



OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION  
LAW ENFORCEMENT ASSISTANCE ADMINISTRATION  
U. S. DEPARTMENT OF JUSTICE

OCTOBER 1979





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

PROGRAM ANNOUNCEMENT

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

Because of your interest in the welfare of youth, we felt it important to notify you of the effort. This packet contains necessary information pertaining to the development of a full application for Federal Assistance under this National Program. Applications should be sent to the State Planning Agency and Central Office of OJJDP based on the specifications and guidelines provided in this packet and LEAA Guideline Manual M 4500.1 G. Applications will be rated and judged on the basis of all selection criteria outlined in the enclosed guideline.

It is perhaps useful to note that funds for this initiative are allocated solely under the authority of the Juvenile Justice and Delinquency Prevention Act of 1974, as amended in 1977, and cash match requirements have been waived for this program.

In making this program announcement it is recognized that no one single agency or program can unilaterally ameliorate the diverse and complex conditions which are manifested in the systems which afford services to youth. It is the intention of this program to assist private and public youth-serving agencies and organizations in implementing programs which develop, test, and support methods of advocacy which stimulate and facilitate needed changes and enhance accountability in the administration of juvenile justice and the delivery of education and social services.

Your participation is encouraged and welcomed.

*David D. West*

David D. West  
Acting Associate Administrator



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ANNUNCIO DE PROGRAMA

Conforme a la Sección 224 de la Ley de Justicia Juvenil y Prevención de la Delincuencia de 1974, según enmendada, la Administración para la Ayuda del Mantenimiento de la Ley (Law Enforcement Assistance Administration - LEAA) está dándole prioridad al programa de "Youth Advocacy" mediante la utilización de fondos discrecionales. Al inicio del programa una evaluación cuidadosa será llevada a cabo para así poder determinar la metodología más efectiva. Dicha evaluación permitirá a jurisdicciones locales y estatales, planificar e implementar programas similares en el futuro. Este anuncio complementa el manual de la LEAA para Programas Discrecionales (M 4500.1G).

Debido al interés que hay en el bienestar de los jóvenes, entendemos que debemos informarle sobre este esfuerzo. Adjunto encontrará información sobre cómo realizar las gestiones pertinentes para solicitar fondos bajo este programa nacional. Solicitudes deberán ser sometidas a la Agencia Estatal de Planificación (State Planning Agency) aplicable, y a la Oficina de Justicia Juvenil de la LEAA en Washington, D.C., conforme a los requisitos incluidos en los materiales adjuntos, así como aquellos que se estipulan en el Manual M 4500.1G de la LEAA. Las solicitudes serán examinadas y evaluadas conforme a los criterios de selección que se enumeran en el manual (panfleto) adjunto.

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

Mediante este programa, reconocemos que ninguna agencia o entidad en particular puede unilateralmente minimizar o reducir las circunstancias que contribuyen en los sistemas que proveen servicios a jóvenes. Este esfuerzo está encaminado a ayudar a agencias y entidades públicas y privadas que proveen servicios a jóvenes, a llevar a cabo programas, desarrollar, examinar, y apoyar métodos de abogar por jóvenes que estimulen y faciliten cambios necesarios para realizar la responsabilidad en la administración de servicios de justicia juvenil, educación y servicios sociales.

*David D. West*

David D. West

Acting Associate Administrator

# JUVENILE JUSTICE AND DELINQUENCY PREVENTION PROGRAMS

## YOUTH ADVOCACY

- a. Program Objectives. Pursuant to the 1977 Amendments to the Juvenile Justice and Delinquency Prevention Act of 1974, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) is sponsoring a major program to develop, test and support methods of advocacy which stimulate and facilitate needed changes and enhanced accountability in the administration of juvenile justice and the delivery of education and social services. The specific objectives are:

- (1) to realize specific system reforms at the state and local levels leading to greater availability and better quality of services to youth by juvenile justice, education and social service agencies and institutions; and,
- (2) to increase knowledge about elements essential to development and implementation of effective youth advocacy projects in order to facilitate replication of such projects in other states and localities.

- b. Program Description.

- (1) Background

Youth advocacy is a process whereby the administration of juvenile justice, social service and education can be improved through the active support and representation of youth interests and needs by advocacy groups. Advocacy approaches which are the major thrusts of this program include, but are not limited to: 1) effective coalition building among public and private groups and organizations to impact the needs of youth; 2) meaningful youth participation in policy decisions affecting youth for the purpose of better defining youth needs and impacting on the policies, practices and utilization of funds in youth serving institutions; and, 3) effective legal advocacy in support of the above two approaches for the purpose of protecting the interests and rights of children and youth.

- (2) Problem Addressed

In an era of diminishing resources the effective use of existing funds takes on added significance. Moreover, advocacy on behalf of a disenfranchised population becomes of critical significance if they are to realize their fair share of available resources. In its passage of the JJDP Act of 1974, and in the 1977 Amendments, Congress recognized that the major youth serving institutions - the juvenile justice, educational and social service systems - have

proven inadequate in meeting the needs of youth. This program is aimed at challenging policies and practices of youth serving institutions that systematically exclude youth from meaningful participation in programs that supposedly exist for them, and as a consequence provide services which are not responsive to the real needs of youth. These institutions have contributed to the inability of youth to survive and compete in society, and to their alienation, isolation and delinquency. The major areas of concern include: a) lack of accessibility to quality services; b) lack of due process safeguards in agency proceedings; c) inequitable and improper classification and disposition of youth cases; d) lack of accountability of agency officials; e) adverse elements in statutes, agency regulations, and procedures affecting youth; and, f) lack of resources, and inequitable deployment of resources for youth programs.

(3) Program Target

The targets for this program are statutes, regulations, policies and practices of the juvenile justice system, education system and the social services system, which are insensitive or detrimental to the needs and best interests of youth.

(4) Results Sought

Results sought in this initiative are:

(a) Juvenile Justice System Changes

- (1) The adoption of practices, procedures, policies, and statutes which provide accurate classifications and equitable disposition of cases handled by the juvenile justice system.
- (2) Establishment of policies, practices, and statutes which safeguard the rights of youth, assure due process, strengthen family ties, and reduce inappropriate intervention into the lives of youth and their families.
- (3) Adoption of statutes, policies, practices and procedures which provide for and safeguard the rights of institutionalized youth to quality rehabilitative services, education, vocational training and humane treatment.
- (4) The allocation of new, and reallocation of existing Federal, state, and local resources to increase and improve required services which reduce the inappropriate placement of juveniles outside of their homes and communities.

(b) Social Service System Changes

- (1) Increase public support for increased resources for youth services, protection of the rights of youth and quality services.
- (2) Modification and adoption of procedures and eligibility criteria which increase access to social services for youth, and modification of those policies and practices of youth serving institutions which are adverse to the positive development of youth.
- (3) Redefinition of agency priorities, and allocation of new and reallocation of existing public and private resources, to increase and improve appropriate services to which youth are entitled.
- (4) Establishment of mechanisms for public accountability of youth serving agencies.

(c) School System Changes

- (1) Modification of policies and practices which limit full educational opportunities for youth, e.g., tracking, ability-grouping.
- (2) Adoption of school policies, procedures and practices which limit pushouts and dropouts and limit the number of suspensions and expulsions.
- (3) Adoption of school policies, procedures and practices which limit referrals of youth to the juvenile justice system.
- (4) Establishment of policies, procedures and practices which provide for the protection of rights and assure due process in disciplinary actions.
- (5) Adoption of innovative educational programs and approaches for youth who require special assistance.

(5) Working Assumptions

- (a) Juvenile justice in the United States can be improved through advocacy in behalf of youth.
- (b) Many problems associated with preventing juvenile delinquency and reducing youth crime involve youth serving institutions

and organizations not located within the formal juvenile justice system. Therefore, advocacy activities must be aimed at the education system and the social services system as well as justice system agencies.

- (c) Independent organizations employing methods of advocacy can stimulate and facilitate needed changes in juvenile justice agencies, social service agencies and schools. Such advocacy will complement and strengthen reform initiatives arising from within these agencies.
- (d) Youth serving institutions' responses to the needs of youth will improve with meaningful youth involvement in the planning, operation and evaluation of policies and programs. Youth in the juvenile justice system, those alienated from school systems and those placed away from their families should play a vital role in youth advocacy programs.

c. Program Strategy.

- (1) Program Design. Applications are invited for action projects which influence one or more of the three systems described in b(4), i.e., juvenile justice, social services, or education. Projects are expected to support the extent and nature of their system(s) focus in the Program Methodology Section and the Problem Definition and Data Needs Section of the Application Narrative.

Projects are to reflect the following characteristics:

- (a) Selective, limited involvement in case advocacy for the purpose of contesting or establishing principles, policies and practices affecting classes of youth, as one element of the advocacy strategy is acceptable. Projects which focus solely upon providing advocacy, representation or service to individual youth on a case by case basis will be considered unresponsive.
- (b) Goals and objectives must have primary impact upon: 1) local juvenile justice, social service or education agencies and/or; 2) state legislatures, state elected and appointed officials and state juvenile justice, social service, or educational agencies/ organizations or systems. National organizations may apply but must operate in a state or community wherein they have a local affiliate or an already established organizational linkage or can demonstrate their acceptability to work in that state as an advocacy group. In addition, a majority of the funds received under this initiative are to be expended through local organizations for operational expenses.

- (c) Projects must incorporate four key elements: 1) functional independence from the organization(s)/system(s) in which change will be sought; 2) participation by interested persons from various community sectors, (government, business, political, industry, labor, churches, indigenous neighborhood groups, etc.); 3) extensive and meaningful participation by youth of the population to be affected by the project in project design, planning and implementation (e.g. staff, consultants, advisors, investigators, board members, negotiators, etc.); youth employed by projects must reside in or have extensive experience with neighborhoods having high levels of crime and socio-economic disadvantage; and 4) the employment of skillful staff, knowledgeable and experienced both with respect to the system in which change is sought and with respect to problems associated with system change and advocacy.
- (d) Action plans must be specific and manageable with respect to anticipated change and must include but not be limited to the following:
  - (1) Community education activities which foster public understanding of the needs of youth, clarify the associated issues, and build consensus about what to do to meet these needs through the use of a variety of communications and media techniques.
  - (2) Regular review of public and private youth serving institutions to: protect the rights of youth, assure that existing laws and policies mandating appropriate services to which youth are entitled are enforced and, identify policies and practices which are harmful to youth.
  - (3) Review and analysis of existing and proposed statutes, and expert testimony to facilitate responsiveness of decision makers to the needs of youth for positive development.
  - (4) Approaches which utilize administrative negotiation to facilitate systems change.
- (2) Dollar Range, Duration of Grants

The grant period for this program is three years with awards made in increments of 24 months and 12 months. Third year continuation awards are contingent upon satisfactory grantee performance in achieving stated objectives in the previous program year(s), availability of funds and compliance with the terms and conditions of



the grants. Grants will range up to \$375,000, for each project year with the amount of funding for each grant based upon: a) the types of statutes, policies and practices to be addressed; b) the potential for impact on large numbers of youth; and c) the cost-effectiveness of the project design. Total funds allocated for this program: \$7.3 million. Funds for this program are allocated from the Juvenile Justice and Delinquency Prevention Act of 1974, as amended in 1977, and require no match. Grants may be terminated at any point for failure to meet program process objectives or grant requirements.

(3) Applicant Eligibility

Applications are invited from public and private non-profit agencies, and organizations which are functionally independent of organizations and institutions they intend to impact. It is incumbent upon the applicant to provide sufficient information to determine functional independence.

d. Application Requirements.

These requirements are to be used in lieu of Part IV - Program Narrative Instruction of the Federal Application Form 424. In order to be considered for funding, applications must include the following information. Applicants are requested to use the order outlined in this guideline:

(1) Problem Definition and Data Needs

- (a) Provide statistical and qualitative documentation of the specific issues and problems to be addressed regarding the harmful effects on youth of the statutes, policies and practices that are to be targeted by the project. Describe the youth affected in terms of: number, age range, sex, race, ethnic and economic status. Discuss anticipated difficulties and problem areas, together with recommended approaches for solutions.
- (b) Provide a description of the area in which the project will operate in terms of: geographic boundaries, crime and delinquency rates, race/ethnic population and adult and youth unemployment.
- (c) Provide a list of existing youth advocacy projects within the target jurisdiction, include a brief description of each, and indicate how coordination with these projects will be achieved in order to complement existing programs and avoid any duplication of effort:

- (d) Describe the formal and informal decision making structures which influence the systems targeted.
- (e) Describe the social, economic and political relationships which will influence the targeted outcomes.
- (f) Provide letters of written agreements which indicate the types of participation and resources available from the community sectors of political, business, industry, labor, church, and indigenous neighborhood groups and organizations.

(2) Project Objectives

Project goal statements should be related to intended impact, and objective statements should be related to activities necessary to produce desired impact. Both statements should be written in measurable terms and specifically related to: 1) specific statutes, policies, and practices which adversely affect large numbers of youth; 2) the target agencies, organizations and local or state systems which will be affected; and, 3) the specific problems addressed in Problem Definition and Data Needs.

(3) Program Methodology

The applicant must provide a definitive methodology with explanation of approach and a detailed description of specific activities for implementing the project and achieving its objectives.

- (a) Describe the advocacy strategies to be employed and the reason for believing they will influence processes which shape the policies, programs, and practices in question as required in Paragraph c (1)(d).
- (b) Describe how the four elements required in Paragraph c (1)(c) are incorporated in the proposed project design.
- (c) Clearly describe the administrative and fiscal organizational structures, and coordination mechanisms to be employed in implementation of the project, (including the role of other groups, agencies and systems in any phase of the project), and the information system which will be used to document change.

(4) Workplan. Prepare a detailed work schedule which outlines specific program objectives in relation to milestones, activities and timeframes for accomplishing the objectives. The workplan and budget should be prepared to allow for a three month start-up period.

