DOCUMENT RESUME

ED 134 099 HE 008 577

TITLE State and Federal Relationships in Education. A

Position Statement.

INSTITUTION Council of Chief State School Officers, Washington,

D.C.

PUB DATE 71
NOTE 78p.

AVAILABLE FROM Council of Chief State School Officers, 1201

Sixteenth Street, N.W., Washington, D.C. 20036

(\$1.25)

EDRS PRICE MF-\$0.83 HC-\$4.67 Plus Postage.

DESCRIPTORS Church Related Colleges; *Cooperative Planning;

Decision Making; Educational Accountability; Educational Economics; *Educational Objectives; Education Vouchers; Federal Aid; Federal Government; *Federal State Relationship; *Financial Support;

Barrell of the

Fiscal Capacity; Higher Education; Money Management; Nonpublic School Aid; Performance Contracts; *State

Federal Aid; State Government

IDENTIFIERS *Government School Relationship; *Priorities

ABSTRACT

The positions and goals of the Council of Chief State School Officers regarding the relationships of state and federal education agencies are explored. Separate chapters deal with the need for cooperative efforts in state and federal relationships; the establishment of national goals and priorities; administration and services of the Office of Education; administration and services of state education agencies; the development process from research to practice; and fiscal management. Forces affecting state-federal relationships are also discussed, including: educational accountability; performance contracting; the voucher system; parental, lay, and student involvement in decisionmaking; accent on manpower development; public aid to nonpublic schools; and federal sharing of educational costs. (LBH)



State & Federal
Relationships
in
Education



State & Federal Relationships in Education

A Position Statement

Council of Chief State School Officers Washington, D. C.



Copyright 1971 © by
Council of Chief State School Officers
Library of Congress Catalog Card Number 74-181878



Single copy, \$1.25, postpaid 10-99 copies, \$1.10; 100-299 copies, 90¢ 300 or more copies, 80¢, all postpaid

Order from Council of Chief State School Officers 1201 Sixteenth Street, N. W. Washington, D. C. 20036





FOREWORD

In 1968 the Council published State and Local Responsibilities for Education, a summary of the positions it has taken and goals it has sought for improving elementary and secondary education. This companion volume explores the Council's positions and goals as they involve the relationships of state and federal education agencies.

This publication was authorized by the Council and has been developed by its Study Commission over a period of three years. Drafts were prepared in annual Commission workshops in 1968 and 1969. A special committee then organized and expanded the statement for final editing by the 1970 workshop. The manuscript was circulated for review by all chief state school officers and members of the Study Commission and was approved for publication by the Council in 1971.

These volumes do not pretend to be the final word on the many important and complex issues that face American education today. Inasmuch as these issues as well as the society within which they exist are constantly changing, the Council will continue to review new developments as they occur, reassessing and modifying its positions whenever indicated.

FLOYD T. CHRISTIAN, President Council of Chief State School Officers



Officers and Directors Council of Chief State School Officers 1971

President
Floyd T. Christian, State Commissioner of Education, Florida

Vice President
William J. Sanders, State Commissioner of Education, Connecticut

Directors

Leonard J. DeLayo, State Superintendent of Public Instruction, New Mexico D. F. Engelking, State Superintendent of Public Instruction, Idaho Martin W. Essex, State Superintendent of Public Instruction, Ohio William C. Kahl, State Superintendent of Public Instruction, Wisconsin Jack P. Nix, State Superintendent of Schools, Georgia James A. Sensenbaugh, State Superintendent of Schools, Maryland

Byron W. Hansford, Executive Secretary 1201 Sixteenth Street, N. W. Washington, D. C. 20036



Table of Contents

	Foreword	3
1.	Need for Cooperative Efforts in State and Federal Relationships Education as a State Function Problems Requiring Cooperative Efforts The Local Role The State Role The Federal Role	7
2.	Establishment of National Goals and Priorities The State Characteristics The Federal Characteristics National Goals and Priorities Areas for National Goals Legislation as it Affects Priorities and Goals Federal Education Policy	13
3.	Administration and Services of the Office of Education	25
4.	Administration and Services of State Education Agencies	34



	•	پ پ
5.	The Development Process From Research to Practice State Responsibilities Research and Development Organizational Implications for Education Agencies State Educational Research and Development Council Evaluation Dissemination Educational Information Systems The Federal Role Research and Development Coordination Evaluation Coordination Cooperative Evaluation Dissemination Coordination Information Coordination	40
6.	Fiscal Management	53
. 7.	Forces Affecting State-Federal Relationships Education as a Social Force Educational Accountability Educational Assessment and Evaluation Performance Contracting The Voucher System Participation in Decision Making	60
	Parental and Lay Involvement Student Involvement Accent on Manpower Development Public Aio to Nonpublic Schools Federal Sharing of Educational Costs	



1

Need for Cooperative Efforts in State and Federal Relationships

During the recent past Congressional action in the field of social welfare has grown. At the same time the federal concern for and role in education has increased. Traditionally education has been regarded as a state function, primarily because it is not specifically mentioned in the United States Constitution. As the national role in education has increased, it is but natural that questions have grown relating to possible conflicting interests and the roles that state and federal governments are to play. Consequently there is a need to clarify roles and functions for each level of government.

Two major conflicting economic theories may be pertinent. One states that there are just so many resources available to the economy; where there is an increase in one sector, there is a corresponding decrease in another. The other theory points out that growth of resources in one area may bring about growth in another. This latter theory may be analogous to the interaction of local, state, and federal governments in terms of the amount of responsibility each may take for education. As one governmental level takes more vigorous action, another level may be forced to take a correspondingly positive action.

If the latter theory is true, there must be an opportunity for all levels of government to do those things each can do best and to make every effort to exercise authority to complement the constructive efforts of other levels. To provide such an opportunity, it is necessary that educational personnel reexamine the roles and functions of their agency or institution.

It is becoming more and more apparent that very little action is being accomplished at the local level by efforts from Washing-





ton alone. The lack of accomplishmer, is especially obvious in the area of human problems, to which disorders and disruptions are so eloquently testifying. There is a need for coordination of efforts at the local level by an agency closer to the scene of action, by an agency that has greater interest and understanding than are possible from the national vantage point. It may be true that the several states appeared to be losing strength until the federal government began to expand its interest; however, the states have responded to federal actions by increasing their strength and actions of their own. If educational problems are to/be overcome, nothing less than total commitment and effort from all levels will be needed; wasteful duplication of effort will have to be avoided.

Education as a State Function

The importance of education in a democracy cannot be overestimated. The development of individuals who are capable of exercising constitutionally guaranteed rights within the framework of a dynamic and ever-changing social structure is absolutely essential for the preservation and progress of the American system.

It has been well established in theory, in practice, and in the courts that education is primarily a state function. Leadership within the state is of utmost importance, therefore, if the state's responsibility for high quality education is to be faithfully discharged. Such leadership must be fostered by all of state government but must stem especially from a strong state department of education with adequate support from the legislature. An effective department of education must be organized around clearly defined missions and goals and must be staffed with personnel having sufficient expertise to ensure adequate needs assessment, program planning and development, operational efficiency, fiscal responsibility, and research and innovation so that the identified missions and goals can be achieved.

by the state legislature is essential if the state is to develop and maintain its leadership function in education.

State legislatures should be made aware of the need for adequately supporting their respective state agencies that have leadership responsibilities if those responsibilities are to remain with the state. Not to provide adequate support is to invite the gradual erosion of the state's leadership role by the agency or level of



government that provides the needed support. A part of the state's responsibility for education may involve the achievement of national as well as state goals; the state must be willing to accept such a role as part of its leadership function since the state also benefits from the results of national goals having been achieved.

National legislation during recent years has placed emphasis on national educational goals. Provisions of such legislation have greatly expanded state departments of education by providing personnel to administer programs. The result, in many instances, has been the overshadowing of state supported efforts by those from the federal level, and federal support has often meant preoccupation of the staff with federal programs. It is thus that the state's role in educational leadership may be eroded. It is only through vigorous support of a strong state department of education working effectively to achieve state defined goals and objectives that a legislature can demonstrate its commitment to education as a state function.

Problems Requiring Cooperative Efforts

In State and Local Responsibilities for Education it was pointed out that new alignments resulting from federal experimentation with educational programs were subordinating local and state initiative and responsibility and exalting federal preceriptions in local education. It was also noted that there are few if any more imperative tasks than to coordinate the educational policies and programs of all three levels of government.¹

There appear to be seven major problem areas that complicate cooperative efforts of the three governmental levels as they work to improve education:

- 1. Priorities and categorical aid appear to be determined more by pressure and "feel" than on the basis of a more scientific needs assessment.
- 2. No systematic, long-range planning vehicle exists that is representative of the federal and state agencies involved.
- 3. The lack of continuity of elected and appointed personnel in Congress and the Department of Health, Education, and Welfare makes agency role definition even more essential.
- 4. Roles are unclear or are overlapping and duplicatory. In some instances, gaps are left by reason of unclear role definition.



^{1.} Council of Chief State School Officers, State and Local Responsibilities for Education (Wishington, D. C.: The Council, 1968), p. 24.

- 5. Great variances exist among states as to their statutory and constitutional legal functions and capabilities.
- 6. Inequality among states as to tax base and comparable salary levels makes it difficult to attract sufficient number of high quality personnel.
- 7. New movements and societal forces confuse the roles of various governmental levels.

Another development currently under way also has implications for the management of education. Professional organizations and other groups associated with education are increasingly concerned with having a major role in decision making. The National Education Association, the American Association of School Administrators, the National Association of State Boards of Education, the Education Commission of the States, in addition to the Council of Chief State School Officers, are just a few who are requesting, if not demanding, stronger roles in educational policy making.

Some basic statements of roles may be made at the outset of this volume as they were published in *State and Local Responsibilities for Education*. The following position statements constitute a recapitulation of that volume's attempt to define the roles of the local, state, and federal governmental levels through a broad, although necessarily restricted, treatment. All position statements are printed in capital letters.

The Local Role

PRIMARY RESPONSIBILITY FOR COMPREHENSIVE PROGRAMS FROM NURSERY THROUGH GRADUATE SCHOOL SHOULD REST WITH LOCAL LEGAL AND PROFESSIONAL AUTHORITIES. THEY SHOULD OPERATE THE PUBLIC SCHOOLS AND CARRY THE HEAVIEST RESPONSIBILITIES OF WHICH THEY ARE CAPABLE IN DEFINING, ORGANIZING, HOUSING, STAFFING, FINANCING, AND CONDUCTING EDUCATIONAL PROGRAMS.²

The State Role

THE STATE IS FINALLY RESPONSIBLE FOR ACCEPTABLE LEVELS OF QUALITY PROGRAMS OF INSTRUCTION WITHIN ITS BORDERS. IT IS ALSO RESPONSIBLE FOR SUPPLAINT AND MECESSARY FUNDS TO ALL LOCAL EDUCATION AGENCIES & EQUIRED TO ESTABLISH AND MAINTAIN SUCH PROGRAMS, THE STATE SHOULD ENCOURAGE

^{2.} Ibid., p. 24.





AND ASSIST ALL LOCAL EDUCATION AGENCIES TO MEET AND TO EXCEED AS FAR AS POSSIBLE ALL MINIMUM STANDARDS OF INSTRUCTION AND FINANCING.

THE STATE EDUCATION AGENCY SHOULD PROVIDE LEADERSHIP IN DETERMINATION OF THE INSTRUCTIONAL PROGRAMS TO BE PROVIDED IN THE SCHOOLS, WORKING IN CLOSE COOPERATION WITH LOCAL EDUCATION AUTHORITIES IN ESTABLISHING AND MAINTAINING INSTRUCTIONAL PROGRAMS OF INCREASING QUALITY.

The state should supply funds to augment local funds in providing at least minimum programs in the local schools and with incentives to exceed such minimums. Federal jeunds should also be allocated within the state by the state a sency to strengthen local programs. The state agency should coordinate the reports on local uses of state and local funds, and assume primary responsibility for reporting to the federal government on the federal share.

The Federal Role

The federal covernment has a significant role in education based on its concern for the national welfare. . . . The federal government should assist the states financially in these endeavors, but should not seek to require uniformity among the states through regulations or other techniques affecting eligibility of state or local education agencies to receive federal funds.

The purpose of the present publication is to stimulate discussion concerning those roles an agency at the state or federal level must play in effective operation. The views of the Council of Chief State School Officers, as reflected in the resolutions and statements of the group over the past several years, make up a considerable portion of the material in succeeding chapters.

The five areas of critical relationships between state and federal education agencies to be discussed in this publication were chosen as primary areas of study after nearly a year of review of the touchpoints between the two levels of government. The five broad areas to be presented include goals and priorities; federal





^{3.} Had., p. 24.

¹ Ibid , p. 25.

agency administration and services; state administration and services; the development process from research to practice; finance. Although these five areas are not all-inclusive, they are among the most important areas of interaction between the two governmental levels. They form a departure point from which roles may be discussed.

