

of the coordinating institutions but rather a simple statement of institutional needs.

On the basis of such an analysis, I think that a new title should be proposed which would precisely be oriented to providing grants to undergraduate institutions for curriculum, faculty and administrative development, student services, et cetera, without the baggage of the cooperative concept.

This, in my view, is a first priority and, insofar as it is based on our empirical experience, has the greatest promise of effective impact.

Such legislation should also involve the establishment of a Council of Advisers for Undergraduate Education similar to that proposed for graduate education in part B of the amended title. Parenthetically, only then does it make sense to undertake the much more costly and complex support of graduate education, a point on which I will elaborate in a moment.

The proposals for amending title IV by adding part C—"Special Services for Disadvantaged Students"—as well as the addition of title IX—"Networks for Knowledge"—seem to me to risk considerable and unnecessary confusion in administering the act and therefore in achieving its aim. In fact, such programs as are envisioned as the provision of counseling, tutorial, career guidance and placement, and other student services, as well as the sharing of facilities, the exchange of faculty, et cetera, are already being funded under title III.

And it is certainly not clear as to whether these new programs would involve additional advisory councils and separate applications on the part of the colleges seeking such funds.

I depart from my text for a moment and say that it has been an inordinate burden on many of the small colleges, the kinds of detailed applications they have had to make. They certainly have difficulties in finding personnel and energies available to do this kind of thing. And anything that complicates the application process is a kind of undue burden.

If we can, in a sense, make more efficient and, I think, pointed the kind of data the Office of Education needs, I think it would be considerably simplified and a good deal of energy could be saved for use in other directions.

This leads me to my next general point: I am afraid that there has been a confusing and possibly wasteful tendency to view institutional grants under title III on the model of the traditional research grant. I speak here not of the questionable policy of allowing overhead charges in grant proposals which are concerned with direct financial aid as I have defined it—curriculum, faculty and staff development, et cetera.

Rather, I would point out that if we are concerned to provide funds to develop and maintain our institutions of higher education, we must design our support in institutional terms.

Such development is all of a piece, so to speak. You cannot develop one aspect—faculty, curriculum, student services, et cetera—without involving all the others.

Already, as I have noted, title III support the gamut of institutional needs. The single research project, on the other hand, typically has the minimum impact on other institutional functions but is rather grafted on, not only in regard to its personnel but also often with respect to