

(b) It specifically directs the complex of activities represented by community action to one over-all objective—the promotion of full family and individual self-sufficiency.<sup>3</sup>

(c) It expands the concept of the migrant and seasonal agricultural worker program, currently stated in terms of assistance in meeting housing, sanitation, education and day care needs, to include the assistance required to help these workers and their families cope with technological changes which are cutting deeper and deeper into even their present inadequate livelihood.<sup>4</sup>

(d) It revises the formula in the present law relating to the treatment under the welfare laws of persons in training or work-training, so as to provide—and test—a new system of incentives under which public assistance recipients would be encouraged not only to work but to push their earnings up to the point where they will get out of poverty.<sup>5</sup>

2. *Strengthening of fiscal and administrative controls and standards.*—As Economic Opportunity Act programs mature, and as agencies responsible for those programs gain operating experience, they should be expected to meet increasingly high standards of efficiency and technical competence.

This objective holds true of all programs under the Act. The problems involved are, however, probably most complex in the case of community action. These local programs may include a wide range of projects and activities; they may involve numerous participating agencies; the community action agency itself is likely to be relatively new; and there are manifest difficulties in developing personnel systems which maintain necessary merit features without curtailing job opportunities for poor people who commonly lack the formal education and training required to satisfy traditional job entrance and promotion requirements. Yet for all these complications, it is clear that if community action agencies are to perform effectively, and measure up to their responsibilities, they must aim for administrative standards which are not only adequate but if possible distinctly above those generally acceptable in the community.

The bill includes a substantial number of amendments which are basically designed to improve or tighten administrative standards consistent with the needs and growing technical capabilities of the several programs. These range from specific evaluation requirements which the bill would attach to the Job Corps, work-training, and community action and migrant programs,<sup>6</sup> to limitations on Job Corps enrollee allowances and the addition to VISTA and the newly authorized part-time volunteer program of safeguards to assure that fees are not charged for volunteer services and that volunteers do not displace employed workers.<sup>7</sup>

In the case of community action, the bill includes an expanded audit and fiscal responsibility provision which would require annual operating audits, as well as the preliminary audits now prescribed; provide for the handling of audit disallowances; and require specific controls over the rate of local agency expenditures.<sup>8</sup> The bill sets forth evaluation requirements, already mentioned above, which cover agency efficiency as well as program effectiveness, and which contemplate appointment of committees which could be composed of business and professional men to advise agencies having particular problems.<sup>9</sup> And it expands and focuses existing program criteria so as to establish for each community action agency a specific obligation to achieve and adhere to standards of organization, management and administration that will meet the objective of providing assistance efficiently and free of any taint of partisan political bias or personal and family favoritism. This obligation would be implemented through rules governing a variety of specific potential problem areas, including staff accountability; salaries, salary increases, travel and per diem allowance and other employee benefits; hiring, retention and promotion standards; personal and financial conflicts of interest; and partisan political activities.<sup>10</sup>

<sup>3</sup> New title II (sec. 103 of the bill), sec. 201.

<sup>4</sup> New title III-B (sec. 104(e) of the bill), secs. 311 and 312.

<sup>5</sup> New title VII (sec. 106 of the bill).

<sup>6</sup> New title I-A (sec. 101 of the bill), sec. 113(a); new title I-B (sec. 102 of the bill), sec. 130; new title II (sec. 103 of the bill), secs. 215 and 222(d); new title III-B (sec. 104(e) of the bill), sec. 314.

<sup>7</sup> New title I-A (sec. 101 of the bill), sec. 109; new title VIII (sec. 107 of the bill), sec. 834. See also the criminal provisions in title III of the bill.

<sup>8</sup> New title II (sec. 103 of the bill), sec. 243(c) and (d).

<sup>9</sup> New title II (sec. 103 of the bill), sec. 215.

<sup>10</sup> New title II (sec. 103 of the bill), sec. 214.