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MARTIN LUTHER KING SCHOLARSHIP FUND

An Evaluative Report

By Patrick Borunda  
Evaluation Specialist  
Portland Model Cities

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## **I. Project Description and Explanation of Evaluation**

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## **I. Project Description and Explanation of Evaluation Methodology**

### **A. Project Description**

Martin Luther King Scholarships (CDA Project 10-05) are administered by the Martin Luther King Scholarship Fund of Oregon, Inc. (MLK), a private, non-profit organization. Funded during First and Second Action Years (1 & 2 AY) for a total of \$50,000, the project was expanded for Third Action Year (3 AY). MLK now uses \$60,000 of CDA Supplemental Funds as the basis of its \$66,113 operation. The remainder of the funds are HEW College Work Study dollars.

The long range objectives of MLK are:

1. To increase the number of college graduates coming from disadvantaged or minority backgrounds, and
2. To perpetuate the Martin Luther King Fund through other resources, both private and public, after Model Cities funding.

The purpose for which MLK is funded by CDA is "providing scholarships and books, and in some cases, work study jobs, to financially disadvantaged Model Neighborhood residents who would otherwise not be able to attend college." This pursuit is broken into two functional elements. These are:

1. Provide administration for the program, and
2. Provide scholarships for disadvantaged students.

### **B. Evaluation Methodology**

Evaluation intends to assess MLK's 1) Project Administration, 2) Impact on the Community, and 3) Resource Utilization. All assessments are in light of both project purpose and MLK's long range objectives.

Information necessary for these assessments has been gathered

over a six-week period from November 6, 1972, to December 18, 1972.

Evaluation methodology was as follows:

1. Analyze material available in CDA's Central Files, including contracts, monthly and quarterly reports, and correspondence
2. Interview staff and beneficiaries
3. Assemble data and identify shortcomings in research
4. Correct shortcomings and draft evaluation
5. Formulate recommendations
6. Finalize report

Because of the nature of reports submitted to CDA previous to Winter term 1972, most figures in this report will be drawn from calendar year 1972.

## II. Project Administration

### A. Requirements of Administration

From the 3 AY Agreement between MLK and the City of Portland, several administrative activities can be identified. These are as follows:

1. Supervise operations (presumably to insure smooth and effective delivery of services within established guidelines)
2. Prepare and maintain records
3. Submit reports as required by CDA
4. Implicitly, maintain communication with CDA to insure a coordinated approach to problems which are the operating agencies' reason for existence.

### B. Administrative Structure

Day-to-day administration is provided by a president and vice-president (office manager) of the MLK office. These officers are



selected by the six to twelve member Board of Directors from among its members.

Reporting and fiscal responsibilities of MLK are placed on the secretary-treasurer, selected in the same manner as his fellow officers.

One full-time secretary is employed.

Delegated responsibilities notwithstanding the Board of Directors retains overall control of and responsibility for Martin Luther King Scholarship Fund. It may be appropriate to note that all directors serve without pay.

#### C. Supervise Operations

MLK's supervision of operations is a source of great concern to Evaluation.

##### 1. Select applicants

Martin Luther King Scholarship Fund By-laws do not specifically describe a selection of applicants process. However, the procedure of the Fund has been as follows:

- a. receive applications
- b. send letters to applicants informing them of materials needed to complete their application files
- c. close applications and notify applicants of screening
- d. a screening committee selects recipients
- e. Board of Directors ratifies committee action
- f. notify recipients
- g. inform appropriate financial aids offices of credit awards.

Although not specifically prohibited from doing so, it has been a practice of MLK to take new students into the program

after the screening for a term is completed. If applications are in fact closed (item "c" above), it is unclear how the project's orderly functioning is encouraged by this practice.

Of a more substantive nature, this practice lends itself to violations of the MLK contract when it results in the disbursement of City funds to students not named in the requisition for advancement of funds. Section IV-A of 1 & 2 AY Agreement and Section III-A-1 of 3 AY Agreement specify that the requisition "shall set forth a student name and address and other necessary information needed by the City and a line breakdown of student expenses for which the advancement is required." This information is necessary for proper fiscal control by the City.

