

particularly those privately operated. It would tend to discourage the initiation of new programs, increase dependence on local public agencies, and generally delay the expansion of the War on Poverty.

NFS believes that public agencies must carry certain basic responsibilities, but that in serving the total needs of our society, the concerted and collaborative efforts of both public and voluntary sources are needed. This is particularly true in the War on Poverty.

#### *Basic Conditions*

NFS believes, further, that the following basic conditions are essential to assure maximum effectiveness of voluntary agencies in a free society:

(a) The acceptance of federal funds should in no way inhibit the freedom of the voluntary agency to engage in social education and action programs, with and on the behalf of its neighbors.

(b) The voluntary agency must receive adequate federal funds to provide administrative, supervisory, and other supportive services necessary to the conduct and administration of these projects.

#### *Revisions of Poverty Criteria*

NFS recommends that the definition of poverty under the Economic Opportunity Act of 1964 be increased from the present figure of \$3130 for an urban family of four persons to \$4000 for such a family. The \$4000 figure would also apply to definitions of target areas in the Anti-Poverty program. Any variations in the minimum poverty level should be in line with costs of living in different areas. Further, we support the new definition of eligibility for enrollees, under Title Ib, Section 125(a).

#### *Grievance and Appeals*

NFS subscribes to the concept that the local CAP, as the broadly representative body of governmental institutions, voluntary agencies, and the anti-poverty target population, should be the principal instrument for review and approval of anti-poverty programs to be funded through the Office of Economic Opportunity.

Implicit in this, however, is the possibility that proposals submitted for review may be rejected by the local Poverty Board. Such rejection may not be justified. NFS, therefore, endorses an effective grievance and appeals machinery which permits and encourages the applicant to submit its rejected proposal directly to the regional and finally to the National OEO for review.

Projects so approved by regional or national OEO should not be subject to local veto.

#### *Role of the Local CAP*

NFS believes that the local CAP should receive and assess applications from delegate agencies. It should make sure that such plans include:

(a) Effective organization of the residents of the target neighborhood.

(b) On-site availability in that neighborhood of the wide range of education, employment, legal aid, health and welfare services.

Both of these are interrelated and each is essential to the success of the other. A key instrument for establishing these functions is the neighborhood service center, a replication of the relevant, vibrant settlement house and neighborhood center.

However, NFS believes that the local CAP should not, itself, ordinarily undertake to administer and operate anti-poverty services. Its most effective role is in negotiating and facilitating the development of community instruments involving the residents of the target areas and existing agencies. For the long haul, it destroys its own effectiveness in this role if it becomes a competitor for the new resources available through federal funding. It should, instead, serve as a "third force."

There exist in many local communities voluntary agencies, including settlements and neighborhood centers, which are equipped to serve as the appropriate delegate agency for the conduct of neighborhood service centers.

Such agencies are often already established in target neighborhoods and have skill in establishing outpost and satellite operations. They are equipped to help residents achieve maximum feasible participation. Such voluntary agencies also have a better chance of achieving the kind of agency cooperation and inter-program coordination needed for multi-discipline, multi-agency, neighborhood operations.

There exist many examples of effective use of existing voluntary agencies by the local CAP. In Cincinnati, the Greater Cincinnati Federation of Settlements