

There are many instances where a college or university desperately needs to renovate or replace existing space in order to adequately serve even its present student body. It must often be done in order to establish a reasonable facility base for enrollment expansion. The most usual example is "Old Main" built to last forever some 30 to 50 years ago. Because of room size mix, and general physical condition, the structure has definitely limited utilization potential. Yet, the square feet are there if renovation can make them truly usable (often it can). If renovation isn't feasible, then the space should be replaced with new construction, and not assumed to be part of the existing facilities pool.

We would recommend the present language in Section 106 be replaced with something like the following:

"An institution of higher education shall be eligible for a grant for construction of an academic facility under this title only if the State Commission determines that, in the particular case and in the institutional context, the facilities included in the project constitute essential needs of the institution and will be fully and efficiently utilized for academic purposes, or in support of the operation of facilities which will be needed for such purposes."

Priority emphasis, as it should be, is still on enrollment expansion capacity generated, since under Office of Education regulation at least 25 percent of the priority rating rests with this factor, with another ten percent on the number of square feet of space to be added by the new construction, and still another ten percent relating to utilization of existing facilities.

Higher Education Act of 1965, Part A, Title VI

There have been a number of amendments proposed to Part A, Title VI, of the Higher Education Act of 1965. Our group would like to offer some recommendations concerning these items.

First, we feel the elimination of subject matter categories is desirable. In fact, the current listing of eligible subjects is virtually all inclusive of academic disciplines. The basic approach in Part A of Title VI should be to justify the need for equipment in terms of programmatic improvement. The increased flexibility provided by the elimination of categorical limitations should aid in zeroing in on basic programmatic goals. Furthermore, it is often not practical to directly relate equipment needs to one specific department or course.

The proposed broadening of the language to include instructional equipment and materials at all levels, rather than just so-called undergraduate items, is a practical move. In fact, the line of demarcation between instructional aids at the various levels is a rather vast gray zone. Because of the system of priority criteria, the advantage will still go to the institutions with primarily undergraduate programs. This is proper since other sources of funding for sophisticated graduate-research type of equipment, at least by the Federal government, are more plentiful than for basic undergraduate assistance.

The Association supports the proposed amendment which would prohibit the purchase of "athletic or recreational equipment" under Title VI. The Association, however, construes this language to mean that equipment for physical education courses would still be eligible. We believe that most, if not all State Commissions, have attempted to administer the existing language in this manner. The distinction between equipment for "physical education" and for "athletic and recreational" purposes can be further clarified in the U.S. Office of Education by Federal regulations.

A majority of our association members would like to propose for your consideration three other amendments for Title VI. I will state them very briefly.

We recommend that in Section 603, subparagraph two, the word "objective" be stricken from the law. Many state commissions would like the opportunity to use such methods as evaluation panels to set priorities. Those that would wish to do so, could still keep their plans on an objective basis.

We suggest consortium of colleges and universities be eligible to receive Title VI grants. We feel that in some instances, equipment could thus be more extensively utilized to the benefits of more students.

The Association recommends that the present legislation, placing closed-circuit television equipment in a second category from other instructional equip-