CONCLUSIONS

The council's program of education and manpower services did little to enable farmworkers to acquire skills necessary for obtaining and holding nonagricultural employment. Prevocational education courses were directed to Puerto Rican contract workers generally planning to return to Puerto Rico (whereas manpower services were directed to former Puerto Rican contract farmworkers no longer desiring agricultural employment) but who were not adequately prepared for nonagricultural employment. Providing prevocational education courses in English and driver training (geared to obtaining Connecticut and Massachusetts driver licenses) to Puerto Rican contract workers who will return to Puerto Rico may not be appropriate. English course enrollees stated English was used minimally in Puerto Rico; therefore, its value appears questionable. Labor needs to insure that farmworkers' needs are identified and appropriate programs developed.

The manpower program was directed at former farmworkers who, on the basis of poor job retention statistics, appeared to have had employment problems that needed to be served by intensive prevocational or vocational education and training not provided at the tobacco camps. Placing former farmworkers in nonagricultural jobs offering opportunities for upward mobility without first giving them intensive prevocational and vocational training appears unrealistic because agricultural skills are not readily transferable to nonagricultural employment.

RECOMMENDATIONS

We recommend that the Secretary of Labor, in conjunction with the designated grantee, identify the needs of migrant and seasonal farmworkers in the Connecticut River Valley and develop programs to meet those needs. We recommend also that Labor review the past approach to job placement to arrange for prevocational and vocational education and training where appropriate to assure more successful job placements.

AGENCY COMMENTS

On December 12, 1975, we discussed the report with Labor officials. They agreed with our recommendations and said they have deferred a decision to fund the council for fiscal year 1976. They said they would consider the

anticipated farmworker population in the valley and review closely the farmworker needs identified and programs proposed to meet such needs.

The officials differed with our conclusion concerning the appropriateness of providing prevocational education courses in English and driver training to Puerto Rican contract workers who return to Puerto Rico. They said that many Puerto Rican contract workers returned to work in the valley each year and, therefore, could benefit from the courses. However, they didn't know how many of the workers generally returned.

If the courses provided training continuity, some returning farmworkers could benefit from them. However, the council did not obtain information from enrollees on previous prevocational training they may have received and did not plan a program to provide continuity.

CHAPTER 5

SEPARATE GRANTEE PROGRAMS INCREASE COSTS OF PROVIDING HEALTH SERVICES

HEW made grants to both the association and the council to provide health services to migrant and other seasonal farmworkers in the Connecticut River Valley. This duplicated available medical services. The council's costs for providing health services were considerably higher than the association's, due primarily to underuse of its clinics. Both grantees appear to have provided reasonably good health care.

PROGRAM GOALS AND OBJECTIVES

The association and the council submitted comprehensive farmworker health care proposals to HEW. The association planned to use its fiscal year 1973 and 1974 health care grants to provide extended outpatient services for about 4,900 adult migrant male farmworkers each year. The target population was primarily from Puerto Rico. The services offered were to supplement inpatient services covered under an insurance program. As mentioned earlier, because these workers generally did not have families with them, the health care burden they imposed was less than would have been the case in normal migrant streams. The association's proposals did not contain estimates of the number of expected patient visits. During the 1973 and 1974 growing seasons, 6,928 and 6,743 visits, respectively, were made to the association clinic and to outside medical specialists.

In addition to treating workers for injuries and illnesses, the association's program included preventive care, emergency dental treatment, health education, and X-ray services. The association's health goals and objectives were established on the basis of consultations and meetings with HEW officials whose suggestions were designed to assure that proposed goals were consistent with the Public Health Service Act. We determined that they were consistent.

The council's objective was to reduce farmworkers' dependence on the association for medical and dental services. The council believed that, when a grower provided or arranged for medical care, workers might fear a loss of confidentiality and the possibility of losing their jobs for medical reasons. The workers might also hesitate to inconvenience the grower, resulting in untreated medical problems.

The council's target population in fiscal year 1973 was also the 4,900 adult migrant workers primarily from Puerto Rico. In fiscal year 1974, the target population was estimated at 15,000 (6,000 migrant workers and about 9,000 day-haul workers). The health care program was to include outpatient services, health education emphasizing preventive care, screening and immunization programs, and transportation of patients to specialists and to dentists for emergency dental care. The council planned for 5,000 doctor visits during fiscal year 1974. During the 1973 and 1974 growing seasons, 2,312 and 2,260 visits, respectively, were made.