Specific instances of this violation are noted in Winter of 1972, when 13 individuals received funds although their names did not appear on the term's request for advancement (MLK Winter Quarter Report dated May 10, 1972). In Spring term of the same year, 20 students whose names did not appear on the request received funding (MLK Spring Quarter Report dated July 17, 1972).

This is a very serious matter since funds, once paid out, are very difficult, if not impossible, to recover.

## 2. Enforce contract requirements

In the same vein, requirements establishing a minimum number of hours to be completed per term were specified in Section II-C of 1 & 2 AY contract and are now contained in Section I-C of 3 AY contract. "All applicants receiving

scholarships pursuant to this agreement shall maintain and complete a minimum number of credit hours per term or semester in order to be eligible to receive scholarships."

During Winter term, 1972, 32 of 61 students did not complete the required 12 hours. Of these 32, 22 were re-funded for Spring term.

Of 59 students funded during Spring term, 26 students did not complete required hours. Two of these students were re-funded for Summer term. (Six later appeared on Fall term's request.)

Of 20 students funded for Summer term, six were credit-deficient from earlier terms. Seven failed to complete required hours. Four of these seven appeared on Fall term's request. Twenty-eight instances of students receiving funds after deficient terms appeared on CDA's records at the end of Summer term 1972.

When, of 65 names appearing on MLK's Fall term request, 14 were credit-deficient according to CDA records, Model Cities refused to fund these students until evidence of correction was provided. MLK provided letters and transcripts indicating that 13 of the 14 had made arrangements to deal with their deficiencies. Some had made arrangements weeks or months before, thus erasing recorded violations. On the other hand, four of the 13 had not provided any evidence of correction to MLK prior to CDA's request.

After the above letters were submitted an intense effort for records reconciliation was made by Evaluation. All availa-

ble information, however fragmentary, was utilized. Evaluation concludes that a reconciliation is not possible until and unless a complete term-by-term analysis is done of MLK's office records.

Some of the violations were accounted for when it was determined that, during Winter and Spring terms of 1972, MLK unilaterally altered their contract to allow graduate students to carry fewer than 12 hours.

The situation at this time is that a graduate student clause has been written into the contract. Further, future administrative procedure to deal with student deficiencies has been agreed upon by CDA and MLK. Yet the fact remains that credit-deficient students have, over a period of several months, been extremely expensive in corrective man-hours and that they reflect unfavorably on MLK's supervision of operations.

3. Maintain communication with and on behalf of students .

By and large, students interviewed concerning MLK felt that the relationship between students and the Fund was satisfactory. Applications were processed quickly and funds handled efficiently. Paperwork and follow-up were not a particular burden to the students.

Commentary solicited from students concerning project improvements fell into three general classes. First, the present system of book purchasing could be simplified. The system presently requires the students to submit verification from their instructors that certain books will be used. Until this is done, MLK will not issue credit slips for purchase. Difficulty in locating instructors sometimes results in students

not receiving books at the term's beginning. Students reported that often the bookstore would be sold out by the time necessary signatures were obtained.

Second, students feel that there should be a tutoring or counseling capability in the Fund administration. Evaluation must make three points concerning this student suggestion. In the first place, provision of counseling through university counseling services is a contract commitment of MLK. Also, there has been no budget provision for internal counseling capability. Given the importance of funneling dollars to scholarships, it seems preferable that MLK increase its contact with otherwise funded counseling resources, as required in their contract, rather than divert funds from scholarships. Finally, as is suggested by MLK's contract, if members of the Board of Directors will make themselves available, their experiences might be a valuable counseling resource to recipients.

The third student suggestion, from 26% of the sample, was that a more business-like or professional manner would be helpful in the MLK office.