Finally, an additional chapter emphasizes the forces of change that affect all educational endeavors. The entrance of commercial and industrial concerns into the public education sector and the public ery for accountability create the need for changing relationships almost on a daily basis. A whole new set of political values and policies that will affect governmental relationships are being thrust upon state and federal agencies responsible for education.



Establishment of National Goals and Priorities

The purposes of education in a free society may be viewed as durable and applicable to all levels of the educational policy-administration-operation complex, but it is apparent that there remains a need for agreement on the local-state-federal responsibilities and relationships in determining the priorities of educational programs in relation to these purposes.

In State and Local Responsibilities for Education it was noted that "the respective roles of local, state, and federal governments require much more precise definition." Role determination is especially needed in the area of establishing goals and priorities for education.

The Council of Chief State School Officers and the American Association of School Administrators have consistently advocated the establishment and delineation of a complex partnership with responsibilities distributed among the three levels of government. The latter organization, in its publication The Federal Government and Public Schools, points out that the effectiveness of such a partnership depends upon the wise assignment of educational responsibilities so that the special strength of each level of government is fully utilized and its inherent weaknesses compensated. Both organizations have stated that each partner must perform duties for which it is uniquely prepared and which it has the ability to perform without interfering unnecessarily with the essential contribution of the other two partners. Simply stated, each level has characteristics that equip it to deal effectively with specific aspects of the system of education.



B. Ibid., p. 23,

^{6.} American Association of School Administrators, The Federal Government and Public Schools (Washington, D. C.: The Association, 1965) p. 58.

The State Characteristics

Because the state has traditionally been regarded, both legally and by custom, as responsible for education within its borders, it brings a unique advantage to the three-way partnership. The state may have delegated certain powers to local education agencies, such as the power to tax and to operate a school district under a local board. But a considerable portion of the funds for such operation have come from state sources. It is only right that the state participate in the financing of local education agencies; if states have the basic responsibility for education, they must also provide funds.

The state also has a leadership responsibility—a responsibility traditionally expressed in setting minimum standards for the operation of schools, but increasingly being exhibited in providing "leadership and services in planning for—and helping others to plan for—meeting educational needs during coming years." ⁷ To carry on such activities, state departments of education have been set up in each state to enforce standards, provide leadership in program activities, and administer state financial support to local schools. Activities of state education agencies are increasingly concerned with planning, development, and change rather than regulation and preserving the status quo.

The states have many strengths which enable them to participate fully in the partnership with local and federal education agencies. They are legally independent and fiscally self-sufficient to a high degree; much higher, at least, than are many local education agencies. Because they are close to local agencies and are keenly aware of similarities and variations in problems, they can aid local districts more effectively than the federal government.

However, there are differences between states that could cause problems if states were forced to operate without federal participation or if the federal government were to act without appropriate consultation with states. The ability to support education varies from state to state and from local agency to local agency within states. The failure of adequate representation of states on the federal level has led to the situation of needs unmet in many of the hard pressed localities while federal programs have reached into places where they are less needed. Similarly, programs which require matching of federal funds tend to focus on agencies capable of appropriating the funds needed.



^{7.} Edgar L. Morphet and David L. Jesser, eds., Emerging State Responsibilities for Education (Denver, Colorado: Project on Improving State Leadership in Education, 1970) p. 19.

Full implementation of national policies and goals might be difficult to attain if left solely to the states, since the states have a varying concern over such priorities. Similarly, without federal support and encouragement of research and development, the influence of such activities to meet state needs would be less.

For these and other reasons, the federal government must be a partner with the local and state agencies to meet national needs and to compensate for differences among states,

The Federal Characteristics

The federal government, too, has strengths which make it an important educational partner with states and local agencies. Above all, there is a broader view of national needs, welfare, and concerns at the federal level. Through being able to discern what can be termed "national needs," the federal government can bring more power to bear on problems.

The federal government also has a broader financial base than the states. It has the advantage of being able to cope with basic inequality among states and being able to establish equitable arrangements among states in such areas as research and development efforts.

Other characteristics of the federal government tend to limit its role as an educational partner. For example, its distance from the local school classroom, where the educational action is, makes direct local-federal involvement impractical. The multiplicity of federal concerns, as opposed to the more concentrated state focus on education, also tends to weaken the position of education in the federal hierarchy.

The states recognize that the federal government has a compelling concern for programs that are in the national interest. The federal government has certain responsibilities and characteristics to ensure the attainment of educational goals that are of national concern. Among these are (1) the power to raise revenues and distribute resources, (2) a broad perspective arising from detachment from provincial considerations, and (3) the responsibility to protect national interests.

Because of these characteristics, the federal government should encourage development of educational programs reflecting national goals and priorities; however, implementation and administration of such programs should primarily be state and local responsibilities.



National Goals and Priorities

Relative to the process of establishing goals at the national level, provision should be made to ensure that they:

- 1. Relate to areas critical to national interest or of pervasive concern among the states.
- 2. Involve appropriate individuals and groups in goal establishment.
- 3. Recognize the state education agencies as the primary authority for administering public education at the elementary and secondary level.

A PROGRAM OF ASSESSMENT OF EDUCATIONAL NEEDS SHOULD BE ESTABLISHED TO PROVIDE CURRENT AND RELIABLE INFORMATION AS A BASIS FOR ESTABLISHING NATIONAL GOALS.

IT IS THE LEGITIMATE RESPONSIBILITY OF THE FEDERAL GOVERNMENT, WITH APPROPRIATE PARTICIPATION BY THE STATES, TO DEVELOP EDUCATIONAL THRUSTS TO MEET CRITICAL NATIONAL EDUCATIONAL NEEDS.

TO ENSURE COMPARABLE EDUCATIONAL OPPORTUNITY AMONG THE STATES, THE FEDERAL GOVERNMENT HAS THE UNIQUE ABIL-ITY TO BAISE REVENUE AND TO DISTRIBUTE FUNDS TO ENSURE SUCH EQUALITY.

SINCE NATIONAL PRIORITIES, OR PRIORITY PROBLEMS, DO SHIFT FROM TIME TO TIME, ADEQUATE METHODS OF DEFINING AND RECONSTITUTING THEM ARE ESSENTIAL.

These methods should ensure that all interested parties have a voice in their formulation; current and reliable information is available to these interested parties; processes for this enlightened participation are functioning; and certain conflicts or hazards are resolved or avoided.

THERE SHOULD BE A SYSTEM WHICH GUARANTEES PARTICIPATION OF INTERESTED PARTIES IN THE FORMULATION OF NATIONAL PRIORITIES.

The following groups should be considered: the general public; special interest groups; the business community, both labor and management; the education profession; other government agencies; the intellectual community, especially higher education;



the information and news media; and the learners.

THESE INTERESTED PARTIES SHOULD HAVE AVAILABLE PERTINENT INFORMATION.

These may include: assessment and evaluative data on the status of learners and on the effectiveness of educational programs; identified national problems or issues (not limited to education); the status of technological capabilities; and projections for future status of the aforementioned.

IN MAKING DECISIONS ABOUT NATIONAL PRIORITIES, BASIC PROCESSES SHOULD BE CONTINUOUSLY EMPLOYED.

These should include: an ongoing assessment program; establishment of a coordinated system of advisory committees and councils; communication to the public of objective information on current and projected issues in education; communication by interested parties to state and federal legislators of their views and positions; and mechanisms for seeking workable compromises among dissenting elements.

These processes and information suggest that there are several hazards or problems which should be avoided in establishing national priorities.

The vested interests of special groups should not be allowed to establish priorities which do not serve the national interest.

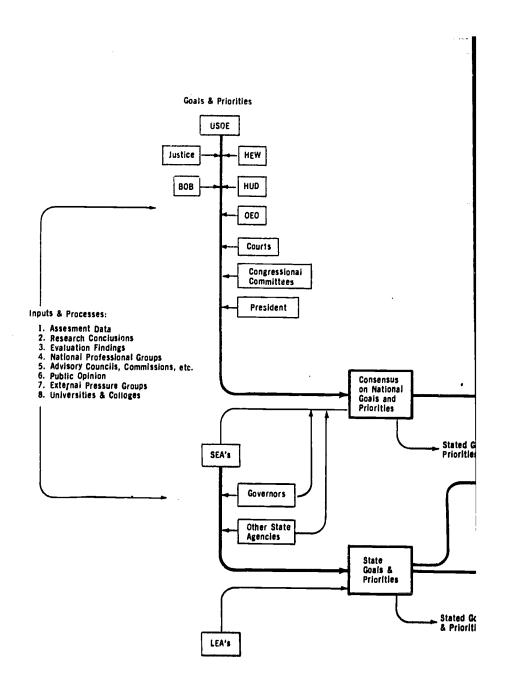
Whether these special groups are based upon geographic affinity, commercial interest, or professional specialization, this position should be held.

Priorities should always be open to modifications in the light of changing conditions.

There is a natural tendency to keep loading in new priorities without retiring old ones,

"High fashion" movements should not be endorsed as priorities without critical examination through the processes established.

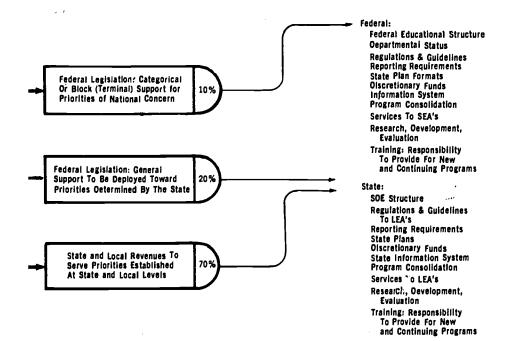




ablishment of Goals & Priorities

Legislation

Administration



Abbreviations:

SEA == State Education Agency
LEA == Local Education Agency
HEW == Ocpartment of Health, Education, Welfare
USDE == U.S., Office of Education
HUD == Ocpartment of Housing & Urban Ocyclopment
BOB == Bureau of the Budget
OEO == Office of Economic Opportunity
(Or Similarly Constituted Offices of the Future)



Biased, one-sided information disseminated to the public or other interested parties does not lead to selection of priorities which are truly in the public interest.

Figure 1 sets forth a graphic description of a process for establishing national goals and priorities. It is divided into three sections: those groups, institutions, agencies, organizations, and individuals that should be involved in the establishment of national and state goals and priorities; the level of legislation needed to serve specific purposes in carrying out national and state goals and priorities; and the federal and state structures and functions in the administration of such legislation resulting from the establishment of goals and priorities. It should be noted that, as shown on Figure 1, a decision must be reached as to who has the ability and the strongest role to play in administering and implementing goals and priorities once they are established. It should also be noted that provision is made for the specific and explicit statement of national and state goals and priorities. A suggested breakdown of the percentage of support for education is made at the end of each division of federal and state legislation to enable implementation. The figures used, 10-20-70, are arbitrary in nature and should not be viewed as a final breakdown. Level of support is an area upon which few legislators, state or federal, or educational administrators have been able to agree.

Inherent in the process is the need for providing training for new and continuing programs; the responsibility is that of both federal and state agencies to see that people are trained to implement national goals and priorities. Unless training is provided it is doubtful that the process can be carried on to successful conclusion.

Areas for National Goals

FEDERAL AND STATE EDUCATIONAL AGENCIES SHOULD DEVELOP SPECIFIC NATIONAL AND STATE GOALS IN CERTAIN BROAD AREAS. WHERE STATE AND NATIONAL CONCERNS AND INTEREST OVER-LAP, COOPERATIVE EFFORTS SHOULD BE DELINEATED.

Programs should be generated from an assessment of educational needs conducted at the national level and should belate directly to (1) the protection of national interests, (2) elimination of regional constraints on



EDUCATIONAL OPPORTUNITY, (3) MULTI-STATE PROJECTS FOR RESEARCH AND DEVELOPMENT, AND (4) IMPROVING STATE LEAD-ERSHIP THROUGH STAFF DEVELOPMENT.

Federal legislation designed to serve the evolving national priority educational goals should be in the form of categorical aid with appropriate guidelines and regulations to assure direction and should be administered through the state education agency. It is suggested that an amount of funds equal to approximately 10 percent (see Figure 1) of the total federal-state-local expenditure for elementary and secondary education would be needed to implement these programs adequately.

The federal government should move to distribute funds to the states to be used for the basic educational program.

Recognizing the power at the federal level to raise resources and distribute funds and the vast differences that exist among the states in ability to finance the basic system of education adequately, it is suggested that an amount equal to at least 20 percent of the total local-state-federal expenditure would be needed for this purpose (see Figure 1). Funds distributed on a basis to equalize educational opportunity should be directed toward meeting educational needs identified in each of the states.

Legislation as It Affects Priorities and Goals

The interests of education should be effectively represented at the national level.

According to the Constitution, education is not a primary federal function. Because of this and because the interests of the enterprise of education are capable of being strongly influenced by policy decisions taken at the national level, it is important that some means be found at the national level by which the needs of education can be expressed.

