

which could carry numerous aid channels. In this way, existing programs could be consolidated under the most effective existing channels with a minimum of change and organization.

3. We strongly urge you to give serious consideration to the principle whereby all federal educational programs available to the states would be administered by a single federal agency rather than multiple federal agencies and whereby an educational agency or agencies in each state would be designated as the administering agency for these programs. Examples of programs for which this principle would be applicable are the pre-school program and the adult basic education program under the Office of Economic Opportunity.

4. Our school year starts with an upswing in September and ends with a downswing in June. Educational planning for this period must be done at least three to six months in advance. This lead time is necessary not only for recruitment of personnel, but also for action to be taken on educational programs by local school boards and school electors during the annual school meetings in July. Crash programs initiated after the beginning of the school year and late appropriations cause problems.

For what are probably good and valid reasons, guidelines from the Office of Education are usually not developed and finalized until after the authorization and appropriation of funds by the Congress. As I am sure you are aware, this practice causes additional time lags and sometimes results in the hasty development of administrative guidelines prior to consultation with state and local agencies. Moreover, the prescriptive guidelines and administrative controls of the Office of Education oftentimes tend to over-reach what seems, upon intensive reading, to be the intent of legislation.

Programs and administrative guidelines developed under the press of time sometimes require precipitous changes at the federal level. Although such changes can be made quickly and effectively at the federal level, follow-up at the state and local levels cannot be accomplished so expeditiously. Commitments already incurred by contractual relationships and programs already initiated are not so easily or quickly altered.

5. Many local districts are already over-taxed. In fact, the poorer ones that need federal assistance the most can become over-burdened with the dollar-matching requirements of federal aid programs. Dollar matching strips such local districts of the fiscal ability of adapting their educational programs to local needs. Carried to an extreme, state and local agencies may well become follow-up agencies for federal programs rather than agencies with the goal of closing educational gaps at the local level. We must encourage and maintain local responsibility and initiative and enhance the quality and quantity of the whole educational endeavor at the local level, rather than therapeutically treat only the most serious symptoms of our educational deficiencies.

6. We support the conversion of Title III of the Elementary and Secondary Education Act to a state-plan operation which will permit each state to administer its plan of supplementary services and centers. We maintain that the primary responsibility of providing general services to local districts should rest with the state agency and the local school district.

The only reference to the state role in the proposed guidelines for Title III is the following:

*"118.49 State educational agency review and recommendations.*

*"In order to afford state educational agencies a reasonable opportunity to review and recommend project proposals submitted within a State, the Commissioner will not take final action with regard to any project proposal, nor will the Advisory Committee on Supplementary Educational Centers and Services make its final review of any project proposal, until 30 days after the applicable deadline date established by the Commissioner for the filing of project proposals by local educational agencies."*

The direct federal-to-local administration of the existing Title III program bypasses fundamental state responsibility and thereby sets a questionable precedent. If, in fact, the federal interest in the stimulation of *exemplary demonstration programs* should be maintained as part of the Title III package administered by the U.S. Office of Education, the relationship of Title III and Title IV which now finances regional laboratories, and research and demonstration centers must be explored.