This third student suggestion is one on which Evaluation can take no position. This information is merely passed on for the consideration of MLK.

4. Encourage the flow of resources from holders to potential beneficiaries

This aspect of operations will be addressed under the heading of Resource Utilization below.

5. Sub-summary concerning supervision of operation

- a. "In-house actions", unreported to CDA, have led to a significant number of contract violations.
- b. MLK's failure to update reports has resulted in a tangle of contract violations, possible violations, and a post facto contract change that will not be straightened out short of a complete audit.
- c. Students are generally satisfied with their relationship to the Fund. Their suggestions reflect a need for closer monitoring of operations by the MLK Board.

D. Prepare and Maintain Records

One of the key activities involved in project administration is record keeping. Substantial deficiencies were found in MLK's records.

For example, MLK reported on a questionnaire prepared for this evaluation that 491 scholarships have been awarded by the Fund. Of these, 338 have been awarded since CDA began to fund MLK in March, 1971. Yet figures submitted to CDA on past reports total 353 awards since the beginning of CDA funding. At a possible \$200+ apiece, this is a significant variation.

MLK reports that 479 students have participated in this program; 263 have participated since the beginning of CDA funding. If 491 scholarships have been granted, between 338 and 353 since March of 1971, this leaves between 153 and 168 to be distributed among 216 students.

In the period of CDA funding, 20 students are now recorded as having graduated through the MLK project. Twenty more students

have voluntarily left the program by means other than graduation. Forty-nine students have been terminated because of inadequate grades or credits. Eighty-nine students in all have passed out of the program since CDA began to provide funds.

MLK reported, on a summary separate from the questionnaire quoted above, that 105 new students have joined the original 72 recipients. Subtracting the 89 students who have left from the 177 that have participated, according to the summary, suggests that there should be 88 students currently in the program. There are 66 on MLK's Fall request. MLK has not accounted for 22 students.

One final illustration involving MLK's records is that in February of 1972, MLK responded to a questionnaire sent by CDA's Social Coordinator at the request of the Mayor's Office. At that time (Winter term) MLK indicated that 8 recipients had graduated. In the questionnaire completed for this evaluation (and quoted earlier in this section) MLK included a list of graduates. It contained 15 names and graduation dates prior to Winter term of 1972. Which record should CDA accept?

CDA has accepted the newest material submitted for this evaluation. Yet, in reviewing it, Evaluation is forced to conclude that MLK has not maintained complete records of its transactions.

#### E. Submit reports

MLK's reports have been a major problem. They have been late, incomplete, inaccurate and, at times, incomprehensible.

##### 1. Reporting

MLK's reporting responsibilities were outlined in Section

IV-a. and d. of 1 & 2 AY Agreement. Currently they are contained in Section III-A-1 of 3 AY Agreement and Section VII of Exhibit A attached to that Agreement.

Briefly, MLK is required to submit a "written requisition for advancement of scholarship funds." This evaluation will refer to this as a "pre-term report" since it must contain student names and addresses and arrive "prior to the start of each quarter or semester for which funds are to be used."

MLK is also required to submit a "post-term report", or quarterly report, on dates specified in the current contract. These quarterly reports were individually requested in 1 & 2 AY under item IV-d of that Agreement.

Finally, MLK is required to submit monthly reports not later than the fifth working day of the month. Although narrative portions of the monthly reports were foregone by CDA in 1 & 2 AY, both narrative and fiscal portions are required in 3 AY.

## 2. Pre-term reports

MLK's pre-term report for Winter of 1972 identified 56 students who were to receive funds. A comparison of that report with the post-term report indicated that 61 students were actually funded in Winter term; eight students scheduled to receive funds did not receive them and, as earlier noted, 13 students whose names did not appear were funded. Further, the list, out of alphabetical order and with given and surnames in mixed order, contained no addresses.

Spring's pre-term report requested funds for 42 scholarships.



