

fication of previously approved local finance officers who are bonded custodians of public funds and are subject to State audit. Even city or county attorneys need to be recertified on each and every application.

The interagency task report, under the section on "Results," notes that agencies are "revising internal processing procedures by eliminating technical review in Washington." The facts of the matter are that a number of agencies still insist upon review of contract forms, applications, or even construction plans by overloaded national staffs.

So as to insure a completely objective review of the extent to which the purposes and activities of the Federal grant-in-aid programs are being carried out, we would recommend that the proposed (in S. 698) reports by the special congressional committees, General Accounting Office and Advisory Commission on Intergovernmental Relations, be supplemented with reports from local officials and their representatives regarding administration and impact of programs as viewed by recipients. We believe a far more accurate picture may result.

In this connection, our council has been instrumental in bringing together construction, financing, engineering, planning, administrative, and other interests concerned with improving the various water-sewer grant-in-aid programs to States and municipalities. This group of 28 associations, now known as the "Advisory Council on Federal Water-Sewer Programs," has maintained close and continued liaison with an interagency committee comprised of representatives of the Department of Housing and Urban Development, the Economic Development Administration, the Farmers Home Administration, and the Federal Water Pollution Control Administration. Together, these two groups—one representing the public, the other representing the agencies—have been striving to develop new forms, standardize planning requirements, establish time limitations in processing, better define financial arrangements, tie down priority systems, speed up availability of accurate statistical information, and broaden systems compatibility. The success of this cooperation is reflected in a new standard form 101 as well as generalized terms and scope of services to be covered in three out of the four agencies' engineering agreements. We believe this relationship could very well serve as a guide for incorporating similar outside participation in reviews and studies which are recommended in S. 698.

Finally, our council is pleased to support section 203 of title II of the Intergovernmental Cooperation Act calling for State handling of Federal grant-in-aid funds. We believe that Federal aid can be better managed at the State level for no other reason than the fact that it eliminates an unnecessary, and generally remote, step in the sequence of events which must occur in the evaluation and approval of any application. Certainly it makes sense that Federal aid be channeled through the States, rather than direct to localities, when the States (1) are providing at least half of the non-Federal share of the funds, and (2) possess the appropriate administrative machinery, as they do in State departments of public health or departments of urban redevelopment, to handle such programs.

In summary, Consulting Engineers Council believes that a searching review of present Federal aid to local governments is badly needed and that further escalation of current methods and procedures can