Secondly, I hope the Treasury Department will look at the $2.2 billion in 1966 that went to the tax investment credit and their recommendations if there should be a tax credit for higher education. It would be only $600 million for the first year and $1.2 billion the second year.

In terms of national priorities, it seems to me that the results for higher education would bear the same responsibility of the tax investment credit.

Congressman Burton?

Mr. BURTON. Are there any portions of any of these acts where the junior accredited colleges in our State are not falsely precluded from participation?

Secretary GARDNER. No, sir.

Mr. BURTON. Are there any portions of these acts where either the trust territorities, Puerto Rico, or the Virgin Islands, are not treated as if they were a part of the continental United States?

Mr. HOWE. I think not.

Secretary GARDNER. Mr. Halperin says there is not, they are in all of them.

Mr. BURTON. What would your reaction be to permitting the colleges to contribute in kind to make up their portion of the matching?

Mr. HOWE. Under work-study?

Mr. BURTON. Yes.

Mr. HOWE. I believe they do now and I think one of the technical amendments we have in here is to suggest that work-study funds may be used for flexibility in building a package of student aid with the opportunity grants, so I think we are reaching for flexibility in this area.

Mr. BURTON. Finally, there are a number of instances where you have, at a later point, in the period for which you are seeking authorization, dropped down to a lower Federal percentage than was contemplated being proposed for the coming year. Would you concur with the general notion that if we decide 75 or 80 or 90 percent should be the supported percentage level of the Federal Government, we should not indulge in predicting 1971 fiscal year's percentage, when in all likelihood we will be back in, scrapping the lower percentage and putting it back to the level we had been operating in the previous fiscal years?

Secretary GARDNER. I would like the Commissioner to try that one.

Mr. HOWE. I think your comment is a pretty good comment on human nature. There is also the pressure to, once you set up a matching level at a certain point, there is always a pressure to maintain it at that point.

Therefore, a change becomes difficult. At the same time, it seems to me there is some point in trying to make those changes and to think of a period of launching as a difficult time for institutions and that the period of planning to assume the obligation after it has gone over a year or so might make it possible for them to make a slightly larger contribution.

We have not suggested major shifts in institutional contributions, only minor shifts.

Mrs. GREEN. In line with Congressman Burton's suggestion, has a study ever been made of the fairness of the allocation to Puerto Rico