When the pre-term report was compared to the post-term report, three students scheduled to receive funds had not received them, 20 students whose names did not appear on the request had received funds. Further, three students who were scheduled to receive only a \$25 incidental fee received full tuition grants plus money for books. And again, addresses did not appear.

MLK's Summer pre-term report was due at CDA on June 12, 1972. CDA reminded MLK of the requirement on June 26, 1972 and instructed them that their funds were being held. The report was forthcoming on June 28, 1972. Funds were released although the report was not complete.

Despite having their funds frozen in Summer term, MLK's Fall term report did not arrive until October 13, 1972 - three weeks after registration. Again it was incomplete. CDA specifically requested that missing student addresses be forwarded on November 15, and they were received on November 22, 1972.

### 3. Post-term reports

As provided for in 1 & 2 AY Agreement, CDA requested on November 29, 1971, that a detailed post-term report for Fall term, 1971 be sent to Model Cities not later than January 5, 1972. While a form of the report was submitted, the only evidence of it that Evaluation found in Central Files was a note that the report was not in the form agreed upon with MLK, nor was the information adequate.

On April 10, 1972 a detailed quarterly report on Winter

term was due. CDA reminded MLK of this requirement on March 22, 1972. It did not arrive until May 10, 1972.

On July 10, 1972 a detailed quarterly report was due for Spring term. CDA reminded MLK of this report on June 19, 1972. The report did not arrive until July 17, after MLK was warned that their funds could be withheld.

Summer term's report was due on September 10, 1972 according to the MLK contract. It arrived at CDA on October 13, 1972.

#### 4. Clarity of reports

In addition to reports being late, inaccurate and incomplete MLK has presented Model Cities with reports that have been, frankly, incomprehensible. The following is an excerpt from a CDA request for information from MLK dated July 27, 1972:

A comparison of the fund request (Spring term) with the Quarterly Report shows the following:  
a) Funds were requested for forty-two (42) students. CDA did not pay the full fund request due to lack of sufficient dollars in MLK's budget, but instead advanced enough money for approximately thirty-six (36) scholarships. Although forty-two (42) were requested and only thirty-six (36) advanced, somehow the MLK fund granted fifty-nine (59) scholarships. The monthly report for the period March 1, 1972 to May 31, 1972 shows that ... MLK chose to overspend \$4,300 in the miscellaneous category (scholarships)...

#### 5. Sub-summary concerning reports

- a. MLK's record keeping system is inadequate to the task of maintaining information required for reports.
- b. MLK's reports have consistently been inaccurate or incomplete.
- c. MLK's reports have consistently been late in arriving at CDA.

d. MLK's reports have been inadequate in providing information required for project monitoring.

F. Maintain Communications with CDA

With regard to the implicit responsibility of MLK to maintain communications with CDA, lack of communication has severely strained relationships between the two agencies.

For example, the MLK contract for 1 & 2 AY limited aid to \$206.25 per term or \$309.37 per semester per student. In the 1971-72 school year, tuition was increased \$30.00 per term.

MLK did not request a contract change.

As a result, when HUD performed a partial audit of MLK in the Spring of 1972, they noted 49 overpayments in their 37 student sample. These, of course, became the responsibility of CDA.

Changes affecting agency operations must be reported to CDA if compensating action is to be timely and effective.

Evaluation examined CDA files attempting to determine if the faulty communication originated, wholly or in part, at CDA.

Although some weaknesses in CDA's monitoring were noted, Evaluation discovered that CDA has dispatched to MLK an average of slightly more than one special request or directive concerning contractual obligations per month since October 4, 1971. These special requests or directives have gone out over the signatures of Social staff, Evaluation staff, Administrative staff and, in fact, that of the CDA Director.

G. Conclusions Concerning Project Administration

Project administration involves supervising operations, preparing and maintaining records, submitting reports as required,

and implicitly, maintaining with CDA a coordinated approach to problems which the operating agency is designed to correct.