The council established its health goals and objectives on the basis of consultations with farmworkers. Meetings were held with health planning agencies in Springfield and Hartford to study and identify health resources. The council's goals were consistent with Federal legislation.

HEW initially decided that the council and the association would each serve separate target populations of 2,500 migrant and seasonal farmworkers in Massachusetts and Connecticut, respectively. HEW divided target populations and geographic areas between applicants because it was politically infeasible to choose between the management-oriented association and the labor-oriented council. HEW believed competition between grantees would result in better services to the farmworkers.

The council argued that (1) it was the OEO-mandated representative of all farmworkers in Connecticut and Massachusetts and (2) since a majority of the farmworkers lived in Connecticut, it would be abdicating its responsibilities by accepting HEW's administrative and geographical limitations.

HEW reversed its decision in August 1972; the target population and geographic area limitations imposed on each grantee were eliminated. Both the association and the council were to provide comprehensive health care services to farmworkers in both States.

THE PROGRAMS

The association operates the only State-licensed hospital for migrant farmworkers in the United States. It is located in Windsor, Connecticut, and functions as an infirmary. The hospital is equipped to provide both inpatient and outpatient medical care.

The association used its fiscal year 1974 HEW grant of \$162,000 to provide outpatient care. Two physicians--a surgeon and a general practitioner--supervised the daily sick call schedules from Monday through Saturday from 11:30 a.m. to 1:30 p.m. or later. The physicians received \$5 per patient treated or examined.

Sick or injured workers were transported in grower-owned vehicles to the association's hospital in time for sick call. If a worker became sick or injured, either while working in the tobacco fields or during nonworking hours, the grower was responsible for transporting the worker to the association's hospital or, in emergency cases, to the nearest hospital.

During June 1974, the association employed 10 full-time personnel, a part-time manager, and an X-ray technician in the health care program. Full-time staff included nurses, health aides, and administrative personnel. Salaries ranged from about \$6,500 for administrative personnel to about \$10,000 for nurses.

In fiscal year 1974, the council contracted for health services with Community Health Services, Hartford, Connecticut, and the Brightwood-Riverview Health Center, Springfield, Massachusetts. The council paid a fixed fee to cover all treatment provided farmworkers during specified hours. Community Health Services provided sessions from 10:00 a.m. to 1:00 or 2:00 p.m. from Monday through Friday. These hours were generally the same as those during which the association operated its sick call schedule. Brightwood-Riverview Health Center provided evening sessions from 7:00 p.m. to 9:00 p.m. Monday through Friday, reserving these periods exclusively for farmworkers.

To transport workers to the health facilities in Massachusetts, the council used two Government-furnished vans. The vans visited eight camps between 4:00 p.m. and 6:30 p.m., arriving at the center in Springfield about 7:00 p.m. In Connecticut, the council also used two Government-furnished vans. Each visited four camps between 8:00 a.m. and 10:30 a.m.

The council rarely provided medical services other than at regularly scheduled daily sick calls. Council officials stated that growers were responsible for meeting the emergency medical needs of the farmworkers during working and nonworking hours. In the Massachusetts and Connecticut farm labor camps, council health aides visited each barracks and announced the availability of council health services.

During June 1974, the council employed 13 full-time personnel in the health care program. The staff included a director, a health coordinator, and health aides. Salaries ranged from about \$6,400 for the aides to about \$13,000 for the director.

PROGRAM RESULTS

In fiscal year 1974, 2,260 visits were made to the council's health facilities--1,634 outpatient clinic visits and 626 dental and medical specialist referrals. The council did not provide health services to the estimated 9,000 day-haul workers. It believed their health needs were being met by State medicaid programs.

As stated earlier, the association did not plan to serve day-haul workers. Migrant workers made 6,743 visits to the association hospital--5,840 outpatient clinic visits and 903 dental and medical specialist referrals.

Of the 9,003 visits made to both grantees' health clinics, only 25 percent were to the council's clinics, although the council and the association received equal funding. Because the council clinics were used less, the cost per visit for the council's health program was about three times that of the association's.