(5) Applicant Capability. The applicant must:

- (a) demonstrate knowledge of and experience with juvenile justice and delinquency prevention issues, the system(s) in which change are to be sought, and the problems, strategies and advocacy approaches necessary to meaningful change in youth serving institutions;
  - (b) have the demonstrated capability or experience to develop management and fiscal systems necessary for the administration of Federal funds;
  - (c) demonstrate the ability to generate public confidence and support for the proposed objectives by inclusion of letters of support from community organizations and individuals;
  - (d) provide a description of the implementing organization as required in Paragraph c (4), a copy of the governing by-laws a list of board members, organizational chart, a description of experience with similar programs completed or now under-way; and,
  - (e) provide resumes of key staff and profiles of board members.
- (6) Budget. Prepare a budget of the total costs to be incurred in carrying out the proposed project over three years, with a detailed categorical itemization and narrative for the first two budget years. Include in the budget funds to support travel for four (4) staff persons (two of which must be youth) to attend four (4) technical assistance and training sessions for the first grant period (two years) for an average of three (3) days per trip. Budget up to 15% of total projected outlays to cover the costs of a management information system. No match will be required for these grants. Travel budgeted for coordination with other advocacy projects must be confined to not more than four (4) trips for two (2) persons over the two (2) year project period, two of which will be for attendance at OJJDP sponsored conferences for all OJJDP Advocacy Grantees.

e. Criteria for Selection of Projects.

Applications will be rated and selected using the following criteria. Only those applications meeting criteria at the highest level will be considered for grant award. All other factors being equal cost effectiveness and geographic distribution will be used in making final selections.

- (1) The extent to which the proposed project addresses the program targets of statutes, policies and practices and establishes that those selected for impact are harmful to large numbers of youth. (15 points)

- (2) The extent to which the applicant demonstrates understanding of the problems associated with affecting change in the proposed program. (15 points)
- (3) The extent to which the project design provides youth advocacy strategies and approaches which include youth, minorities, other citizen groups, and key leadership groups of the communities. (15 points)
- (4) The extent to which the applicant provides a clear plan for taking specific actions reasonably designed to accomplish measurable project objectives. (15 points)
- (5) The extent to which the applicant demonstrates capability to successfully carry out the project through use of available key personnel with essential skills and experience. (20 points)
- (6) The extent to which the applicant demonstrates its ability to develop necessary management information system and fiscal management systems. (5 points)
- (7) The extent to which the proposed activities are cost effective in relation to their potential for effecting changes in statutes, policies, and practices which adversely affect large numbers of youth. (5 points)
- (8) The extent to which the proposed strategy has the potential for modifying the targeted statutes, policies, priorities and practices. (10 points)

f. Submission Requirements.

- (1) Submission Procedures. The Youth Advocacy initiative has been determined to be of national impact and awards will be made directly to the successful applicants. Applications must be submitted to the Office of Juvenile Justice and Delinquency Prevention in accordance with the form outlined in Appendix 2, Section 2, Paragraphs 4b and 5, Guide for Discretionary Grant Programs, M 4500.IG, dated September 30, 1978. Refer to Appendix 5, Part II and Part IV for instructions on how to prepare the budget, budget narrative and program narrative. Applicants must consult with the State Planning Agency of their state before making application to LEAA, and are encouraged to review the most recent Comprehensive State Plan produced by the State Planning Agency and to request a conference with the SPA to discuss the proposed project. The conference should also include regional and/or local planning unit representatives. In addition, applicants must submit applications to the relevant State Planning Agencies for review and comment concurrent with their submission to OJJDP, as provided by M 4500.IG; Appendix 2, Section 2. Prior to submission of applications to the Office of

Juvenile Justice and Delinquency Prevention, applicants must also submit applications to appropriate A-95 Clearinghouses in accordance with A-95 requirements. Letters of verification indicating appropriate contacts with State Planning Agencies and A-95 Clearinghouses must be included in the applications. Addresses are included in Appendices 1 and 2.

- (2) Deadline for Submission of Applications. One (1) original and two (2) copies of the application must be mailed or hand delivered to the Office of Juvenile Justice and Delinquency Prevention, LEAA, Room 442, 633 Indiana Avenue, N.W., Washington, D.C. 20531, by December 31, 1979. Applications sent by mail will be considered to be received on time if sent by registered or certified mail no later than December 31, 1979, as evidenced by the U.S. Postal Service postmark on the original receipt from the U.S. Postal Service.
- g. Evaluation Requirements. The projects funded under the program will be evaluated by an independent evaluator selected by the Office of Juvenile Justice and Delinquency Prevention. In addition each applicant must indicate the capability of developing a management information system. The Management Information System (MIS) must be capable of providing data on:
- (1) the system(s) covered by the projects;
  - (2) the types of activities/programs undertaken to reach specific project objectives;
  - (3) types of interventions (programs/activities) undertaken under specific conditions for different systems; and
  - (4) the immediate results produced by advocacy program intervention.
- The evaluator will assist the grantees in establishing an MIS System.
- h. Technical Assistance. Technical Assistance will be provided in accordance with the standard procedures of the Office of Juvenile Justice and Delinquency Prevention.
- i. Definitions.
- (1) Youth Advocacy - is a method of positive intervention by individual advocates or by advocacy groups on behalf of large numbers of youth to assure that problems confronting youth are effectively solved or managed through existing youth serving entities in the public, private and/or community sectors of society. A major objective of youth advocacy activities is to penetrate the blockages and obstacles between youth and service delivery systems which occur within complex social organizations. A further objective is the

accomplishment of institutional (agency) change which results in improved service delivery to youths and reallocation of available resources. The level of effort required of advocacy in the representation process (negotiation, arbitration, contesting) is to support the needs and rights as if they were the advocates' own.

- (2) Citizen Participation - is active, continuous and meaningful involvement of youth, neighborhood residents and representatives of neighborhood organizations and city-wide institutions (minority, business, industry, labor, religious) in the planning, development and monitoring of programs affecting young people.
- (3) High Risk Communities - are communities where youth live that are characterized by high rates of crime and delinquency, high infant mortality rates, high unemployment and under employment, sub-standard housing, physical deterioration and low incomes.
- (4) Education System - includes elementary, junior high schools and senior high schools, both public and private; also includes variations of the above as part of public educational systems or private educational systems or institutions (e.g., vocational schools, special education programs, including educational programs in juvenile correctional facilities, and alternative education programs); also, includes the governing bodies of the educational system (state/local boards of education, other authorities).
- (5) Social Service System - (Youth Serving Agencies) includes the state and/or local private and public departments/agencies which provide services to youth (e.g. social services, welfare, mental health, health, employment, recreation, and others). Also includes private youth service bureaus, other service referral networks and specific services or programs such as crisis intervention, counseling, alcohol/drug treatment, community-based prevention, treatment programs and others.
- (6) Juvenile Justice System - refers to official structures, agencies and institutions with which juveniles may become involved as the result of allegations of delinquency, abuse, neglect, mental illness, drug addiction, non-delinquent misbehavior, or other legal grounds. These systems include, but are not limited to juvenile or family courts, administrative hearing boards, law enforcement agencies, etc.
- (7) Jurisdiction - is any unit of general government such as a city, county, state, township, borough, parish, village, or combination of such units.
- (8) Delinquency - is the behavior of a juvenile, in violation of a statute or ordinance in a jurisdiction, which would constitute a crime if committed by an adult.

- (9) Disposition - is that procedure in the juvenile court process which results in the imposition of a sentence, (e.g., probation or commitment).
- (10) Program - refers to the National Youth Advocacy Initiative to establish programs supported by OJJDP and the overall activities related to implementing the Advocacy Program.
- (11) Project - refers to the specific set of advocacy activities at given site(s) designed to achieve the overall goal of improving services to youth and protection of the rights of youth.
- (12) Needs of Youth - for the purposes of this Guideline is defined as family, education, employment, skills training, emotional support, health aids, medical care, physical education and recreation, legal advice and assistance in assuring recognition and enforcement of the rights of youth.
- (13) Youth - are defined by each jurisdiction's definition as contained in the welfare and juvenile codes.
- (14) Legal Advocacy - is an approach whereby test case litigation or representation used to advocate for the interests and protect the rights of a given group or class of youth as a means of achieving systems change for the entire class of youth.
- (15) Youth Participation - is defined as "involving youth in responsible, challenging action, that meets genuine needs, with opportunity for planning and/or decision making affecting others, in an activity whose impact or consequences extend to others - i.e., outside or beyond the youth participants themselves." (Judge Mary Conway Kohler)

## APPENDICES

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April 19, 1979

APPENDIX 1 ADDRESSES OF STATE PLANNING AGENCIES

Alabama

Robert G. Davis, Director  
Alabama Law Enforcement Planning Agency  
2863 Fairlane Drive, Executive Park  
Building F, Suite 49  
Montgomery Alabama 36116  
Phone (205) 277-5440 FTS 534-7700

Alaska

Charles Adams, Executive Director  
Governor's Commission on the Administration  
of Justice  
Pouch AJ  
Juneau, Alaska 99811  
Phone (907) 465-3535 FTS 399-0150 Thru  
Seattle

American Samoa

Meritiana Sunia, Acting Director  
Criminal Justice Planning Agency  
Government of American Samoa  
P. O. Box 3760  
Pago, Pago, American Samoa 96799  
Phone Pago, Pago 633-5221  
(Overseas Operator)

Arizona

William Braybrook, Acting Executive Director  
Arizona State Justice Planning Agency  
4820 N. Black Canyon  
Phoenix, Arizona 85017  
Phone (602) 271-5466 FTS 765-5466

Arkansas

Sam Tatom, Executive Director  
Arkansas Crime Commission  
1515 Building, Suite 700  
Little Rock, Arkansas 72202  
Phone (501) 371-1305 FTS 740-5011

California

Douglas R. Cunningham, Executive Director  
Office of Criminal Justice Planning  
7171 Bowling Drive  
Sacramento, California 95823  
Phone (916) 455-9156 FTS 465-9156

Colorado

Dian P. Callaghan, Acting Director  
Division of Criminal Justice  
1313 Sherman Street  
Room 419  
Denver, Colorado 80203  
Phone (303) 839-3331 FTS 327-0111

Connecticut

William H. Carbone, Executive Director  
Connecticut Justice Commission  
75 Elm Street  
Hartford, Connecticut 06115  
Phone (203) 566-3020

Delaware

Christine Harker, Executive Director  
Delaware Criminal Justice Planning Commission  
State Office Building, Fourth Floor  
820 North French Street  
Wilmington, Delaware 19801  
Phone (302) 571-3430

District of Columbia

Betsy Reveal, Executive Director  
Office of Criminal Justice Plans and Analysis  
Munsey Building, Suite 200  
1329 E Street, N. W.  
Washington, DC 20004  
Phone (202) 727-6537

Florida

John H. Dale, Acting Bureau Chief  
Bureau of Criminal Justice Assistance  
530 Carlton Building, Room 215  
Tallahassee, Florida 32304  
Phone (904) 488-6001 FTS 946-2011

Georgia

Jim Higdon, Administrator  
State Crime Commission  
Suite 625  
3400 Peachtree Road, N. E.  
Atlanta, Georgia 30326  
Phone (404) 894-4410 FTS 285-0111

Guam

Thomas Duke, Executive Director  
Guam Criminal Justice Planning Agency  
Government of Guam, P. O. Box 2950  
Agana, Guam 96910  
Phone Guam 472-8781 (Overseas Operator)

Hawaii

Irwin Tanaka, Director  
State Law Enforcement and Juvenile Delinquency  
Planning Agency  
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Phone (808) 548-3800 FTS 556-0220

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APPENDIX 8 (CONT'D)

Idaho

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Law Enforcement Planning Commission  
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Boise, Idaho 83720  
Phone (208) 384-2364 FTS 554-2364

Illinois

Daniel W. Weil, Acting Director  
Illinois Law Enforcement Commission  
120 South Riverside Plaza  
Chicago, Illinois 60606  
Phone (312) 454-1560

Indiana

William S. Mercuri, Executive Director  
Indiana Criminal Justice Planning Agency  
215 N. Senate  
Indianapolis, Indiana 46202  
Phone (317) 633-4773 FTS 336-4773

Iowa

Richard E. George, Director  
Iowa Crime Commission  
Lucas State Office Building  
Des Moines, Iowa 50319  
Phone (515) 281-3241 FTS 863-3241

Kansas

David W. P. O'Brien, Director  
Governor's Committee on Criminal Administration  
503 Kansas Avenue, Second Floor  
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Phone (913) 296-3066 FTS 757-3066

Kentucky

John R. Lancaster, Acting Administrator  
Executive Office of Staff Services  
Department of Justice  
State Office Building Annex, Second Floor  
Frankfort, Kentucky 40601  
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Louisiana

Wingate M. White, Executive Director  
Louisiana Commission on Law Enforcement and  
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1685 Wooddale Boulevard, Room 615  
Baton Rouge, Louisiana 70806  
Phone (504) 389-7515

Maine

Ted Trott, Jr., Executive Director  
Maine Criminal Justice Planning and Assistance  
Agency  
11 Parkwood Drive  
Augusta, Maine 04330  
Phone (207) 289-3361

Maryland

Richard C. Wertz, Executive Director  
Governor's Commission on Law Enforcement and  
Administration of Justice  
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APPENDIX 8 (CONT'D)

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DIRECTORY OF STATE CLEARINGHOUSES AND STATE CENTRAL  
INFORMATION RECEPTION AGENCIES (For A-95/TC-1082 use)

The following addressees should be sent federal assistance action notices in compliance with Circular TC-1082, for State Central Information Reception Agencies (SCIRAs). Note that in 44 states the address of the State Clearinghouses and SCIRA is the same and a single notification will suffice when both A-95 and TC-1082 compliance (at state level) is required. Appropriate area-wide clearinghouse addressees must also be informed as applicable under A-95. At this writing, the State Clearinghouse and the SCIRA are different addressees in the States of Vermont, New Jersey, Illinois, Colorado, Nevada and Hawaii. This list will be updated periodically.