Despite the general tendency to speak well of education, it is a fact that the programs which would most benefit education have so far shown limited political appeal. Elementary schools do not send rockets to the moon—at least not directly. But what happens in a kindergarten may largely determine the future direction an individual may choose. A breakthrough in a child's ability to read may not have the glamour of a breakthrough in





science, but the two are as intimately related as cause and effect. Public recognition of this fact would give education political strength and make it possible to bring about the structural and

policy changes proposed.

There are a large number of programs which are not thought to be educational but which strongly influence the conduct of education. Examples include the Selective Service System and Urban Renewal. The need for these programs in the national interest is not here in question. However, it can hardly be doubted that it would be wise to consider the potential effects on education in the process of drafting the legislation for the programs. As matters now stand, decisions to establish such programs are more reflective of national political realities than of local educational realities or the national interest in education.

THE STRUGGLE FOR ADEQUATE FEDERAL POLICIES AFFECTING EDUCATION IS INTIMATELY TIED TO THE QUESTION OF AN APEQUATE FEDERAL STRUCTURE FOR THE ADMINISTRATION OF EDUCATIONAL AFFAIRS. THE STRUCTURE MOST TO BE RECOMearrow mended for the permanency and depth of its influence AND CAPACITY TO SERVE IS A DEPARTMENT OF EDUCATION WITH FULL CABINET STATUS.

In order to maintain and improve cooperative relationships concerning federal-state programs in education,

THE COUNCIL UBGES THAT ITS BOARD OF DIRECTORS AND EXECU-TIVE SECRETARY : O CONSTITUTED AN ADVISORY COMMITTEE TO CONFER REGULARLY WITH THE U. S. COMMISSIONER OF EDU-CATION AND LEADING MEMBERS OF HIS STAFF IN REGARD TO FEDERAL-STATE RELATIONSHIPS.

The Council is particularly concerned that rules and regulations and other important decisions of the Office of Education affecting programs administered in the states by departments of education be cooperatively agreed upon through consultations between the Commissioner and the representative body of the Council before they are placed in effect.

Information about education should be collected and disseminated nationally. Decisions at the national, state, or local level regarding education require access to considerable data, particularly if such decisions are to take financial needs into account. It is possible for any state or locality to make its needs

24





known; but it is impossible for any to speak for all, and it is difficult for any to determine by its own efforts how it stands in relation to others. There must be some device by which the nationwide collection and dissemination of systematic information about education can be accomplished. Thus, there should be a national data-gathering agency competent to perform the task.

Immediate priority should be given to research and to information to be provided to the public on educational achievements and needs. Local, state, and national education agencies depend upon information so they may be geared to meet current and new educational needs on all fronts.

THE COUNCIL URGES THE DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE AND THE OFFICE OF EDUCATION TO INVOLVE THE CHIEF STATE SCHOOL OFFICERS IN LEGISLATIVE PREPLANNING AND, AFTER ENACTMENT, IN ESTABLISHING GUIDELINES AND DRAFTING OF REGULATIONS.

Precedence for such a relationship was established following passage of the National Defense Education Act. All chief state school officers were invited to come to Washington and the officials of the Office of Education talked with them about regulations and solicited their reactions to and suggestions for drafting them. In many instances the actual earrying out of guidelines and drafting of regulations would be much easier if the chief state school officers or their designated personnel were involved.

One of the needs at the federal level has to do with the establishment of the major policies under which federal educational activities proceed.

IT SHOULD BE THE POLICY OF THE GOVERNMENT OF THE UNITED STATES TO CREATE AN ENVIRONMENT IN WHICH EDUCATION CAN FLOURISH IN THE STATES AND LOCALITIES.

A candid review of the actual blocks to passage of desirable legislation reveals that it is not the issue of need or the issue of control that accounts for the difficulty in obtaining federal action. The real opposition arises from:

- 1. the issue of public funds directed to church-related schools;
- 2. the issue of desegregation in public schools;
- 3. the issue of expanded federal spending; and
- 4, the issue of federal administrative control.



THERE SHOULD BE A CLEAR DIFFERENTIATION OF THE EDUCATIONAL FUNCTIONS WHICH CAN BE PERFORMED MOST EFFECTIVELY AND OBJECTIVELY IN CONDITIONS OF PROFESSIONAL INDEPENDENCE (AND THEREFORE SHOULD BE SEPARATED FROM THE POLITICAL ARENA) FROM THOSE EDUCATIONAL FUNCTIONS WHICH REQUIRE DECISION IN THE POLITICAL ARENA (AND THEREFORE SPOULD BE INVOLVED IN POLITICS).

Federal Education Policy

Over the years, the Office of Education has also been greatly concerned about establishing goals and priorities. There has been recurrent emphasis upon the need for educational reform, for developing a cohesive federal educational policy to implement change. Attention has been directed toward the need for climinating the "patchwork patterns" of federal financing of education and, equally important, toward the need for "overhanling" the patchwork pattern of organizing the Office of Education in response to current legislation.

Two priorities have been identified: (1) raising the status of education on the national scene, thus gaining a larger share of available funds for education; and (2) supporting requests for funds with facts as to what the money would accomplish.

Summary

The purposes of education in a free rociety may be viewed as durable and applicable to all levels of the educational policyadministration-operation complex. A great amount of effort must be put into agreeing on the roles and relationships of various units to education throughout the country. Once the roles and responsibilities have been determined, policies can be developed which determine what relationships each level of educational organization will have with the others.



Administration and Services of the Office of Education

After more than a decade of increasing federal aid to education, it is apparent that several major focal points in the management and administration of education have not received adequate attention:

- goal determination (broad goal development and direction setting)
- decision making (management)
- implementation (operations)
- · evaluation and accountability

There is necessarily some overlap among these focal points in educational management, and it should be understood that they occur in varying degrees at many different levels in the educational enterprise. At this point in time, assignment of responsibility for initiation of action along these four points is not clearly defined, with the result that evaluation of program effectiveness is difficult. This lack of clarity in assignment of responsibility for these functions has seriously detracted from the closeness of coordination and cooperation that is necessary to achieve desired quality and quantity of product.

Responsibility for performing these management functions must be delineated and assigned, their parameters clearly established, and their execution evaluated. Based on this evaluative information, delineation and assignment should be reviewed, revised, and restated periodically.

It is the intent of this chapter to analyze these four focal points of educational management and the levels at which proper





action should be taken. Special emphasis will be given to the role of the U.S. Office of Education in this area and the services it might best provide.

Figures 2 and 3 are designed to indicate in a very general way how the government at each level—federal, state, and local—has been and should be involved in carrying out the education of its citizenry. The first figure indicates that, in general, up to 1900 the major thrust for education was at the local level. The second figure indicates a possible balance of concern that may be reasonable for present-day educational efforts.

In reviewing the growth and development of federal involvement in the field of education, the role emerging for the national level seems to be that of mediator, coordinator, supporter of the educational thrust at the state level. The Office of Education is the logical body to provide leadership to the states and in the development of a unified national commitment to education.

Such commitment should not result in a system of schooling imposed from the national level. Rather it should help develop the kind of climate which balances both the needs of the individual citizen and the requirements of the state and nation in order to guarantee citizens the privileges stipulated in the U. S. Constitution. In view of the state's legal responsibility for education, the role for the national government in education in a representative democracy is that which assists the states to strengthen their capabilities. The suggested emerging role is currently somewhat obscure. Its lack of clarity results from short-term planning and the national penchant for reacting to issues rather than working with and through the states to develop long-range (three to ten years) plans and programs based upon identified needs expressed as national goals.

A Proposed Role for the U.S. Office of Education

The following position statements are the result of a careful and detailed study of the legal and operational requirements of the various state education agencies and their educational systems. It appears that if all or even part of the changes recommended were brought about the end result would be an improvement in both the effectiveness and efficiency of the state education agencies.

THE LEADERSHIP ROLE OF THE OFFICE OF EDUCATION SHOULD ENCOMPASS AT LEAST THREE FUNCTIONS:



Figure 2* Educational Participation Prior to 1900

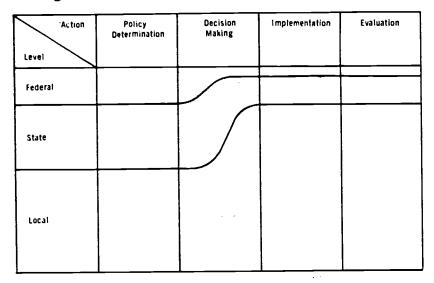
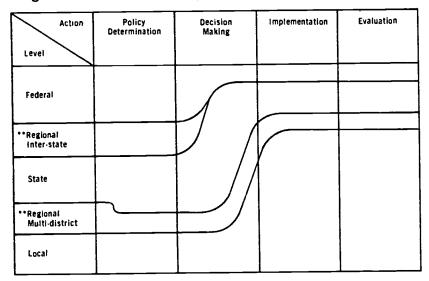


Figure 3* Possible Emerging Educational Participation



^{*} These two graphic presentations of the roles of the levels of government are not based on specific facts nor are they intended to represent any proposed percentage of involvement. They are general in nature and illustrative only.



^{**} Service oriented.

- 1. INTEGRATION OF LOCAL, STATE, AND NATIONAL INPUTS INTO THE FORMULATION OF NATIONAL GOALS AND PRIORITIES WHICH TRANSCEND STATE LINES.
- 2. Coordination of multi-state efforts to solve common and persistent problems.
- 3. FOCUSING ATTENTION ON AND PROVIDING RESOURCES FOR BROAD SCALE RESEARCH AND DEVELOPMENT EFFORTS AIMED AT NATIONAL PRIORITIES.

As the Office of Education has increased its involvement in program administration and management, both at the state and local level, it seems to be losing the "leadership battle" to coordinate the various program thrusts coming from Congress that affect education. As a result, there are numerous educational programs being administered by a number of different agencies.

Research currently under way in education is limited and not well coordinated. The consultant help to state departments of education is spread too thin or is nonexistent. The variations in program proposals, methods of funding, procedures for operation and evaluation hinder implementation and reporting of programs. The role of the Office of Education should be carefully reexamined and steps taken to enable the office to strengthen its leadership.

THE OFFICE OF EDUCATION SHOULD INCREASE ITS CONSULTATIVE SERVICE CAPABILITY TO STATE AGENCIES,

In earlier documents the Council of Chief State School Officers has stated that "the critical nature of education problems will require increasingly effective consultative services from the Office of Education." 8

The Council believes that:

The extent of services provided by the Office of Education should be in keeping with its role as the education agency of the federal government. Adequate funds and staff should be provided to permit it to exercise essential leadership in the great education tasks confronting the nation.⁹



^{8.} Council of Chief State School Officers, Resolutions, 1949, II, p. 139. (Resolutions and policies adopted by the Council 1948-1971 are included in bound volumes "Letters to All Chief State School Officers" Vols. I-XXIII, available in the Council's Washington office. References in this publication are by date of adoption, volume, and page.)

adoption, volume, and page.)
9. National Council of Chief State School Officers, Our System of Education (Washington, D. C.: The Conneil, 1950) p. 22.

Increased capability does not simply mean increased staff; it also implies the design of a new thrust for utilization of consultative services, including helping state agencies analyze their strengths and weaknesses and assisting in the development of strong, active departments that will meet the partnership requirements and provide leadership in management systems, instructional systems, dissemination systems, and information systems. Direct consultative assistance to achieve these objectives is desired, welcomed, solicited.

The following list indicates the kind of assistance that the Council of Chief State School Officers sees as beneficial:

- 1. Providing consultative services and fiscal support to state education agencies for the purpose of strengthening state education agencies' capabilities in the areas of need assessment, program planning, program administration, and program evaluation.
- 2. Providing consultative services to state education agencies in developing innovative programs for instruction and pupil personnel services.
- Disseminating promising and exemplary practices to state and local education agencies, including ideas for improved operation of state agencies as well as local agency programs.
- 4. Collecting, coordinating, and interpreting educational data needed for educational planning; making these data available to a broad array of users.

The Council reaffirms its position in support of local and state autonomy:

In order to promote efficiency and to retain state and local control of education programs, all federal participation in public education should be through the regularly constituted state education agencies. No federal agency should deal directly with any school, school system, or any political subdivision of a state on any education project or activity except with the prior approval of the Chief State School Officer.¹⁰

THE OFFICE OF EDUCATION SHOULD BE THE ADMINISTRATIVE CENTER FOR EDUCATION FOR THE FEDERAL GOVERNMENT; IT SHOULD DIRECTLY ADMINISTER ALL EDUCATIONAL LEGISLATION AND COORDINATE ALL EDUCATIONAL ACTIVITY.