The council and the association incurred costs of about \$135,000 and \$125,000, respectively, in 1974 and \$154,000 and \$140,000, respectively, in 1973 under their health grants. The average direct cost per visit of providing outpatient services at the council's two clinics was over twice as high as that of the association's hospital, as shown below.

	<u>Association hospital</u>		<u>Council clinics</u>	
	<u>1973</u>	<u>1974</u>	<u>1973</u>	<u>1974</u>
Average direct patient care cost	\$9	\$8	\$26	\$20
Average cost of referrals	8	8	20	18
Total average cost per visit either at clinic or to specialist	9	8	24	19

Allocating indirect costs to direct patient care costs doubled the per-visit cost of providing outpatient services at the association's hospital and tripled such costs at the council's clinics. Total direct and indirect previsit costs are shown below.

	<u>Association hospital</u>		<u>Council clinics</u>	
	<u>1973</u>	<u>1974</u>	<u>1973</u>	<u>1974</u>
Average cost per clinic visit	\$21	\$18	\$72	\$61
Average cost of referrals	19	19	54	56
Total average cost of medical care either at clinic or under specialist	20	18	66	60

Because 75 percent of the approximately 9,000 patient visits were made to the association's hospital, council clinics were greatly underused. As can be seen in the following schedule which summarizes how the two council clinics were used between March, the beginning of the tobacco-growing season, and October 1974, the Connecticut clinic was used less.

<u>Clinics</u>	<u>Sick call visits</u>	<u>Hours of operation</u>	<u>Visits per hour</u>
Brightwood-Riverview Health Center	1,009	316	3.2
Community Health Services	<u>625</u>	<u>477</u>	<u>1.3</u>
Total	<u>1,634</u>	<u>793</u>	2.1

HEW believed that an advantage of having two health care providers would be reduced farmworker travel time to health services. If the criterion for providing health services to farmworkers is their proximity to the health care provider, the residents of four camps in Connecticut, with approximately 70 percent of the total camp bed capacity in the State, should receive health care at the association's hospital. However, 64 percent of the visits to the council's Hartford clinic were made by these residents. The camp generating the majority of the visits was next to the association's hospital but 15 minutes by car from the Hartford clinic.

Similarly, residents of all but two camps in Massachusetts would have been expected to receive their health care at the council's Brightwood-Riverview Health Center in Springfield, Massachusetts. However, about one-third of the 1,900 outpatient visits to the association hospital were made by residents of the Massachusetts camps. The Massachusetts camps generally are about 25 minutes by car from the Springfield clinic but about 40 minutes by car from the association's hospital.

In addition, excessive transportation costs were incurred because each grantee visited the same camp--the association with grower-owned vehicles and the council with Government-furnished vehicles.

NATURE AND QUALITY OF MEDICAL CARE

According to the medical staff at both the Massachusetts and Connecticut clinics, the more common illnesses or diseases for which farmworkers sought treatment included colds, upset stomachs, German measles, chicken pox, and venereal disease. Medical staff at the association's hospital said farmworkers generally sought medical treatment for upper respiratory infections, venereal diseases, and skin diseases.

We randomly interviewed 44 Puerto Rican farmworkers who received health services at either the association's hospital or a council clinic. Twenty-three received services exclusively at the association's hospital, 12 received services exclusively at 1 of the council's 2 clinics, and 9 received services at both.

Farmworkers were generally satisfied with the quality of medical care received, whether they were treated at the association's hospital or at the council's clinics. They stated that if sick or injured again they would return to either health provider. Most workers knew they could go to either grantee for treatment.

During the 1973 growing season, an OEO legal services grantee (see ch. 6) filed complaints with HEW and the Connecticut Department of Health concerning alleged physical and verbal abuse of seven farmworkers at the association's hospital. On the basis of a site visit, the health department recommended that all staff be given inservice training concerning appropriate and professional behavior at a hospital, that patient records be kept in greater detail, and that a system be established to insure prompt and appropriate treatment in emergency cases. The HEW Regional Office for Civil Rights agreed with the recommendations made

by Connecticut's department of health and received assurances from the association that the recommendations would be implemented. The office for civil rights found no evidence that the association's hospital had not complied with the grant conditions.