ALABAMA

Alabama Development Office  
State Office Building  
Montgomery, Alabama 36104

ALASKA

Planning and Research Div.  
Office of the Governor  
Pouch AD, State Capitol  
Juneau, Alaska 99801

ARIZONA

Dept. of Economic Planning  
and Development  
Arizona State Clearinghouse  
1624 West Adams Street  
Phoenix, Arizona 85007

ARKANSAS

Department of Planning  
400 Train Station Square  
Little Rock, Arkansas 72201

CALIFORNIA

Office of the Governor  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, California 95814

COLORADO (2)

(1) State Clearinghouse:  
Division of Planning  
Department of Local Affairs  
1845 Sherman Street  
Denver, Colorado 80203

(2) SCIRA:

Office of State Planning and  
Budgeting  
Non-State Funds Section  
617 State Services Building  
Denver, Colorado 80203

CONNECTICUT

Office of Intergovernmental Programs  
340 Capitol Avenue  
Hartford, Connecticut 06115

DELAWARE

State Planning Office  
Thomas Collins Building  
530 S. Dupont Highway  
Dover, Delaware 19901

INDIANA

State Budget Agency  
212 State House  
Indianapolis, Indiana 46204

IOWA

Office of Planning and  
Programming  
523 East 12th Street  
Des Moines, Iowa 50319

KANSAS

Division of Planning and  
Research  
Department of Administration  
State Office Building  
Topeka, Kansas 66612

FLORIDA

Bureau of Intergovernmental  
Relations  
Division of State Planning  
660 Apalachee Parkway  
Tallahassee, Florida 32304

GEORGIA

Office of Planning and  
Budget  
Attention: Clearinghouse  
270 Washington Street, S.W.  
Atlanta, Georgia 30334

HAWAII (2)

(1) State Clearinghouse:  
Department of Planning  
and Economic Development  
P.O. Box 2359  
Honolulu, Hawaii 96804

(2) SCIRA:  
State of Hawaii  
Department of Budget  
and Finance  
P.O. Box 150  
Honolulu, Hawaii 96810

KENTUCKY

State Clearinghouse  
Office for Local Government  
Capitol Annex, Room 327  
Frankfort, Kentucky 40601

IDAHO

Division of Budget, Policy  
Planning and Coordination  
State House  
Boise, Idaho 83720

ILLINOIS (2)

(1) State Clearinghouse:  
State Clearinghouse  
Bureau of the Budget  
103 State House  
Springfield, Illinois 62706

(2) SCIRA:

State of Illinois  
Commission of Intergovernmen-  
tal Cooperation  
217 S. First Street  
Springfield, Illinois 62706

MINNESOTA

State Clearinghouse  
State Planning Agency  
Capitol Square Building, Room 101  
St. Paul, Minnesota 55101

MISSISSIPPI

Coordinator Federal-State Programs  
Office of the Governor  
400 Watkins Building  
510 George Street  
Jackson, Mississippi 39201

MISSOURI

Office of Administration  
State Planning and Analysis  
Division  
P.O. Box 809  
State Capitol Building  
Jefferson City, Missouri 65101

LOUISIANA

Office of Intergovernmental  
Relations  
P.O. Box 44455  
Baton Rouge, Louisiana 70804

MAINE

Executive Department  
Main State Clearinghouse  
184 State Street  
Augusta, Maine 04333

MARYLAND

Department of State Planning  
301 W. Preston Street  
Baltimore, Maryland 21202

MASSACHUSETTS

Office of State Planning  
John Mc Cormack Building  
1 Ashburton Place  
Boston, Massachusetts 02108

MICHIGAN

Department of Management and  
Budget  
Office of Intergovernmental  
Relations  
Federal Aid Management Division  
Lewis Cass Building  
Lansing, Michigan 48913

NEW HAMPSHIRE

Coordinator of Federal Funds  
State House  
Concord, New Hampshire 03301

NEW JERSEY (2)

(1) State Clearinghouse:  
Bureau of State and Regional  
Planning  
Department of Community Affairs  
329 W. State Street  
P.O. Box 2768  
Trenton, New Jersey 08625

(2) SCIRA:  
Department of Treasury  
Bureau of the Budget  
State House  
Trenton, New Jersey 08625

MONTANA

Research and Information  
Systems Division  
Department of Community  
Affairs  
1424 9th Avenue  
Helena, Montana 59601

NEBRASKA

Office of Planning and Programming  
Box 94001, State Capitol  
Lincoln, Nebraska 68509

NEVADA (2)

(1) State Clearinghouse:  
State Planning  
Coordinator  
State Capitol Building  
Carson City, Nevada 89701

(2) SCIRA:  
State Department of  
Administration  
Blasdale Building, Room 205  
Carson City, Nevada 89701

OREGON

Federal Aid Coordinator  
Intergovernmental Relations  
Division  
240 Cottage Street  
Salem, Oregon 97310

PENNSYLVANIA

State Clearinghouse  
Intergovernmental Relations  
Division  
Governor's Office of Budget  
P.O. Box 1323  
Harrisburg, Pennsylvania 17120

RHODE ISLAND

Statewide Planning Program  
Dept. of Administration, Rm. 201  
265 Melrose Street  
Providence, Rhode Island 02907

NEW MEXICO

State Planning Office  
State Capitol  
Santa Fe, New Mexico 87501

NEW YORK

State Division of the Budget  
State Capitol  
Albany, New York 12224

NORTH CAROLINA

Office of Intergovernmental  
Relations  
116 W. Jones Street  
Raleigh, North Carolina 27603

NORTH DAKOTA

State Planning Agency  
State Capitol  
Bismarck, North Dakota 58501

OHIO

Office of Governor  
State Clearinghouse  
State Office Tower  
30 E. Broad Street  
Columbus, Ohio 43215

OKLAHOMA

State Grant-in-Aid Clearinghouse  
5500 N. Western  
Oklahoma City, Oklahoma 73118

VERMONT (2)

(1) State Clearinghouse:  
State Planning Office  
Pavilion Office Building  
Montpelier, Vermont 05602

(2) SCIRA:  
Department of Budget and  
Management  
Pavilion Office Building  
Montpelier, Vermont 05602

VIRGINIA

Division of State Planning and  
Community Affairs  
1010 Madison Building  
Richmond, Virginia 23219

SOUTH DAKOTA

State Planning Bureau  
State Capitol  
Pierre, South Dakota 57501

SOUTH CAROLINA

State Clearinghouse  
Division of Administration  
1205 Pendleton Street  
Columbia, South Carolina 29201

TENNESSEE

Office of Urban and Federal  
Affairs  
Suite 108, Parkway Towers  
404 Robertson Parkway  
Nashville, Tennessee 37219

TEXAS

Division of Planning  
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Office of the Governor  
Capitol Station, P.O. Box 12428  
Austin, Texas 78711

UTAH

State Planning Coordinator  
118 State Capitol Building  
Salt Lake City, Utah 84114

WASHINGTON

Office of Governor  
Program Planning and Fiscal  
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House Office Building  
Olympia, Washington 98504

WEST VIRGINIA

Grant Information Department  
Office of Federal-State Relations  
State Capitol Building  
Charleston, West Virginia 25305

WISCONSIN

State Clearinghouse/Central  
Information Reception Agency  
Department of Administration  
Room B-158, State Office Building  
1 West Wilson Street  
Madison, Wisconsin 53702

WYOMING

State Planning Coordinator  
Office of the Governor  
Capitol Building  
Cheyenne, Wyoming 82002

DISTRICT OF COLUMBIA

Office of Budget and Management  
Systems  
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PUERTO RICO

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Santurce, Puerto Rico 00908



GUAM

Governor of Guam  
Agana, Guam 96910

VIRGIN ISLANDS

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St. Thomas, Virgin Islands 00801

SAMOA

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Government of American Samoa  
Pago Pago, American Samoa 96799

## APPENDIX 3

### BACKGROUND PAPER

#### YOUTH ADVOCACY

##### INTRODUCTION

Advocacy of interests and causes is widespread in the United States. Business, labor, professional, and trade associations abound at the national, state and local levels. These groups recognize the necessity of constant, vigilant protection and promotion of their interests. Advocacy on behalf of youth is less well developed. Young people have less influence, financial resources, time and experience to generate advocacy efforts on their behalf. This paper examines the posture of youth advocacy in the United States. It reviews exemplary youth advocacy activities in past United States history and describes recent developments in youth advocacy programs at the national, state and local levels. The many forms that advocacy takes are also described and a rationale for advocacy on behalf of young people is suggested. Lastly, some issues and problems associated with system change advocacy are examined.

The heightened interest in youth advocacy can be attributed to the steadily increasing influence of large impersonal institutions - schools, juvenile justice systems, employment channels, public and private human service agencies and others - on the development of young people, especially low income and minority youth. It has been found that, all too often, the policies and practices of these institutions tend to inhibit the satisfactory development of young people. Many of the youth then turn to patterns of delinquency and crime. One of the purposes of youth advocacy activities is to help strengthen youth serving institutions and thereby reduce delinquency and youth crime.

## 1. DEFINITION, FORMS AND RATIONALE

### (a) Definition

The Encyclopedia Britannica describes an advocate as one who pleads a legal matter. Webster defines advocacy more broadly as the "action of pleading for or supporting another or the action of arguing for, defending, maintaining or recommending a cause or proposal". (Webster's Third New International Dictionary). Youth advocacy should be defined in this broader sense to include but not be confined to or emphasize legal advocacy. Kahn, Kamerman, and McGowan define advocacy on behalf of young people as "intervention on behalf of children in relation to those services and institutions that impinge on their lives". (Kahn, et al, 1972:63). This definition posits an advocate and a client each of whom may be an individual or a group and a target system to be changed, such as schools, juvenile justice system, employment network, welfare department or other public or private youth serving agency. Today there is a great amount of confusion concerning youth advocacy. Some would use it to embrace any activity designed to help children, including direct services. Many programs labeled as advocacy programs are merely traditional social services programs. The definition suggested here distinguishes advocacy from service and emphasizes action designed to change existing systems or institutions to make them more responsive to the needs of youth.

### (b) Forms of Advocacy

- (i) Class Advocacy. This form represents the interests of a given group of individuals as an identifiable class and seeks system change for the entire class. The identifiable class is a sub-set of youths such as handicapped, disabled or emotionally disturbed youths, curfew violaters, truants, high school dropouts or pushouts or drug abusers. Class advocacy seeks system or institutional change for the entire group, not for an individual.
- (ii) Case Advocacy. Advocacy on behalf of an individual is called case advocacy. This is oriented toward an individual or small group of youths. The individual's interests are represented in a school disciplinary proceeding, in a juvenile court matter, or a similar youth serving agency. An example is the Citizen Advocacy Program where one person is responsible for protecting the rights of a developmentally disabled Protege. Similarly, the work of local legal services program exemplifies case advocacy. For legal services programs, the distinction between service and advocacy does not apply. Advocacy is the service they provide.

- (iii) Self Advocacy. Self help advocacy is a strong tradition in the United States. Business has its powerful chambers of commerce and the National Association of Manufacturers. Employees have strong unions. Trade associations, bar associations, medical societies, professional groups abound. These groups use advocacy as one way of protecting their interests.
- (iv) Consumer Advocacy. This seeks to protect the interests of the general public, in this case, of all youth. This distinguishes it from class advocacy which seeks through similar means to protect the interest of a clearly identifiable group or sub-set of youth. Ralph Nader and his associates are the foremost practitioners of consumer advocacy. Through fact-finding, monitoring, publicity, lobbying, and legal action they highlight the inadequacies of products and services being offered to the public by private companies or government instrumentalities.
- (v) Professional Advocacy. This form of advocacy seeks to develop technology to make it possible for institutions to be more responsive to youth. Programs of this sort often concentrate explicitly on research and information dissemination. Emphasis is placed upon the development of expert or professional standards, criteria, and specifications. The activities of professional advocacy programs include program development, research, dissemination of prototype programs, and professional training.

(c) Rationale

The rationale for youth advocacy rests on a number of assumptions (Knitzer, 1976:200).

It assumes that youth have certain basic rights, the most important of which is access to appropriate developmental opportunities. In the past and, to a certain extent at present, youth are regarded as being entitled only to what their family is able to secure for them.

Youth advocacy assumes that rights are enforceable by statutory, administrative, judicial, or other structured procedures. Experience demonstrates that adults with broad discretion to make decisions affecting the lives of young people sometime make errors. Advocacy activities assume processes exist or can be developed to rectify these errors.

Youth advocacy focuses on systems or institutions that impinge on the lives of young people. In saying this, it is recognized that some youths have problems. But often it is wrong "to blame the victim" because the problem is in the system or institution adversely affecting the young person.

Youth advocacy assumes young people individually do not have the power to insure that their basic rights are effectively protected. They seldom have enough money of their own to carry on sustained advocacy efforts. In our society young people are conditioned to accept a passive, not assertive, posture vis-a-vis adults. Many adults in positions of responsibility tend to discount the views of young people if these views differ from their own. Youth is a transitional state which militates against sustained advocacy efforts by youth alone. Their time is limited particularly by educational responsibilities. They seldom have experience in the techniques of advocacy. For these reasons advocacy on behalf of youth is essential to effectively secure their basic rights.

The need for youth advocacy increases as institutions gain influence over the lives of the young. Due to industrialization and urbanization, institutions such as the school system, the employment network, the juvenile justice system, and human service systems replaced and supplemented the family in influencing the development of young people. All of these systems are naturally subject to the inherent impersonal and inflexible character of complex bureaucracies. Advocacy efforts are needed to protect the rights of all, particularly, low income and minority youth when the institution is not serving young people's needs. Corrective efforts are also needed as conditions change but the bureaucracy does not. The recent period of rapid social change undoubtedly has contributed to the heightened interest in advocacy activities.

## 2. IMPACT OF YOUTH ADVOCACY IN THE UNITED STATES: PAST HISTORY

### (a) Public Education

One of the earliest examples is the 19th century campaign for universal public education. This was led by Horace Mann whose dream was that American education become for the democratic and rational man what the church had been for the medieval man. (Messerli, 1972:XII). He was imbued with the absolute conviction that, given proper education, a better world and social progress was assured. To this end, he fought for the right of all children to receive education. Mann fashioned a coalition of diverse interests, a corps of friends of education, to support his reforms. To do so he used a variety of methods.

As Secretary of the Massachusetts State Board of Education, he made a series of annual reports which documented the sorry state of many school systems. His first annual report told of "neglect, parsimony, apathy, and sometimes chaos" in the schools. Often huge variations in funding existed, with one school system spending \$1 per child while another spent \$6. Textbooks were often provided by parents which meant a single classroom could be using 14 spellers, 8 grammars, and 15 geographies. (Massachusetts State Board of Education, 1838).

A second method Mann used was the lecture circuit, especially the prestigious Society for the Diffusion of Useful Information (Messerli, 1972:287). One result of these lectures was the offer by Edmund Dwight to provide half of the funds required for a school for teacher preparation, one of Mann's pet projects. With this anonymous offer in hand, Mann was able to convince the state to provide the rest of the funding. (Messerli, 1972:299).

