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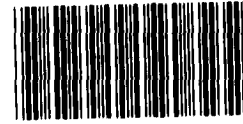
UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

HUMAN RESOURCES
DIVISION

June 24, 1981

B-203684

The Honorable Vic Fazio
House of Representatives



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Dear Mr. Fazio:

Subject: Review of Yolo County, California, Economic Opportunity Commission Concerning Matters Affecting Local Poverty Programs (HRD-81-110)

This is in response to your March 3, 1981, letter concerning the Yolo County Economic Opportunity Commission's involvement in certain matters affecting the county's poverty programs. Your letter cited significant concern by local citizens regarding the Commission's administration of certain Federal antipoverty programs.

You forwarded to us a copy of a February 25, 1981, letter from Mr. Robert N. Black--a member of the Yolo County, California, Board of Supervisors. Supervisor Black's letter contained 11 allegations (see enc. I, p. 1) about the Commission's operations. We developed information to substantiate or refute these allegations. The information we developed was provided in an April 24, 1981, briefing to you and your Woodland, California, district office staff.

We obtained information on these allegations through discussions with officials from the Community Services Administration (CSA) and Department of Health and Human Services (HHS) in Region IX, State officials, and local officials. The local officials included members of the Board of Supervisors, the county government, and the Commission, including members of the Community Action Board. Also, parents of Head Start program participants, Winters Parent Nursery School officials, and some of the Head Start Parent Policy Council representatives as well as various community representatives were contacted. Federal, State, and local officials provided documentation on matters relating to the 11 allegations we reviewed.

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This report is not intended to be a program and fiscal audit of the Commission's entire operations. Such an effort was beyond the scope of our review.

Our review indicated the following.

- The Commission's 1980-81 Head Start grant application effectively eliminated the Head Start scholarship program as it existed in Winters, California. However, the local scholarship program had only one child enrolled at the Winters Parent Nursery School in 1979-80 which met the original intent of the program (i.e., to pay tuition for preschool activities for children with special needs, meaning handicapped children).
- The Commission's Head Start staff did not fail either to visit children in the home-based Head Start program as required or to provide the proper training or group experiences to program participants.
- No discrepancy existed in 1978-79 between the number of children claimed to be served and actually served by the Commission's Head Start staff.
- The Commission's Head Start staff failed to provide services needed by a handicapped child from September 1979 until May 1980.
- There was no inordinate amount of travel by Commission staff, including Head Start personnel. Furthermore, we found no evidence of expenditures made for Head Start staff to stay overnight in a Sacramento hotel at the program's expense. Members of the Parent Policy Council, however, recently attended a 2-day training function in Sacramento for which their expenses, as allowed by Federal regulations, were reimbursed. Specific instances where Commission employees were, in our opinion, improperly reimbursed for unauthorized travel expenses are being referred to CSA's Office of the Inspector General for additional investigation.
- Funds budgeted for consumable school supplies as well as employee training were used on numerous occasions to buy lunches for Head Start staff.
- A July 8, 1980, election for one of the five representatives to the Community Action Board was canceled because of the unintentional misconduct of Commission personnel.

- We found no evidence to indicate that Commission personnel offered a low-income weatherization program in areas of Yolo County with homes in the \$100,000 to \$300,000 price range.
- Rental homes were weatherized by Commission employees in violation of contractual provisions, and personnel performing the weatherization were paid for a full 8-hour day while attending school for 4 hours. Payment was authorized for time spent in school only.
- The Commission's Senior Citizens Nutrition Program failed to provide home-delivered meals to certain county residents and to provide the number of meals required by its contract with the State's Area 4 Agency on Aging.
- No erroneous presentation was made by the Commission staff to the Board of Supervisors concerning a grant proposal for a multicounty food and nutrition program.

Throughout our review, we observed certain management deficiencies--such as the lack of effective program oversight, poor communication, and the failure to assure compliance with program performance standards--in the operation of the Commission's Head Start program. These deficiencies are pointed out in our discussion of the first allegation, which focused on the issue of the Winters Parent Nursery School scholarships. (See enc. I, p. 8.) In Yolo County, these management weaknesses are compounded by the lack of agreement among all affected parties concerning their roles and responsibilities. Ongoing discussions between HHS' Region IX and local officials are currently being conducted on these and other topics.


The enclosure to this letter discusses background information concerning the Commission, its organizational structure and selected programs, the delineation of duties and responsibilities regarding the county's antipoverty program operations, and pertinent information on the local Head Start program's policy council. Also detailed information developed concerning the 11 allegations is provided.

As requested by your office, we have not obtained written comments on this report. However, its contents were discussed with CSA and HHS officials in Region IX, and appropriate changes were made based on their oral comments. Also, as arranged with your office, we will provide copies of this report to Supervisor Black and other members of the Yolo County Board of Supervisors.

B-203684

Unless you publicly announce its contents earlier, we plan no further distribution of this report until 2 days from its issue date. At that time, copies will be sent to the CSA Acting Director and the Secretary of HHS. Copies will be made available to others on request.

Sincerely yours,



Gregory J. Ahart
Director

Enclosure

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ABBREVIATIONS

CETA	Comprehensive Employment and Training Act
CSA	Community Services Administration
GAO	General Accounting Office
HHS	Department of Health and Human Services
YCCIP	Youth Conservation and Community Improvement Projects

REVIEW OF YOLO COUNTY,
CALIFORNIA, ECONOMIC OPPORTUNITY COMMISSION
CONCERNING MATTERS AFFECTING
LOCAL POVERTY PROGRAMS

INTRODUCTION

In a March 3, 1981, letter, Congressman Vic Fazio requested that we review certain activities of the Yolo County Economic Opportunity Commission--the administering body for the county's poverty programs--which operates under the auspices of the Community Services Administration (CSA). The letter indicated that there was concern on the part of local citizens about the Commission's administration of Federal antipoverty programs.

To illustrate this concern, Congressman Fazio forwarded, as an attachment to his March 3 letter, a February 25, 1981, letter from Mr. Robert N. Black--a member of the Yolo County, California, Board of Supervisors. Mr. Black's letter contained allegations being expressed within the local community about the Commission's operations.

The 11 allegations cited by Mr. Black could be characterized as the community's perceived failure of the Commission to (1) adequately conduct or fully implement a proper delivery system to county residents needing direct and indirect services to help low-income and disadvantaged persons and (2) maintain an effective oversight responsibility of its staff's efforts to implement program objectives.

