

In other words, the administrative decision to follow up on this change at a local and State level requires additional time. I have a couple of examples, letter of credit, and a few other things.

In dollar matching, we feel many districts are already overtaxed. When we put dollar matching on categorical paths, we begin to tax the local agencies, and it strips them of fiscal ability to fulfill educational needs at the local level. In a sense we become kind of a followup to a Federal program. If we carry this to the extreme of the categorical paths, I think we are going to become followup agencies rather than meeting the needs you indicate we should.

We would support the conversion of title III to State plan operation and if you want to question our attitudes on this, I will define them for you.

I would like to emphasize two things in title III. One is the fact that it is concerned with supplementary centers and services, and lists such things as physical education, academic programs, sciences. We maintain that these kinds of services ought to be the responsibility of the local State agencies to fulfill.

Now, the second aspect is a secondary and exemplary program. I think the emphasis has been heavily on the innovation aspects. I suspect there is a stronger relationship to that focus or that thrust than to title IV through the demonstration programs there to the regional labs and so forth than there is to the previous concept of supplementary services that are needed by the children in the district.

It is an area where we feel strongly we would like to have a stronger involvement in the administration.

Now, as far as ERIC is concerned in title IV, ERIC is developing, there are some subcenters funded and so forth. We would believe in the dissemination of research information; there is a vast need, as we see it.

The State educational agency has the liaison and the light now and somewhere in this network, this hookup, the State educational role ought to have a function within ERIC.

Also—and the last point I would like to make, I am going through these hurriedly so you can react with me if you wish—with regard to the guidelines in this prescription, I would like to cite the one thing I enumerated. The current guidelines will have it in some addition to the guidelines of last year, and some things like this give us concern.

In item G of title I, let me quote: "Such reports shall include a disclosure of any allegations which may be made by local educational agencies or private individuals or organizations of actions by State or local educational agencies contrary to the provisions of title II of the act or the regulations in this part, a summary of the result of any investigations made or hearings held with respect to those allegations and a statement of the disposition by the State educational agency of those allegations," et cetera.

I think we have some concerns about the kind of statement in guidelines like this. What does this mean? Our house counsel tells us that an allegation is otherwise "hearsay." It leads us to feel that we are being used almost in a sense of enforcement concerning some kinds of problems that might develop concerning guidelines which could cause us some problems.