A third technique was lobbying for educational reform in the state legislature. At the time, what little legislation existed was fragmentary and often ambiguous. Thomas Kinnicutt, Speaker of the House and friend of Mann's cooperated by appointing men to the Committee on Education who were friendly to Mann's concepts.

Mann, an "intellectual giant" in education, became so influential that his theories swept the field for the next 50 years. (Dewey, 1971:1134).

(b) Removal of children from the adult justice system

In 1869, agents of the Illinois Board of State Commissioners of Public Charities, "inspected 78 jails where they found 511 persons, of whom 408 were awaiting trial. 98 children under the age of 16 were found in 40 jails." (Platt, 1969:118). Of the Cook County jail they said, "The jail is so dark that it is necessary to keep the gas burning in the corridors both day and night. The cells are filthy and full of vermin...this effort of promiscuous herding together of old and young, innocent and guilty, convicts, suspected persons and witnesses, male and female, is to make the county prison a school of vice. In such an atmosphere purity itself could not escape contamination." (Platt, 1969:119).

In this period the co-mingling of children and adults in the criminal justice process--jails, courts and prisons--caused increasing dissatisfaction. Massachusetts in 1869 authorized courts to release children to the parents under the supervision of a probation officer (Leiby, 1978:147) and some courts in that same state arranged for separate children's dockets. (Sarri and Hasenfeld, 1976:3). Chicago in 1855 created a separate reform school for boys and Illinois in 1871 opened one at Pontiac for boys under 18. These essentially were prisons for children. (Platt, 1969:102,103).

The Chicago Women's Club moved into the forefront of reform efforts to improve the lot of children involved in the adult criminal justice process. They were also concerned that wayward children, many from immigrant families, be placed in a supervised situation where they could learn the moral values and social ethos shared by their own members. (Platt, 1969:4). Women's Club members considered city life violent, depraved, dirty, foul smelling, economically unstable and corrupt - an atmosphere contributing to the degenerate condition of many children.

These women and others who participated in their efforts were a formidable group consisting of professional women and the wives of the most prominent men in Chicago.

During the 1890's the campaign for a completely separate juvenile justice system in Illinois gained steam. "Judges and prison wardens and other officials, public-spirited physicians, lawyers and clergymen, settlements, the State Board of Charities, the State Federation of Clubs, the principal child-caring societies, the Bar Association, showed a common desire to help." (Lathrop, 1925:292-3). Grass roots groups such as Hull House also supported the effort. The women's group decided that the matter should not go to the legislature as a women's measure but rather as a legal matter supported by the Bar Association. With the Bar Association leading the way the legislation sailed through the Illinois legislature in a single session in 1899. The Illinois law became the pattern for juvenile court legislation throughout the country. (Platt, 1969:130-133).

(c) Establishment of the Federal Children's Bureau

In 1900 the federal government had three separate agencies (census, education, labor) charged with various aspects of child welfare. (Goldmark, 1953:95). None, however, was devoted to the total picture. The lack of a central office hampered the work of states, individuals and agencies involved with child welfare. No centralized statistics existed on the number of births and deaths each year or how many infants died before their 1st birthday. Medical science was able to prevent 1/4 of infant blindness but, because this knowledge was not disseminated through the states, newborn babies were still going blind. Textile industries in at least eight states employed small boys through the night. Only 2 states, Ohio and Illinois, had even a pretense of a law prohibiting this. (Goldmark, 1953:98).

Lillian Wald, nurse and founder of the Henry Street Settlement, in New York, was the first to propose the federal government should establish a Children's Bureau. (Goldmark, 1953:96). She made this suggestion to Florence Kelley, member of the National Consumers League. Kelley and Dr. Edward Devine, Columbia University sociologist and fellow trustee of the National Child Labor Committee, enlisted the support of President Theodore Roosevelt.

At the same time, the National Child Labor Committee took on the Bureau as its main legislative goal and began to enlist the support of community leaders.

The First White House Conference on the Care of Dependent Children, called by President Roosevelt in January, 1909, provided a powerful impetus for the successful passage of the Children's Bureau bill. On the recommendation

of the Conference, President Roosevelt sent a special message to Congress endorsing the bill. The next year, 1910, the bill was endorsed by President Taft who said if we are spending money to tell farmers how to raise good cattle and horses, it does not seem to be a "stretch of logic...to spend the money on a Bureau of Research to tell how we may develop good men and women." (Bradbury, 1962:3). Two years later the bill was passed by Congress and signed into law.

(d) Aid to Dependent Children

Throughout the latter half of the 19th century sensitive persons and groups sought to help the growing number of homeless, neglected and dependent children. In 1852 the Children's Aid Society pioneered a program of placing New York City children in homes, largely in rural areas, throughout the country. (Abbott, 1937:128). By 1900 the maintenance of children in large almshouses with the elderly, retarded, mentally ill, had been discredited. Progress had been made under public and private auspices in substituting foster-care for asylums. (Lubove, 1968:96-97).

However, many children continued to be institutionalized because they were dependent. In a Special Message to Congress President Roosevelt stated that "the Census Bureau reported in 1904 that there were in orphanages and children's homes about 93,000 dependent children. There are probably 50,000 more...in private homes either on board or in adopted homes..." (White House Conference on Children, 1909:5). One of the major causes was the poverty of the family. Singled out for particular concern was the widowed or deserted mother.

In the first decade of the 20th century the mother's pension movement commenced, receiving a powerful boost from the first White House Conference on Children. Two key advocates of the conference and of the private home for the care of children were Theodore Dreiser, editor of the Delineator, and James West, an attorney who later headed the Boy Scouts of America.

From 1907-09, the Delineator formed a national Child-Rescue League and conducted a Child-Rescue Campaign, regularly running stories depicting the plight of homeless children. West called the campaign to the attention of President Roosevelt. West and Dreiser recruited a small group of nationally prominent supporters who asked Roosevelt to call a White House Conference on Children. The first and key recommendation of the Conference was the primacy of the private home for rearing children. (White House Conference on Children, 1909:09).

The Conference and the work of the Mother's Pension Movement resulted in the enactment of mother's pension legislation in most states with a short period of time. The state programs of aid to mothers with dependent children provided the model and framework for Title IV of the Social Security Act of 1935. (Douglas, 1939:185).



(e) Child Labor Laws

The struggle for stringent child labor laws was long and difficult. In 1884 Henry Demarest Lloyd, Chicago, wrote of 6 and 7 year old children working on coal breakers. 20 years later Florence Kelley wrote of children under the age of 10 working in tenements and denounced the hypocrisy of American factory and mine owners for denying this existed. (Annals of America, 1968:205).

For 40 years Florence Kelley, a remarkable woman of relentless energy and vision, spearheaded efforts to improve the working conditions of children. Aided by Lloyd and others such as Jane Addams and Julia C. Lathrop, she initiated reform efforts long before the public considered child labor evil. A writer and careful researcher of tenement conditions around Hull House in Chicago, Kelley published statistics on child labor documenting the inadequacy of protective laws. After 1899 Kelley promoted this cause as head of the National Consumers League in New York City.

From its inception, the National Consumers League dedicated itself to educating people through the media and to promoting new laws by arousing the consumer public. Other groups active in this long fight were the Children's Bureau, the New York Child Labor Committee and the National Child Labor Committee. Kelley, as chairwoman of several women's organizations, brought this controversial subject to the attention of such national organizations as the National Women's Suffrage Association, the General Federation of Women's Clubs and the National Congress of Mothers.

In 1893, Illinois passed its first factory law (also the first in the United States), which proposed an 8-hour day by statute and put limits on the age of children working. This also created the Illinois State Factory Board, of which Kelley was the first inspector. Subsequently the Supreme Court declared this law unconstitutional.

After the turn of the century, the fight was expanded to the federal scene. In this Kelley remained under wraps until after the Children's Bureau was voted into law because she did not want to antagonize influential congressmen who would vote for the Bureau but not for child labor laws. (Goldmark, 1953:114). Later studies compiled by staff members of the Children's Bureau, documenting the evil conditions children worked under, were influential. (Bradbury, 1962:19).

The first federal act to control child labor, the Keating-Owen Act, was passed in 1916. It was declared unconstitutional in 1918 by the Supreme Court but advocates persisted until the Supreme Court in 1941 sustained a child labor bill in the Fair Labor Standards Act of 1938. (Bradbury, 1962:52).

(f) Equal Educational Opportunity

In 1929 the National Association for the Advancement of Colored People (NAACP) was awarded a \$100,000 grant by the Garland Fund to promote equal educational opportunities for all children through legal advocacy. They were to do so by attacking the "separate but equal" doctrine adopted by the Supreme Court in upholding the provision of separate facilities for Whites and Blacks as long as they were equal. However, the NAACP attorney Nathan Margold argued that the Supreme Court was not ready to reverse this doctrine and that the NAACP's resources would be used best to prove the inequality of the South's separate educational facilities and demanding enforcement of the "separate but equal" doctrine. This became the cornerstone of NAACP strategy for the next 20 years.

In 1935 Charles Houston replaced Margold as counsel and Thurgood Marshall, a leading student of Houston's at Howard Law School, became counsel to the Baltimore Chapter of the NAACP. He won a major victory in a case requiring admission of a qualified black applicant to the University of Maryland Law School. In 1936 Marshall was hired as the NAACP's first field staff attorney for Maryland and Virginia. Houston and Marshall developed the long range strategy for the NAACP campaign against inequality in educational opportunity for the nation's Black children.

Houston believed cases should be brought in state and local courts where Blacks could organize politically to support court efforts. Efforts also concentrated on opening up professional opportunities for qualified Blacks and special emphasis was put on gaining admission to law schools. At this time, Marshall was succeeding in system-wide challenges to the unequal pay of Black teachers in Maryland and Virginia. This success led to the second prong in the NAACP strategy. In addition to local organizing around cases advocated by Houston, federal class action test cases would be brought to accomplish widespread system reform. These two techniques became the NAACP legal strategy as Marshall succeeded Houston as counsel in 1938. The legal staff was incorporated into the now famous NAACP Legal Defense and Education Fund, Inc.

On the organizing front, significant progress was made in forming and developing NAACP chapters in various communities around the country. These were supported by the newly formed Black Bar Association, the National Lawyer's Guild and biracial committees of volunteer lawyers.

Finally, a direct assault was developed on the "separate but equal" doctrine which was keeping the nation's schools segregated and unequal. Contributing factors were the Roosevelt Supreme Court which became increasingly favorable on racial rulings and the NAACP legal staff expanded to 6 attorneys which compiled significant victories in a variety of cases. Marshall and Thomas Emerson, of the Yale Law School, organized a Committee of Law Teachers Against Segregation in Legal Education. This committee filed a friend of the court brief in the NAACP case of Sweatt v. Painter where a qualified Black

was denied admission to the University of Texas Law School, a segregated school. While the NAACP pursued its inequality argument, the Committee's brief directly attacked the "separate but equal" doctrine. The Supreme Court avoided the "separate but equal" issue and ordered admission on the basis of inequality.

But the attack had begun and continued until the "separate but equal" doctrine was overturned in Brown v. Board of Education of Topeka. The NAACP then began a massive drive to enforce and expand Brown. Desegregation suits were brought in cities and towns across the country. The NAACP effort was aided by the passage of the Civil Rights Acts of 1957, 1964 and 1968 and the creation of the Civil Rights Division of the U.S. Department of Justice. This effort to bring about change in school systems to provide the reality of equal educational opportunity has proved as difficult, if not more so, than changing the "separate but equal" rule.

This account is based upon the study made by Richard Kluger (1976).

### 3. RECENT EXAMPLES OF YOUTH ADVOCACY

#### (a) 1960's

The migration of large numbers of minority persons to the big cities of the North and West provided a challenge to the United States in the period following World War II. The new residents brought with them their rural and ethnic cultures which clashed with the white Anglo middle class culture of the big cities. The Kerner Commission documented the result: In 1966 30% of non-white families in the central United States lived in poverty compared with 9% of White families. (Kerner Report, 1968:256-263). "Of the 59,270 addicts known to the U.S. Bureau of Narcotics at the end of 1966, just over 50% were Negroes." The rates of juvenile delinquency in the central city neighborhoods of New York City were twice that of the entire city.

In 1960 Richard Cloward and Lloyd Ohlin published Delinquency and Opportunity (Cloward and Ohlin, 1960) in which they argued that delinquency was the response of minority youths to this cultural clash. Youth were presented with the middle class concept of success but were doomed to failure by ineffective education, poor housing and living conditions and exclusion from employment. Delinquency was the expression of their frustration. Through the Henry Street Settlement House on the Lower East Side of New York, Cloward and Ohlin sought to put their theories into practice. They helped shape a program known as Mobilization For Youth (MFY) which became "the forerunner and in many ways the prototype of the comprehensive juvenile delinquency prevention project." (Grosser, 1969:7).

MFY's rationale was that youth could not be successfully integrated into socially constructive community life unless their adult role models were themselves a part of the community. It assumed that masses of low income people are an effective source of power.

MFY's organizing issues were concrete and immediate. Tenants were organized around the lack of heat and hot water. Parents were organized around demands for more teaching time, textbooks, counseling appointments and safety at street crossings. "Such groups had to devote all their efforts to meeting the ongoing service needs of their members. Strategies for social action and institutional change were thus enormously diluted as the organization's resources were swamped by the mass of individual problems." (Grosser, 1969:11). MFY then set up dual staffs, one for service and one for organizing.

MFY's strategy of organizing masses of low income people was highly visible and soon produced newspaper attacks and a multitude of investigations. In the end MFY was vindicated but damaged and forced to retrench.

"On the one hand MFY nearly went out of existence as a result of an attack which would not have been launched if MFY had refrained from community action. Although it survived, its course may well have been irrevocably deflected from the encouragement of effective social action by the poor. On the other hand, a number of local but substantive accomplishments may be cited: drastic revision of the City's interpretation of the Welfare Abuses Law, changes in the administration of the local schools, and legislation easing and legalizing rent withholding in New York State." (Purcell, 1967:334).