Martin Luther King Fund's project administration has been unsatisfactory to date. Supervision of operations has been conducted in a manner that has failed to prevent contract violations. Violations are then difficult to correct because of inadequate records and confusing reports.

CDA's control over funds with which it is charged has been challenged by "in house" decisions and, in two cases, unilateral contract alterations (graduate student credits and maximum amounts payable).

Effective "preventive maintenance" by CDA has been made doubly difficult by the necessity of constantly requesting information that should be provided both by contract and by virtue of the agencies' mutual commitment to aiding disadvantaged students.

It appears that correction of project administration can be effected by the threat of withholding funds. However, it is clear to Evaluation that if this is necessary more than once or twice, then CDA should consider locating a new project administration.

### III. Impact on the Community

An assessment of the impact of the MLK Scholarship Fund is not yet truly possible. The real effect of education is accumulating "access" which will be used over an extended period. Yet, insofar as figures measure impact, we can evaluate MLK in the short run.

#### A. Scholarships and Graduates

Approximately 491 scholarships have been awarded by MLK since the Fund began in 1968.

Seventy-eight percent of these scholarships have been used at

Portland State University. The remaining 22% have been distributed among ten other schools. Portland Community College, Pacific University, and University of Portland have received the bulk of these.

Approximately 353 scholarships have been awarded in seven terms of CDA funding. Twenty students have graduated during this period.

In a survey prepared for this evaluation (sample = 30%+ of current recipients) 43.4% of the sample indicated that without MLK funding, they would not have been able to remain in school. If this percentage holds across the entire service population then the impact of MLK can be regarded as significant.

#### B. Limitations on Impact

However, several notes should be made on practices which are regarded as impact limiting by Evaluation.

##### 1. Means of information distribution

Four out of five students interviewed indicated that they were informed of MLK scholarships by friends. This was as opposed to 1) high school or college counselors, 2) educational or public media, 3) school postings. Particularly with regard to MNA residents seeking to resume their education after a period away, the reliance on friend-to-friend communication limits MLK's impact.

##### 2. High school contact

MLK reports almost no activity in the area of high school contacts. Insofar as this should be the primary source of MLK recipients, potential impact is reduced to the degree that public school students are not informed of MLK's availability.

##### 3. Racial distribution of recipients

At the request of Evaluation, CDA's Information Systems used OEO's Poverty Guidelines to relate family incomes to family sizes in the MNA. This allowed them to determine the percentage of MNA families below poverty level. The figures were then cross-tabulated by race to determine that 14.8% of the families in CDA's data bank (7.3% of MNA residences) were non-Black families of eight or fewer below OEO's poverty level. Black families of eight or fewer below poverty level were 16.6% of the sample.

When the reader further takes into account that 53.2% of the sample is non-Black as opposed to 46.8% Black, it appears that the need for scholarship aid, in absolute terms, is as great for non-Blacks as Blacks in the MNA.

Martin Luther King Scholarship Fund has granted two scholarships to non-Blacks (brother and sister) in the memory of the MLK president, who has been with MLK since its inception. Evaluation regards this practice as impact limiting.

Although Section I-A-5 of 3 AY Agreement indicates that preference will be given to minority applicants, it is clear that if this is interpreted as exclusionary it becomes subject to HUD General Conditions (Exhibit "B" in MLK's 3 AY Agreement) which takes precedence over any conflicting condition in the contract. Section 107-B of the General Conditions prohibits denial of participation in, or benefit of, any project or program for reasons of race, color, religion, or national origin.

#### 4. Funding of non-MNA students

The benefits of CDA funds have been diverted from the Model

Cities by the MLK practice of funding non-MNA residents.

Residency requirements for MLK recipients were established in Section I of 1 & 2 AY Agreement and are currently in Section I-A-4 of 3 AY Agreement. On the questionnaire prepared for this evaluation, MLK indicated that there have been 43 non-MNA recipients funded in 1971-72.

