

This complaint is substantiated by evidence found in the following exhibits:

*Exhibit B:* Griffin-Spalding County Board of Education, pages 12-13.

*Exhibit G:* Griffin-Spalding County Board of Education, page 26.

*Exhibits N, O, P* which are exact replicas of arbitrary memoranda, found on pages 46-48.

4. Administration of certain Federal laws by personnel not fitted for this responsible position by either training, experience or comprehension.

Specific reference is made to the administration of the provisions of the Civil Rights Act of 1964 which refer to the desegregation of schools. Education as a profession is entrusted with the responsibility of both practicing and teaching efficiency and effectiveness. Nothing can be more disruptive and detrimental to the administration of educational programs by professionals than to have totally unqualified people advising, admonishing and even intimidating these responsible school people. This situation has been imposed upon school officials throughout Georgia.

Abundant evidence exists to substantiate the complaint that many representatives from the Office of HEW do not possess the necessary qualifications to properly administer the delicate provisions of the Civil Rights Act applying to our public schools.

5. Use of administrative practices and tactics which are unprofessional, ineffective, and highly detrimental to the educational processes.

An examination of the abundance of available evidence testifying to the aforementioned practices by representatives of the Office of HEW strongly suggests that never before has such a comprehensive and potentially fine a program been so ineffectively administered.

Special attention is called to the following administrative practices by HEW officials:

(1) Lack of any consistent system of communications with local school officials concerning their problems, shortcomings, etc.

(2) Use of form letters to call attention to deficiencies and unacceptable practices. It is readily concluded that such letters cannot possibly serve to communicate judgements and instructions to several school systems which differ appreciably in many respects.

*Exhibit M:* This exhibit, which is a form letter and found on pages 46-48, is representative of the practice mentioned above.

(3) Lack of fixed responsibility and direct lines of communication.

*Exhibit L:* This exhibit, found on page 42, testifies to the confusion experienced by one system superintendent.

(4) Use of the telephone by HEW officials for transmitting judgements concerning compliance with HEW Guidelines by local school officials. Innumerable school officials have stated to me that upon receipt of such calls, they requested that the communication be reduced to writing and forwarded to them. This was either not done or done so belatedly that it contributed to the complaint registered in this instance.

6. Practice of issuing memoranda, usually in long-hand, labelled as "Suggested Amendment to Desegregation Plan" by HEW field representatives.

*Exhibits N, O, P* found on pages 46-48 provide copy of memoranda in question.

An examination of these exhibits reveals an absolute disregard for even the provisions of the guidelines as promulgated by the Office of HEW, to say nothing of the provision of the Civil Rights Act of 1964. These memoranda have seriously impaired the good relationships which should and must exist between all agencies responsible for the administration of public school systems.

7. Practice by HEW representatives of by-passing school officials upon visiting in a school community to determine the degree of compliance with HEW guidelines.

This widespread practice violates any code of ethics and further characterizes those engaging in such practice as lacking the necessary qualifications for the responsible position which they hold.

Furthermore, and most disturbing, is the fact that these tactics result in HEW representatives confronting school officials with arbitrary and unfounded opinions garnered from a few hand-picked citizens of the community and declaring them guilty of unsatisfactory compliance—*guilty until proven innocent*. This despicable practice violates one of the basic tenets of our American way of life.