Onsite visits were made during the 1974 growing season by representatives of both the office for civil rights and the Connecticut Department of Health. On the basis of interviews with patients and hospital staff, the civil rights office found no substantive violations. Officials stated that the original seven complainants were not interviewed because they did not return to work in 1974.

No complaints were filed against the association's hospital during the 1974 growing season. The legal services grantee believed the complaints filed in 1973 resulted in better quality medical care and treatment for farmworkers in 1974. No complaints concerning abuse at council clinics were made in 1973 or 1974.

We visited the grantees to determine if the facilities, equipment, staffing, and program content were adequate to provide a rational health program for migrant workers. In our opinion, migrant workers were receiving reasonable health services; however, the quality of health care was not improved by maintaining two separate administrative organizations operating two separate programs.

HEW MONITORING ACTIVITIES

HEW's Regional Public Health Service office is responsible for reviewing both grantees' program and budget applications, establishing funding levels for the grantees, and monitoring and reviewing their health programs. HEW officials believed that equally dividing the regional health grant funds for migrants between the association and the council would allow the alternative health care delivery systems offered by each grantee to be evaluated. HEW's evaluation and monitoring, however, was minimal. Evaluation procedures included intermittent site visits, phone calls, review of progress reports submitted by grantees, and budget and grant reviews. HEW officials stated (1) they had not made indepth evaluations and (2) personnel changes and reassignments had interfered with an ongoing evaluation of the programs.

FINANCIAL CONTROLS

We reviewed selected payroll and other large dollar expenses, such as medical specialist fees and equipment and medical supplies, for the association's and the council's health programs. These expenses were recorded accurately and were properly supported. The council used its Labor grant funds to pay the salaries of staff employed under the HEW health grant, with reimbursement occurring, in some instances, 2 to 3 months later. This occurred because the council failed to accurately estimate its cash requirements when applying for monthly cash from HEW.

Council officials stated they would make more frequent determinations of their cash position, in anticipation of computing monthly cash requests. This would better permit the council to use the proper agency funds for expenses related to its health care program.

CONCLUSIONS

HEW's policy of supporting two independent health programs to serve the same target group living in the same area has resulted in duplicate medical services, high medical care costs, and underused health clinics. Although each grantee received the same grant amount, about 75 percent of all outpatient visits during 1974 were handled by the association's hospital. As a result, outpatient medical care per farmworker visit at the council's clinics was three times more expensive than at the association's hospital. Discussions with selected migrant farmworkers indicated they were satisfied with the quality of medical care provided by both grantees.

If a local labor force is used more and migrant farmworkers are used less, as was the case during the 1975 season (see p. 8), the requirements for health facilities should be drastically reduced.

RECOMMENDATIONS

We recommend that the Secretary of HEW determine present and future health needs of farmworkers in the Connecticut River Valley before awarding future grants. We also recommend that, in awarding future grants, anticipated use of health facilities and the time and distance farmworkers must travel to them be considered.

AGENCY COMMENTS

On December 12, 1975, we discussed the report with HEW officials. They agreed with our recommendations and said they had begun actions to eliminate duplication of health care services. They also said they are negotiating with health care providers and plan to contract directly with them for the fiscal year 1976 program.

CHAPTER 6

LEGAL SERVICES PROGRAM

The council delegated operation of the legal services program to Neighborhood Legal Services, Inc. Services were provided primarily to Puerto Rican contract workers. Neighborhood Legal Services agreed to serve seasonal day-haul workers as well; however, service to this group was provided only in isolated instances. Information was not available to determine if day-haul workers had legal problems for which they were unable to obtain help.

The Governor of Connecticut, under the authority granted him in the authorizing legislation, vetoed OEO's fiscal year 1973 grant of \$50,000. OEO eventually overrode the veto. However, during the period the veto was in effect, Neighborhood Legal Services provided services to migrant farmworkers using funds from another OEO grant which was intended to serve low-income residents of Hartford. This grant was reimbursed after the veto was overridden. We are not questioning the reimbursement of these expenditures because of a lack of documentation concerning their authorization before the veto was overridden.

PROGRAM GOALS AND OBJECTIVES

The council, in its proposal to OEO¹ and agreement with Neighborhood Legal Services, planned to resolve problems peculiar to farm employment and to assure protection of farmworkers' legal and human rights. The council planned, where necessary, to institute legal action to protect farmworkers' civil rights by resolving violations of State and Federal antidiscrimination laws and by providing legal representation to farmworkers who wished to organize for social, educational, legal, and other benefits.