In the '60's the public was becoming increasingly concerned about delinquency and juvenile crime. Arrests and publicity steadily increased. "Between 1960 and 1971, the number of reported juvenile delinquency cases more than doubled (121 percent increase) as compared to the 30 percent increase in the number of children aged 10 through 17." (Kalbatz and Bosarge, 1973:27). While there may be great inaccuracies in crime and delinquency statistics, the information the public was receiving was consistently unsettling.

Shortly after President John F. Kennedy was elected, he directed David Hackett to develop a new federal initiative against delinquency. After extensive investigation Hackett selected the MFY approach and asked LLOYD Ohlin to assist in designing the program. The President's Committee on Juvenile Delinquency and Youth Crime was created and chaired by Attorney General Robert Kennedy. It developed community organization anti-delinquency programs in sixteen cities including four of the Grey Areas previously funded by the Ford Foundation.

They all shared the MFY rationale that delinquency could only be alleviated if urban institutions changed to afford low income and minority persons greater opportunities. Their organizational structures varied.

Where MFY eschewed linkages with local government and established institutions, others, such as the Oakland Interagency Project, the Community Progress, Incorporated, New Haven, and the Youth Opportunities Board of Los Angeles, were either governmentally directed or closely affiliated with the established institutions. They developed many similar educational and employment programs. Many developed legal services programs and neighborhood multi-service centers which provided employment and other participation opportunities for residents.

To a greater or lesser extent, all the programs moved away from system change and toward the provision of direct services to residents of the neighborhood. (Grosser, 1969:30). Marris and Rein (1967:64) concluded that the pre-school training, remedial reading and frequent tutoring were the most successful educational programs but that little by way of institutional reform was achieved. All the programs except possibly MFY underestimated and were unprepared for the school system's resistance to change (Marris and Rein, 1967:69). In the employment area they concluded that the programs were reasonably successful in providing preparatory training for jobs but they could not guarantee a job to all trainees. The fundamental difficulty was that the programs were essentially local programs and some of the poverty problems they were addressing, such as employment, had national policy implications. Lacking national policy dimensions the programs were unable to address the essential element of the problem. (Marris and Rein, 1967:91-92).

(b) Early 1970's

In 1968 Congress enacted the Juvenile Delinquency Prevention and Control Act of 1968 (P.L. 9-445). Pursuant to it the Youth Development and Delinquency Prevention Administration (YDDPA) of HEW developed a strategy for youth development and delinquency prevention.

The YDDPA National Strategy maintained the earlier emphasis on the inadequacy of established institutions but concentrated more sharply on the specific youth serving institutions - schools, juvenile justice systems and neighborhood. They suggested the need for differentiated approaches in four school settings - inner city, suburbs, the rural community, and college and high school campuses. The strategy concentrated on "why and under what conditions young people lead essentially law-abiding lives, not the question of why so many of them violate the law." It suggested that "ready access to socially acceptable, responsible and personally gratifying social roles in the areas of family life, education, recreation, religion, and eventually work" led to law-abiding lives. Delinquency prevention should therefore concentrate on increasing access to acceptable social roles, avoidance of negative labeling, and escape from alienating processes. (HEW, YDDPA National Strategy, 1971). To achieve these goals and objectives, YDDPA supported the development of youth service systems linking together the many public and private sector bodies designed to serve youth. (HEW, YDDPA Annual Report, 1972:12-13).

Increasingly youth advocacy became an integral component of YDDPA programs. Of 90 programs supported in FY 1973, 43 had youth advocacy components. (OYD, 1973:77). The 1972 YDDPA Annual Report singled out two model programs. Both were youth advocacy programs (HEW, YDDPA Annual Report, 1972:38). One, the St. Joseph County, Indiana, Youth Advocacy Program, was a system change program. The other, the St. Louis Home Detention Program, employed case advocacy.

The Youth Advocacy Program brought together a Youth Coalition of over 50 youth groups and a coalition of adult community leaders in a joint effort to make the youth serving agencies of the community more responsive to young people. The staff - young adults and teenagers - as well as the Youth Coalition, included "street" youth and "establishment" youth. A major system change effort extending over a period of five years resulted in a number of changes in the local school system. The school system became more willing to listen to young people and others in the community. New programs, including an alternative school, were instituted. Suspension and expulsion policies were modified. These resulted from extensive investigations by the Youth Advocacy Program and long and hard bargaining with the school board and staff by a task force of adults and youth.

The St. Louis Home Detention Program is based upon the premise that many children are placed in the city's detention home because there are no alternative services to meet the extreme needs of these children. The Program serves these children by employing indigenous workers who are given wide latitude in how they handle their jobs. Their only general instruction is "keep your boys out of trouble and see that they are always available to the Court." (HEW, YDDPA Annual Report, 1972:42). Since then the concept of one-to-one advocate-client programs has tremendously expanded.

By 1973 YDDPA was placing increasing emphasis on system change advocacy bringing together youth and community "power brokers" in an effort to implement its national strategy. (HEW, YDDPA, Delinquency Prevention Reporter, Feb. 1973). The next year Congress moved primary federal responsibility for delinquency programs from HEW to the newly created Office of Juvenile Justice and Delinquency Prevention in LEAA, Department of Justice. Congress thought LEAA with its total involvement in the nation's criminal justice efforts would be in a better position to address and coordinate the various dimensions of prevention, diversion, and serious offender activities.

#### (c) Current Youth Advocacy Programs

The 1970's have seen a marked expansion of youth advocacy activities. The Juvenile Justice and Delinquency Prevention Act of 1974 provided funds to develop juvenile programs with special emphasis on the prevention of delinquency,

diversion from the juvenile justice system, and community based alternatives to traditional incarceration. It provided that status offenders not be placed in detention or correctional facilities and that juveniles should not be detained with adults. It also provided funds for temporary runaway shelters. It helped spark the creation of new youth programs at the national, state and local levels.

The Juvenile Justice Amendments of 1977 specifically provided for the development of youth advocacy programs. Legislation recommended by the Administration and by Senator Bayh proposed that a new special emphasis program in youth advocacy be developed by OJJDP. This was consistent with the basic federal strategy of concentrating on the prevention of, rather than the reaction to, delinquency, more effective services to young people, and the reduction of inappropriate incarceration. The Senate Committee Report (U.S. Senate Judiciary Committee Report, 1977) indicates the need to expand opportunities for all young people to develop to their fullest potential, greater opportunities in school, in employment, and in the receipt of human services. The juvenile justice system should become more responsive and humane. LEAA was to "develop and support programs stressing advocacy activities aimed at improving services to youth impacted by the juvenile justice system." (P.L. 95-115).

The focus of the advocacy activities were to be on the improvement of services to youth not on the protection of their individual legal rights. The original Senate bill calling for the development of advocacy programs included the protection of the rights of youth. This language was not in the House bill or the final Conference Committee version so that the advocacy programs envisioned by the 1977 Act are system change rather than case advocacy programs. (Congressional Record, 1977:H9991) The Conference Report (1977:21) indicates that the "Conferees intend youth advocacy services to include a full and comprehensive range of services."

(i) National Youth Advocacy

At the national level, such long standing organizations as the American Bar Association, American Civil Liberties Union, Child Welfare League of America, National Council on Crime and Delinquency, National Council of Jewish Women, National Urban League are adding advocacy to their youth development programs. (Gross, B. and Gross, R., 1977:357-380).

National groups engage in educational efforts directed at the formation of federal legislative and administrative policy and programs. They share their views with individual members of Congress and their staff members, congressional committees, and executive branch officials and staff members. To build grass roots support, they communicate their views to their constituencies through newsletters, publications, conferences and the mass media.

Most of these groups are concerned with reform of the systems that serve young people: education, juvenile justice, employment and welfare, health and shelter. Their research and publications document the inadequacies of these systems presently and point to options and alternatives for improvement. Their hope is that the general public, legislators and administrators will be influenced to call for fundamental change in youth serving systems.

One of the newer national advocacy groups is the Children's Defense Fund (CDF), formerly called the Washington Research Project. The bulk of CDF's work is quiet, day-to-day research, monitoring, negotiating, technical assistance and litigation to promote its goals. Last year CDF, along with other national youth advocacy groups, induced HEW to strengthen the early and periodic screening, diagnosis, and treatment program to include pediatric rural clinics in the Medicaid program and also to keep Head Start out of a separate Department of Education. It secured court decrees banning inappropriate hospitalization of children in public mental health hospitals in the District of Columbia, and defining the state's obligation to provide equal educational opportunities to handicapped children in Mississippi.

CDF completed and published two investigative research reports. Children Without Homes (Children's Defense Fund, 1978) documented that over 500,000 children were living away from their families in facilities ranging from individual foster family and group homes to large institutions. For the Welfare of Children (Children's Defense Fund, 1978) provides facts about children and welfare and indicates that the overwhelming number of welfare recipients are children. They are working to convert welfare reform from a "lazy parents" to a children's issue. Previous research reports include investigations of children in jail, out of school, school suspension, health care and civil rights, and civil rights protection for children.

In March 1979, CDF launched the Children's Public Policy Network to develop a broad national base of support for its national interventions and to provide assistance to state and local advocacy groups. The fund has a policy against receiving federal funds in order to be free to effectively advocate for the interests of youth before federal agencies and Congress. It is seeking to develop a broader base of private financial support.

National youth advocacy programs are an important part of a total youth advocacy effort. They contribute to the development of sound national youth policy. Just as other groups have found, it is essential to have national advocates systematically monitoring and intervening in the processes by which national administrative and legislative policy is shaped. They also provide support to state and local advocacy programs in much the same way as the youth law back-up centers assist local reform efforts. These National centers provide assistance in appealing decisions, litigation test case challenges, and develop reform-oriented legislation. They also prepare position papers, briefs, and legislative analyses on state and local programs. In addition, national programs can provide training, technical assistance and serve as clearinghouses for information.



(ii) State Youth Advocacy

The 1970s have seen the development of a new kind of statewide youth advocacy body. Independent groups concerned with all aspects of state youth policy and programs have emerged in a number of states. These new groups are concerned with deinstitutionalization, the development of community based youth programs, and the modification of the needs of all young people. They monitor the operation of state and local programs affecting youth, impact state and local legislative and administrative policy, provide training and technical assistance to their local affiliates, publish newsletters and otherwise serve as information clearinghouses. They are private, non profit agencies funded by state administered LEAA funds, church groups, and foundations.

One such statewide youth advocacy program is the Wisconsin Youth Policy and Law Center. Its priority areas are:

1. Inconsistent use of locked facilities for minors
2. Development of dispositional alternatives
3. Improvement of juvenile court processes

The Center employs multiple approaches to achieve its goals. To reform the Children's Code, it organized a statewide coalition covering a broad spectrum of viewpoints including legislators, legislative and executive staff members, Wisconsin County Bar Associations and the Wisconsin Association for Youth. The Center made its research findings available to the coalition and to the legislature and executive agencies. Other legislative achievements of the Center and its confederates include and a \$500,000 State appropriation for state reimbursement to counties for local shelter care and the right of the state to over-rule local zoning to facilitate the location of group homes in residential neighborhoods.

The Center also engages in test case litigation to invalidate inappropriate confinement of minors in locked facilities. It is preparing a handbook for attorneys who practice in juvenile courts and provides training to persons who work in the juvenile justice system. Public support is generated through public and media appearances by Center representatives and through a newsletter.

The Center receives many requests for legal assistance for individual clients. It handles the very few that give promise of being important test cases. The others are referred to legal services programs with follow up to assure the service is provided.

Another statewide advocacy program is the Chicano Education Project (CEP) a six-year-old effort to help Chicano families in rural Colorado make public schools more responsive to children's needs. A major on-going priority has been to develop a core group of parent leaders that has influence both in their local communities and statewide.

Much CEP effort has centered on the implementation of Colorado's strong bilingual education law. CEP organizers have worked in rural communities throughout the state to strengthen state-mandated Bilingual Committees, composed mostly of parents. Bilingual education has also been supported through CEP lawsuits and administrative complaints to state and federal officials — most of which have been sustained.

In 1976, CEP initiated a School Finance Reform Project, which is suing the Colorado State Board of Education to force a change in the way schools are financed. Because of the present finance system based on the property tax, many rural school districts have had very limited funds to support education. CEP is using the media and the training of lawsuit plaintiffs, local citizens, and school officials to create broad public awareness about school finance.

One of the growing number of state coalitions of youth serving agencies is the Ohio Youth Service Network (OYSN). In addition to its training, technical assistance, and clearinghouse activities the OYSN was successful in developing a broad based coalition behind legislation closing a state school for boys, creating a \$21 million fund for community based programs, and helped defeat a counseling licensure bill they considered undesirable. A similar state coalition is the Association of Washington Community Youth Services which was instrumental in the enactment of a forward looking juvenile code and later preventing its retrogressive amendment.

(iii) Local Youth Advocacy

Presently the dominant form of youth advocacy at the local level is case advocacy, one-to-one assistance by the advocate of the client along the lines of the St. Louis Home Detention Program singled out by YDDA in its 1972 Annual Report. Current interest in case advocacy for children can be traced to the recommendation of the Joint Commission on the Mental Health of Children in 1969 calling for a national system of child advocacy. This was picked up by the 1970 White House Conference on Children and resulted in a multitude of state and local advocacy activities in the 70s. It also triggered the creation of abortive HEW National Center for Child Advocacy. Although the national center never was provided the resources to be effective, these activities helped child advocacy gain widespread popularity.

In 1972 Kahn, Kamerman, and McGowan completed a national survey of child advocacy programs (Kahn, Kamerman, and McGowan, 1972). They identified a wide variety of state and local programs labeled child advocacy and many advocacy programs not so labeled. The local programs were concentrated in three areas. The first is self help programs such as hot lines, alternative schools, drug treatment centers and encounter groups. The second is concerned with youth participation in the determination of public policy. The third area is student rights, especially in the school system. For the most part advocacy efforts grew out of two related program activities - case work and service monitoring. When the client did not secure a service to which the case worker thought the person was entitled, the case worker became an advocate and engaged in efforts to change the agency's negative decision. The other approach is to systematically monitor a given service provider's performance and then on the basis of this data, to mount a campaign to change the agency's policies.

