

1. We ask that you mandate that changes in budgeted program amounts approved for funding by the Office of Education exceeding 10% of their original budget be resubmitted through the same approval cycle. The appended list of New York City's Title I projects shows the comparison of the original budget as passed in a public hearing and two subsequent modifications made without public review. Projects were modified up to 400% from the original allocation. These comparisons were obtained only by extensive digging in the records of the Board of Education, since no procedures for review of modifications exist in the system. Such administrative changes, remote from public scrutiny, we understand to be widespread throughout the country.

2. We ask that you strengthen the role of community participation in planning in order to provide at least some checkpoints on Title I allocations. The present loose consultative relationships of the New York City Board of Education and the Council Against Poverty are ludicrously insufficient to relate planning for Title I to other educational projects and they make a mockery of community involvement and comprehensive planning. They invite deception on the part of the Board of Education and are, therefore, potentially dangerous.

3. We ask that you make explicit the functional relationships between the several Titles of the Act, particularly Titles I and III. It is our hope that some of the innovative spirit of Title III might find its way more easily into the school systems, through the cross-fertilization of shared ideas from educators and the communities together.

4. We ask for amendments to render the required evaluations of Title I projects meaningful. The Act states that evaluations must be made, not that they be utilized in future planning. In New York City this year, projects were recycled before last year's evaluations were submitted. To be made more useful, evaluations should have built into them alternatives and the recommendations of the evaluator. What is now an expensive exercise should be made a function to provide service to local school boards having the responsibility for making policy based on experience. American business would not survive if its consultants did not supply management with alternatives after reviewing the efficacy of programs.

5. We ask that you mandate 15% of funds for innovative projects to be set aside for retraining and orientation of new staff for the goals of the new programs. We think it would be fruitful to explore training possibilities outside the schools. In-service training now often amounts simply to the transmission of outmoded skills and the perpetuation of ineffective methods.

6. We ask that you reinforce other new legislation calling for the creation of non-professional career development by amending the Act to cover training and salaries for indigenous personnel. Under ESEA, they are presently limited solely to custodial tasks—hall duty, cafeteria duty, yard duty—with the substitution of federal for local funding being the only change. We think it essential to evolve new roles and new training vehicles to produce clear non-professional development lines for paid classroom auxiliaries. We need also to provide education for the classroom teacher to understand and to accept such help as an adjunct to his own professionalism.

Federal aid under ESEA amounts to over 7% of New York City's school expense budget, but its potential, intended by Congress to cause profound change in the system has thus far not been realized. A great deal of federal money has been poured into the system. Two years of experience have demonstrated that money alone—without the creation of new approaches and new skills—will not lead to better education for those children whose shocking educational neglect led to the enactment of Title I.

We strongly believe that the training of adults, both as neighborhood classroom aides and as teachers trained in the dynamics of change will have the longest-lasting effect upon our schools. The children of the year 2000 will thank you for the quality upgrading of the system they will inherit.

We have given you as succinctly as possible our suggested amendments to the Elementary and Secondary Education Act of 1965. We have other less critical changes to recommend about the day-to-day operation of ESEA in New York City and the role of the State Education Departments which have failed to transmit the directive for change. We reserve these for further exploration and discussion with you.

ESEA has failed so far in the largest city in America, with the largest Title I appropriation—where one might expect leadership, boldness, and a great sense of