The Council has long felt that the Office of Education should be responsible for conducting or coordinating the education ac-

10. The Council, Our System of Education, p. 24.



tivities of the federal government. As it has stated in earlier documents, the Council believes that the federal government should designate the Office of Education as the agency to earry out its education responsibilities to the states, with provision for utilization of services of other federal agencies by the Office of Education as necessary. Any other federal agency conducting activities which concern state education systems should have its proposals approved by the Office of Education. Information concerning every such proposal should be transmitted by the Office of Education to the appropriate state education agencies.

The state education agency cannot adequately manage an operating system if it has little or no control over vital inputs of resources to the system. This kind of situation develops when programs for highly specialized purposes originate from a multiplicity of federal governmental departments. In turn, each department further complicates state management by setting up diverse regulations, guidelines, and fiscal accounting periods and forms.

The office of education should fulfill the following administrative functions:

- 1. Interpret federal laws and write regulations necessary for implementation.
- 2. Provide Leadership for Gathering, processing, and interpreting data to assess national educational needs, formulate broad national goals, and establish national priorities.
- 3. Prepare guidelines for the preparation of state plans and of project proposals.
- 4. Distribute funds to states according to legal requirements.

The structure of the Office of Education should be such that it facilitates and promotes vertical communication (local agency—state agency—Office of Education) as well as horizontal communication and liaison with other federal agencies having responsibility for educational programs.

The Office of Education has had minimal impact on federal legislation primarily because it is restricted and circumscribed by its rank in the federal hierarchy and by lack of statutory authority.

The failure to coordinate the efforts of the numerous educa-



tional forces, particularly the state education agencies, has hampered the thrust of the Office of Education in both legislative and nonlegislative matters. The lack of broad involvement of all educational forces in planning, developing, and initiating action at the national level has had an adverse effect upon subsequent action in implementing educational programs.

In program administration and management the paucity of planning with states has resulted in (1) late timing of programs and appropriation of funds, which has lessened opportunity for full success; (2) insufficient lead time for implementation of programs, evaluation, or the gathering of report forms; (3) less than optimum communication and coordination between program and fiscal personnel; and (4) diversity of policy and practice in the administration of some forty plus educational programs.

THE OFFICE OF EDUCATION SHOULD BE GIVEN DEPARTMENTAL STATUS.

Over the years the Council has pointed out the need for a top level agency to give unified direction to the national education thrust, one that is directly responsible to the President and not several layers down in a department.

As federal involvement in and aid to education have grown, the acute need for a more highly visible agency for education has become evident. This concern, first voiced publicly by the Council in 1949, has been reinforced by the events of the last 20 years. Once again:

The Council of Chief State School Officers reaffirms its belief that the office of the U.S. Commissioner of Education is one which requires the highest degree of civic and professional competency. It hopes full recognition will be accorded the need for continuity and stability.... The Council recommends that there be created in the federal government a department of education, headed by a secretary of cabinet rank, for carrying out the federal responsibility in education.¹¹

The Council is convinced that to achieve the degree of coordination, cooperation, and control needed in the thrust for quality education, the change indicated by the position statement should be made.

THE NEED FOR AND THE OPERATIONAL OBJECTIVES OF REGIONAL OFFICES SHOULD BE CAREFULLY REEXAMINED.

11. The Council, Resolutions, 1960, XIII, p. 205; 1968, XXI, p. 140.





For a number of years the Council has recognized the desirability of decentralizing certain activities of the Office of Education. Some types of activities of the Office of Education make it desirable that federal personnel be located in the states for the performance of services. However, the Council continues to oppose any plan of decentralization which would delegate to regional directors educational responsibility vested in the U.S. Commissioner of Education. The Council believes it is undesirable to decentralize the federal education agency in ways which would delegate to federal employees in regional offices any federal administrative responsibility affecting federal-state programs.

Specifically the Council recommends that in any decentralization,

The U.S. Commissioner of Education: (a) retain full responsibility for selecting and assigning professional personnel in the field; (b) delegate such educational responsibility as may be appropriate directly to Office of Education representatives stationed in the field; and (c) conduct the field activities of the Office of Education in close cooperation with the respective chief state school officers.¹²

In summary, the Council once again affirms its position that the U. S. Commissioner of Education deal directly with the chief school officer in each state in matters requiring important administrative decisions in elementary and secondary education and not delegate such matters to subordinate federal officials located in regional offices. The functions of the regional offices should consist of consultative assistance as opposed to administrative or regulatory responsibilities.

A joint study, including representatives of the Office of Education, state departments of education, and other groups, should consider the following issues: (1) the needs of state education agencies that could be met by a regional office; (2) the authority and responsibility such offices should be assigned; and (3) the consistency in operations among and between regional offices.

Finally, the Council would urge that an in-depth analysis of the role of advisory bodies such as committees and councils at the national, state, and local level be undertaken at an early date. National advisory-councils created by legislation should report to the federal education agency.



^{12.} The Council, Resolutions, 1964, XVII, p. 342.

Summary

The federal role in and responsibility for education should be clearly defined and steps taken to strengthen badership of the Office of Education. Consultative services to state departments of education should be increased. The Office of Education should serve as the administrative center for education for the federal government. To fulfill this role effectively, the Office of Education should be given departmental status. Finally, the Conneil of Chief State School Officers believes that the need for and operational objectives of regional offices should be carefully reexamined.



4

Administration and Services of State Education Agencies

Education is a state function legally and traditionally. Hence, responsibility for educational leadership is at the state level. The state education agency should be responsible for planning, managing, directing, and administering education in the state. To carry out its leadership role, the state agency must become proficient in (1) general administration; (2) program planning, development, and administration; (3) services for the improvement of instruction; (4) services for the improvement of administration; (5) accreditation, licensing, and staff development; and (6) fiscal management. (For an in-depth discussion of the state as the primary operator, see State and Local Responsibilities for Education.)

To assume this kind of major thrust and to obtain maximum efficiency, the state must constantly review its operations and restructure its organization whenever indicated. The following position statements are indicative of the directions which the Council of Chief State School Officers believes state and federal governments should take to produce strong, effective educational leadership at the state level.

THE ADMINISTRATION OF THE STATE EDUCATION SYSTEM BY STATE EDUCATION AGENCIES MUST BE UNIFIED, NOT FRAGMENTED BY FEDERAL PROGRAMS; FLEXIBLE, NOT BURDENED WITH ARBITRARY CONSTRAINTS IMPOSED BY FEDERAL PROGRAMS; AND AGGRESSIVE, NOT BOGGED DOWN BY UNREALISTIC "ADMINISTRIVIA" REQUIRED BY FEDERAL REGULATIONS AND GUIDELINES.

The administrative unity and the achievement of state edu-



cation agencies have been compromised frequently by the nature of the resources available to them from the federal government to promulgate educational programs.

The difficulty of sustaining a full-fledged operational educational system throughout the state and at the same time mounting major new thrusts in specific need areas has been compounded by the vaguely coordinated program thrusts from the federal level. To further complicate the situation is the range in the extensiveness or sparsity of the federal regulations and guidelines in the various programs being administered by the Office of Education. For example, Title V of the Elementary and Secondary Education Act has a minimum of regulations, while the 1968 Amendments to the Vocational Education Act have voluminous regulations and guidelines.

The Council believes it is imperative for the welfare of public education in the United States that the concept of state responsibility for education be preserved and furthered, and that all levels of government maintain their efforts in that direction. As the Council has stated in previous documents: "We specifically urge the U. S. Commissioner of Education and the Secretary of Health, Education, and Welfare to give vigorous support to state educational agencies in their efforts to strengthen themselves and to improve public education."

The fullest possible involvement of state education agency and local grantee personnel that is consistent with time and other factors is recommended in the development of projected regulations and guidelines. A clear distinction should be made in the guidelines between that which is required by law and that which is offered by way of suggested practice. Guidelines should facilitate rather than hinder state and local planning. They should optimally offer alternative procedures consistent with the statute, but with flexibility and coordination to provide for adaptation to differences among state and local situations that will alter state plans and programs.

In prelegislative development, the unique legal requirements and specialized needs of states and regions should be considered through personal representation so that ensuing legislation will reflect these concerns. State involvement would contribute to successful implementation of proposed programs and would tend to lessen the need for persuasion or coercion to bring about implementation.



^{13.} The Council, Resolutions, 1967, XX, p. 232.

The Council urges the U.S. Commissioner of Education and all federal officials dealing with state departments of education to curtail federal discretion to that necessary under the laws. The Council believes that state departments of education should assume full responsibility for their increasing functions. Federal administrative powers should not be used to induce state departments to act or refrain from acting on matters not legally relevant to the matter under consideration. The Council reiterates a previous position that federal public school legislation should be based on clear and unequivocal recognition that education is constitutionally a primary function of the state and that federal funds for education should not be used in any way to control education programs and activities at either the state or local level.

THE STATE EDUCATION AGENCY SHOULD EXERCISE THE PRIMARY LEADERSHIP ROLE IN THE OPERATION OF THE STATE SCHOOL SYSTEM.

That the state is sovereign with respect to its basic responsibility for establishing and administering a program of education adapted to the needs of its citizens is established elsewhere in this and other publications. However, this position can be endangered by forces from without when the state education agency is bypassed. When local education agencies are utilized by outside elements for the testing and development of programs or the implementation of programs, state responsibility is endangered. Such practices could, if unchecked, undercut and eventually render impotent vital and important state agency responsibilities. It is recognized that some states are not exercising all of the powers given them under present legislation. States must not abdicate their educational roles.

A review of Council positions stated elsewhere indicates that the Council is especially concerned about the federally related functions of state departments of education and the necessity for fulfilling these functions effectively in order that a proper balance of educational influence and authority may be maintained among local, state, and federal governments. As the Council has repeatedly stated, local and state autonomy in education depends upon effective state departments of education.

The Council believes that the time has come to face squarely attempts by noneducational agencies to restructure or otherwise to interfere with the administrative autonomy of state departments of education.



If educational leadership is to realize its potential and properly serve our schools and colleges, state departments of education must be strengthened by more adequate professional staffs properly compensated and in a position to exercise independence of professional action without undue interference by other governmental agencies.

There is an unfortunate trend that tends to restrict and subordinate educational leadership at the state level which ultimately, if allowed to go unchecked, will tend to stimulate similar subordination in local school districts. . . . Realizing the inherent dangers in this trend, the Council urges legislative bodies and leaders in government to take appropriate action to maintain the educational autonomy under which the American school system can be most effective.

The Conneil reiterates its belief in local control of education. We believe such local control is the most efficient and effective means of bringing about improved educational opportunities for boys and girls of our nation and is the process most consistent with our form of government.

We do believe, however, that local control of education can be preserved only if it produces good schools. Since adequately staffed and well administered state departments of education are uniquely able to aid in the upgrading of local leadership and the improvement of local schools, we urge the citizens of each state to support efforts to strengthen their state departments of education while working for the improvement of local schools.¹⁴

THE STATE EDUCATION AGENCY IS THE KEY AGENCY FOR PROVIDING SERVICES TO THE LOCAL SCHOOLS IN THE OPERATION OF THE EDUCATION SYSTEM.

A tremendous increase in educational activity and involvement at the federal, state, and local levels has occurred in the last decade and a half. The demands for changes in methods, procedures, and techniques of management have far outstripped governmental agencies' ability to change. Nevertheless, the demands for change are persistent and increasing.

There is a need to direct all resources available to provide services to local education agencies through a central coordinated channel. In some instances federal programs, for all practical purposes, have been implemented directly with local agencies. In the past, federal and sometimes even state programs or projects have required essentially a completely separate organizational unit for implementation.

Lack of coordination has resulted in duplication of services



^{14.} The Council, Resolutions, 1962, XV, pp. 137-138.

within state agencies as well as duplication of services at the state and federal levels. Frequently, neither the federal nor the state agency has achieved the degree of success in program operation that rightfully should have been expected.

In order to improve present conditions, staff size and competency in state agencies should be given immediate attention. Staff capability in the areas of assessment, planning, project development, project review, project monitoring, evaluation, and dissemination should be improved. As the state endeavors to meet consultant service requests from local agencies, it should not be compromised by competing thrusts from the Office of Education.

THE PROLIFERATION OF ADVISORY COUNCILS AT THE STATE LEVEL SHOULD BE HALTED AND THOSE NOW REQUIRED SHOULD BE REVIEWED FOR POSSIBLE CONSOLIDATION OR ELIMINATION.

Properly constituted advisory councils in reasonable number help a state department of education to (1) appraise the quality and aims of its programs, (2) obtain better communication of its views to local agencies and clients, and (3) achieve better coordination with other agencies' programs.

To the degree that advisory groups provide these by-products and this assistance, state departments welcome their aid.

However, advisory councils created by Acts of Congress or the state legislature, together with regulations growing out of such legislation, with funding for staffing and operations, frequently

- assume managerial and administrative characteristics and functions;
- 2. assume roles which replace at duplicate those of legally constituted agencies charged with responsibility for program implementation;
- extend operational jurisdiction to lower levels of organization;
- 4. have capability and aut of to communicate their findings and recommendations both in an upward and downward manner; or
- 5. may act independently of and may harass the agencies they are created to advise.