Program objectives were based on the council's determination that farmworkers lacked legal assistance services. The objectives were consistent with the authorizing legislation.

The council's proposal did not specify the number of farmworkers it expected to serve or the number of cases it

¹The Legal Services Corporation assumed responsibility for administering legal services grants on October 14, 1975.

expected to handle. The specified target population to whom free legal assistance would be provided was the migrant and seasonal farmworker population in Connecticut and Massachusetts.

OEO funded legal services on the basis of costs the council estimated it would incur to conduct its proposed program. OEO did not provide a financial target or use a formula to establish the funding allocation.

PROGRAM RESULTS

During fiscal year 1972, Neighborhood Legal Services opened 145 cases. The Governor of Connecticut vetoed OEO's fiscal year 1973 grant to the council in July 1973. He believed existing federally funded legal assistance agencies could provide adequate legal services to farmworkers in Connecticut.¹

OEO overruled the veto in May 1974--9 months later. However, from August 15, 1973, to April 30, 1974, Neighborhood Legal Services opened 85 cases. Overriding the veto did not provide for reimbursing the expenses incurred before the grant's effective date. An additional 296 cases were opened after May 1974 through November 1974.

During April 1974 to August 1974, Puerto Rican Legal Services--another OEO grantee headquartered in Puerto Rico--assisted Neighborhood Legal Services in providing legal assistance. Puerto Rican Legal Services opened 135 cases (69 percent of the 196 cases processed by Neighborhood Legal Services during April to August 1974). Salaries and expenses of Puerto Rican Legal Services personnel for the period were about \$19,000. These expenses were paid from the separate OEO grant to Puerto Rican Legal Services.

¹The Governor acted under authority of the Economic Opportunity Act of 1964, as amended (42 U.S.C. 2834). The act required that a proposed OEO grant within a State be submitted to the Governor of the State for approval. If the Governor disapproved the grant, the Director, OEO, could reinstate the grant if he found, upon reconsideration, that it was fully consistent with provisions of the authorizing legislation.

The schedule below lists the cases begun in 1972, 1973, and 1974 by type of case.

	May 1, 1974, to Nov. 25, 1974	Aug. 15, 1973, to Apr. 30, 1974	Jan. 4, 1972, to Oct. 20, 1972
Contract vio- lations	86	3	16
Wage claims	55	23	20
Workmen's com- pensation	34	17	47
Health insurance	45	2	18
Hospital project complaints	1	14	-
Retaliations	12	1	-
Firings	6	6	6
Other (note a)	<u>57</u>	<u>19</u>	<u>38</u>
Total	<u>296</u>	<u>85</u>	<u>145</u>

^aPersonal problems, lost baggage, housing violations.

From August 1973 to November 1974, about 67 percent of the cases opened were for Puerto Rican farmworkers living in Connecticut and 24 percent were for those in Massachusetts. The employment location of the remaining 9 percent could not be identified. About 90 percent of all cases involved the contract workers. Statistics for 1972 were comparable.

Neighborhood Legal Services officials said day-haul workers received few legal assistance services because reaching day-haul workers and identifying their legal needs were difficult. They stated also that day-haul workers were reluctant to seek legal services.

During August 1974, Neighborhood Legal Services' Farmworker Division employed seven full-time personnel: a director, legal assistants and investigators, and a secretary.

Types of cases

Contract violation cases involved such issues as alleged failure of employers to reimburse workers for the cost of the airline fare from Puerto Rico to the United States, alleged violations of the growers' obligations to guarantee 80 hours of work within every 2-week period, and alleged illegal health insurance deductions from workers' paychecks

during illnesses. Wage claim cases generally involved differences between the grower and the workers as to the number of hours worked. Workmen's compensation issues involved alleged misclassifications of injuries as health insurance cases rather than compensation cases, resulting in financial advantages to growers and disadvantages to workers.

Most cases, according to Neighborhood Legal Services' officials, were resolved successfully with the association or the growers. Cases were closed when (1) they were referred to the Workmen's Compensation Board, (2) farmworkers discontinued communicating with Neighborhood Legal Services, and (3) they were referred to Puerto Rico for resolution by Puerto Rican Legal Services. Most cases were resolved out of court.

