

fiscal purse tightening, but they need saying because it appears to us that the Office of Education has not been completely frank with you in its previous testimony. I sympathize with OE's reasons for reticence, but I am free of restrictions. In our opinion, the present USOE staff is being asked to do too much, and therefore to do it less capably than they are able.

Let me now pass to a second issue. We have noticed, in reading the testimony already presented to this Committee, the care with which the Committee has been investigating the systems through which the Office of Education obtains advice and consultation on general policy and on the award of the specific contracts and grants. I would like to suggest a third area concerning which this Committee may wish to inform itself: the procedures through which the Office of Education *develops guidelines* for the implementation of new legislation. It is in the process of drafting and applying guidelines that the dreaded spectre of "federal control" may best be discerned, or more accurately, from with the spectre will emerge *if* it ever emerges. In enacting legislation, Congress goes to great lengths to avoid provisions which would lead to "control" of local and state educational activities. Similarly, the system which USOE uses to award grants and contracts is eminently fair and rational; the grumblings about it which are occasionally heard stem largely from discontented applicants who have been denied funds for sound reasons.

However, in its efforts to avoid federal control, the Congress often enacts legislation which requires, for purposes of implementation, a good deal of administrative specification of what may or may not be done under the new law. There is a tendency in all bureaucratic organizations to routinize and to regularize; there is, therefore, a tendency for guidelines to emerge which effectively stifle the very diversity and experimentation which Congress, and the higher echelons at USOE, wish to encourage. Complicating the situation is the great pressure of time and politics under which guidelines for most new programs must be worked out, a pressure which does not encourage flexible and creative thinking on the part of the officials charged with very difficult tasks. Under this pressure, it is inevitable that a relatively small number of outside advisers and consultants can be involved in the process, and that the advisers thus involved will come from a narrow band of persons with whom the harried officials are acquainted and comfortable. The consultations which result are neither as unhurried nor helpfully critical as they might be.

As result of these circumstances, guidelines often appear which afford the potential applicant virtually no time really to plan his proposed program, in view of the deadline confronting him. We find in some guidelines, too, that arbitrary decisions, which USOE officials later agree are unwise, are fixed into USOE procedures for a year or for one "round" of project applications.

I wish to make several simple suggestions for the consideration of this Committee which are addressed to some of the problems just discussed. First, USOE desperately needs, and should be authorized to obtain, a larger staff. Second, the career and professional opportunities of working in the U.S. Office of Education should be enhanced, so that the nation is assured of obtaining the best possible men and women to work in this crucial agency. In this respect, we endorse Secretary Gardner's proposed reorganization plan, which we know about only from the press. The designation of the Office of Education as a separate "department" within the Department of Health, Education, and Welfare would not only give stature to the agency; it would also result in a meaningful Civil Service upgrading of the entire staff. Third, I wish to suggest that the present procedure of approving HEW appropriations in August or September is seriously detrimental to the operations of the Office and to the efficacy of the programs which the Office sponsors. USOE, through Commissioner Howe, has already made its feelings clear on this matter, and we wish only to underscore the urgency of the situation. Finally, a good deal of the hectic atmosphere at USOE, and a good part of the feelings of insecurity which USOE-supported projects and agencies experience, might be alleviated if USOE were permitted by Congress, or if the agency used the authority which it now possesses, to enter into more than year-to-year agreements, on either a contract or a grant basis. We are confused about USOE's present authority in this area, and I do not wish to go further except to say that other Government agencies seem to have fewer inhibitions about entering into agreements for longer than 12 or 15 month periods.