The allegations cited in Supervisor Black's letter were:

- A reduction in the number of Head Start scholarships being made available for children in the Winters area of Yolo County to attend a local nursery school caused by unilateral actions taken by Commission staff.
- The failure of the Commission's Head Start staff to visit children in the home-based Head Start program as required and to provide the proper training or group experiences to program participants.
- A discrepancy between the number of children claimed to be served and actually served by the Commission's Head Start staff.
- The failure by the Commission's Head Start staff for a 9-month period to provide services needed by a handicapped child.

- An inordinate amount of travel by Commission staff, particularly Head Start staff.
- The unauthorized use, for lunches of Head Start staff, of funds budgeted for school supplies and an overall lack of adequate school supplies for a 1-year period.
- The cancellation of elections to the Commission's Community Action Board because of the improper conduct of Commission staff at a polling location.
- A low-income weatherization program conducted by Commission staff in areas of Yolo County with homes in the \$100,000 to \$300,000 price range.
- The weatherization of rental homes by Commission staff in violation of contractual provisions as well as the improper payment of personnel performing the weatherization as full-time employees while attending school.
- The failure of the Commission's Senior Citizens Nutrition Program to, among other things, provide home-delivered meals to elderly county residents after arrangements had been made for these services.
- The failure by the Commission's staff to provide accurate information to the Yolo County Board of Supervisors concerning a regional food program resulting in the county not participating in a grant program.

The information we developed on these matters was provided in an April 24, 1981, briefing to Congressman Fazio and his Woodland, California, district office staff.

This report discusses background information concerning the Commission, its organizational structure and selected programs, the delineation of duties and responsibilities regarding the county's antipoverty program operations, and pertinent information concerning the Head Start Parent Policy Committee--a formal structure by which parents and representatives of community organizations which have a concern for children of low-income families can participate in the policymaking and operation of the local Head Start program. Also, the information we developed concerning the requestor's specific areas of interest is provided.

We obtained information on the topics mentioned above through discussions with officials from CSA and the Department of Health and Human Services (HHS) in Region IX, California State officials, and local officials. The local officials included members of the Board of Supervisors, officials of the county government's departments and agencies, and the Commission officials and staff,

including members of the Community Action Board. Also, parents of Head Start program participants, Winters Parent Nursery School (Winters school) officials, and certain Head Start Parent Policy Council representatives as well as various community representatives were contacted. Federal, State, and local officials provided documentation on matters relating to the 11 allegations reviewed.

BACKGROUND

On February 8, 1965, the Yolo County Board of Supervisors passed and adopted a resolution creating a Yolo County Community Action Council, whose purpose was to mobilize local resources to combat poverty through community action programs as provided in title II of Public Law 88-452--the Economic Opportunity Act of 1964. Subsequently, the Commission was established as a nonprofit corporation in May 1965 to conduct, administer, or coordinate various war on poverty programs within the county. On May 13, 1968, the Board of Supervisors designated itself as the community action agency in Yolo County and authorized an application for its recognition to be filed with the Office of Economic Opportunity (now CSA).

In the intervening years, agreements between the Commission and the Board of Supervisors have designated the Commission to administer the county's poverty programs. In its latest agreement, dated October 21, 1980, the Board of Supervisors reaffirmed its position within the county's community action agency.

According to the agreement, the Board of Supervisors, in its capacity as the agency's governing body, has the following powers:

- Grantee for CSA funds.
- The appointment and discharge of the agency's executive director.
- Final approval of all agency personnel, program, and fiscal policies.
- Final approval and disapproval of the agency's overall program plans and priorities.
- Final approval and disapproval of all the agency's program proposals and budgets.
- Final approval and disapproval of all delegations of agency responsibilities to other parties (delegate agency agreements).
- Enforcement of compliance with all conditions of CSA grants.

--Selection of its own officers and committees and establishment of rules or procedures.

--Referral of matters in regard to the above powers to the Commission for the purpose of recommending appropriate action.

Under Federal regulations, the Board of Supervisors could delegate its power to make decisions and set policy to the Community Action Board. Unless this power is delegated, however, the Community Action Board can only recommend proposed actions to the Board of Supervisors, the community action agency's governing body, for its consideration.

The Community Action Board--the Commission's administering board of directors--is the administering board for the county's community action agency. It is composed of 15 members--of whom 5 are public officials, 5 represent private groups and interests, and 5 are elected representatives of the poor. The Commission's day-to-day operations are carried out by a paid staff of 45 individuals, as of March 31, 1981. This staff is headed by the Commission's executive director, who is ultimately responsible to the county Board of Supervisors.

The Community Action Board has the responsibility for

- achieving the established goals and objectives of the various poverty programs;
- assuring that all Federal requirements are met;
- submitting to the Board of Supervisors, at least quarterly and more frequently if requested, a progress report on each funded program which outlines how the program is meeting its goals and objectives;
- preparing the agency's funding requests for consideration and approval of the Board of Supervisors in accordance with all Federal requirements; and
- keeping the Board of Supervisors fully informed on legislative or administrative matters that would affect the local agency's program operations.

In addition to these responsibilities, the Community Action Board has certain powers, including the power to participate with the Board of Supervisors in selecting the Commission's executive director.

Three of the Commission's direct service programs--the Head Start Program, the Energy Conservation and Home Repair Project, and the Senior Citizens Nutrition Program--are included to varying degrees in the allegations made by Supervisor Black. These programs operate in the Yolo County communities including Broderick, Davis, Esparto, West Sacramento, Winters, and Woodland.

Head Start program

The Head Start program, funded by grants made by HHS to the Board of Supervisors, is a child development program for 3- through 5-year-old children from low-income families. The program is based on the premise that all children share certain needs, and that low-income families, in particular, can benefit from a comprehensive development program to meet these needs. The overall goal of the Head Start program is to bring about a greater degree of social competence in children of low-income families.

Handicapped children--meaning children who are mentally retarded, hard of hearing, deaf, speech impaired, visually handicapped, emotionally disturbed, or crippled or who require special education services--can be included in the program.

The responsibility for carrying out program goals rests with the Head Start grantee. According to Region IX HHS officials, the grantee is the Board of Supervisors, not the Commission. As the grantee, the Board has the legal and fiscal responsibility to guide and direct such functions as planning, general administration, personnel administration, grant application processing, and program evaluation.

The various Head Start programs in Yolo County are based on a number of program options advocated by the HHS' Office of Child Development.

