

sional considerations, the assurance that there will be a vigorous group of planning, design, and construction architects and engineers and planners outside of the scope of governmental activity on a private basis and the assurance that we do not staff up the administrative agency with their own in-house facilities to do this planning and this design and this construction is probably the best assurance that we can have that we do not end up with a "standard" instead of a "sound" approach to these problems.

So, you see, I have found a way to pay due tribute to the professionals as well.

Senator MUSKIE. Mr. Reutter, I note the criticism of the water and sewer grant-in-aid program on page 3 of your statement. The first full paragraph on that page refers to the fact that rules and procedures for handling applications are still being finalized and standardized more than 2 years after the programs have been implemented, and that appropriated funds cannot possibly meet existing requests, while local offices of some agencies continue to promote their respective programs and to solicit applications. I think that second criticism reflects the dilemma faced by these agencies. If you do not have pipelines filled with applications, then you reduce the pressure on the part of the Congress to provide the appropriations. Secondly, if the community does not get their applications in the pipeline, then it is not in a position to compete for whatever funds there are. It is a very unsatisfactory situation, not only for the Federal agencies, but also for the local communities. And I suppose that there is enough blame to pass around to everyone, including Congress, or it is one of those almost unavoidable situations that you have got to live with as best you can. I think that a great deal of your criticism is attributable to this appropriations logrolling.

But, I am also interested in getting whatever specifics you have on this matter of rules and procedures.

Mr. REUTTER. This is true. Various agencies have different rules and different procedures. My own firm has two projects which have been some 4 years in the mill. One of these is probably going to be another 3 or 4 years, but the other is coming to a head and will be settled out within the next 30 days. One of the reasons for all the delay is that rules and procedures were changed continually by the agencies involved.

As an example of changes, the Farmers Home Administration has an engineering contract form which was pretty much defined, and yet some of the FHA regional offices are now inserting changes that were not in the previous document and were never agreed to by the societies which discussed it with the Farmers Home Administration administrative heads here in Washington.

Senator MUSKIE. Are you making reference to the Aiken law here?

Mr. REUTTER. Yes; that is correct.

Senator MUSKIE. The difficulty then goes back again to Congress. We have got five different Departments concerned in the water-sewer field, and Agriculture is one of them.

Mr. REUTTER. That is correct.

Senator MUSKIE. And Interior is another.

I think it is quite clear that we have to move for consolidation of a lot of these programs, but what I was particularly concerned with was