On the other hand, much of the success enjoyed by the educational enterprise may be achieved through public involvement obtained through advisory councils. However, to prevent inter-



38 -<u>i</u> 0

ference with the responsible agency legally constituted for educational purposes and to avert the danger of externally mandated and funded advisory councils that may usurp the responsibilities of such an agency, the following principles should — considered in the establishment of advisory bodies:

- 1. Membership of the advisory council should be named by and be responsible to the agency legally constituted for the service.
- 2. The advisory council should be composed of knowledgeable people representative of a broad range of interests and capabilities.
- 3. Tenure should be consistent with the specific purposes assigned to the advisory council.
- 4. Functions of the advisory council should be clearly defined by the parent agency.
- 5. Functions should be clearly established as advisory, rather than administrative or monitorial.
- 6. Staff services needed by the advisory council should be provided by the parent agency, not by paid employees attached to the council.
- 7. Stipends for an advisory council should cover only travel, subsistence, and incidental expense.
- 8. Reports, findings, and recommendations should be transmitted only to the person or agency to which the advisory council is directly responsible.
- 9. The work of an advisory conneil should be limited to making reports and recommendations to the parent agency.

Summary

State responsibility for education has been clearly established. Federal efforts must not crode the authority or autonomy of the state. At the same time, the state education agency must not abdicate its responsibility for planning, managing, directing, and controlling the state system of education. To strengthen the operation of advisory councils, guidelines and regulations are recommended which clearly delineate their role and functions.



The Development Process from Research to Practice

The national network of state and local school systems provides learning situations for children and adults. As time advances and circumstances change, practice must change to meet new needs. The fact that over three times as many ninth graders complete high school as did fifty years ago is an example. Children attend elementary and secondary schools now who require new materials, new techniques, new settings.

It is the purpose of this chapter to show how efficient planning can lead to the identification of unmet or partially met needs through the steps of research, development, dissemination, and demonstration with evaluation to installation at the points of need. Further, the stress of the chapter is on state and federal roles in the process with special emphasis on the interrelationships of federal and state agencies.

State Responsibilities

Critical problems and issues in education face each state. All organizations and agencies concerned with education should work together in identifying these problems and in developing an appropriate research and development program if state resources are to be used to best advantage. Some activities can be undertaken most efficiently by the state department of education because of particular staff competencies, ready availability of data, and proximity of necessary contacts. Other activities may be best executed by, or in cooperation with, local school districts, universities, research and development centers, and national laboratories.



Research and Development

The state department of education encounters a wide variety of problems where research and development are necessary to the effective exercise of leadership in the state system of education. Departmental responsibilities for research and development may be briefly enumerated as follows:

- identify unmet educational needs;
- 2. conduct research pertaining to departmental and local functions:
- 3. coordinate research activities within the department;
- 4. provide consultant assistance in design and analysis;
- 5. provide inservice training in techniques;
- 6. evaluate studies and products of significance to education;
- 7. disseminate findings and suggestions for implementation;
- 8. stimulate research and development throughout the state; and
- 9. support activities with adequate commitment of resources.

Organizational Implications for Education Agencies

The state department of education should have an organizational unit with research and development activities as its primary responsibility, operating in close cooperation with other departmental units. Two extreme situations are to be avoided: (1) the research and development unit should not usurp the planning and operating responsibilities of other units; (2) the other units in turn should not restrict the research unit within such narrow limits that needed work cannot be conducted efficiently. In some instances the unit may organize and coordinate team effort in attacking a problem facing the department. At other times it may conduct activities or merely provide consultant service to departmental operating divisions or other organizations engaged in research and development.

STATE EDUCATION DEPARTMENTS REQUIRE RESEARCH PERSONNEL EXPERT IN SENSING PROBLEMS, IN SUPPORTING RESEARCHERS IN MANY INSTITUTIONS IN WORKING ON SUCH PROBLEMS, AND IN DISSEMINATING TO THE FIELD USEFUL INFORMATION GROWING OUT OF SUCH ACTIVITY.

The research function can be carried on by the department with competent people in the department itself, but the talents



of gifted researchers at universities and other research centers should be enlisted on a short-term, job-type contract basis. The talents of individuals outside the department should be utilized in achieving the ultimate purpose.

State Educational Research and Development Council

The need for effective planning and coordination in any comprehensive state research and development program suggests the formation of a statewide council. Initially, research planning should receive major emphasis; once a program is under way, there should be an increasing emphasis on coordination and dissemination. Topics of major concern to the council would be related to two recurring issues: What research and development should be done? Who should do it?

EACH STATE DEPARTMENT SHOULD STIMULATE AND PROMOTE EDUCATIONAL RESEARCH AND DEVELOPMENT IN OTHER AGENCIES COMPETENT TO CONDUCT IT, AND SHOULD HAVE AN EFFECTIVE PROGRAM OF ITS OWN, THE DEPARTMENT SHOULD ASSIST IN EVALUATION AND SHOULD ASSUME LEADERSHIP IN THE WIDESPREAD IMPLEMENTATION OF RECOMMENDATIONS FOR IMPROVEMENTS OF DEMONSTRATED SUITABILITY.

Although some types of research and development may be best carried out in academic or educational laboratory settings, there are other types which should be carried out in state agency and local agency settings. Working policies to implement this concept should be developed cooperatively.

Efforts in each state must be coordinated and priorities established, based on such criteria as administrative requirements, regulatory duties, comparative value, cost, time, staff competence, and needs of the various programs operated or supervised by the department. The importance of each of these criteria will vary from state to state, and value judgments must inevitably be made as to the relative weight of each. Such judgments can usually be rendered most equitably by a committee charged with the responsibility.

Research and development activities designed to facilitate the teaching-learning process are vital to the improvement of education. They include research in curriculum content and organization, instructional materials, teaching methods, classroom organization, school administration, special programs, and the auxiliary services provided for children and youth. Such concerns



are statewide, not confined to the state department of education, and the impetus for research and development may come from other organizations as well.

THE DEVELOPMENT PROGRAM OF STATE EDUCATION AGENCIES SHOULD EMPHASIZE:

- 1. GATHERING ADMINISTRATIVE AND PLANNING DATA;
- 2. FIELD TESTING INNOVATIONS;
- 3. DEMONSTRATING AND DISSEMINATING, SERVING AS THE COMMUNICATIONS LINK BETWEEN THE FEDERAL GOVERNMENT, REGIONAL LABORATORIES, RESEARCH AND DEVELOPMENT CENTERS, AND LOCAL DISTRICTS.

Evaluation

Expansion in quality, scope, and cost of education has brought new responsibilities to the education agencies of local, state, and federal governments for evaluation of public education and for reporting the results of such evaluation to pupils, parents, teachers, and the general public. The people have a right to know about the results of education and its cost as the largest peacetime function of government. The action of the Congress in making evaluation of educational programs at the state and local levels a part of the requirements for the use of supporting federal funds reflects the general public desire for educational accounting. Despite the difficulties involved, it is believed that public school administrators have an obligation to make such an accounting. In the process, it should be possible to assist both the profession and the public to understand more thoroughly that the complexities of teaching and learning limit the extent to which the results of education can be measured with precision.

State planning for evaluation will involve efforts to identify aims, to develop objectives, and to project future needs. Plans for development programs must be made that will meet the challenges of the future. Evaluation of existing programs according to how well they meet objectives, and development of new programs arising from unmet needs should be continual.

Dissemination

Departmental specialists can transmit information about new concepts and practice through their work with local districts. State and local district conventions, institutes, workshops, and



committee meetings are convenient occasions for reporting pertinent research and development findings and outputs and their implications for education. Demonstration projects are an excellent means of disseminating new ideas and procedures and can be conducted in local school districts or in a state-sponsored experimental center. Interschool and interdistrict visits by teachers and administrators are another method of publicizing successful experimental projects and should be encouraged. Publications of all types, both regular and special, should also be utilized in the process of dissemination within the profession.

It is necessary also to disseminate important research and development findings and outputs to boards of education, community groups, and citizens interested in public education. This information should be presented in nonteclmical language and attractive format. Appropriate media include state department publications, films and filmstrips, reports to boards of education, talks to community groups, and releases or arranged coverage via newspaper, radio, and television.

Demonstration activities are essential if those in the local school districts are to have the opportunity to see innovative ideas in actual operation. They may then choose among a variety of innovations for those which best suit their purposes. The state has a responsibility to provide opportunity for local districts to participate in such activities.

STATE DEPARTMENTS OF EDUCATION SHOULD SET ASIDE STATE MONIES TO BE USED FOR FURTHERING INNOVATION AND COULD ESTABLISH STATEWIDE DECENTRALIZED PROGRAMS FOR THE DIFFUSION OF EDUCATIONAL INVENTIONS.

Educational Information Systems

Accurate information is necessary for the effective operation of the state department of education. The collection, processing, and treatment of statistics should be governed by their intended use. Sometimes statistical data will be used administratively on request or through a planned information program. At other times these data will have particular relevance for research and development.

EACH STATE SHOULD PREPARE A PLAN FOR INSTALLING A TOTAL INFORMATION SYSTEM.

The state system should be potentially compatible with the

-1-1



national integrated information system described in the next section but adapted to maximize local education and state education agency activity.

The Federal Role

The Office of Education, being in a position to maintain a national perspective on education and to rally a large pool of resources and talents, is able to identify and attack educational problems which are beyond the capability of any single state department of education. Therefore, the Office of Education should stress providing vital leadership functions for the total educational enterprise and offering needed services to state departments of education.

Research and Development Coordination

Research and development efforts relating to national needs, goals, and priorities should be a federal-state cooperative venture with the Office of Education assuming the leadership role at the national level. Higher education institutions, as well as private and nonprofit organizations, should also be included in the venture as a third set of partners.

A JOINT OFFICE OF EDUCATION/STATE DEPARTMENT OF EDUCATION COMMITTEE ON RESEARCH AND DEVELOPMENT SHOULD BE. FORMED TO GIVE CONTINUING ATTENTION TO THE FOLLOWING:

- 1. IDENTIFYING EDUCATIONAL PROBLEMS REQUIRING RESEARCH AND DEVELOPMENT;
- 2. RECOMMENDING PRIORITY AREAS FOR RESEARCH, DEVELOP-MENT, AND DISSEMINATION PROGRAMS;
- 3. PROVIDING A COORDINATING MACHINERY WHEREBY STATES MAY WORK TOGETHER WITH OTHER INSTITUTIONS ON COMMON PT TUEMS;
- 4. PROVIDING TRAINING FOR STATE EDUCATION AGENCY AND LOCAL EDUCATION AGENCY PERSONNEL AND USERS OF RESEARCH AND DEVELOPMENT.

The Office and state education agencies should jointly agree on a commitment to research and development as a means of bringing the full power of science and technology to bear for the improvement of education.

THE OFFICE OF EDUCATION, IN FULFILLING ITS LEADERSHIP



FUNCTION, SHOULD FOCUS ATTENTION AND RESOURCES ON BROAD SCALE RESEARCH AND DEVELOPMENT EFFORTS AIMED AT NATIONAL PRIORITIES. IN GENERAL, SUCH ACTIVITIES SHOULD CONCERN SUBJECTS BROAD IN SCOPE AND NATIONWIDE IN INTEREST AND CONCERN.

Continuing research, development, experimentation, and evaluation are essential to the development and improvement of education. There should be constant reexamination of the nature and scope of all phases of education and their interaction with the practical problems of society. The Office of Education should support research which will provide insights into practical problems. The identification of these problems, however, should be through joint efforts of all those involved in research and development activities, and should lead to a long-range program for a systematic approach to problems.

Research and development centers and regional educational laboratories should be regarded as one of several possible arrangements by which research and development activities may be earried out.

OFFICE OF EDUCATION FUNDS SHOULD BE USED TO STRENGTHEN THE RESEARCH AND DEVELOPMENT CAPABILITIES WHERE NEEDED, BUT ESPECIALLY IN STATE EDUCATION AGENCIES, AND SHOULD ALSO PROVIDE FUNDS FOR CONDUCT OF RESEARCH ACTIVITIES IN STATES.

Federal support for educational research and development should involve commitment to the application of research findings and development outputs. Two facets to be considered are: (1) the ability of researchers to present findings so that they may be translated into application in an educational setting through development activities; and (2) the ability of practicing educators to understand and implement research reports and findings. Consultative services from the Office of Education may help.

FUNDS FROM THE EDUCATION PROFESSIONS DEVELOPMENT ACT SHOULD BE MADE AVAILABLE TO STATES FOR THE IMPROVEMENT OF STAFF (BC 'U STATE AND LOCAL) COMPETENCE TO READ, INTERPRET, AND APPLY RESEARCH AND DEVELOPMENT FINDINGS AND OUTPUTS.

The state edos tion agency should have the major role in determining how when, and where training of staff will be carried out in the score.