Under the variations in center attendance model option, eligible children are served on a less than 5 days per week basis. This model currently operates only in Woodland.

The county's home-based model, which operates throughout the county, focuses on the parent as the primary factor in the child's development and the home as the central facility. A home visitor is the essential element in the home-based program. This individual makes regular 1- to 2-hour visits to the family in their home.

The third model--the locally designed model with variations--permits communities to design and propose other program options which they find suited to meet the needs of children and the families in their own areas. The county's locally designed program has been a scholarship program for children with special needs to

attend a day care center. Originally planned to operate throughout the county, the program has primarily benefited children in the Winters area.

Head Start officials believe that the gains made by a child in the Head Start program must be understood and built upon by the family and community. To achieve this goal, Head Start provides for the involvement of the child's parents and other members of the family by giving them many opportunities for a richer appreciation of the child's needs and how to satisfy them. The formal structure within Yolo County by which parents participate in the policymaking and operation of the program is the Head Start Parent Policy Council.

Federal regulations governing the local Parent Policy Council-- a grantee-level policy council, according to HHS Region IX officials, because no complete or partial delegation of responsibility has been made for operating the local Head Start program--require that the council be composed of at least 50 percent of the parents of Head Start children presently enrolled in the grantee's program. The remaining members of the Parent Policy Council can be representatives of major public and private agencies and major community civic or professional organizations which have a concern for the children of low-income families and can contribute to the program. Parents of former Head Start children may serve as community representatives.

The grantee is empowered to determine the size and the composition of the policy council while adhering to guidance provided within applicable Federal regulations. The present Parent Policy Council has 16 representatives, of whom 11 are parents of presently enrolled children. These 11 members consist of one parent representative from each of the county's 7 Head Start home-based groups, the 3 Head Start center groups, and the Winters school. The remaining members are three parents of former Head Start children, one community representative, and one representative from the Community Action Board.

According to Federal regulations, policy councils, such as the county's Parent Policy Council, have certain major management functions connected with the local Head Start programs and varying degrees of responsibility for these functions. For example, the Parent Policy Council must approve the decisions made in regard to the following matters and have been consulted in the decision-making process by the Board of Supervisors before the point of seeking approval.

- Establishing goals of the local Head Start program and developing ways to meet them within HHS guidelines.

- Developing plans to use all available community resources.
- Establishing criteria for selecting children within applicable laws and HHS guidelines.
- Determining personnel policies.
- Hiring and firing the Head Start director.
- Making major changes in budget and work programs while the program is in operation.

A policy council may also negotiate for additional functions and a greater share of responsibility if all parties agree. In regard to the role and responsibilities of the county's Parent Policy Council in the local Head Start program, discussions have recently begun between HHS Region IX and local officials to, among other things, better define and clarify these management functions.

Energy Conservation and Home Repair Project

The Commission's Energy Conservation and Home Repair Project is funded by Department of Energy grants, which are provided to the Commission by the California State Office of Economic Opportunity. The program enables low-income persons of Yolo County to participate in an energy conservation program designed to lessen the impact of the high cost of energy and reduce excess utility consumption. The project focuses on the insulation and weatherization of homes using individuals participating in the Department of Labor's Comprehensive Employment and Training Act (CETA) program as work teams.

Senior Citizens Nutrition Program

The Senior Citizens Nutrition Program, known locally as the Not By Bread Alone program, is funded primarily by HHS through the Area 4 Agency on Aging. The program provides nutrition and socialization to senior citizens over 60 years of age by providing an out-of-the-home setting where they will find good food and company. A home delivery service provides disabled senior citizens with meals at home. Also, information and referral services, blood pressure clinics, hearing tests, diet information, and other related services are provided.

ALLEGED WEAKNESSES IN COMMISSION'S ADMINISTRATION OF LOCAL POVERTY PROGRAMS

The following information responds to the specific allegations provided in Supervisor Black's February 25, 1981, letter to Congressman Fazio concerning the Commission's administration of certain Yolo County poverty programs.

Allegation #1--A reduction in the number of Head Start scholarships being made available for children in the Winters area of Yolo County to attend a local nursery school caused by unilateral actions taken by Commission staff.

Supervisor Black alleged that the Commission's Head Start staff was unfair in its efforts to replace a highly successful and popular program. According to Supervisor Black, the Head Start scholarship portion of the Winters school program, which was providing services to eligible Head Start children in the Winters area, was in effect terminated in spring 1980 with the Commission's submission of a Head Start grant application for the 1980-81 school year. The grant application reduced the number of scholarships to be made available within the county and shifted the Winters area program from a locally designed option for providing service to children in a day care center to one of a home-based program for about 10 children.

Later, the concern expressed by interested parties, including parents of Head Start children in the Winters area and the Winters school staff, resulted in the Commission entering into a contractual arrangement with the Winters school for preschool experiences for 15 eligible Head Start children. The contract was for the 1980-81 school year only, beginning on November 3, 1980, and ending on May 15, 1981.

GAO findings

We found that the Commission submitted a 1980-81 Head Start grant application which did in effect eliminate the scholarship program as it existed in Winters. This action was taken without notice to the Winters school officials or certain other interested local parties. However, the scholarship program had only 1 child out of the 10 enrolled at the Winters school in 1979-80 which met the original intent of the local scholarship program (i.e., to pay tuition for preschool activities for children with special needs, meaning handicapped children). The Parent Policy Council's decision to reduce the number of scholarships was intended to be one of complying with existing policies and regulations while allowing sufficient funds to serve Head Start children with special needs in other areas of the county.

Our review of available documentation and discussions with Head Start personnel indicated that the scholarship program was a locally designed Head Start program option to provide service to children with special needs. The special needs were, according to the current Head Start director, those conditions described under the definition of "handicapped children" in the Federal regulations for the Head Start program. Therefore, an eligible Head Start child with a handicap, such as hard of hearing, speech impairment,

or serious emotional disturbance, who did not live in an area of the county with an already existing Head Start class could receive tuition to attend, for example, the Winters school. The director provided documentation which indicated that the Parent Policy Council and Head Start staff had worked together to establish the criteria for selecting special needs children as scholarship recipients.

In an undated Commission policy statement prepared to standardize the criteria for enrollment in the scholarship program, the following policies were established:

- The child must be at least 3 years old but not more than 4 years old as of December 1 of each school year.
- The child must be referred to the Head Start program by an agency competent to certify the child's needs (for example, Child Protective Services, Mental Health, Social Services, hospitals, or concerned medical personnel).
- Certification of the child's needs for scholarship placement must accompany the referral.
- Scholarship enrollees must meet Federal income criteria guidelines.
- Appropriate Head Start staff must approve the application.