Neighborhood Legal Services has also been involved in class action suits¹ affecting all farmworkers. During the 1973 growing season, it filed complaints with HEW and Connecticut's department of health concerning alleged physical and verbal abuse received by farmworkers at the association's hospital. (See p. 35.)

Services during period of Governor's veto

The Governor of Connecticut asked why legal services were being provided to the farmworkers by Neighborhood Legal Services while his veto was in effect.

According to Neighborhood Legal Services' executive director, legal services were provided to contract farmworkers in Connecticut and Massachusetts during the veto period because OEO gave continued assurances that the veto would be overridden. The executive director stated these assurances were oral--not documented. OEO officials could not confirm any such assurances.

Neighborhood Legal Services officials stated that Puerto Rican Legal Services personnel were needed in Connecticut during the 1974 growing season because, until the Governor's veto was overridden and an agreement negotiated with the council, Neighborhood Legal Services did not have sufficient staff to go into the camps to identify farmworkers' legal problems. Puerto Rican Legal Services personnel filled this void.

¹Filing one law suit on behalf of a class (similarly situated people).

In a May 1, 1974, letter to the Governor, the Director, OEO, stated Neighborhood Legal Services had a separate OEO grant that specifically provided for legal assistance to low-income residents of Hartford. He explained further that the purpose of the additional grant to the council was to provide legal assistance that would benefit farmworkers living in the agricultural areas of both Connecticut and Massachusetts.

Neighborhood Legal Services incurred expenses of about \$13,000--excluding Puerto Rican Legal Services expenses--during the veto period. According to Neighborhood Legal Services officials, these expenses were paid from the grant for the Hartford residents, which was later reimbursed when the veto was overruled.

Although the purpose of this grant was to serve low-income residents of Hartford, we are not questioning the reimbursement of these expenditures because of the lack of documentation concerning their authorization before the veto was overridden.

TIME AND ATTENDANCE PRACTICES NEED IMPROVEMENT

Neighborhood Legal Services spent most of its money on personnel costs. We reviewed one month's payroll and found that time and attendance records were not adequate to assure that staff were paid only for hours worked.

Weekly time sheets were kept for only two of the seven persons on the payroll. These time sheets were prepared by the office manager rather than by the individual employee. A similar deficiency was noted in a certified public accountant's audit report covering Neighborhood Legal Services' 1972 agreement with the council.

CONCLUSIONS

Legal assistance services provided by Neighborhood Legal Services concentrated primarily on serving migrant contract farmworkers from Puerto Rico, with few services going to seasonal day-haul workers. Information was not available to indicate the extent to which such workers may have needed legal assistance. Neighborhood Legal Services officials said day-haul workers were reluctant to seek assistance and identifying those having legal problems was difficult.

The Governor of Connecticut vetoed OEO's fiscal year 1973 legal services grant to the council. During the time the veto was in effect, services were provided to migrant farmworkers and paid for from another OEO grant that had been awarded to Neighborhood Legal Services.

Reimbursement was made to the grant for services to Hartford residents after the veto was overridden. Because of a lack of documentation concerning authorization of expenditures incurred before the veto was overridden, we are not questioning the reimbursement of these expenditures. However, the Legal Services Corporation should insure that grantees provide services only to authorized clients under grants formally approved.

Time and attendance records need to be better maintained to assure that staff are paid only for time worked.

RECOMMENDATIONS

We recommend that the President, Legal Services Corporation:

- Take appropriate steps to insure that grantees provide services only to eligible clients under grants that have been formally approved.
- Require that grantees maintain time and attendance records for all employees.

AGENCY COMMENTS

On December 16, 1975, we discussed the report with Legal Services Corporation officials. They agreed with our recommendations and said they planned to (1) issue regulations establishing client eligibility requirements and (2) develop procedures to insure that grantees maintain accurate time and attendance records.

