

tion will maintain a good network of informal communication. Information obtained through that can then be used as a part of the program reviews conducted by the Division of Program Operations.

2. On page 8 the limitation of the amount of grant to 30 percent of the amount budgeted by the local education agency, may adversely affect communities with large parochial school systems. Is there no way in which an account can be taken of their expenditures.

3. The discussion in the first full paragraph on page 10 takes what seems to be to me an unrealistic view by assuming that poverty's children will always be concentrated in specific classes. My belief is that in many communities, virtually all programs will have significant participation by non-poor children. I think that this is programatically desirable because it helps to avoid economically segregated programs. I also think the problem would be particularly acute in rural areas.

4. The discussion on page 15 indicates a preference for spending money evenly among the grades. I am not at all sure that this is programatically sound. It may very well be that it is more effective to concentrate efforts at certain age levels. While the wording would certainly permit this, I think it unduly discourages it and I would shift the emphasis away from distributing evenly.

5. The discussion of types of activities and services beginning on page 16 does not specifically deal with such items as renovation and repair of facilities, purchase of major equipment and rental of space. These categories are all alluded to in other parts of the guidelines, but never in any very specific way.

6. Part (g) on page 18 discusses the relationship of title I to other titles of the Elementary and Secondary Education Act. There is no mention of other Federal Legislation which might be appropriate. I think there should at least be a reference to this legislation. Perhaps this could be included in an appendix.

7. Pilot projects (i)—page 18 have some problems, if there is not a warning that highly expensive pilot projects may never be capable of replication because of financial limitations. Communities should understand that there are some constraints.

8. The discussion of sub-professional personnel on page 20 is basically good. I would add a word of caution against using subprofessionals in purely menial tasks. There should be an emphasis on creating career ladders for subprofessionals. I would also emphasize the use of volunteers from outside the neighborhoods as being extremely helpful.

9. The discussions of pre-school projects on page 20 imply that Head Start programs are for five-year olds. In fact, the minimum age limit is three.

10. In the discussion of relationships to Community Action Programs at the top of page 29, I would add an item (4) as follows:

"Programs are meshed with other Federal legislation such as the Manpower Development and Training Act, Community Mental Health Programs and other pertinent programs."

I would also include at the end of the section on page 30 a sentence to the effect that "Persistent disagreements between CAA's and LEA's might be the subject of joint inquiry between the State Education Agencies and the State Technical Assistance Agencies."

APPENDIX J

MEMORANDUM

DECEMBER 13, 1965.

To: Jule M. Sugerman, Acting Associate Director, Community Action Program.
From: James E. Mauch, Chief, Programs Branch, DPO.
Subject: Guidelines for Administration of Elementary and Secondary Education Act of 1965.

Thank you very much for your comments on the guidelines dated November 26, 1965. I have gone over them very carefully and I can see that you spent a good deal of time on the guidelines and your comments are very astute and perceptive. Jack Hughes and Mike Kirst both read your memo and would, I am sure, agree.

As you know, we have been reviewing the guidelines almost constantly since they first came out in order to try to make them as valuable as possible. For this reason some of the points that you raised have already been taken care