I am aware of what we have here about title V, improving State departments. But I see concerns in my mind in title I, disbursement of funds, that are involved where the Federal Government, through its

department, is dealing directly with the school districts.

Using my State as 1 in 50 as an example, I am not sure that we are not in a better position at the State level to say how those funds should be used, how they should be concentrated, in which school districts, in which areas of concern; that we would not be in a better position at the State level to make this type of determination.

I would appreciate your comments on this.

Mr. Howe. First of all, I think there is some misunderstanding about title I. This is a program which is farmed out to the State departments of education. It is really the responsible agent. It makes determination of the project grants approved by local school districts and is thoroughly involved in responsibility for effective operation of title I.

I would say that title I really reflects a philosophy that we are

trying to operate through our entire program.

Mr. Dellenback. If you will excuse my interrupting, what if in the State of Oregon our State department were to decide that the area of greatest need was area X, whatever that may be, and it wanted to use all of the funds, title I funds, that were available within the State of Oregon, within area X, and not use them in A, B, C, and so on, in the others.

Would it be permitted to do so?

Mr. Howe. This would depend to some extent on what area X is. The Congress has said that the funds must be used for the benefit of concentrations of deprived children. If area X did fit into the service of deprived children in accordance with the formula the Congress has set up, then there is a great deal of discretion for the State and the

local school district to support area X.

I think what we might do in such a situation would be to point out to a State that was concentrating all its funds on one particular kind of service, let's say it was counseling, that there are problems with reading and that you might not answer all the needs of the children in the State by focusing on counseling; that education is a kind of total enterprise which has a variety of facets, and that a single focus on one of these facets may not serve all the children best, that is, the deprived children.

What we would do, I think, also, is to let them go ahead, as you suggest, and finance area X, as long as it is within the rules of the game as set up by Congress, and ask for a responsible evaluation of it; and then to examine with interest, as the State would, the results of

that evaluation.

There is great discretion in the State to decide what happens to title I funds on the basis of local proposals. The proposals have to come from the local school districts. Therefore, the State would have to persuade the local school districts that area X is what they should do. But the State could perhaps do that.

Mr. Dellenback. Mr. Commissioner, might there not be advantage, since I am sure, having lived in about three or four of the other 49 States, that the needs will vary from State to State, would