It appears that the operation of the scholarship program was not provided sufficient oversight by the Commission's Head Start staff. For example, in the intervening 3-year period from the program's inception in 1977 to 1980, the actual use of the scholarship program became that of providing tuition, for the most part, to children without special needs. Furthermore, the scholarships were being awarded only to children in the Winters area although intended for children throughout the county.

During the 1979-80 school year, the Head Start staff realized that all scholarships had been awarded to Winters area children to attend the Winters school. The staff's closer examination of the scholarship recipients indicated that all but 1 of these 10 scholarships were awarded to children without special needs.

The Winters school director told us that she knew that many of the children receiving scholarships did not have special needs. She believed that the Head Start staff had to know there were not many special needs children in the Winters area, yet the staff continued to approve applications and award scholarships. In this regard the Head Start director stated that the staffmember responsible for this matter was relatively new and was not fully aware of the scholarship program's purpose when the awards were made.

The reason that Winters area children were the only scholarship recipients was that no referrals were received from other parts of the county. As children applied to the Winters school, school officials initiated the application process for available scholarships. The important requirement for children to be referred to the program by an agency competent to certify a child's needs was satisfied by contacting the Winters area public health nurse. The nurse wrote referrals which generally reflected the child's need for socialization. Both the Winters school director and the Head Start director agreed that this type of referral was not intended to be a special need.

Problems resulting from the inadequate oversight of the scholarship program's operation appear to have been compounded by (1) a lack of communication between all parties and (2) the failure of Head Start staff to adequately assist the Winters school in assuring compliance with program performance standards.

Regarding the lack of communications, the most noteworthy example was the failure of the Head Start staff and Parent Policy Council in 1980 to include Winters school officials and staff in discussions to substantially reduce the number of scholarships in the 1980-81 school year. The Winters school director said that the Head Start program officials' actions distressed her in that a 3-year program that parents and school personnel had grown to expect was abruptly stopped without their being involved in the decisionmaking process. When the director inquired about the decision, she was told it had already been made and that it was a Head Start decision not a Winters school decision. The director acknowledged that the failure of the Winters Head Start parents to assure that they had a policy council representative and that this person attended the Parent Policy Council's meetings at which this matter was discussed and agreed to may have been a mistake. But, for the most part, the Head Start parents from Winters were not fully aware of the structure and function of the Parent Policy Council.

Evidently poor communications still exist. On March 20, 1981, the Parent Policy Council voted to continue tuition payments in the next school year to the Winters school for only those children who are in the program this year and who will still be eligible next year. The Parent Policy Council will accept no more children in the scholarship program unless they meet the established policy criteria. Although the Winters policy council representative was present for this meeting, she said she was not aware that a vote had been taken on this matter.

According to the Winters school director, the Head Start staff failed to adequately assist the Winters school in meeting required program performance standards. Although the Head Start staff is responsible for insuring that these standards are met, interviews

with Head Start staff and the Winters school staff indicate that before 1980 the Head Start staff made limited efforts to help the school meet or even become aware of these standards. The Winters school director said that the Head Start staff occasionally mentioned during the 1979-80 school year that certain performance standards must be met. However, she said no mechanism was set up for meeting these standards.

One example is that before the 1980-81 school year the Winters school never served lunches. Federal regulations require that every Head Start child in a part-day program receive a quantity of food in meals and snacks which provide at least one-third of a child's daily nutritional needs, with consideration being provided for meeting the special needs of children with a handicapping condition. The Winters school director said that the Head Start staff told her Head Start schools provide meals but did not directly instruct her to begin providing meals.

The issues--lack of effective program oversight, poor communication, and the failure to assure compliance with program performance standards--discussed above are evidence that actions are needed within Yolo County to improve the local Head Start program's effectiveness. For example, the roles and responsibilities of all affected parties must be assessed and agreed upon. Also, the size and composition of the Parent Policy Council must be examined to determine if it is responsive to the county's needs.

These and other similar topics are being addressed in ongoing discussions between HHS' Region IX and local officials. In our discussions with HHS' Region IX Chief, Head Start Program, Administration on Child, Youth, and Families, we were told that the actual powers and responsibilities for administering the local Head Start program cannot be stated at this time. There are issues that need to be resolved by the concerned parties in Yolo County. In her opinion, the current organizational structure does not correspond to what has developed in actual practice. She believes the program has been operating as though the Commission, not the Board of Supervisors, was the grantee.

Allegation #2--The Commission's Head Start staff failed to visit children in the home-based Head Start program as required and to provide the proper training or group experiences to program participants.

According to Supervisor Black, the Head Start's home-based program in the Winters area claimed to be serving 12 children during the 1980-81 school year when, in fact, only 6 were being served. Supervisor Black believed that each of the 6 families served would testify to the fact that the home visitors (teachers) were not showing up in most (50 to 70 percent) cases as scheduled or for the period of time required, did not provide the proper

social or educational training, and made no provision for group experience or field trips for the children.

GAO findings

Our discussions with Head Start officials, including the home visitor serving the Winters and Davis areas of Yolo County, and four of the families participating in the home-based program did not substantiate these allegations.

The Head Start grant proposal for the 1980-81 school year stated that each home visitor would serve about 11 to 12 families and each family would receive 1 to 2 hours of service per week. The local policy is for the home visitor to schedule four families per day on Tuesdays, Wednesdays, and Thursdays. Mondays and Fridays are reserved for home visitor training, planning, report writing, and other administrative duties. Policy allows home visitors to cancel the home visit during the week when a group activity, such as a field trip, is planned. It is preferred that home visits canceled because of parent meetings with the home visitor be rescheduled. Local policy allows for a maximum of 6 hours of release time each week for the home visitor for continuing education. Other than the grant proposal which gives general guidance for program coverage, the Head Start Assistant Director told us that there is no written guidance for the home visitors to follow.

Head Start records indicate that 11 families in the Winters/Davis areas are served by a home-based visitor. Seven of these 11 families are from Winters. We were able to interview four of the Winters area families during our review. In interviewing the parents, it became apparent that at one time they believed that the home visitor was supposed to come once each week and that any group activity would be supplemental. All the families we interviewed acknowledged that there have been group experiences, such as field trips and class days.