Local service programs for runaways and other alienated youth developed in the last few years emphasize what they consider an advocacy approach. The 1973 Annual Report of the San Francisco Youth Advocacy Program (Youth Advocacy, Inc. 1973:13) states

"Youth Advocates means more than we like young people. It also explains how we serve teenagers - as their advocates. Advocacy counseling is the process through which all our services are created and delivered. Advocacy counselors relate to their clients like attorneys. They upfront take the young person's side, especially in dealing with the establishment system, and help them implement their own decisions."

Case advocacy programs employ many different physical settings and engage persons with varying backgrounds as advocates. The Minnesota Youth Advocate Program employs professional educators to serve as advocates for youth in the schools they return to after release from a correctional institution. The Advocate's job is to help the youth in school, at home, at work and elsewhere in any way possible. An evaluation of the program indicated it had a positive impact on the behavior of youth involved in it. (Higgins, 1978:215). The evaluator recommended more careful recruitment of advocates and that their training should stress alternative schools, job programs and improved relations with other youth workers, such as police officers.

Many traditional direct service programs have added advocacy to their activities. The Family Service Association, the national office representing many such local agencies, is promoting the development of system change advocacy components in its locals. One local, the Family and Children's Service of Nashville, Tennessee has developed a Family Advocate Program. This consists of one professional staff person, the Public Issues Committee of the Agency's Board of Directors and community

task forces that are created to deal with specific issues. Last year the program dealt with six major issues, including statewide foster care review, police protection in public housing projects and emergency shelters for women. The advocate seeks to mobilize coalitions of persons and groups in the community around each issue and assists them in their intervention with public and private leaders. As a result of their efforts last year, day care has been expanded, and the planned construction of a large state school for dependent and neglected children in Nashville has been delayed. Legislation to give adoptees birth information passed one but not both houses of the State Legislature. The advocate indicates it is difficult for a local program to develop statewide support on issues.

Other examples of the impact of local youth advocacy programs include: Open Road in Santa Barbara, California which was recently successful in establishing a student involvement program in nine local secondary schools training students in techniques of reducing violence and vandalism. It established a youth run investigative program which published a policy paper, Lost In The Shuffle, pointing out ways to improve school counseling. The Community Congress of San Diego spearheaded efforts that resulted in local revenue sharing funds being used to support private community based youth agencies. It had similar success in opening up local criminal justice and United Way funding to the agencies.

In addition, some local programs have been involved in both case and system change advocacy. Examples include:

The Parents Union for Public Schools in Philadelphia is an independent, citywide parents organization. Parents Union's goal is to represent parent and student interests at the school and sub-district level and on a systemwide basis. An extremely active 15-person Board of Directors volunteers thousands of hours per year to the organization, which is assisted by a paid staff of three.

Depending heavily on parent volunteers, Parents Union's Grievance Committee provides advocates who advise parents and accompany them to school in efforts to resolve such problems as suspension, special education placement, academic problems, and transfer to other schools.

On a system-wide basis, Parents Union is active on several fronts, for example:

A Parents Union committee meets monthly with the Superintendent of Schools and his key staff to raise problems they have identified through their individual grievance work and to press for systemwide solutions.

Parents Union has been active in the major fiscal crisis that the

school district has been experiencing. They monitor the school district's budgeting and expenditure process in great detail, pressing for direct services to children to become the school district's number one spending priority.

(2) The staff of the Student Rights Project (SRP) (located in Dayton, Ohio) serve as advocates for any student and parent on request. They have been heavily involved in suspension and expulsion cases, but they also deal with special education and a variety of other school-related problems.

SRP has placed a major focus on school district-wide issues of suspension and discipline. They have been concerned about the disproportionate suspension of Black students and have stimulated the Office of Civil Rights to investigate Dayton's record in this area. They proposed a model discipline code to the Dayton school board and pressed for its adoption. Currently, each local school has its own code; these codes differ sharply and are frequently vague.

SRP is a project of the American Friends Service Committee.

(d) Present Situation

The two most well developed areas of advocacy for young people are system change advocacy at the national level and one-to-one case advocacy at the local level. Less well developed is system change advocacy at the state and local levels. At the national level first the children's Bureau, then in the '60's the President's Committee on Delinquency and HEW's Office of Youth Development and Delinquency Prevention, and more recently the Office of Juvenile Justice and Delinquency Prevention have led governmental efforts to improve national policy for youth. A large number of traditional national agencies have added youth advocacy to their agendas and many new national youth organizations that engage in system change advocacy have recently been created. At the local level in the past ten years a large number of new youth programs have been created to engage in case advocacy and many traditional youth serving agencies have added such advocacy to their activities. System change advocacy is less well developed at the state and local levels.

4. SYSTEM CHANGE ADVOCACY ISSUES AND PROBLEMS

(a) Advocacy and Service

In the past local and state programs originally designed for system change advocacy have tended to drift into service as demands for assistance with immediate problems proved irresistible. The staffs of youth programs in the early 1960s were consumed with such problems as getting the landlord to provide heat, securing a welfare check, housing, safety at

street crossings, and drug sales. The Youth Advocacy Program in St. Joseph County, Indiana and the Wisconsin Youth Law and Policy Center experienced the same tension. Both programs had a legal service component designed for test case and class actions. They received many requests for legal assistance that they referred because the cases had no special policy significance.

There are many reasons why programs initially oriented toward advocacy drift into a service orientation. They receive many requests for direct and immediate assistance and it is difficult not to respond. If successful, the provision of help gives an immediate sense of accomplishment to staff members whereas system change advocacy is usually slow in producing tangible results. The techniques of providing direct service are usually more familiar to staff members than the techniques of system change advocacy. The latter involves a certain amount of tension and conflict with staff members and others associated with the institution that is the target of the change effort. This may be unpleasant for both sides. These are some of the reasons there is a great temptation to drift into a service orientation.

To avoid this temptation programs must make their system change mission clear to staff, board members, and volunteers. Otherwise there will be misunderstandings when potential clients are turned away. System change programs must develop processes for referring inappropriate service matters to other agencies and following up to see that the service is provided. This need for information and referral capacity must be anticipated and planned for from the outset.

(b) Difficulty of Influencing Large Institutions

Programs engaged in system change efforts have expressed the common problem of the difficulty of influencing large institutions such as the school system, juvenile justice system, and other similar youth serving institutions. Of the President's Committee on Juvenile Delinquency and Youth Crime '60's programs, Marris and Rein (1967:69) state "It seems clear from the first year of the education programs' experience that the projects underestimated the resistance of the schools, and lacked power to meet it. They assumed too hopefully that the aims of the programs had been reconciled in the negotiations which precede action. But when the schools failed to meet their commitments, as the project understood them, no effective sanctions lay to hand."

Persons engaged in system change efforts today have similar observations about the difficulty of moving large institutions. However the processes of institutional change are receiving increased attention. The work of Bennis, Benne, and Chin, The Planning of Change, or Hornstein, Bunker, Burke, Gindes and Lewicki, Social Intervention are good readers on the state of the art in Organization change. They provide a comprehensive discussion of the application of behavioral science principles to organizational change efforts. Organizational research to date

supports the theory that an institutional change strategy must be (1) comprehensive, (2) influential, (3) participatory, and (4) timely.

(i) Comprehensive

A community institution such as a school system or a juvenile justice system is best understood as having complex internal and external relationships. Top policy makers, top administrators, middle managers and workers on the front line all have roles to play in carrying out the mission of the organization (Sofer, 1972). Community institutions also have sensitive external relationships with public officials and private citizens. A significant change in the system will affect most or all of these relationships. A planned change strategy therefore must be comprehensive in scope and anticipate and advert to the changes required in all parts of the system (Bennis, Benne, and Chin, 1969:299). For example internally a high degree of interdependence exists among the board, superintendent and other top administrative staff, school building principals, teachers, and students. Externally a school system has very sensitive relationships with parents and interested community leaders and with local and state public officials and boards that influence its financial condition, its licensing posture, and its program activities. A major change in the operation of the school system may require that many or all of these modify their policies, procedures, and expectations.

Successful organizational change strategy must be comprehensive in terms of time, a "successful unfreezing (of) the present level, moving to a new level and freezing group life on the new level" (Lewin, 1947:35).

The large Rand study of educational change efforts corroborates this three-phase conceptualization of institutional change. In a study of federal efforts to induce change through its bilingual education, vocational education, Right-to-Read, and innovative projects programs, Rand found that a successful change process has a mobilization, an implementation and an institutionalization phase. In the mobilization phase all the persons and resources involved in the effort must be committed to achieving the new program's goals and objectives. This includes school board members, top Central administrators, principals, teachers, parents, students, community leaders. The implementation phase involves the execution of the new program in the local school system. Most programs died there because they did not proceed through the third phase - institutionalization. In this final phase the new program is to be incorporated into the standard operations of the school system including its budget, personnel, instructional program, and facilities planning (Berman, et al, 1978).

Many change efforts have found that changes in stated policy, themselves hard won, are infinitely easier to achieve than corresponding changes

in the day-to-day behavior of the institution. The programs of the early '60s secured agreement in principle to new approaches in education but saw very little actual change in the operations of the schools. They were unable to move to effective implementation and institutionalization. A similar difficulty has plagued nationwide efforts to effectively implement Brown v. Board.

Rand found the only educational change efforts that were institutionalized were those which were comprehensive in scope and time. Top down programs mandated by top administrators without the meaningful involvement of teachers, parents, and others failed because the latter did not support them. Strictly grass roots programs without broad, top administrative and community support failed because policy makers allowed them to die. Changes that were institutionalized were those which began with a broad-based strategy involving all relevant persons and groups and with a plan for the long-range continuation of the program.

(ii) Influential

It is the nature of complex organizations to persist in traditional patterns of behavior (Watson, 1972:296). The history of the youth advocacy efforts of the 1960s and the testimony of persons presently engaged in system change advocacy bear this out. Change has come about when sufficient influence was mobilized. Children were separated from the adult criminal justice system and the first juvenile court was created in Illinois in 1899 when influential women, leaders of the bar, and community leaders formed a coalition behind the idea. The White House Conferences on Children, which brought leaders together from all over the country, have proven effective in mobilizing sufficient influence to bring about change. This coalition strategy is based on the premise that a critical mass of key leaders predominantly in the private sector and heavily representing business, labor and industry represent one of the strongest sources of influence in a community (Hunter, 1953, and Dahl, 1961). Without such community leadership linkages, low income and minority persons have found institutional change difficult to achieve.

Instead of developing linkage and board based coalitions, some change efforts have relied primarily upon organizing low income and alienated persons to generate sufficient influence to bring about change. This is true of the labor, civil rights, and peace movements, some of the youth advocacy programs of the early '60s, some of the anti-poverty programs, and some current neighborhood organization activities. Sometimes this has been by choice, sometimes out of necessity because coalition building efforts were rebuffed. However the overwhelming number of successful changes in the U.S. have employed the coalition



and negotiation approach. This is true of the major youth advocacy efforts in the 19th and early 20th Century, the decennial White House Conferences on Children and Youth, most recent and current youth advocacy efforts, and of literally thousands of business, labor, and professional group change efforts.

While the development of linkages with public and private, sector leadership has proven most effective in generating sufficient influence to bring about change, it is very important that the change agent maintain its organizational autonomy. Kahn, Kamerman, and McGowan (1972:112-113) found that the freedom and flexibility this autonomy provided was essential to effective advocacy. Involvement in a hierarchical system with close supervision and tender sensitivities make effective change efforts difficult if not impossible.

(iii) Participatory

Over the years Levin, Bennis, Blake, Mouton, McGregor (Theory X and Theory Y), Argyris, and others have found that persons are more likely to support change if they share in its development. In their 1972 national survey on advocacy programs for young people, Kahn, Kamerman and McGowan found that the most successful programs involved youth and adults in their operation. They said "youth programs that are administered strictly by adults fail because they lack credibility with the youths..." (Kahn, Kamerman and McGowan, 1972:107). Rand found that educational change strategies that mobilized the support of top policy makers, administrators, principals and teachers were more likely to be implemented than projects that were imposed solely from the top down or were solely grass roots. The former failed because teachers felt no responsibility for them. Grass roots projects failed because policy makers failed to provide the staff and resources to institutionalize them (Berman et al, 1978:18).

The civil rights movement and the poverty program suggest that clients have valuable insights into the operation of human service programs and that they should participate in their planning and operation (Knitzer, 1976:200-201). Rand found that projects designed to help teachers carry out innovations were significantly strengthened when teachers participated in project decisions. "Teachers, who are the closest to the problems and progress of project activities, are in the best position to suggest remedies for perceived deficiencies." (Berman et al, 1978:29).

(iv) Timely

Bennis and Schein (1969:341) have found from their work with business organizations that the state of readiness of the organization for change is important. There are many reasons why organizations may not be ready to change - value system, personal relationships, level of conflict, receptivity of key personnel to change effort, and the possibility of developing a long term relationship between the change agent and the organization.

Moore (1936:86) indicates that if a culture is already in a changing situation the time is riper for planned, directional changing.

In their evaluation of federal education innovation efforts Rand found that the institutional setting at the time of the change efforts was very significant. For example they found secondary schools to be more resistant to change than elementary schools possibly because high school teachers were more "subject oriented" in contrast to the "child-centered" orientation of elementary teachers. (Berman et al, 1978:32). Another Rand study on the role of demonstrations in federal research and demonstration policy concluded that the eventual implementation of change was significantly affected by the institutional environment of the target system (Glennan and Rettig, 1978).

There are a number of indications that a system may be ready for change. Top policy makers may be dissatisfied with its present performance. Much of the recent ferment in the juvenile justice field can be attributed to judges, legislators, correction officials, police, and other public officials' conviction that existing approaches are failing. Or key community leadership may feel a change is needed. The St. Joseph County Youth Advocacy Program effort to change the school system would probably not have succeeded if a broad segment of the community leadership had not been disturbed about annual outbreaks of violence in the schools. Occasionally a widely publicized dramatic incident may spark and sustain a change effort. Publicity about brutal and punitive treatment of youth at the Institution of Child Guidance at Bridgewater, Massachusetts, is credited with creating the climate of opinion that sustained the deinstitutionalization program in that State. However, more often than not, public interest flags quickly after a crisis passes. Changes in legal policy may make systems more malleable. The Brown v. Board Supreme Court decision made it possible to move on the segregation of local schools. The Juvenile Justice Amendments of 1974 facilitated the deinstitutionalization of young people nationwide.

