

[APPENDIX A]

ADMINISTRATIVE RELATIONSHIPS AND CONCERNS

1. The relationship and responsibility between regional offices and the Washington office are not clear; as a result, most of the state agency's contacts are with the Washington Office of Education.

2. Administrative procedures and guidelines may, from time to time, be hastily conceived. For example, Title I guidelines were revised two or three times while the program was being initiated. It is also apparent that fiscal 1967 guidelines will not be finalized until December or January. We recognize that late Congressional action may have an effect on the development of guidelines. While difficult to achieve, we would hope for maximum participation of state agency staff in the development of guidelines and mandatory administrative procedures.

3. Administrative procedures in federal guidelines often seem to place high priority on compatibility with federal procedures without needed flexibility for state and local administration (i.e. letter of credit freeze requesting program balance in middle of a month rather than end of month or quarter).

4. Peak loads of state and federal reporting occurs at the beginning and end of the school and fiscal year. Increased program reports at these times taxes the performance of local and state agencies. The incidence of late or delinquent reporting has increased significantly the past two years.

5. Approval of fiscal operations by the U.S. Office of Education, such as intra-state re-allocation, ratable reductions, ratable increases, should be left in the hands of state agencies in order to avoid time lags and to expeditiously make funds available for program operations.

6. Technical assistance from the U.S. Office of Education depends upon personnel from the Office of Education thoroughly understanding the legal and administering operations of each state. For numerous reasons, personnel from the U.S. Office of Education are not always familiar, nor possibly can they be with impact at the state level. For this reason greater reliance should be placed on the state to administer within the intent of Congress and within existing state channels.

7. Communication is one of our most critical problems. Various sources many times provide a series of conflicting interpretations. We believe there is a great need for the U.S. Office of Education to provide prompt, comprehensive, official communications on program changes, authorization, entitlement, etc. Up-to-date official information is essential for common understanding.

8. Upon occasion we find gaps in policy and administrative action. Probably this cannot ever be totally overcome, it should be minimized to the greatest degree possible.

9. Whether fact or fiction, there seems to be some inclination to believe regulations and guidelines are developed to secure compliance with the intent of Congress based upon performance compliance from the agencies least able to perform. Individualized *general state plan* procedures can be developed to meet unique and individual state abilities. *State plan* procedures are preferred by us to federal administrative guidelines.

10. One of our most formidable problems in the State educational agency is responding to requests for information. Not only do we have definition problems, multiple collection of same information (dates and data conflict can cause the collection of the same information within 15 to 30 days). While it would be a great asset to know everything, increasingly it is apparent this is not possible. Our problem, state and federal, is to collect data which is significant and meaningful within a total system approach with maximum compatibility between state and federal systems.

11. Education program efforts are rapidly expanding. It is, and promises to become, a large effort. We believe serious policy decisions need to be made as to responsibility for given areas of our total effort, if duplication of effort is to be avoided and maximum compatibility between local, state and federal efforts are to be achieved.