One family believed that the home visitor canceled her visits 50 percent of the time and that, when she rescheduled visits, she did not always keep the new appointment. This particular family kept records of the meetings and activities and over a 3-month period the family's record indicated that the home visitor made five home visits. According to the same record, there were two field trips, two class days, and three parent meetings held during the period. However, according to the Head Start Assistant Director, the parent meetings are not meant to be a substitute for home visits as are the field trips and class days. Another family said the home visitor did not make frequent home visits. This family said that the teacher stayed about 30 minutes on one recent visit; otherwise, she usually stayed an hour or longer. A third family told us that the home visitor came when she was supposed

to or tried to reschedule visits. The fourth family said it was rare that she did not come.

According to the Head Start assistant director, home visits are supervised to the extent that home visitors are required to hand in monthly lesson plans and schedules, write monthly narratives of their activities, and maintain pupil folders. The assistant director reviews these records with each home visitor and attends a limited number of home visits while maintaining telephone contact with parents.

The actual activities with the children provided by the home visitor appeared to be in line with the education services, objectives, and performance standards cited in the Code of Federal Regulations and the proposed objectives stated in the local grant proposal. Also, all of the families we interviewed knew of the additional special services, such as medical and dental treatment, special education, speech and hearing services, etc., provided by the local Head Start program.

Allegation #3--A discrepancy existed between the number of children claimed to be served and actually served by the Commission's Head Start staff.

Supervisor Black indicated that a former Head Start employee alleged a discrepancy between the number of children that Head Start claimed to be serving and the number actually served in the 1978-79 school year. Specifically, it is alleged that Head Start claimed to have served 170 children but actually served only 150.

GAO findings

Our review of the Head Start enrollment files and the Project Head Start Program Information Report for 1978-79 did not substantiate this allegation. We did not find that Head Start claimed to be serving 170 children or actually served only 150.

The Project Head Start Program Information Report states that all children who participate in the program throughout the program year are to be counted. It includes children served for any length of time from the beginning through the end of the operating year. Specifically included in the actual enrollment count are dropouts and late enrollees. The report for 1978-79 indicates that 232 children were served by the program that year. A review of the program's records for that year substantiates this total.

We interviewed the former Head Start employee--the source of the allegation--who said she kept a record of all the children enrolled in the program for that year. However, her count at any one time included only children who were active in the program; it did not include those who transferred or dropped out.

Allegation #4--The failure by the Commission's Head Start staff from September 1979 until May 1980 to provide services to a handicapped child.

GAO findings

Although we received contradictory information from various sources, this allegation appears to be essentially true. Documentation shows that Head Start received an application from a scholarship program child in October 1979 and that the Head Start special education coordinator was aware of the child's special education needs.

According to the special education coordinator, immediate services were not provided because required consent forms and other documents were not submitted by the Winters school or the child's parents. In early March 1980, the completed forms were received. After these forms were received, the coordinator told us that six trips were made to the Winters school to evaluate and give speech therapy to the child. According to the coordinator, the child was present on only one of the six visits.

However, the Winters school teacher said that she was not advised until late in the school year that the Head Start staff needed additional information. On several previous occasions, she had tried unsuccessfully to contact the Head Start special education coordinator to discuss this matter. Furthermore, the teacher told us that the coordinator never came to the Winters school to visit the child when the school was in session.

In any event, the child received no special services from Head Start staff during the 1979-80 school year. It is our understanding that, in the 1980-81 school year, the child was enrolled in the Winters Day Care Program and received regular treatment.

Allegation #5--An inordinate amount of travel by Commission staff, particularly Head Start staff.

Supervisor Black believed the amount of travel taken by the Commission staff was inordinate. In one case, he alleged that the Head Start staff went to Sacramento and stayed in a hotel overnight at the program's expense.

GAO findings

We did not identify an inordinate amount of travel by Commission staff, including Head Start personnel. Furthermore, our review of Commission records disclosed no evidence of expenditures made for Head Start staff to stay overnight in a Sacramento hotel at the program's expense. Members of the Parent Policy Council,

however, in December 1980 attended a 2-day training function in Sacramento for which their expenses were reimbursed as allowed by Federal regulations. The bill totaled \$1,598.75. This bill included a \$50 charge for the use of a meeting room, \$334.40 for eight rooms for overnight lodging, and \$1,214.35 for four meals for 31 persons. However, the eight individuals who received overnight lodging spent more than the maximum allowable rate of \$50 in the Sacramento area for reimbursement of actual and necessary expenses incurred on the first day of the 2-day session. The total charges for these eight individuals on the first day totaled \$562.

During our review of the Commission's travel practices, we discovered several instances where Commission employees were, in our opinion, improperly reimbursed for unauthorized travel expenses. These instances are being referred to CSA's Office of the Inspector General for additional investigation.

The Commission is required by CSA policy to follow the travel policies set forth in the Standardized Government Travel Regulations. However, in accordance with CSA policy, when the grantee has travel policies that are more restrictive, those policies should be followed. The Board of Supervisors may from time to time revise the Commission's travel policies. For example, if the Board of Supervisors believes that travel and/or per diem costs are excessive, it may establish policies to better control these matters. However, the Community Action Board approves and disapproves individual travel requests.

The Commission budgeted \$43,849 for travel for the current fiscal year, ending June 30, 1981. As of March 31, 1981, \$35,911, or about 82 percent of the Commission's travel budget, had been expended.

Expenditures for travel which fail to meet the requirements of CSA regulations or the Commission's internal travel policies may be questioned as charges against grant funds. We examined the travel performed by Commission employees from July 1980 through February 1981 to determine the extent of travel by Commission staff and the appropriateness of reimbursement received by the staff while on travel status. This initial review culminated in a detailed analysis of the travel-related activities and expenditures of two Commission employees--the executive director and the Head Start special education coordinator.

Members of the Board of Supervisors and a member of the Community Action Board told us that the amount of travel taken by the Commission's executive director has been excessive and, as a consequence, hampers her ability to manage the Commission's day-to-day operations.

To address this concern, we examined the 85 workdays from July through October 1980 and found that the executive director was out of town on business for 16 of those days, or 19 percent of the time. In addition, local travel expenses were charged on 11 other workdays. We recognize the subjective judgment involved in determining what constitutes excessive travel, but based on our review of the purposes of the executive director's trips, we believe that her travel was directly related to the Commission's operations or its programs. Changing travel policies or disapproving individual travel requests are powers currently held by the Board of Supervisors and the Community Action Board, respectively.

