

3. Time factors—employing a staff, deadlines for budget determination, future appropriations, etc.
4. Shortages of qualified personnel to meet program needs.
5. Delays on program information and USOE decisions.
6. Project development and approval frustrations.

II. FEDERAL STATE—LOCAL RELATIONSHIPS

The school boards of Wisconsin, individually on a widespread basis and collectively by majority decision, are concerned about and opposed to the extension of the U.S. Office of Education as it reaches down and out to the state and local educational provinces.

1. The local boards prefer to have their State Department of Public Instruction as the intermediary between local education and the federal government.
2. Local boards are disturbed by the ever extending local infringement by the U.S.O.E. Boards object to subjecting their decisions to non-school organization sanction as in the case of community action agencies. They are also disturbed by the siphoning off of public funds to support private or non-school organization program in competition with local public school programs.
3. Local Wisconsin boards have confidence that their State Education Agency can serve and administer the federal programs. We feel that the Congress could assign a greater State Agency role in the federal programs. If the states aren't capable of this assignment, then correct those deficiencies but not ignore the competent agencies.
4. Local school boards are convinced that the USOE programs and guidelines would be more easily implemented and understood if local board members and superintendents could have counseled during the development stages.

III. PUBLIC SCHOOL ADMINISTRATION FOR EDUCATION PROGRAMS

Wisconsin is somewhat unique with its historic dual (Public education and vocational education) system which does affect local public (grade 1-12) education. In our state the vocational system is now becoming a statewide post-high school system, but federal legislation has prevented some of the historic vocational programs from being relegated to the public schools (Smith Hughes, etc.).

Also, our boards are concerned about the trend toward a proliferation of jurisdictions in local education programs.

1. Local Wisconsin school boards want programs and funds for elementary and high school education programs to be allocated directly to and distributed by the State Superintendent.
2. Wisconsin boards want their State Superintendent to be recognized officially in the design and promulgation of any educational preparation or training for youth below grade 12.
3. Proposed guidelines for Title III (PL 89-10) contemplates grants for "dual enrollments", "studying ways to improve the legal and organizational structure for education", "Making available—educational equipment and especially qualified personnel—to public and other nonprofit schools", and "providing mobile educational services" and "proposals shall include evidence that representatives of appropriate culture and educational resources have participated in the planning and will participate in the operation." These broad references and provisions are further alarming when considered as being a direct independent local organization contract with the USOE and little State Superintendent involvement or correlation.

IV. PROGRAM ADMINISTRATION

Some Wisconsin school districts are becoming involved in more than one federal program and in some cases more than one under Title I of P.L. 89-10. The planning, drafting, administration, etc. is extensive and may involve, concurrently, services to more than one program by individual staff people.

1. Wisconsin boards are most anxious to have the law or guidelines modified to allow local board to allocate a fixed sum or percentage from each federal program to an administrative fund or pool from which to employ and pay for defined administrative services under these programs. This would avoid the arbitrary separation of administrative personnel service and charges among various programs with the resulting accounting and assignment complexities.