Evaluation accepted this figure but now believes that it should probably be much higher. When CDA requested addresses for Fall term recipients on November 15, 1972, MLK reported on an attached summary that there were 10 non-MNA residents on the list of 66. However, when the main body of the list was checked, 18 non-MNA residents were found. MLK was only generally aware of the Model Cities boundaries.

Although these students may be deserving in every other way they are not eligible to use Model Cities dollars.

#### 5. Referrals

MLK reports that they have received 349 applications for scholarship aid. Using the figure reflecting most favorably upon MLK, there have been 263 students participate in the program. This suggests that MLK should have made at least 86 referrals to fulfill their obligation to assist students to obtain alternative funding (Exhibit A, Section II - Activities 2-5 and 2-10). From admittedly incomplete records, Evaluation found 22 referrals; two of these in a term when, from 100 applications, 66 students were selected.

#### C. Conclusions Concerning Impact on the Community

Although the impact of MLK has been significant, it has been

restricted. Particular problems are as follows:

1. Almost all MLK scholars have been informed about the program by friends rather than through public channels.
2. MLK scholars have been almost exclusively Black. Figures communicating a racial distribution of need suggest that at least several recipients should have been from other racial groups.
3. Non-MNA residents have been funded with Model Cities funds.
4. MLK has not made a practice of referring students in need to other sources if MLK funds were not available.

#### IV. Resource Utilization

##### A. Distribution of Resources Within the Project

MLK receives \$60,000 of its \$66,113 budget from CDA (HUD Supplemental Funds). In 3 AY, 19.3% of their total budget is being utilized for administration (all non-scholarship functions). If salaries paid teacher trainees are regarded as scholarships, then the Teacher Training Project uses 18.3% of its budget for non-scholarship functions.

MLK's administrative budget percentage is up from 17% of the total budget in 2 AY. Care must be taken in a program of this nature to keep administrative costs as low as is reasonable since an administrative dollar's alternative use is a student scholarship.

##### B. Seeking Additional Funding Sources

One of the long-range objectives of MLK, the reader will recall, involved resources and their acquisitions. MLK seeks to "perpetuate the Martin Luther King Fund through other resources, public and private, after Model Cities funding."

On November 22, 1972, Evaluation requested that MLK provide CDA



with information concerning the level of contributions MLK receives. At the time that this final draft is being prepared (December 18, 1972) the information has not arrived at CDA. Although lacking desired documentation, Evaluation can nonetheless report, from conversations with several MLK directors, that MLK's fund raising efforts have been minimal since CDA funding began.

If the MLK program is contained in its long-range objectives, then fully half of the program has been, in the main, inoperative.

#### C. Coordination with Other Agencies

One aspect of maximum resource utilization is coordination with other operating agencies providing similar services.

Although MLK has been reminded of the importance of coordination in the past, their Fall term, 1972 request contained two individuals receiving aid from other CDA funded program. When informed of this, MLK, as it has in the past, indicated that it would coordinate with Operation Step-Up and would, in addition, open communications with Teacher Training Project.

Given the level of need in the community, there are not sufficient resources to multiple-fund any one person.

#### D. Funding of Graduate Students

Martin Luther King Fund's purpose is providing aid for "disadvantaged students".

Does "disadvantaged" refer to inherent qualities in the students, or does it refer to the students' starting point in economic and social competition? If it is the latter, then a student doing graduate level work is probably no longer "disadvantaged". His competitive position is substantially better than that of many of

his fellow citizens.

Evaluation suggests that the funding of graduate students is not the most effective utilization of scarce resources. Model Cities resources are charged with providing access to the larger society for a great number of people. It does not seem reasonable to provide a graduate level education to the few when so many are striving just to gain a foothold in higher education.

#### E. Conclusions Concerning Resource Utilization

1. Allocation of resources to various project functions is acceptable.
2. For a long-range objective, the obtaining of additional resources has received inadequate attention since CDA funding began.
3. MLK's coordination with other operating agencies is inadequate at this time.
4. Funding of graduate students is a questionable practice given the level of need in the community.