ALL GRANTS TO LOCAL EDUCATION AGENCIES FROM THE FEDERAL LEVEL OF EDUCATION RELATING TO RESEARCH AND DEVELOPMENT ACTIVITIES SHOULD BE CHANNELED THROUGH THE STATE EDUCATION AGENCY.

If the state is to act in the functional areas of coordination, stimulation, and experimentation, such priorities as are beyond the ones set by the Congress and the Office of Education should be established by the state, for its knowledge of the local areas within its boundaries is much greater than such knowledge can possibly be at the federal level.

The Council of Chief State School Officers favors cooperative research projects in education through contracts or jointly financed arrangements with state education agencies, local school systems, and public and nonprofit educational institutions and organizations for the conduct of research, surveys, demonstrations, and development activities.

The Council has, from the beginning, approved the operation of the Cooperative Research Act (P. L. 531) as a funding source for contracts in research at colleges, universities, regional boards of higher education, state departments of education, and local public school districts after approval of project applications by the state education agencies. It views as essential the obtaining of substantially increased funds confined to contracts for such purposes.

Evaluation Coordination

The administrative fusion of categorical programs would not likely reduce the complexity of the evaluation program. Conversion to general aid would turn attention to evaluation of the total educational program—which, in turn, would put attention on packaged programs, as in the instances of reading, arithmetic, adjustment, or whatever. It is conceivable that such evaluation should zero in on specific programs and target groups, e.g., reading for the disadvantaged. Evaluation procedures should be an integral part of the project plans. Measures of effectiveness of a program should be related directly to its goals and objectives.

THE OFFICE OF EDUCATION SHOULD BE RESPONSIBLE FOR DEVELOPING EVALUATION MATERIALS AND ASSESSMENT PROCESSES WITH THE ADVICE OF A TASK FORCE STEERING COMMITTEE OF STATE REPRESENTATIVES.





An effective and efficient structure for the Office of Education should result in certain conditions being prevalent. These conditions are characterized by an optimal balance of emphasis being given to the provisions for leadership and services to states, research and development activities, and the performance of administrative functions.

THE OFFICE OF EDUCATION SHOULD SUPPORT RESEARCH ON EVALUATION METHODOLOGY AND TRAINING OF PERSONNEL IN EVALUATION TECHNIQUES. THE OFFICE OF EDUCATION SHOULD ABRANGE SUFFICIENT RESOURCES TO MEET THE NEED FOR EVALUATION.

Cooperative Evaluation

The Council of Chief State School Officers and the U. S. Office of Education in 1968 jointly agreed to develop an evaluation and reporting system for federally supported elementary and secondary education programs as required by law. The Federal-State Program of Educational Evaluation was designed for eventual nationwide use; as a pilot project for three years it included approximately half of the states as participants on a voluntary basis. The Council has consistently approved the objectives of the program as one effort in the broad arena of educational evaluation.

THE COUNCIL SUPPORTS THE FEDERAL-STATE PROGRAM OF EDU-CATIONAL EVALUATION. WHILE THE PROJECT IS FRAUGIT WITH DIFFICULTIES, IT HOLDS PROMISE FOR SIMPLIFYING THE COLLEC-TION OF PROGRAM INFORMATION AND ULTIMATELY FOR MORE MEANINGFUL PROGRAM EVALUATION.

Every effort should be made to cement federal-state-local cooperative relationships so that all states may benefit.

Federal funds for the program should be adequate to enable the Office of Education to operate effectively in its arrangement with the states.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS SHOULD BE CLOSELY INVOLVED IN THE FORMULATION OF PLANS FOR EVALUATION.

State education departments should be given opportunities for full participation in planning and in the operation of evalua-







tion programs at the state level. All state departments should be kept fully informed of the results of evaluation of activities within their respective states.

Any program of the office of education involving evaluation at the state or local levels should meet the following criteria: (1) the objectives and the intended results of the program will be clearly stated; (2) the techniques used will have been demonstrated to be valid; (3) efforts will have been made to minimize or eliminate duplication of evaluative data.

Dissemination Coordination

The Office of Education should look upon the state agencies as the clearinghouse for educational research findings and development outputs that appear to be ready for diffusion and dissemination. To eliminate duplication of effort and to assure that information will be available to the state agency, where the primary responsibility should rest for diffusion and dissemination, the Office should direct major leadership and funding efforts toward dissemination of research and development through the state agency. A firm link should be established between state agencies and the Educational Resource Information Centers system (ERIC).

FUNDS FOR THE PURPOSES OF DISSEMINATION AND INSTALLATION SHOULD BE SUFFICIENT TO ENABLE STATE AGENCIES TO OPERATE WORKSHOPS AND OTHERWISE DISSEMINATE, STIMULATE, AND TRAIN PERSONNEL IN THE SPECIFIC ACTIVITIES.

Without funds being made available, and other funds from the state being added, little in the way of actual impact at the local classroom level will be attained.

Information Coordination

Major goals of the Committee on Educational Data Systems, established by the Commit in 1962, include (1) development of a basic educational data system compatible with both state and federal requirements for collecting essential information about local school districts; and (2) improving the coordination of all data collection activities between the states and the U. S. Office of Education.



THE COUNCIL FIRMLY SUPPORTS THE COMMITTEE ON EDUCATIONAL DATA SYSTEMS (CEDS), WHICH THROUGH ITS PLANNING COMMITTEE REPRESENTS COUNCIL INTERESTS WITH THE USOE NATIONAL CENTER FOR EDUCATIONAL STATISTICS (NCES).

Federal data requests from the Office of Education have not allowed sufficient lead time for states to evaluate instruments or to prepare for collection of new or altered items. The lack of lead time makes it impossible for states to effectively plan their state data collection toward fulfilling federal data needs.

THE COUNCIL RECOMMENDS THAT ANY SURVEY, QUESTIONNAIRE, OR INFORMATION GATHERING DEVICE, WHETHER HANDLED DIRECTLY BY NGES OR BY CONTRACT, SHOULD FIRST BE CLEARED WITH THE CEDS PLANNING COMMITTEE IN TIME TO PROVIDE OPPORTUNITY FOR PUBLICATION AND DISTRIBUTION WELL IN ADVANCE OF REPORTING DEADLINES.

THE CHIEF STATE SCHOOL OFFICERS BELIEVE THAT STATISTICAL AND EDUCATIONAL INFORMATION REQUIRED OF STATE AND LOCAL AGENCIES BY CONGRESS AND FEDERAL AGENCIES SHOULD BE CHANNELED TO THE OFFICE OF EDUCATION THROUGH STATE DEPARTMENTS OF EDUCATION.

Such information requirements should not be matters for negotiation between the Office of Education and the local education agency or institution within the jurisdiction of a state department of education, except by express agreement between the federal agency and the state department of education concerned.

The Committee on Educational Data Systems has developed a common coding of information. The Midwestern States Educational Information Project has assisted a group of thirteen states to gear up for more specialized programs. Individual states are making progress in developing information systems relevant to their needs. Subsystems for student target groups, however, are in the embryonic stage.

The Office of Education needs additional resources to permit it to make adequate use of the momentum provided by efforts such as those above. Specifically, it needs added computer capacity, personnel, and the means for helping states. Further, subsystems categories should be established to allow information system applications to specific target groups, e.g., disadvantaged, non-English speaking, and those with reading difficulties.



THE OFFICE OF EDUCATION SHOULD SUPPORT A PLANNING AND FEASIBILITY STUDY FOR THE NATIONAL CENTER FOR EDUCATIONAL STATISTICS IN CONCERT WITH THE COMMITTEE ON EDUCATIONAL DATA SYSTEMS OF THE CHIEF STATE SCHOOL OFFICERS.

The purpose of such a study would be to delineate steps needed to implement a total information system for all levels responsible for the operation of school systems. This system would extend from local education agencies through state education agencies to the Office of Education, including subsystems concerned with students, programs, personnel, facilities, equipment, finance, and community characteristics; added groups to be considered are the various target groups mentioned earlier.

Summary

The Council of Chief State School Officers recognizes the value of the current mechanism for research and development efforts in education established by the Office of Education, specifically educational laboratories, university-based research and development centers, and individual contract research. It is urged that such efforts be coordinated with the work of state departments of education and that appropriate relationships be established to provide maximum utilization of research and development results.

The Office of Education should also provide services to aid in development of innovative programs and to enable the state to participate to the fullest extent in dissemination of promising and exemplary practices to local education agencies. The Office also aids in collecting, coordinating, and interpreting educational data needed for planning at all levels. States should be involved in the design, development, and review of federal data collection programs; adequate lead time should be provided for review of all new or amended data collection procedures, schedules, and instruments; criteria for evaluating the purpose and quality of existing and proposed data collection items should be developed. To contribute to effective administration and decision making, such data must be made available to a broad array of users.

. The state agency, on the other hand, should be responsible for determining the extent and quality of educational services to be provided to local education agencies and for assisting such



agencies to assume their responsibility in providing these and additional services. The primary function of the state department of education in relation to local administrative units should be to provide educational leadership; planning, research, development, evaluation activities; and advisory services. All services from the state agency to local administrative units should be planned to encourage local initiative and responsibility for policies and programs of education.

Fiscal Management

To a decision maker, a manager, the most crucial component in management is the assurance of sufficient funds at the right time with the necessary degree of flexibility to attain the stated objectives to the level desired or required. Without this assurance all planning becomes an academic exercise.

Most emphatically, planning, organization, and control, the three elements in the management cycle, must be thoroughly implemented in any situation. The overriding factor, however, is a firm commitment by someone, somewhere, sometime to see the project, program, or operation through by providing financial support.¹⁵

If commitment to an endeavor (1) is insincere, i.e., a publicity seeking gesture, (2) has discrepancies between promises of funding and amount delivered, (3) has a time span commitment that is too short or indefinite for planning, implementation, and evaluating, (4) has insufficient lead time for planning or lead time is ignored, then the endeavor has built-in failure tendencies.

Accepting the basic premise that presently a national, state, and local educational goal is to provide maximum quality educational opportunities for every citizen at the most economical cost possible, it follows then that each level of government must increase its ability to manage effectively and efficiently its program and fiscal operations.

An effort has been made to analyze the areas of fiscal management which pose problems between the state and federal levels. The position statements which follow represent some of these key areas as viewed by a state education agency. Action taken to eliminate the bottlenecks highlighted by these position statements should be helpful.

55

^{15.} Terry, G. R., Principles of Management (Homewood, Ill.: Richard Irwin, Inc. 1968, 5th ed.) pp. 151-140.

ALL FEDERAL EDUCATIONAL LEGISLATION SHOULD PROVIDE FOR AMPLE PLANNING AND LEAD TIME FOR THE OFFICE OF EDUCATION AND STATE AND LOCAL EDUCATION AGENCIES.

FUNDS APPROPRIATED SHOULD EQUAL AUTHORIZATIONS AND SHOULD BE KNOWN WELL AHEAD OF THE TIME THEY ARE TO BE PUT INTO USE.

Funding educational programs requires recognition of several unique, interrelated factors concerning the educational sector of our society. The school year traditionally begins in September and ends in June. In order to service school programs, operational plans for an ensuing year must be developed at least six months prior to the opening date of school. (Long-range plans, site purchase, facility construction, curriculum change, personnel development, etc., take from two to five to even more years.)

One of the most crucial problems resulting from the increased participation of the federal government in the financing of education is the incompatibility of the legislative fiscal year and the school year as it affects planning and financing of school programs. The problem results primarily from the fact that federal funds become available beyond the time when planning for their use can be effective.¹⁶

It should be evident that to plan effectively, local and state education officials must have a final fiscal commitment by the first of March preceding the operational year. On an emergency basis, plans can be modified as late as the first of June, but such delay jeopardizes operations and compromises seriously their effectiveness.

In order to maximize the effectiveness and efficiency of the resources committed to education the following recommendations are made:

- I. The state education agency should be the one central coordinating agency for all research and program funds made available to the state for elementary and secondary education.
- 2. Program authorizations and appropriations should be for at least a three-to-five year period to provide for proper planning and development. Appropriations should be consistent with the authorization.
- 3. The fifty states and territories differ in population, economy, and educational needs. Educational legislation and grants should recognize these differences. Distribution for-

^{16.} The Council, Resolutions, 1967, XX, p. 233.





imilas should reflect the fact that starting costs are usually higher than continuing costs.

4. The Office of Education should continue to fund projects to completion or until it is obvious that the project is one that cannot be successfully completed and, consequently, should be dropped before funding other projects of a similar nature.

WITHDRAWALS OF CASH SHOULD PROVIDE FOR FLEXIBILITY TO MEET CHANGING NEEDS IN STATE AND LOCAL PROGRAMS.

When a program is nearing its operational date (the date it is to be implemented) there should be enough fiscal flexibility to cover "start-up" costs. In many programs this period of operation is a most critical time for the program from an expenditure standpoint. Letters of credit should be drawn for no less than thirty-day periods of time and should not be based upon equal monthly amounts.