FRANK E. MOSS, UTAH, CHAIRMAN
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 ROBERT F. ALLNUTT, STAFF DIRECTOR

United States Senate

COMMITTEE ON
 AERONAUTICAL AND SPACE SCIENCES
 WASHINGTON, D.C. 20510

May 30, 1974

B-177486

Honorable Elmer Staats
 Comptroller General of the United States
 General Accounting Office
 441 G Street, N. W.
 Washington, D. C. 20548

Dear Mr. Staats:

We respectfully request that the General Accounting Office conduct an audit of federally funded programs for seasonal farmworkers in Connecticut.

We ask this because recently there has been expressed to us strong feelings that the vast expenditure of federal funds (approximately 1.7 million in calendar year 1973) is not yielding much in benefits to the workers.

Enclosed is a listing of the issues we would like you to address in your report.

With kindest regards,

Sincerely,



Lowell Weicker, Jr.
 United States Senator



Robert Giaimo
 Member of Congress



William Cotter
 Member of Congress

LW:cr

Enclosure

ISSUES TO BE CONSIDERED IN GAO AUDIT OF FEDERALLY FUNDED
SEASONAL FARMWORKER PROGRAMS IN CONNECTICUT

1. GAO should evaluate the use of all Federal funds for seasonal farmworker programs in Connecticut (i.e. OEO, HEW, DOL) for the period 1971-74.
2. The report should include an evaluation of the following:
 - a) What are the program goals of the program sponsors? How were the goals and objectives developed? Who established the goals?
 - b) Are the program goals in concert with the legislation providing the federal funds?
 - c) To what degree were the program goals accomplished?
 - d) Could the program goals have been achieved more efficiently through some other mechanism? To what extent are services being provided which duplicate other federal, state or private services?
 - e) How have funding levels been established for seasonal farmworker programs?
 - f) Were the levels of funding adequate to meet the objectives? How many workers were to be served?
 - g) What is the cost/benefit ratio and does it warrant continuation of federal financial support?
 - h) What has been the record of administrative and fiscal management of the program sponsors?
 - i) How do all parties involved perceive the performance of the program sponsors?
 - j) To what extent are there any negative side-effects which result from the activities of the sponsors?

PRINCIPAL OFFICIALS RESPONSIBLE
FOR ADMINISTERING THE ACTIVITIES
DISCUSSED IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
<u>DEPARTMENT OF HEALTH,</u> <u>EDUCATION, AND WELFARE</u>		
SECRETARY OF HEALTH, EDUCATION, AND WELFARE:		
David Mathews	Aug. 1975	Present
Casper Weinberger	Feb. 1973	Aug. 1975
Frank C. Carlucci (acting)	Jan. 1973	Feb. 1973
Elliot L. Richardson	June 1970	Jan. 1973
ASSISTANT SECRETARY (EDUCATION):		
Virginia Y. Trotter	June 1974	Present
Charles B. Saunders, Jr.	Nov. 1973	June 1974
Sidney P. Marland, Jr.	Nov. 1972	Nov. 1973
ASSISTANT SECRETARY (HEALTH):		
Theodore Cooper, M.D.	May 1975	Present
Theodore Cooper, M.D. (acting)	Feb. 1975	May 1975
Charles C. Edwards, M.D.	Mar. 1973	Feb. 1975
Richard L. Seggel (acting)	Dec. 1972	Mar. 1973
<u>DEPARTMENT OF LABOR</u>		
SECRETARY OF LABOR:		
W. J. Usery, Jr.	Feb. 1976	Present
John T. Dunlop	Mar. 1975	Jan. 1976
Peter J. Brennan	Feb. 1973	Mar. 1975
ASSISTANT SECRETARY (EMPLOYMENT AND TRAINING):		
William H. Kolberg	Apr. 1973	Present

LEGAL SERVICES CORPORATION

PRESIDENT:		
Thomas Ehrlich	Jan. 1976	Present
EXECUTIVE VICE PRESIDENT:		
E. Clinton Bamberger, Jr.	Nov. 1975	Present

OFFICE OF ECONOMIC OPPORTUNITY

DIRECTOR:

Bert A. Gallegos	Dec. 1974	Jan. 1975
Bert A. Gallegos (Director Designate)	July 1974	Dec. 1974
Alvin J. Arnett	Sept. 1973	July 1974
Alvin J. Arnett (acting)	June 1973	Sept. 1973
Howard Phillips	Jan. 1973	June 1973
Phillip V. Sanchez	Sept. 1972	Jan. 1973