We found several discrepancies in our detailed analysis of the executive director's expenditures for travel taken from July 1980 through February 1981.

On July 21, 1980, the executive director drew a travel advance of \$94 for a 2-day trip to Reno, Nevada, later in the month to attend a meeting of the California/Nevada Community Action Association. On August 19, 1980, another advance for \$162.50 was drawn in conjunction with a 3-day trip to Los Angeles in late August to attend another meeting of the Association. These combined advances of \$256.50 for the two trips were not acknowledged when the executive director's travel voucher for these two trips was filed in September 1980. The executive director told us that the Commission's clerical staff prepared her travel voucher and that the failure to account for the travel advances was unintended. She expressed a willingness to reimburse the Commission for the overpayment she had received as a result of this oversight.

We found that the executive director had been reimbursed for \$198.28 in total by the Commission for her payment of group lunches on five separate occasions while on travel status. The executive director believed the cost of group meals was permitted based on a telephone conversation about 6 years ago with a CSA regional office representative.

The first three incidents, involving lunches bought for \$61.89 in total for the Executive Committee of the California/Nevada Community Action Association, occurred in August and September. The charge was submitted on her October 20, 1980, local travel expense statement.

In the other two instances, the executive director bought lunches for others at the Commission's expense while attending Association functions in San Diego and Berkeley. The executive director bought lunch on December 5, 1980, for \$85.55 for seven individuals in San Diego and on December 12, 1980, for \$50.84 for six individuals in Berkeley.

Finally, the executive director's October 20, 1980, out-of-town travel expense statement for the purpose of claiming expenses incurred in attending the Statehouse Conference on Families in San Diego was incorrectly completed. The executive director requested reimbursement of \$87.50 for 7 quarters (at \$12.50 per quarter based on a per diem allowance of \$50 per day) based on an arrival at 7:00 p.m. on October 10 and a departure at 10:00 a.m. on October 12. However, her hotel receipt indicated that she had checked out of the hotel on October 11 and apparently returned to the Sacramento area.

A July 7, 1980, memorandum written by the executive director to the Commission's program managers clearly stated that an employee should automatically be placed on actual subsistence and be reimbursed for actual and necessary expenses incurred in high-rate geographical areas (up to the maximum rates prescribed). According to the rates schedule issued by CSA and provided as an attachment to her memorandum, the rate for San Diego was \$50. The prescribed maximum daily rates were not to be construed as per diem rates. The executive director did not know how this travel expense statement had been erroneously prepared.

The Head Start special education coordinator was reimbursed for unauthorized travel expenditures made in conjunction with two business trips--one to Washington, D.C., in August 1980 and the other to Detroit in November 1980. On both occasions, the Head Start official traveled to Allentown, Pennsylvania, on personal business. Each time the official paid the air fare from the business location to Allentown but failed to pay the increased amount to return to Sacramento from Allentown rather than from her business trip destination.

The return flight in August from Allentown to Sacramento resulted in the Commission incurring an additional expense of \$17 which should have been borne by the Head Start official. The return flight in November should have resulted in a \$40.50 disallowable expenditure to the traveler to recover the air fare incurred by the traveler for personal business.

Excessive subsistence expenses were claimed and reimbursed for both trips. For the 6-day Washington, D.C., trip, \$348.26 was claimed when, according to CSA regulations and Commission travel policy, only up to \$50 per day could be reimbursed to the traveler for actual and necessary expenses. Similarly, during the 6-day Detroit trip, the official incurred and was reimbursed for \$438.03 of expenses although the same maximum daily limitation of \$50 applied to travel expenses. Also, the Head Start official was reimbursed for \$67.10 of sightseeing tours taken while in Washington to attend the 18th Annual International Association of Logopedics and Phomiatics Conference.

The special education coordinator was under the impression that she had paid for all the additional costs involved with her personal trips. She believed that she had permission to charge actual travel expenses with no ceiling based on a conversation she had with the Head Start director. We noted on her form requesting and authorizing this out-of-town travel that \$28 for a tour was included as part of the trip's cost estimate. An advance for \$373, including the \$28 for the tour, was later authorized by the Commission's Head Start director, executive director, and accountant.

The adequacy of the Commission's internal mechanism to assure compliance with CSA's travel regulations and its own travel policies is an issue we believe the CSA's Inspector General staff should address in their forthcoming investigation of the Commission's travel practices. To improve the existing situation, a CSA Region IX official told us that it is possible to improve the Commission's current practice to identify disallowed travel expenses by integrating the Commission's fiscal responsibilities into the ongoing county's fiscal operations if this arrangement is agreeable to all parties.

Allegation #6--The unauthorized use, for lunches for Head Start staff, of funds budgeted for supplies and an overall lack of adequate supplies for a 1-year period.

Supervisor Black alleged that funds budgeted for supplies were not properly used and that supplies for teachers to conduct their programs were inadequate for an entire school year. It was further alleged that the funds were used for purchasing lunches for Head Start staff.

GAO findings

In our analysis of the Head Start general ledger account for consumable supplies, we found two instances in this fiscal year where this account's funds had been used to buy lunches. Only one of these instances, involving the Parent Policy Council, is permitted by Federal regulations. However, the expenditure for the Parent Policy Council's meals was incorrectly charged to the consumable supplies account. The other instance involving payment for the lunches of Head Start staff is not authorized, nor were the 13 other similar incidents we discovered in reviewing the Head Start employee training account.

The expenditures for lunches in the local area which we identified as being charged to the consumable supplies account totaled \$236.61 on one occasion for members of the Parent Policy Council and \$139.54 on another occasion for the Head Start staff. The Head Start director told us that these amounts had been incorrectly charged to the consumable supplies account and that necessary

correcting entries would be made. However, we believe that only the Parent Policy Council members' meals can be legally paid for with Head Start program funds.

The same Federal regulation discussed previously in allegation #5 regarding authority to pay for, among other things, meals of Parent Policy Council members would be appropriate for use in this instance. Neither we nor HHS Region IX officials were able to find any authority for Head Start staff to be provided lunches. A closer examination of the Head Start employee training account revealed 13 instances between September 1980 and February 1981 in which Head Start staff had been provided an additional \$2,000 of lunches using Head Start funds.

Regarding the overall lack of supplies for a 1-year period, we were unable to obtain any testimonial evidence to conclusively prove or disprove this allegation. The current and former Head Start employees we interviewed said that in some years supplies were adequate but in other years there were shortages. They told us that no consumable supplies were ordered in some years.