THE DIALOGUE WITH RESPECT TO AUDITING SHOULD BE BETWEEN THE FEDERAL GOVERNMENT AND THE STATE EDUCATION AGENCY, AND PROGRAM AND FISCAL AUDITS SHOULD BE KEPT SEPARATE.

Although the Conneil of Chief State School Officers recognizes that it is right and proper for the federal government to audit federal funds at the state level, local audits should be the exclusive responsibility of the state government. The state should provide adequate auditing procedures, and it should be responsible for all reporting by local education agencies to the federal government for funds derived from federal sources through certifications based on reports from local administrative units to the state department of education. An exception to this practice would be a request by the state school chief for a special audit of a-local education agency.

An area of conflict in auditing that must be resolved is the application of the fiscal audit to cover program audit areas. An analysis should be made to delineate what a fiscal audit should cover and what a program audit should cover. Fiscal audits should be limited to their proper sphere, and program audits should be limited to theirs. Each should be performed by specialists in their respective fields.



The bulk of federal government funds should be in the form of general or block grant aids. Categorical aids should, with the exception of critical national emergency needs, be limited to excess of cost programs that deal with national goals. The federal government should move to revenue sharing with a proportion earmarked for education.

With the advent of the highly concentrated categorical aid program of the late fifties came the tendency in many states to fragment management in the state department of education. This fragmentation continued as each new program came out of Congress in the sixties. A lack of long-range planning both at the federal and state level and, more importantly, the lack of joint planning contributed to the splintering of efforts. In some isolated instances it appeared that the Office of Education bypassed the state of location agency and implemented programs with local schools. When a conflict of either interest or jurisdiction arises a conference should be arranged with representatives of both program and audit agencies.

The Council reafficus its belief that:

Federal legislation she of the drawn along the following lines in order that honest fears about possible federal control of education can be completely allayed; (a) the largest portion of federal funds should be invested in state systems of general school support as authorized by the legislature of each state; (b) federal funds should be deemed by federal law to become state funds upon receipt by the state, with subsequent responsibility for fiscal accounting to the federal government confined to the official state agency for education; (c) tax funds of federal and state origin should be allocated to local school authorities for public educational purposes as defined by state law, and directed to the areas of greatest need through new or old equalizing portions of state educational finance systems; (d) state and local educational authorities should continue to determine their most critical educational needs and priorities and how these needs can best be met. 17

If joint federal and state long-range planning is done well, many present problems will take care of themselves. However, if there is lack of confidence in each other's intent, integrity, and capability, then present problems will not only remain but will intensify.

In an earlier document the Council stated that the interests 17. The Council, Resolutions, 1964, XVII, p. 341.



of American public elementary and secondary education will be served best by permanent, broad-purpose federal financial support rather than by limited, emergency federal aid for special purposes. The Council recognizes, however, that special federal aids are often important, especially when they meet needs not readily met through any state foundation system of educational finance. In addition, special federal aids should be enacted when the educational need is a major one that lies beyond the financial reach of the state program and should be dropped when the need no longer exists.¹⁸

Federal funds should be distributed by formulae which should include the following elements: (1) the economic ability of the state to support education; (2) the number of children to be served; and (3) the educational needs of the children to be served.

The people of the country desire educational opportunities for their children consistent with the highest ideals and aspirations of the nation. Growing enrollments and obsolescence demand new classrooms, new facilities, and an adequate supply of well-qualified teachers. In order to improve the schools, broaden and expand educational opportunities, and provide enough classrooms and competent teachers, more adequate financing of schools is essential. Since only a small percentage of the gross national product is now being invested in education at all levels, greater efforts to provide essential funds can and must be made at the local, state, and federal levels, and the federal government must share more fully in the general support of education.¹⁹

The Council has long felt that federal funds should be apportioned among the states on an equalization basis so that the poorer states would receive proportionately more than the wealthier states. Each state should be left free to extend its own program of allocation to local districts so that the purposes of equalization of financing within each state will be fully served.²⁰

In addition, the Council recommends that federal grants be made available for public school plant planning and construction in the several states, territories, and possessions. These funds, as with all federal educational funds, should be channeled through the Office of Education to the state education agencies. The dis-

```
18. The Council, Resolutions, 1964, XVII, p. 340.
```

^{19.} The Council, Resolutions, 1960, XIII, p. 204.

^{20.} The Council, Resolutions, 1963, XVI, p. 180,

tribution of funds should be made upon the basis of an objective formula involving need and financial ability. To assure the apportionment of funds within states according to plans developed by the respective states, legal guarantees must be established.²¹

Public funds, both federal and state, should be reserved for public schools.

While it is the inherent right of the people to choose which type of school their children should attend, public or private, the principle of separation of church and state must be maintained and all public funds for education, both federal and state, should flow to public schools only.

The Council reiterates its position that all financial assistance originating from state or federal tax sources for whatever educational purpose, whether for current expense, capital outlay, or school connected auxiliary services, should be restricted to tax supported and publicly controlled school systems and institutions of higher education. The Council believes that no federal or state legislation should be enacted that violates the principles of separation of church and state in educational financing or in other aspects of educational governance under state and federal constitutions.²²

THE "MAINTENANCE OF EFFORT" REQUIREMENTS OF CERTAIN FEDERAL PROGRAMS SHOULD BE REVISED.

There presently is no specific definition of maintenance of effort that can be used in determining if a state is complying fairly with the requirement. Each separate act has a different definition, and there is some question as to whether it applies to the specific act or to the overall program. When new funds are committed to a program area, it is reasonable to expect that certain safeguards will be established to prevent supplementary funds from being used to replace previous funds. The safeguards, however, should be simple to execute, consistent in application, and flexible in use.

Maintenance of effort should have positive application also, i.e., states should be encouraged not only to refrain from replacement usage but to add extra efforts of their own. This may be accomplished in several ways:

21. The Council, Resolutions, 1951, IV, p. 19.22. The Council, Resolutions, 1964, XVII, p. 343.



By requiring the state to match federal grants with "new" state funds, with poorer states matching proportionately less than wealthier ones.

By penalizing a state through a reduction of federal aid if total state and local funds for public education are reduced. By providing incentives for increased state and local appropriations for public education.

Summary

Federal financial support for education should be administered so as to contribute to effective management of each state's system of education. Thus, all federal funds for elementary and secondary education in a state should be coordinated by the state education agency. Regulations and guidelines for such funds should provide for ample planning and lead time and for withdrawal of eash to meet changing needs. While the Council of Chief State School Officers recognizes the right of the federal government to audit federal funds at the state level, it believes local audits are the responsibility of the state. In addition, the Council believes that the bulk of federal funds for education should be in the form of general aid or block grants and should be distributed on formulae which are based upon a number of factors including the economic ability of the state and the number and need of pupils. Finally, the Council reiterates its belief that public funds should be reserved for public schools.



Forces Affecting State-Federal Relationships

In the earlier chapters of this document, an attempt has been made to delineate state and federal roles and relationships in five critical areas: establishment of national goals and priorities, federal administration and services, state administration and services, the educational development process from research to practice, and financing public school education. This chapter focuses upon those forces, current and emerging, which affect these areas.

State and federal agencies charged with educational responsibilities function in an era of change. Forces impinging upon them call for new and different arrangements. Recognition of these forces and development of practices consistent with a dynamic society are a necessity.

Education as a Social Force

The American belief in education has always been strong. Various purposes have been ascribed to the system of public education, including molding the minds of yout' by inculcation of popularly held societal beliefs, teaching the years to use their minds for themselves, individual advancement to higher levels of society, and training of the intellect. Most of these are linked to a system of free inquiry through secular education.

The school system in the United States has been given a tremendous task to perform, that of taking people from varied cultures and teaching them all of the beliefs and practices of one society. While helping produce skilled manpower, the schools must also aid youngsters to a point where they can face the technological, social, and cultural problems of the day. To accomplish



this, schools must instill the habits of critical inquiry so necessary to an intelligent citizenry.

For education to be truly effective as a social force means that it must be accountable to the prevailing desires of society: as society changes, so must education.

Educational Accountability

There is a growing concern among parents, school officials, governing agencies, and society in general relative to the instructional effectiveness of today's schools. Other factors—the rising cost of public education, increased government-spending-in-education, the aggressive entrance of private industry into education, the ever more insistent demand by school patrons that expenditure of their funds and their children's time result in the attainment of an adequate educational level—have all resulted in emphasis upon the fiscal and programmatic effectiveness of the schools. That emphasis on determinable effectiveness is called "educational accountability."

Schools today are more and more being held accountable to taxpayers, to local and state school agencies, and to state and federal legislative bodies in fiscal matters. State and local agencies, and increasingly the federal education agency, are becoming more concerned about how money is spent and what results or impact the expenditures of federal, state, and local funds are making on the education of children across the country. The trend is evidenced in the more stringent initial requirements for obtaining certain federal and state funds and in the correspondingly more stringent requirements on project reports and evaluations of funded projects. Substantive evaluation, including hard testing data, is being demanded as well as the meeting of specific objectives that have been established or identified as being related to specific areas of need.

A reflection of the demand for accountability is also evident in the massive amounts of work that federal and state agencies are doing to update their statistical and management procedures. The demand for fiscal accountability is being initiated by legislative councils and may stem from demands of taxpayers to know why there is a continued cry for larger expenditures for teachers and educational programs when a great proportion of the total tax funds are going to them at present. In the past the results of the relatively great expenditures for education were examined from the limited dimension of financial accounting, consequently



the public was not adequately informed of the calcertional results of their fiscal support. Certainly it will be in possible in the near future to account for the effect of certain and longitudiness on individual pupils; however, the premissive is a considerable general inadequate accounting procedures, the mequities, and the general lack of concern by both local and state agencies will tend to diminish,

The demand for accountability is also clearly evident in the establishment of new management appraisal systems. The development of management information systems, program-planning-budgeting systems, concentrated efforts in evaluation, and other management supporting techniques at the state, local, and federal levels are significant parts of attempts to alleviate the accountability problem.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS BELIEVES THAT PUBLIC EDUCATION SHOULD AND MUST BE HELD ACCOUNTABLE FOR ITS RESULTS IN TERMS OF BENEFITS TO ALL CITIZENS COMMENSURATE WITH LEVELS OF EXPENDITURE.

THE COUNCIL FURTHER BELIEVES THAT STATE EDUCATION AGENCIES SHOULD PROVIDE PRIME LEADERSHIP IN THE EVALUATION OF ALL PROGRAMS WHICH INVOLVE STUDENT TIME AND PUBLIC FUNDS, WHETHER INNOVATIVE, EXPERIMENTAL, OR TRADITIONAL.

Educational Assessment and Evaluation

When educational assessment is defined as a measurement of the quality of a school's products, there are in existence at least two major manifestations. The first of these has been called national assessment. Over the years national assessment has become a relatively less important aspect of the total educational assessment picture. The decrease in importance has come because an increasingly large number of states and local education agencies are involving themselves in an assessment of their own schools products. While there is considerable variation among assessment programs, there is a very strong thread of commonality through all programs of this kind.

Distinctions in purpose, rationale, and methods of procedure may be observed through a comparison of assessment at the national, state, or local level.

The stated purpose of the National Assessment Program is to determine at what age and to what degree specific competencies



that constitute levels of achievement within specified subject matter areas are achieved by different types of students. Thus, specific information about the time and the degree to which specific knowledges are acquired by specific groups of individuals are important goals. In order to provide information of this kind, selected samples of subjects representing different age groups and different geographic backgrounds are exposed to assessment exercises which are analyzed by different categories.

The stated purposes of local and state assessment programs include making it possible for school personnel to answer certain specific questions such as "How effective is a particular school in teaching mathematics to a student of average ability at the junior high level?" or "How successful is this school, in relation to other schools, in teaching social science to black, economically or socially deprived students?"

Thus, state and local assessment efforts are generally attempts to provide information of the relative knowledge and skills of students in different schools or school systems in a broad range of the curriculum, while the national program is concerned with the ubsolute knowledge of students with specific biographical, geographic, or socioeconomic characteristics.

Evaluation necessarily begins with statements of the goals and objectives of learning. The national program mentioned above defined these in terms of traditional elementary-secondary school subjects, citizenship, and occupation-career development. At state and local levels, a variety of specifications of the goals of instruction are used, including those of the subject areas sampled by a single test; abilities and behaviors measured by achievement and aptitude test information; traits of personality sampled by inventories and other measures; and successful behavior of the student in the projected world of the student's adulthood at some point in the future.

A major step in evaluation is a specification of the subcategories of each objective following validation. In local systems it is approximated by asking appropriate teachers, "Is this what you teach when you are teaching mathematics?" Or "Is this a complete listing of the desirable skills and knowledge the student should have when he successfully completes his mathematics training?" The national program asks a variety of persons, including knowledgeable lay persons, to rate the validity of their subcategories and subsequent items. At this level, and when they are properly stated, these subcategories of objectives are called "measurable objectives."



