

GOVERNOR'S VETO

Title I—Section 115(c) provides for the governor of any state the power of absolute veto over the establishment of a Job Corps center or similar facility within it. We would recommend that the provisions of this part and that of similar sections under other titles of the bill (e.g. Vista, Title VIII, Section 810(b)) be made consistent with that of *Title II, Section 242*, which authorizes reconsideration by the Director of OEO and the overriding by him of any such veto. In the interest of effective programming, the resources of the Federal government and its anti-poverty programs should be made equally available to all citizens and in all states as a matter of right.

POLITICAL ACTIVITY

Title I, Section 118(b), Title II, Section 214(a) and (b), and Title VIII, Section 810(b) seek to extend the application of the Hatch Act and other limitations on citizen action to enrollees and to employees of agencies, institutions and organizations engaged in the War on Poverty.

Much of the direction of the bill under these Sections seems to be toward precluding the participation of individual enrollees, CAP organizations, grantee and delegate agencies in continuing efforts for community and institutional change. Indications of this intent are found in the language proscribing picketing and protest and, under Title II, authorizing the Director of OEO to promulgate rules or regulations "*which shall be binding on all agencies carrying on community action activities with financial assistance (from OEO) . . . governing conflicts of interest, use of position of authority for partisan political purposes or participation in direct action, regardless of customary practices or rules among agencies in the community.*"

NFS is strongly opposed to these Sections of the bill as an invasion of the rights of individuals and autonomous organizations, and asks that they be deleted.

PERSONNEL STANDARDS

The bill authorizes each community CAP (Title II, Section 214(a)) to adopt for itself and other agencies using funds or exercising authority for which it is responsible, rules designed to establish specific standards governing salary, salary increases, travel and per diem allowances and other employee benefits. While NFS supports the efforts of OEO to establish decent standards for personnel employed under Title II, CAP grants, it is opposed to this section in the bill. NFS believes that any code promulgated nationally by the Director of OEO or by a local CAP should serve as a floor and not as a ceiling. Many agencies serving as local CAP delegate agencies already have extant local civil service or other merit systems, union contracts or voluntary agency board-approved personnel practices codes.

All these Sections subvert the principle of local autonomy and can but have the affect of destroying the enthusiastic participation of many agencies, including our 399 affiliates, in the War on Poverty.

FINANCIAL ASSISTANCE

The language of the bill, in a number of Sections dealing with financing programs, has been changed significantly. Under the current law, the Director of OEO is authorized to *make grants, or to contract with* appropriate Grantee and Delegate agencies.

The new language states that the *Director may provide financial assistance* for programs and projects. Title VI, Section 609 (2), defines "financial assistance" as "assistance advanced by grant, agreement or contract . . ."

Inherent in this language change, despite the definition cited above, we believe, is a further assault on the autonomy of agencies willing and equipped to participate effectively in the War on Poverty, but as independent contractors or grantees, prepared to have the quality of their work in carrying out their contracts fairly and equitably assessed by the granting agency.

NFS is therefore opposed both to this language change and to the inherent change in status of delegate and grantee agencies. We ask for a return to the original language. Further clarification is needed to assure the autonomy of the agency which sells its services and skills to the OEO. It is neighborhood residents who are in need of assistance from the federal government, and not the helping agency.