#### (c) Youth Participation

The effective involvement of young people in advocacy programs can significantly strengthen the programs by giving them greater credibility with youth. Without such participation programs run the risk of being ignored and irrelevant to young people. The involvement of young people, the clients of the youth serving institutions, insures that the advocacy efforts will be targeted on the areas of greatest concern. Youth are in the best position to know the weaknesses and shortcomings of the serving institutions. However, the effective involvement of young people presents special problems. The National Youth Work Alliance investigated local efforts to implement the youth participation requirements of the Juvenile Justice and Delinquency Pre-

vention Act (JJDPA) and the youth employment sections of the Comprehensive Employment and Training Act (CETA). The Alliance found that the efforts were generally very ineffective (National Youth Alliance, 1979:5). This was corroborated by the Department of Labor's study of the CETA programs which said, "In a few cases the effect of youth involvement on planning councils has been significant but usually it is not. The youth themselves frequently do not participate (and) where they do, the participation is more form than substance." The Alliance indicated that in general youth felt inexperienced in planning complex programs. The Alliance concluded that, youth participation efforts will be successful only when they are given a much higher programmatic priority which is supported by adequate staff and other resources.

#### Youth as Curriculum Builders

High school students in Philadelphia developed a puppet show to educate younger students on the dangers of drugs, VD, and alcoholism. Another group of high school students developed an environmental curriculum they used with younger children.

#### Youth as Community Manpower

In a Connecticut town students operated an emergency ambulance service, and in San Francisco they staff the Exploratory Science Museum.

#### Youth as Entrepreneurs

Home economics students opened a restaurant in school and served meals to faculty and students. Teenagers in New York maintained a natural science museum.

#### Youth as Community Problem Solvers

Denver students saved gasoline in their city by developing a community carpooling operation. In New York City, students were trained to notice and report housing violations in their neighborhoods.

#### Youth as Communicators

Inner city young people have expressed pride in their heritage by the creation of huge outdoor murals. Many students have prepared oral histories of older persons in the community to develop and preserve the history of their people.

## Youth As Resources for Other Youth

In California, high school students served as counselors for new students. In Seattle, students staffed a hotline and rap center (Gross and Gross, 1977:283-3). Many of these examples reflect efforts to create new roles for youth. They demonstrate that, given opportunities and training, young people are capable of much more responsibility than we traditionally accord them. This not only contributes to their self development, but it also contributes to the well being of the community.

For any program designed to benefit youth, meaningful youth participation in the total process, from pre-planning to implementation and evaluation, should be its principal goal. To meet this goal, often the first necessary step for those administering programs is to rid themselves of stereotypes of youth as incompetent and uninformed. They must avoid common mistakes such as adult domination, giving youth menial tasks, fear of taking youth to public meetings because they might say or do something embarrassing, public chastisement, or leaving young people to their own devices (Blake, et al, 1978:151-2).

The trust of adult school administrators in Los Angeles, Oakland and Santa Barbara has been rewarded by better learning atmospheres and reduced vandalism through their cooperation in the Open Road Student Involvement Program. This is a particularly important example because it demonstrates how low income and minority youth, often not involved in school affairs, can be attracted and trained to participate in community planning and decision making processes. Natural leaders -- not necessarily those usually involved -- were identified, recruited and trained to organize their peers into a broad based body. Then they identified strategies to deal with the issues of vandalism and violence, unique to each school. They developed constructive recommendations, met with school administrators to determine their feasibility, and determined how students could participate in their implementation. With success on this issue, they moved on to participation in curriculum development, library and textbook selection, guidance and counseling, grievance procedures and student participation on faculty and other school committees. This experience equipped the selected students to acquire and perform other leadership roles in the school. They were so successful that in some schools the administrators requested that all students receive similar training.

The training and supervision young people receive strongly affect the contribution they can make to a program. Blake, Penn, Mason, and Hoffman (1978:141) found that teams of young people, working with and supervised by adults, made unique contributions to the planning and long-term public service jobs when effectively trained and directed. In the Open Road Program, students

were trained in problem solving techniques, issue identification, effective listening, survey and interview methods, school, organization, and student rights and responsibilities. Analogous, directly relevant training must be handtailored to the new role young people are to play in particular situations. Again low income and minority youth, whose life situation often excludes them from having the experience with adult planning and decision making processes, must be oriented and trained to the knowledge and skills necessary to effectively function in these processes.

With adequate training and supervision, young people can participate in all aspects of youth advocacy programs. They can serve as staff, consultants, advisors, investigators, board members and negotiators. They bring special insight and access to these functions that adults cannot possess. This is especially true of young people from the population to be affected by the program.

Adequate staff support for the involvement of youth is essential. The recruitment of young people takes more than the issuance of general invitations. It often involves imaginative, personal explanations of the program and the importance of the young person's potential role in it. Because young people go away to school, take new jobs, or adopt different interests, recruitment is a continuous responsibility. The National Commission on Resources for Youth (1976) found that effective youth involvement programs invariably were effectively managed programs. In addition to the usual requirements for sound planning and supervision, youth involvement activities often present special transportation needs, scheduling concerns, and legal questions of liabilities and child labor.

(d) Staff Capability

Kahn, Kamerman, and McGowan found weaknesses of staff members of local advocacy programs to be a serious problem. In general, staff members lacked familiarity with extant knowledge on change theory and experience, failed to set clear goals, relied on traditional but often inappropriate methods of operations, seized upon fads, such as "systems approach" which they didn't understand, received little training, and failed to develop effective processes of accountability to their clientele. On the other hand, in general, state programs evidenced stronger staffs than local program. (Kahn et al, 1972:108).

In addition to the usual administrative skills, the conduct of advocacy activities requires certain special skills. The Kahn study found that leadership was the most important. Programs that flourished under strong and effective leadership floundered when it was gone. The style of leadership - dramatic and charismatic or low key - was of no significance as long as leadership was exerted. Leadership is critical because of the complexity, difficulty, and long term character of system change activities.

It is critical also because system change activities require that staff have a great amount of autonomy and flexibility in seeking to achieve their objectives. All phases of system change - mobilization, implementation, and institutionalization - require staff to interact with a broad spectrum of persons, from street youth to legislative leaders. Planning and implementing all phases of system change requires sensitive adaptation of the strategy and tactics to the background and orientation of the various persons and groups involved or affected by the effort. For example while maintaining fidelity to the truth, one should explain the virtues of community based corrections to "street" youth quite differently than to legislative leaders. Many other staff decisions must be made on the spur of the moment as the opportunity or problem presents itself. Strong, trusting leadership is necessary to instill self confidence and flexibility in the staff.

Staff engaged in system change advocacy are required to operate at times under conditions of great uncertainty. In mobilizing allies one can never be certain of who will join and who will not and why. In attempting to convince those responsible for changing system policy - legislators, school board members, employers - the same is true. Staff must expect a certain amount of frustration because sometimes they are rebuffed.

Persons involved in system change advocacy must have a strong commitment to young people. Rewards are slow in coming. Implementation and institutionalization are low visibility activities and are likely to be most successful when as much credit as possible for change is directed toward the system rather than the change agents. This can create a certain loss of credibility with young people and other supporters.

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## NATURE OF COMMENTS AND LEAA's RESPONSE

The Office of Juvenile Justice and Delinquency Prevention received 233 responses to the Youth Advocacy Initiative Draft Guideline published in the June 15, 1979 Federal Register. A brief analysis of these comments shows that numerous commentors supported the program and offered suggestions for substantive and technical modification, and a substantial number of commentors expressed opposition to the government becoming involved in issues which involve the family or local/state organizations; 26 commentors objected to the restriction on the eligibility of national organizations and the operation of multi-state focused grants, 8 were supportive of this restriction and limitation; 8 commentors supported the emphasis on youth participation as an essential program strategy in all applications; 3 commentors stated that the strategy was overemphasized and unrealistic; 15 commentors suggested that legal advocacy be strengthened or specifically included in the final Guideline, and 1 commentor suggested that legal advocacy was an inappropriate strategy.

Comments were received from 100 private organizations, 98 private citizens, 16 local units of government, 9 state agencies and 8 State Planning Agencies.

The comments received and LEAA's response follows:

### I. APPLICANT ELIGIBILITY

#### A. Application by National Organizations to Implement Multi-Site Projects

There were approximately 25 comments concerning the eligibility of national groups and organizations to implement multi-site projects.

Based on the above concerns, OJJDP has decided that national organizations are eligible to participate in this initiative but those that choose to operate in more than one state, must clearly describe the strategy for impact, examples of acceptable strategies are:

1. They must operate in a state or community wherein they have a local affiliate or an already established organizational linkage; or demonstrate their acceptability to work in the respective states as an advocacy group.
2. The applicant must expend a majority of the funds received under this initiative through local or state affiliates for operational expenses. This program is designed to aid large numbers of youth, and therefore a majority of funds should be spent at the implementation level where they can have the most impact. National Organizations will be allowed to retain funds for overall administration, coordination and resource development and support; however, those organizations passing on a greater share of funds will be considered to be more responsive.

The reasons for the above decision follow. OJJDP agrees that:

1. The failure to allow for two-state, regional, or multi-state projects inhibits the implementation of the congressional policy of developing a national effort to combat juvenile delinquency.
2. The draft initiative removed from consideration a great number of national and regional organizations with substantial track records in the area of child advocacy, and may have rejected successful models for Youth Advocacy.
3. The emphasis of the initiative, as stated in the program objectives section, is to sponsor "a major program to develop, test and support methods of advocacy which stimulate and facilitate needed changes and enhanced accountability in the administration of justice." By creating the one state limitation on applications, the draft initiative limited OJJDP's ability to fully test various advocacy methodologies. A number of multi-state Youth Advocacy Programs currently exist whose models should be examined.
4. Multi-state projects can be effective and efficient. Given their centralized administration, accounting, research capability, and decision-making, such programs can be adaptable, productive, responsive and sophisticated.

B. There were several comments objecting to the eligibility of public agencies.

These objections stated that it would be impossible for public agencies as part of "the system" to effect change. OJJDP decided to allow for applications by both public and private not-for-profit organizations for the following reasons:

1. There are many public organizations, agencies, or offices which have been established legislatively or otherwise for the specific purpose of advocating for youth and creating changes within the system intended for impact.
2. To disallow application by public agencies would presume that it is only the public sector that needs improvement and, in addition, that the public sector is incapable of achieving systems change.

C. Several comments indicated that the language in the "Applicant Eligibility" section, "which are in no way affiliated with the organizations

and institutions they intend to impact," was unclear and limiting. In response to these comments, OJJDP has rewritten the "Applicant Eligibility" statement to read as follows:

"Applications are invited from public and private not-for-profit agencies and organizations which are functionally independent of organizations and institutions they intend to impact." The intent of this stipulation is to insure the applicant's ability to function independently, remain objective, and prevent structural relationship barriers from impeding positive change and improvements in the statutes, policies, and practices of the systems to be impacted.

- D. Several commentors suggested that applicant organizations be required to have two years experience in the advocacy field in order to be eligible.

OJJDP determined that as long as the project staff could demonstrate adequate individual and collective knowledge and experience in system change and familiarity with those systems to be targeted, this would be sufficient demonstration of required experience.

## II. CRITERIA FOR SELECTION OF PROJECTS

In response to recommendations, OJJDP has reorganized and altered the Criteria for Selection of Projects as follows:

- A. OJJDP has eliminated the first selection criteria in the draft Guideline, "the extent to which applicants meet the capability and eligibility requirements as outlined in paragraph c(3)(1)" because ineligible applications cannot be considered for selection.
- B. OJJDP has rewritten Selection Criteria (f) in the draft Guideline to avoid any duplication and to provide clarification. It now reads: "The extent to which the applicant demonstrates its capability to successfully carry out the project through use of available key personnel with essential skills and experience." (20 points)
- C. OJJDP has added the following two criteria in order that the Application Requirements section more closely parallel the Selection Criteria:
- "The extent to which the applicant provides a clear plan for taking specific actions reasonably designed to accomplish measurable project objectives." (15 points)
- "The extent to which the applicant demonstrates its ability to develop necessary management, fiscal, and information systems." (5 points)
- D. OJJDP has reallocated the points to provide for a total amount that is less cumbersome in review procedures.
- E. OJJDP has added the following to Section e. Selection Criteria: "All other criteria being equal cost effectiveness and geographic distribution will be used in making final selections."

### III. YOUTH PARTICIPATION:

OJJDP received eight (8) comments both supportive and non-supportive, concerning youth participation. Some commentators felt that youth do not have enough experience to be involved in program planning and implementation, while others felt that it was imperative that youth involvement be stressed. In most cases commentators requested further clarification.

- A. OJJDP decided to retain "youth participation" as an important project element, and to add to the guidelines that youth participation must be "meaningful". OJJDP regards involvement of youth in meaningful roles as necessary not only for reducing antisocial behavior, but also for ameliorating long-term social problems. Society often de-values youth by denying them those roles that have long-term career potential or immediate personal gratification.

Instead of assuming that young people are incapable of acting on their own or contributing to the problem-solving process, applicants must acknowledge youths' abilities, value their inputs and encourage their participation in all aspects of American society. For the purposes of the project, meaningful youth participation can be implemented through significant involvement in planning, project design, program development and implementation and evaluation. In addition, with appropriate training commensurate with their interests, abilities and growth potential, youth can learn about community organizing, problem solving, action planning and implementation, data collection and analysis, survey taking, understanding bureaucracies and the political system, and other types of activities important to advocating on behalf of their peers.

- B. A definition of "youth participation" was added to the section on "Definitions" as follows: "Youth Participation is defined as 'involving youth in responsible, challenging action, that meets genuine needs, with opportunity for planning and/or decision making affecting others, in an activity whose impact or consequences extends to others, i.e., outside or beyond the youth participants themselves' (Judge Mary Conway Kohler)."

### IV. MULTI-SYSTEM FOCUS

There were approximately 15 comments which encouraged the support of applications proposing to deal with more than one of the three systems (juvenile justice, social services, education) targeted for advocacy program intervention. Due to the arguments set forth in support of allowing experienced programs to focus on more than one system OJJDP has changed, "Section C. Program strategy (1) Program Design" of the guideline to read as follows: "Applications are invited for action projects which will influence one or more of the three

systems described in b(4), e.g., juvenile justice, social service, and/or education. Projects are expected to support the extent and nature of their system(s) focus in the Program Methodology section and the Problem Definition and Data Needs section of the application narrative".