Allegation #7--An election to the Commission's Community Action Board was canceled because of the improper conduct of Commission staff at a polling location.

GAO findings

Our inquiry into this matter disclosed that a July 8, 1980, election for one of the five representatives of the poor was canceled because of certain irregularities at one polling location-- a senior citizens meal center in east Yolo County. We found no evidence that these irregularities resulted from any intentional misconduct. Rather, they resulted from a lack of adequate supervision of the election by Commission staff.

One Commission staff member was assigned to the meal center to conduct the election. Before arriving at the polling location on election day, he was given a general briefing and given the necessary forms by the Commission official responsible for conducting the elections.

During the election, the following events reportedly occurred that resulted in the election being canceled.

--A senior citizen employed by the Commission to oversee the meal center was telling elderly citizens who asked, which of the candidates to vote for as they came in for lunch.

--The Commission staff member conducting the election removed the ballot box from the polling location when he went to lunch.

--One senior citizen helped another senior citizen to vote.

A member of the Community Action Board told us, in regard to the first event, that the senior citizen who allegedly was telling senior citizens who to vote for is no longer employed by the Commission. The Board member said that she had talked to the employee in great detail and that the employee maintained she only responded to questions concerning who she would vote for. She had no intentions of improperly influencing voters on the election.

Both the Commission staff member involved in the second event and the supervisor responsible for the election said the staff member was instructed to take his lunch and to take the ballot box with him. They said in retrospect this was a mistake and that the ballot box should have remained at the election site with a second person detailed to supervise the election while the other staff member was at lunch. As a result, elections will now be supervised by two persons.

Concerning the third event, the staff member conducting the election said, as he recalled, he was busy answering questions at the time and was unaware of what was happening. He told us that, had he been aware, he would have assisted the senior citizen.

After the election was canceled by the Board of Supervisors and the Community Action Board, the Commission staff and Community Action Board members received training from the Commission official responsible for elections. Also, the two-member teams supervising elections are now briefed by the Commission election official before going to the voting location.

Allegation #8--A low-income weatherization program was conducted by Commission personnel in areas of Yolo County with homes in the \$100,000 to \$300,000 price range.

Supervisor Black alleges that Commission staff went door-to-door offering free weatherization services.

GAO findings

We were unable to substantiate, either from files or through interviews with present or former Commission employees or with Community Action Board members, that residents of \$100,000 to \$300,000 homes were solicited by Commission staff for free weatherization services.

The county official who provided the information regarding this allegation remembered receiving two telephone calls within the past 2 years from the residents of the Willow Banks area complaining about weatherization being done by Commission employees in their area. The officials could not provide names or dates for the telephone complaints.

In response to our point of inquiry, the official told us that she wasn't positive that weatherization services were being provided. She said that it could have possibly been services associated with a drought problem. Regardless of the service being provided, she did not believe Commission personnel needed to or should concern themselves with high-income neighborhoods.

Commission officials indicated that this allegation may be referring to a Commission program conducted in August 1977. That program was contracted with Yolo County for a CETA Title VI Public Service Project. The \$90,000 project employed 10 persons to install water conservation devices and repair water leaks in households throughout Yolo County. Residents were contacted door-to-door and offered the installation of water flow restrictors for shower heads and faucets, baffles in toilet tanks, and repair of leaking faucets.

Because this project was conceived and implemented under extreme drought conditions in Yolo County and much of California, the decision was made to involve all households in the county.

Allegation #9--Rental homes were weatherized by Commission employees in violation of contractual provisions, and personnel performing the weatherization were paid on a full-time basis while attending school.

GAO findings

Our inquiry into this allegation disclosed that Yolo County's Office of County Administrator/Manpower Division, the county government's prime sponsor for the Department of Labor's CETA programs, had identified the problems of unauthorized weatherization of rental homes and the payment of CETA participants for a full 8-hour day while attending school for 4 hours. These problems were later corrected.

On July 26, 1979, the Yolo County Manpower Advisory and Planning Council approved the Commission's request for operation of one of the Youth Conservation and Community Improvement Projects (YCCIP) for weatherization of low-income housing. CETA authorized funds for YCCIP in order to provide youths with constructive work in terms of individual and community benefit in such areas as the weatherization and basic repair of low-income housing. On October 19, 1979, the Commission agreed in its capacity as a subgrantee to a special condition to restrict all residential home weatherization and repair activities to low-income, owner-occupied housing.

On August 27, 1980, a monitoring visit to review the Commission's YCCIP program was conducted by the county government's prime sponsor. It disclosed, among other things, that the YCCIP weatherization crews had worked on five homes occupied by renters, not owners. At its August 28, 1980, meeting, the Manpower Advisory and Planning Council was informed that the Commission's YCCIP crews had worked on at least five rental homes during fiscal year 1980. Because this activity appeared to be a violation of a special provision in the Commission's YCCIP contract, the Commission was notified that the county intended to disallow the costs associated with the repair of these rental units.

During an October 1, 1980, meeting in the office of the county administrative officer, the Commission's executive director acknowledged that the allegation was correct. She pointed out that the Commission's failure to comply with contract provisions was unintentional. She stated that the Commission was in compliance with local and Federal guidelines that work not be done on low-income rental units unless the landlords signed an agreement that rent would not be raised for 3 years and that tenants would not be evicted. The executive director produced documentation that this agreement had been obtained on all rental units worked on by the YCCIP crews.

The executive director requested that, if possible, this special condition of the contract be rescinded by the Board of Supervisors for the following reasons: (1) the noncompliance was unintentional, (2) the intent of the restriction had been met through the signing of the landlord agreements, and (3) strict compliance with this special condition would penalize low-income families that could not afford to own their own homes or to rent adequately insulated low-income housing. The matter was finally settled on October 28, 1980, with the Board of Supervisors approval of a contract modification deleting the provision that the YCCIP crews work on owner-occupied housing only.

Another monitoring visit by the county's prime sponsor had been made on June 10, 1980, to investigate allegations of salary payments being made to YCCIP participants for times they did not work. For the time period reviewed, from December 1979 through February 1980, the monitoring visit disclosed that YCCIP participants were paid for 8 hours of work when their only activity was 4 hours of in-school training. In June and July 1980, a fiscal monitoring review was conducted, by the prime sponsor, in response to the findings discovered in the June 10 monitoring visit. The fiscal monitoring review report, dated August 7, 1980, concluded, among other things, that about \$1,370 in wage and compensation payments would be disallowed because of the policy of being paid for time of nonparticipation in the YCCIP activity.