#### V. Conclusions and Recommendations

The scholarship project concept is an important one with great potential impact on the lives of MNA residents. Unfortunately, to date, Evaluation cannot report that Model Cities residents have received benefits commensurate with their expenditures.

In the opinion of Evaluation, the primary problem in MLK's stewardship has been the failure of the Board of Directors to monitor the Fund's activities.

This opinion is based on several related observations. First, Fund activities have proceeded without a properly planned program based

on long-range objectives. Second, there has been no appreciable growth in the expertise of MLK functionaries. Third, despite interruptions of resources flowing from CDA, there has been little change noted in the degree of contract compliance by MLK.

A. Project Administration

MLK's project administration has been unsatisfactory. Evaluation recommends the following:

1. That the MLK Board familiarize itself with MLK's contract with the City. Further, that they establish an effective internal monitoring system.
2. That MLK allow CDA Planning and Evaluation to help them in establishing an effective work schedule based on the project's long-range objectives.
3. That MLK request, from CDA Information Systems or some other equally qualified group, help in establishing an effective record-keeping system.
4. That CDA categorically refuse to accept a report from MLK that is incomplete in any way.

B. Impact

In order to increase the impact of CDA educational dollars, Evaluation recommends the following:

1. That a regular program of public information be prepared by MLK. Cost would be very, very small if current recipients and directors are utilized. Particular attention should be paid to informing MNA high school students and teachers.
2. That the above program should include, in each presentation, that the scholarships are available to all students regardless

of race, color, religion or national origin.

3. That the MLK Board of Directors and Selection Committee familiarize themselves with the Model Cities boundaries and restrict their distribution of Model Cities dollars to individuals having a claim to Model Cities residency.
4. That MLK establish and maintain communications with other financial aid sources, public and private. Further, that MLK make a practice of referring all students not receiving MLK funds to an alternative source.

C. Resource Utilization

MLK has access to some very important CDA dollars, those relating to education. CDA dollars are not plentiful nor will they always be available.

MLK's charge is to properly disburse these funds today; and, through their effective use of resources, build the kind of reputation that will allow their important project to attract support for tomorrow. To these ends Evaluation recommends:

1. That MLK establish an ongoing program of funds acquisition and that records of funds acquired be kept separate and distinct from those involving CDA dollars.
2. That CDA require MLK, as well as Operation Step-Up, Teachers Training and any other similar project that might receive CDA funding in the future, to submit to CDA carbon copies of pre-term lists sent to one another as a precaution against multiple funding of students.
3. That CDA request guidance from the Citizens Planning Board and Education Working Committee on the funding of graduate students.

#### **D. General Recommendations**

In view of the difficulties of achieving service delivery through MLK, Evaluation recommends:

1. That CDA immediately assume control of scholarship operations if any contract violations come to its attention in 3 AY. Contract violations are here interpreted to include late reports.
2. That CDA prepare a general description of a scholarship program for Fourth Action Year. Further, that CDA make this description available to potential operating agencies and invites them to submit project proposals to CDA Planning.
3. That Martin Luther King Fund of Oregon, Inc. be invited to submit a project proposal with the other potential operating agencies. Further, that MLK's proposal be considered without prejudice, for or against, by CDA Planning.

#### D. General Recommendations

In view of the difficulties of achieving service delivery through MLK, Evaluation recommends:

1. That CDA immediately assume control of scholarship operations if any further contract violations come to its attention in 3AY. Contract violations are here interpreted to include late reports.
2. That CDA prepare a general description of a scholarship program for Fourth Action Year. Further, that CDA make this description available to potential operating agencies and invites them to submit project proposals to CDA Planning.
3. That, only subsequent to a complete audit by CDA or its representative, Martin Luther King Fund of Oregon, Inc. be invited to submit a project proposal with the other potential operating agencies. Further, that at that time MLK's proposal be considered without prejudice, for or against, by CDA Planning.