## V. LEGAL ADVOCACY

- A. OJJDP received 16 comments regarding concern that no specific mention is made of legal advocacy as a viable program approach. Some of these comments suggested that the program description section of the guideline be expanded specifically to include legal advocacy.

OJJDP would like to note that the intent has always been to include legal advocacy and OJJDP concurs with the above suggestion because public and private coalition building and youth participation strategies can be strengthened by supportive legal advocacy efforts which protect the rights of children and youth. For further clarification, OJJDP has added "legal advocacy" to the guideline as an approach under the program description section as follows:

(3) "Effective legal advocacy in the support of the above two approaches for the purpose of protecting the interests and rights of children and youth."

- B. On another facet of this issue, one comment objected to the following limitation: "Projects which focus solely upon providing advocacy, representation or service to individual youth on a case by case basis will be considered unresponsive."

While legal support is an essential element of advocacy strategies it is important to distinguish legal assistance to individual youth on a case by case basis (direct services) from legal support which involves the selection of cases for the purpose of contesting or establishing principles, policies and practices affecting classes of youth such as dropouts and pushouts, incarcerated youth, truants and others. For the purpose of this guideline the primary emphasis is on the latter type of legal support because of the potential capacity to facilitate broad based change in systems to be impacted. Therefore, the limitation will remain unchanged. However, for the purpose of clarification, the term legal advocacy has been added to the definition section as follows: "Legal advocacy is an approach whereby test case litigation or representation is used to advocate for the interests and protect the rights of a given group or class of youth and seek systems change for the entire class of youth."

## VI. PARTICIPATION OF INFLUENTIAL INDIVIDUALS AND GROUPS

Several commentors objected to the requirement that projects need incorporate as part of their strategy "extensive participation by influential and interested persons from various community sectors..." As a result of these comments OJJDP has changed this section to read "...participation by interested persons from various community sectors..." OJJDP decided

that participation is essential for effective advocacy programs, however, OJJDP also realizes that the requirement that the participation be from "influential" individuals or groups may weaken rather than strengthen advocacy efforts, depending upon their relationship to the system(s) targeted for change.

#### VII. SPA COORDINATION AND APPROVAL

Several commentors expressed concern over the role of the State Planning Agencies (SPA) in the development and approval of applications, and in addition, requested clarification of "coordination with the SPAs." In accordance with the Guideline for Discretionary Grants, M4500.1G, Appendix 2, page 2, OJJDP has altered the guideline to read: "Applicants must consult with the State Planning Agency of their State before making application for funds to LEAA.... Applicants are encouraged to review the most recent Comprehensive State Plan produced by the State Planning Agency and to request a conference with the SPA to discuss the proposed project. The conference should also include regional and/or local planning unit representatives." In addition, when the application is submitted to the Office of Juvenile Justice and Delinquency Prevention, it must be submitted to the SPA at the same time for review and comments.

#### VIII. DOLLAR AMOUNTS

Several comments stated that the projected maximum levels of funding were: too high, too low, or adequate. After due consideration OJJDP has decided that the maximum amount allowable for all grants will be \$750,000 for a two year period with cost effectiveness being a major consideration.

This decision was made based on the wide range of strategies and the diverse areas that could be labelled "local" or "statewide" and the corresponding possible costs.

#### IX. TRAVEL AND COORDINATION AMONG PROJECTS

There were several recommendations that more money be allowed in the budgets for coordination and information sharing among projects.

In response to those comments, a decision was made to allow projects to budget up to 2 trips per year for such purposes. One of these trips per year will be for attendance at an OJJDP sponsored conference for all OJJDP advocacy grantees.

#### X. DIRECT SERVICE VS. SYSTEM CHANGE

There were a couple of comments recommending that direct services be allowed in these projects as well as a number of comments supporting the proposed strategy of systems change.

Because the focus of this initiative is on broad based change for large numbers of youth who are affected by statutes, policies, and practices of the targeted systems rather than on the delivery of direct services to individuals or small groups of youth, the focus will remain the same.

#### XI. TECHNICAL CHANGES

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

#### XII. MANAGEMENT INFORMATION SYSTEMS (MIS)

There were several requests for clarification of the Management Information System (MIS). In response to those requests the following has been included under g. Evaluation Requirements.

"In addition each application must indicate the capability of developing a management information system. The Management Information System (MIS) must be capable of providing data on:

- (1) the system(s) covered by the projects;
- (2) the types of activities/programs undertaken to reach specific project objectives;
- (3) types of interventions (programmatic/activities) undertaken under specific conditions for different systems; and,
- (4) the immediate results produced by advocacy program intervention.

The evaluator will assist the grantees in establishing an MIS System. "

#### XIII. OPPOSITION TO FEDERAL SUPPORT FOR ADVOCACY ACTIVITIES

A good number of comments indicated opposition to the guideline and recommended that it be cancelled. The opinion most often expressed was that taxpayers dollars should not be used to support youth advocacy activities because the guideline represented more government control and regulative authority over the private sector.

The following excerpts are illustrative of the misconceptions expressed in the comments as to the intent of the youth advocacy guideline initiative:

1. "To assume authority or control over public and private youth serving organizations"
2. "To interfere with successful programs governed by Volunteer boards of lay citizens"



3. "To take away rights of parents"
4. "To take over the running of the family"
5. "To create funded ad hoc groups whose basic function would be to criticize and who would do nothing to accomplish the objectives of the program."

The intent of this guideline is to carry out the mandate of the Congress in accordance with the 1977 Amendments to the Juvenile Justice and Delinquency Prevention Act of 1974, Section 224(a)(7) which states, "develop and support programs stressing advocacy activities aimed at improving services to youth impacted by the juvenile justice system,". This program recognized that in order to achieve this objective it is essential that improvements in the education and social service system(s) result from advocacy activities.

As stated in the Background Paper, Appendix 3 of the Program Announcement, the rationale for youth advocacy rests on a number of assumptions (Knitzer, 1976:200).

It assumes that youth have certain basic rights, the most important of which is access to appropriate developmental opportunities. In the past and, to a certain extent at present, youth were regarded as being entitled only to what their family was able to secure for them.

Youth Advocacy assumes that rights are enforceable by statutory, administrative, judicial, or other structured procedures. Experience demonstrates that adults with broad discretion to make decisions affecting the lives of young people sometime make errors. Advocacy activities assume processes exist or can be developed to rectify these errors. Youth Advocacy focuses on systems or institutions that impinge on the lives of young people.

Youth Advocacy assumes young people individually do not have the power to insure that their basic rights are effectively protected. They seldom have enough money of their own to carry on sustained advocacy efforts. In our society young people are conditioned to accept a passive, not assertive, posture vis-a-vis adults. Many adults in positions of responsibility tend to discount the views of young people if these views differ from their own. Youth is a transitional state which militates against sustained advocacy efforts by youth alone. Their time is limited particularly by educational responsibilities. They seldom have experience in the techniques of advocacy. For these reasons advocacy on behalf of youth is essential to effectively secure their basic rights.

The need for youth advocacy increases as institutions gain influence over the lives of the young. Due to industrialization and urbanization, institutions such as the school system, the employment network, the juvenile justice system, and human service systems replaced and supplemented the family in influencing the development of young people. All of these systems are naturally subject to the inherent impersonal and inflexible character of complex bureaucracies. Advocacy efforts are needed to protect the rights of all, particularly, low income and minority youth when the institution is not serving young people's needs. The recent period of rapid social change undoubtedly has contributed to the heightened interest in advocacy activities.

OMB Approval No. 29-R0218

STANDARD FORM 424 PAGE 1 (10-75)  
Prescribed by GSA, Federal Management Circular 74-7

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

## GENERAL INSTRUCTIONS

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

## APPLICANT PROCEDURES FOR SECTION I

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

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

**Item**

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

**Item**

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

**APPLICANT PROCEDURES FOR SECTION II**

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

**Item**

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

**Item**

- 23b. Self explanatory.
- 23c. Self explanatory.

Note: Applicant completes only Sections I and II. Section III is completed by Federal agencies.

**FEDERAL AGENCY PROCEDURES FOR SECTION III**

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

**Item**

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

**Item**

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

**Federal Agency Procedures—special considerations**

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

# PART II

FORM APPROVED  
OMB NO. 43-R0528

## PROJECT APPROVAL INFORMATION

### Item 1.

Does this assistance request require State, local, regional, or other priority rating?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Name of Governing Body \_\_\_\_\_

Priority Rating \_\_\_\_\_

### Item 2.

Does this assistance request require State, or local advisory, educational or health clearances?

\_\_\_\_\_ Yes \_\_\_\_\_ No (Attach Documentation)

Name of Agency or Board \_\_\_\_\_

### Item 3.

Does this assistance request require clearinghouse review in accordance with OMB Circular A-95?

\_\_\_\_\_ Yes \_\_\_\_\_ No

(Attach Comments)

### Item 4.

Does this assistance request require State, local, regional or other planning approval?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Name of Approving Agency \_\_\_\_\_

Date \_\_\_\_\_

### Item 5.

Is the proposed project covered by an approved comprehensive plan?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Check one: State ☐

Local ☐

Regional ☐

Location of Plan \_\_\_\_\_

### Item 6.

Will the assistance requested serve a Federal installation?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Name of Federal Installation \_\_\_\_\_

Federal Population benefiting from Project \_\_\_\_\_

### Item 7.

Will the assistance requested be on Federal land or installation?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Name of Federal Installation \_\_\_\_\_

Location of Federal Land \_\_\_\_\_

Percent of Project \_\_\_\_\_

### Item 8.

Will the assistance requested have an impact or effect on the environment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

See instructions for additional information to be provided.

### Item 9.

Will the assistance requested cause the displacement of individuals, families, businesses, or farms?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Number of:

Individuals \_\_\_\_\_

Families \_\_\_\_\_

Businesses \_\_\_\_\_

Farms \_\_\_\_\_

### Item 10.

Is there other related assistance on this project previous, pending, or anticipated?

\_\_\_\_\_ Yes \_\_\_\_\_ No

See instructions for additional information to be provided.

INSTRUCTIONS

PART II

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

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

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

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

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

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

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

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

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

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

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

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

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

LEAA FORM 4000/3 (Rev. 5-76)  
Attachment to SF-424

PART III – BUDGET INFORMATION

SECTION A – BUDGET SUMMARY

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

SECTION B – BUDGET CATEGORIES

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

## INSTRUCTIONS

### PART III

#### General Instructions

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

#### Section A. Budget Summary Lines 1-4, Columns (a) and (b).

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

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

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

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

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

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

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

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

Line 5 — Show the totals for all columns used.

#### Section B. Budget Categories

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

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

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

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

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

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



### SECTION C – NON-FEDERAL RESOURCES

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

### SECTION D – FORECASTED CASH NEEDS

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

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

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

### SECTION F – OTHER BUDGET INFORMATION

(Attach additional Sheets If Necessary)

21. Direct Charges:

22. Indirect Charges:

23. Remarks:

## INSTRUCTIONS

### PART III (continued)

#### Section C. Source of Non-Federal Resources

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

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

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

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

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

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

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

#### Section D. Forecasted Cash Needs

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

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

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

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

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

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

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

#### Section F — Other Budget Information.

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

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

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

#### LEAA Instructions

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

## INSTRUCTIONS

### PART IV PROGRAM NARRATIVE

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

#### 1. OBJECTIVES AND NEED FOR THIS ASSISTANCE.

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

#### 2. RESULTS OR BENEFITS EXPECTED.

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

#### 3. APPROACH.

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

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

#### 4. GEOGRAPHIC LOCATION.

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

#### 5. IF APPLICABLE, PROVIDE THE FOLLOWING INFORMATION:

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

## PART V

### ASSURANCES

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

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

APPENDIX 6

APPENDIX 2. PREPARATION AND SUBMISSION OF APPLICATIONS

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

SECTION 1. PREPARATION OF APPLICATIONS

2. STANDARD APPLICATION FORMS.

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

3. PREAPPLICATIONS.

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

SECTION 2. SUBMISSION OF APPLICATIONS

4. CONSULTATION AND PARTICIPATION WITH STATE PLANNING AGENCIES.

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

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

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

5. SUBMISSION AND PROCESSING PROCEDURES.

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

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

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

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

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

6. PANEL REVIEW PROCESS.

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

7. NOTIFICATION.

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



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

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

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

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

a. Budget Information. (Section A)

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

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

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

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

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

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

4. PART IV - PROGRAM NARRATIVE INSTRUCTIONS.

- a. Standard Form 424 Instructions require applicants to prepare a program narrative. Items 1 through 3 of the instructions essentially require applicants to answer the following five questions:

- (1) What problems are to be addressed by project activity?  
(Item 1 of Part IV)
- (2) What results are to be sought by the project for which support is requested? (Items 1 and 2 of Part IV)

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

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- 2 Impact Goal. An impact goal helps to measure the effect that the project is expected to have on crime or the criminal justice system itself. An impact goal relates therefore to project "ends" rather than project "means". To use the crime prevention example again, an impact goal might be "a 5% reduction in residential burglaries within census tract three by month eight."
- (3) How the project will work. Describe the activities that will be undertaken and the resources that will be required to support those activities. Indicate how project elements will be implemented. (A listing of key project elements usually will be found in the program description).
- (4) Steps involved in setting up and operating the project. (Grant Implementation Plan). The grant implementation plan should indicate implementation steps, operating activities, milestones, and a timetable for review of project progress. The grant implementation plan details the major steps which must be taken to carry the grant through to completion and goal achievement. It consists of two parts, a "start-up" plan and a "program operations" plan. The entire grant implementation plan should consist of a step-by-step process for completing the grant and achieving its goals. If the plan does not achieve this, it will not support an LEAA decision to fund the grant application.

  - (a) Start-up. For each of the following identify the major activities involved in starting and completing each step. If a particular step will take longer than two months to complete, divide it into substeps so its progress can be measured.

    - 1 Contract Staff/Consultant Hiring. List each staff and consultant position which is critical to project start-up program operations. Indicate the target dates for starting to recruit and fill each critical position.
    - 2 Space, Major Equipment and Services. Identify the major space, equipment and services items which must be acquired before the grant can become operational. Indicate for each item the target dates for starting and completing acquisition efforts.

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



**END**