The practice of paying participants for release time after attendance at school had been discontinued on April 22, 1980.

Allegation #10--The Commission's Senior Citizens Nutrition Program failed to, among other things, provide home-delivered meals to elderly county residents after arrangements had been made for these services.

Supervisor Black indicated that there were several cases in which frail and elderly persons, who had recently been released from hospitals, failed to receive meals at their homes. Although contact had been made with Senior Citizens Nutrition Program personnel to assure immediate delivery of meals, either no meals were provided or meals were not delivered as requested. The practical effects of this action were that (1) handicapped people were left in their homes without meals, unless alternative arrangements could be made, (2) certain hospital discharge nurses would no longer make referrals to the program, and (3) the nutrition program director was not receiving enough referrals to comply with provisions of the Commission's funding grant.

GAO findings

We found that home-delivered meals were not served to certain senior citizens discharged from local hospitals and that the Senior Citizens Nutrition Program's Woodland center had failed throughout the current fiscal year to provide the number of home-delivered meals required by the Commission's contract with the State's Area 4 Agency on Aging.

There are several sources of referral for the county's senior citizens who require home-delivered meals. Among these are the senior citizens themselves, hospital discharge departments, social service activities, and visiting nurses organizations.

Our discussions with officials of various referral activities indicated that the major concern with the Commission's program involved its Woodland center. The Woodland program is one of three home-delivery program locations operated within the county (the others are Esparto and East Yolo).

Officials of two referral organizations with whom we spoke mentioned four cases where they said they had referred home-bound elderly citizens for meal delivery and received commitments from the Woodland center for meals that were later not provided.

In two cases, one referral organization was unwilling to specify details concerning exact dates and the person or persons at the Woodland center with whom they spoke. However, the months of December 1980 and January 1981 were identified as the general time frame in which referrals were made. We could not confirm or refute the specifics of these cases because of the referral organization's unwillingness to provide the necessary details.

The other referral organization provided us with the information needed to pursue this matter with Commission officials for the remaining two cases. These two cases, which occurred in the October-November 1980 time frame, were both handled by the Commission's director of the Senior Citizens Nutrition Program. At the time of these incidents, the director was in the midst of a 5-month period (September 1980 through January 1981) in which he was managing the Woodland area home-delivery program.

In the first case, the director told the individual making the referral that the person was ineligible because the home delivery was beyond the 3-mile distance criterion from the nutrition center in downtown Woodland. The referral organization, however, said that service was promised and it was not provided.

In any event, the 3-mile distance criterion was of particular importance in this case. The distance criterion in effect during the period in question specified that service would be provided within a 3-mile radius of the Woodland center. The referral organization said that the location required for the meals to be delivered met the criterion. The program director did not dispute this, but said the criterion's intent was 3 road miles from the center. In March 1981, the director published revised program guidelines which specified, among other things, a distance criterion of 3 road miles rather than a 3-mile radius distance from the Woodland center.

In the second case, the director admitted that a home meal was not delivered as promised. He said the referral was for a senior citizen who lived in a trailer park. Three separate attempts were made by program staff to contact the person. On the first two visits no one answered the door. On the third visit she answered the door and indicated she had been unable to answer the door on previous occasions because she had fallen and could not walk to the door. A meal scheduled for delivery for the next day was not delivered because of a scheduling error. The meal was delivered the following day, but it was refused by the senior citizen.

We found that the provisions of the Commission's contract with the State's Area 4 Agency on Aging established a requirement for the home-delivery of 30 meals per day, 5 days a week, within Yolo County. The daily requirement of 30 meals was divided among the Commission's three program locations--12 meals by the Woodland center, 3 meals by the Esparto center, and 15 meals by the East Yolo center.

The following table shows the average number of meals delivered on a daily basis in these locations over the 9-month period from July 1980 through March 1981.

Home-Delivered Meals

<u>Month</u>	<u>Serving days</u>	<u>Daily average (note a)</u>		
		<u>Woodland</u>	<u>Esparto</u>	<u>East Yolo</u>
July	22	0	2	3
August	21	0	2	5
September	20	1	2	13
October	23	3	3	14
November	17	2	3	17
December	21	5	2	16
January	21	7	2	15
February	19	7	3	19
March	22	8	2	16

a/Fractions of daily averages rounded up.

As evidenced by this table, the Woodland center failed throughout the current fiscal year to provide the number of home-delivered meals required by the Commission's contract. The Senior Citizens Nutrition Program director said that the reasons for the low number of home-delivered meals in Woodland could be attributed to (1) an overly cautious startup approach on his part to avoid overcommitment and building expectations that could not be met, (2) the lack of a full-time Woodland center director from September 1980 through January 1981, and (3) a general lack of good public relations and outreach efforts. A person was hired in February 1981 to conduct the Woodland center home-delivery program.

Allegation #11--The Commission's staff failed to provide accurate information to the Yolo County Board of Supervisors concerning a regional food program which subsequently resulted in the county not participating in a grant program.

Supervisor Black believed that the Commission's staff presented an \$860,000 program proposal to the Yolo County Board of Supervisors in which the Commission would enter into an agreement with community action agencies from several surrounding counties to operate a regional food and nutrition program revolving around the community cannery in Woodland. Supervisor Black claimed that, when the matter was presented to the Board of Supervisors, it was rejected because the program's magnitude was unwarranted and beyond the Commission's capacity to administer. Later, when the matter was presented by the other counties to the Sacramento Regional Area Planning Commission, the program was estimated to cost \$220,000.

It was Supervisor Black's view that Yolo County did not participate in the grant because of the error made in presenting the grant proposal to the Board of Supervisors. He believed that,

had the program proposal been initially presented, or resubmitted, to the Board of Supervisors at its actual funding level, the Board of Supervisors might not have rejected the proposal.

GAO findings

Our work did not substantiate any evidence of an erroneous presentation of the grant proposal to the Board of Supervisors for a multicounty food and nutrition program.

The Commission's proposal that was disapproved by the Board involved \$803,000 for 2 years for a multicounty area. Yolo County was significantly involved in this proposal because of the planned use of the existing county cannery and its refrigerated storage. After the proposal was disapproved by Yolo County officials, the proposal was rewritten by representatives of the remaining counties. The \$220,000 cost of the resulting proposal presented by the other counties to the Scaramento Regional Area Planning Commission represented the first year's estimated budget of the revised proposal.