In the beginning of this program (as is true in almost any other) difficulty was experienced in filling staff positions. As of June 30, 1965 about one-half of the authorized positions were unfilled. By the end of March 1967 about one-fifth of the positions were vacant. Despite staff shortages, it has been possible to operate the program effectively as shown by the fact that as of April 30, 1967, 61,000 spaces were filled.

Faced with staff limitations innovative approaches have been tried in order to assure proper supervision of trainees involved in work experience and other project activities. One of these is the use in Eastern Kentucky of selected Title V trainees to serve as crew foreman to oversee other trainees engaged in work experience. One foreman is assigned responsibility for supervision of a crew consisting of 10–20 trainees. A two-week foremanship (crew chief) course is provided under contract with the University of Kentucky. This use of crew chiefs has resulted in better supervision to assure that the work experience is actually instilling good work habits.

7. Sparing use of private employers for on-the-job training

Private employers have been used in Title V projects and the results have been outstanding. An informal survey in which approximately 85 percent of the returns have been received to date shows that 1,130 trainees have gone into employment of which 660 (58 percent) were employed by their private employer sponsor and 470 went into other employment. At least 3,000 Title V participants are currently in training with private employers.

Some projects using private employers as sponsors of training units are:

Connecticut:

Oil heating industry skills

Denver County, Colo.:

Automotive repairing

Washington-Knox-Hancock-Waldo-Kennebec County, Maine:

Canning and cabinet making

Acadia-Jefferson Davis-Vermilion Parish Project, Louisiana:

Auto servicing and repairing

Cleburne Six County Project, Arkansas:

Food locker and storage service
Auto repairing

19 County Project, Kentucky:

Small engine repairing
Auto glass installation

Cook County, Ill.:

Taxicab operation and National Cash Register

As Dr. Levitan has noted, the use of private employers is not authorized under Section 409 of the Social Security Act on which the Title V program is based. Therefore, it has been necessary to grant a waiver for this purpose. Such waivers have been granted since April 1965 on the basis of the policy decision quoted in Dr. Levitan's paper. In order to avoid any exploitation of Title V trainees, however, the following safeguards are required:

> The public welfare agency must provide assurance that such training is constructive from the standpoint of upgrading the employability of the participants and that participants are not exploited as a source of free labor. The training period should be reasonably related to the nature of the job. The participant is not to be given tasks other than those associated with the duties of the skill he is learning. As in all of our units under Title V, participants in training with private employers may not displace or adversely affect regular employees (including substitute workers) or additional workers who would otherwise be hired.

Despite such caution, a complication has arisen in connection with the implementation of the 1966 Amendments. The Department of Labor has raised question about Title V placements with private employers being in violation of the Wage and Hour Law. At this point, the Department of Labor has concurred in the use of private employers only for a 90-day period while the matter is under review.