

consolidation of grants has been effected; and we would not want consideration of this aspect now to prevent prompt passage of the beneficial provisions of S. 698.

TITLE III, TECHNICAL AID TO STATES

First, we would like to commend the sponsors of S. 698 for including in section 302 reference to "furtherance of the Government's policy of relying on the private enterprise system." This is a rare legislative reference, and a good one to see being specified.

Advice, information and technical assistance to the States and localities are among the ways NAM believes the Central Government can properly aid State and local governments. We believe such activities constitute a means for the Central Government to promote the acceptance of fuller responsibilities by State and local governments for functions which can ultimately be handled without any outside aid. Furthermore, the availability of reimbursable "competence on call" should contribute to effective implementation of consolidated programs, and even to economy in government in the overall sense.

The purpose of this title is to permit reimbursable technical services. To avoid misunderstanding we would like to see this word expressly used in section 301, as it is in the initial summary of purposes of S. 698.

TITLE IV, URBAN DEVELOPMENT POLICY

We still have some concern with the language of section 401 on "Declaration of Urban Assistance Policy." In Senator Muskie's introductory comment about original S. 561, it was indicated that interagency coordination in the Central Government was the thrust of this title. That is, it was a uniform policy for application by Federal departments and agencies that was sought, not an imposition of policy obligations on State-local governments. We certainly support consistency and interagency coordination in Central Government management. And we do not wish to impede improvement in intergovernmental coordination or efficiency. But we are concerned that, in the absence of express language to the contrary, section 401(a) can be interpreted and applied as requiring three-level governmental adherence to "the concurrent achievement" of the eight enumerated "specific objectives of urban development," and also that section 401 (b) can require adjustment by each level of government to the viewpoints of every other level of government in planning urban development. The use of the passive tense in section 401(b) makes it quite unclear. If this section is not a requirement for Central Government only, it would seem almost impossible to implement.

There should be a clarification in this regard. Sections 401 (c) and (d) are both quite explicit in limiting their application to the Central Government. Sections 401 (a) and (b) can be equally explicit, and in our view should be.

We believe the strengthening of State responsibility in intergovernmental relationships is the paramount consideration for improving the operation of our Federal system, and we do not like to see legislative language which would be open to the charge that the Central Government was establishing the objectives of urban development, and by-