The purpose of evaluation at either the state or local level may not be to describe what students at a particular age level or from a particular geographic area have learned, but rather may be to evaluate schools by comparing achievement within one school district or between school districts. The simplest procedure for doing this is to determine what schools or school districts are alike or characteristics that are considered significant and make comparisons between similar schools or districts. These characteristics are commonly population density, the socioeconomic background of the parents, and the father's occupational level. This allows comparisons of how students at grade five at one school compare to students of the same age and common background charact astics in another school. A more sophisticated technique is that in which the effectiveness of the school is related to the amount of growt1-students make in a specific period of time.

As in other programs where there is a well publicized and standardized measurement of educational products, there are strong cries from various groups that there are inherent dangers in allowing tests to be the basis of the curriculum. An extension of this fear is that a test-generated uniform curriculum will cause the entrance of extensive state or federal control into the schools. Other fears could also be cited.

Assessment, either to establish the absolute level of achievement of identifiable students or to compare the average achievement of subjects in different schools or school districts, forms the inescapable basis for accountability, performance contracting, and all other systems where quality and quantity of education are important.

The movement toward assessment of the status of education and the subsequent determination of educational needs hold promise for improving the quality of education in the schools. The Council recognizes the limitations inherent in current assessment programs but believes these limitations should not serve as the basis for avoiding assessment; rather, they should stimulate efforts toward improving measurement tools and techniques.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS RECOGNIZES THE NECESSITY FOR ASSESSMENT OF EDUCATION AT THE STATE AND LOCAL LEVEL AND URGES THE MEMBER STATES TO SUPPORT THE DEVELOPMENT OF ASSESSMENT CAPABILITY WITHIN THE STATES.

THE COUNCIL BEAFFIRMS ITS COMMITMENT TO A FULLER UN-



DERSTANDING OF THE STATUS AND NEEDS OF AMERICAN PUBLIC EDUCATION THROUGH EDUCATIONAL ASSESSMENT AT THE NATIONAL LEVEL AS CONDUCTED BY THE EDUCATION COMMISSION OF THE STATES.

Performance Contracting

As part of the management approach to education, new techniques and business practices are currently being developed and applied to instructional programs throughout the educational community. As one outgrowth of this movement, performance contracts for various types of educational services have been entered into by school systems in several states and additional programs are under consideration. A district typically defines objectives it wishes to obtain, then develops a request for proposals specifying payment of certain amounts contingent on measurable increases in learning achievement. Financial support for performance contracts is derived from a variety of public and nonpublic sources.

One advantage of performance contracting is the concentrated application of resources to such problems as dropont prevention and helping disadvantaged students move ahead at a faster rate, especially in recently desegregated areas. Another advantage is the opportunity to experiment with innovative programs without financial risk.

Many educators, especially teachers, resist the concept of performance contracting, fearing the loss of teaching positions to private business and the dehumanizing of education. Some districts are utilizing funds from federal sources to pay teachers incentive bonuses for measurably "good teaching," but teachers often find evaluation techniques unpleasant and contend that many phases of education are not measurable.

The Council recognizes that the emergence of performance contracting places a new and added responsibility on state education agencies. This involvement of the private sector in the conduct of educational programs should in no way lead to the abdication of state and local responsibility for management and accountability for public education in the state.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS BELIEVES THAT STATE EDUCATION AGENCIES SHOULD TAKE POSITIVE ACTION TO ENSURE THAT THE STATUTES AND THE ADMINISTRATIVE POLICIES OF THE STATE ARE FOLLOWED; THAT GUIDELINES APPRO-





PRIATE FOR THE SIZE AND OTHER CHARACTERISTICS OF SCHOOL SYSTEMS ARE DEVELOPED FOR USE BY LOCAL AGENCIES; THAT EDUCATIONAL GOALS ARE ESTABLISHED; THAT AGREED UPON GCALS ARE TRANSLATED INTO PROGRAM SPECIFICATIONS DESIGNED TO RESULT IN EDUCATIONAL ACHIEVEMENT; THAT PROCEDURES FOLLOWED ARE BASED ON INSTRUCTIONAL EFFECTIVENESS AND THE RESULTS EVALUATED; THAT PERFORMANCE CONTRACTS ARE REVIEWED AND EVALUATED IN TERMS OF PREDETERMINED CRITERIA; AND THAT THE INTEGRITY OF THE TEACHING PROFESSION IS RESPECTED.

The Voucher System

The practice of providing parents with vouchers equivalent to the cost of educating each pupil on a yearly basis has been introduced and has evoked extensive criticism. One group has condemned the system as a plan to perpetuate segregation, recalling the tuition grant program prevalent in the South after the Supreme Court decision of 1954. A national teacher organization, through its chief officer, expressed concern that such a plan would encourage hucksterism or a resort to fads and gimmicks to win students and that a massive bureaueracy would be required to prevent abuse.

Other complaints stem from fears that schools will select the better students, dumping the disadvantaged elsewhere; that parents who can afford to will supplement the vouchers to send their children to more exclasive schools; that many parents do not have enough information to make intelligent choices in the field of education.

One of the first major voucher systems was developed in the East under a federal grant. It called for bonus vouchers for the disadvantaged and handicapped that would enable them to obtain the additional educational services needed. The payment of transportation expenses would enable students to attend schools of their choice rather than being restricted by zoning or proximity to certain schools.

Under the plan, schools with an abundance of applicants would choose one-half by lottery. A school would have to be integrated and would not be allowed to discriminate on the basis of sex, race, or economics; schools would not be allowed to charge a student more than the value of the voucher. To help parents make intelligent choices, schools would provide complete information about their programs and their operations. The schools,



of course, would be subject to audit.

The voucher system is viewed by its supporters as a vehicle to finance educational innovation on a broad scale. Its promoters hope through at to improve the education of disadvantaged children; to integrate the school system economically, socially, and racially; to increase community involvement; and to provide more alternatives than are now available.

It is difficult to know at this time how the voucher system would actually affect education if put into operation, but it is questionable that the system would actually accomplish the hoped for objectives. Such objections as have been raised, including the following, demand careful consideration.

- 1. Excessive commercialism and exploitation of children for profit could occur; parents would need "consumer protection."
- 2. Public schools could tend to become chiefly places for disadvantaged children.
- 3. The proposed system could markedly increase the costs of public education.
- 4. The proposed system could support denominational schools with public funds.
- 5. The competitive emphasis of the system would not be sufficient to ensure quality.
- 6. The proposed system would not guarantee more equal educational opportunity and might actually open the way to less equal educational opportunity.
- 7. The proposed system would make accountability difficult.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS BELIEVES THAT THE VOUCHER SYSTEM COULD INCREASE RACIAL SEGREGATION, PROVIDE PUBLIC FINANCIAL SUPPORT TO NONPUBLIC SCHOOLS, ENCOURAGE EXPLOITATION OF CHILDREN FOR PROFIT, AND INCREASE OPERATIONAL COSTS FOR SCHOOLS AND, THEREFORE, IT SHOULD NOT BE SUPPORTED AT THIS TIME.

THE COUNCIL UNDERSTANDS THAT THE PRESIDENT'S COMMITTEE ON EDUCATIONAL FINANCE WILL INCLUDE A THOROUGH STUDY OF THE VOUCHER SYSTEM. THE COUNCIL WILL REEXAMINE ITS POSITION ON THIS MATTER WHEN THIS STUDY IS COMPLETED. IN THE MEANTIME EXPERIMENTATION IN THE DEVELOPMENT OF PROCEDURES GRAND TO PROVIDING INCREASED FLEXIBILITY IN THE INTEREST OF INDIVIDUAL STUDENTS SHOULD BE DEVELOPED BY STATE AND LOCAL AGENCIES.



Participation in Decision Making

Parental and Lay Involvement

Involvement of people in decisions which affect their lives is basic to the American way of life. The public school system can, to a certain extent, be credited with the preservation and progress of society, and especially of the institution of democracy. Such responsiveness to the needs of society has come about through seeking and utilizing the advice of knowledgeable citizens. To be able to provide soundly based educational programs, school systems will necessarily be required to continue seeking aid in the assessment of needs, development of programs, and evaluation of effectiveness. The same is true for all levels of governmental operation related to education.

The Council several years ago set forth its belief that American schools are especially suited to the future of a civilized, humane society where laman values may take precedence over all others. It was pointed out that schools thrive on the participation of parents, who must always have the opportunity to remind the schools and the state that for their children they have both love and hope. Such schools call for the closeness to community provided by local boards familiar with local needs and problems, and to whom citizens may appeal with some feeling of nearness.

Amendments to national legislation providing program funds for disadvantaged youth have given the United States Commissioner of Education authority to promulgate regulations to ensure the participation of parents in the planning, operation, and evaluation of federally supported projects where he deems it necessary and advisable.

THE COUNCIL COMMENDS THE CONGRESS FOR RECOGNIZING THE IMPORTANCE OF PARENTAL AND LAY INVOLVEMENT AND POINTS OUT THAT STATE AND LOCAL EDUCATION AGENCIES FOR MANY YEARS HAVE BEEN INVOLVING CITIZENS IN EDUCATIONAL PROGRAMS IN MANY DIFFERENT WAYS. WE URGE THAT THE COMMISSIONER, IN DEVELOPING REGULATIONS TO IMPLEMENT THIS SECTION OF THE LAW, AVOID THE TEMPTATION TO PRESCRIBE PROCEDURES AND PROCESSES AND MANDATE ONLY THAT STATE AND LOCAL EDUCATION AGENCIES ESTABLISH THE PROCEDURES AND PROCESSES, DESCRIBING THEM IN THE STATE PLAN AND/OR LOCAL DISTRICT APPLICATIONS AND EVALUATING THE OVERALL FETECTIVENESS IN ANNUAL REPORTS.



Student Involvement

American nationhood arose through a demand by the people for a direct control over their own destiny. New thrusts in this direction began during the last decade—thrusts that included the quest of youth to be more directly involved in the planning of educational programs.

Student rights and freedoms are protected at the federal level by the Foorteenth Amendment's provision that the state may not deprive an individual of life, liberty, or property without due process of law. Students now point to the Amendment when liscussion arises as to whether school attendance is a right or a privilege. If school attendance were a privilege, it could be revoked at will and the due process clause would not apply.

Courts generally now recognize that educational opportunity is a right, and in the last few years they have concerned themselves with assuring that students involved in disciplinary cases receive basic standards of fairness and due process of law. Emphasis has been placed on the importance of education and protection of personal liberties.

Along with court involvement in protection of student rights, the students themselves have been demanding more involvement in planning, operation, and administration within educational institutions and the system generally. One major reason for the magnitude of the student voice is the age of the college student and his ability to articulate his desires. His influence is being felt in the secondary schools as students at that level make known their desires for a voice in the decision making processes of the classroom, school, and community.

There have been notable examples that students can play positive and constructive roles in planning, developing, and evalnating educational programs that affect them. A concurrent advantage is the promise of providing for growth of individual student leadership.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS ENDORSES THE CONCEPT OF STUDENT INVOLVEMENT IN PLANNING, DEVEL-OPING, AND EVALUATING THE EDUCATIONAL PROGRAMS THAT DIRECTLY AFFECT THEM.

Accent on Manpower Development

The nation's greatest asset is generally recognized to be its human resources. Yet, as societal complexity grows, millions have



dropped out of educational institutions because of being forced into choosing one of three programs; general, college preparatory, or vocational. In nearly every high school most students were counseled into selecting the college preparatory route because of its status implications.

As technology progresses, all instruction will have value for purposes of selection and maintenance of an occupation. Jobs will change so rapidly that individuals will need to be trained or retrained on an almost continuous basis. Society, as well as the individual, demands that the schools provide learning programs that will lead to a contributory role of service for one who has completed each phase of the educational program. Only in this manner can the educational system turn out at least a partially finished product with a sense of dignity and worth.

The false separation of "general education" and "vocational training" must be overcome if products of the educational system are to become contributing members of society. However, federal educational programs are still being placed with agencies other than educational ones, and guidelines and regulations are still being made so rigid and inflexible as to continue the separation.

Legislation related to manpower development passed at the national level in the late 1960's prompted the Council of Chief State School Officers to call upon state governors and legislatures to meet the full matching requirements of the legislation and to assist in the unification of all education that concerned the world of work. The Council also requested the U. S. Office of Education to interpret the legislation as broadly as possible in regulations and in federal administration of the law to promote such unity. Federal officials were urged to minimize those incentives in the law and practices in administration that might tend to separate the basic education and special training that are equally important in the modern world of work.

Manpower development and training programs were placed under the responsibility of the Secretary of Labor as the decade of the 1970's opened. Extremely broad authority was granted to that official to grant funds to prime sponsors to provide training, retraining, and upgrading for all types of skills, to provide counseling and job coaching and other supportive services to help workers reach their potential, to develop job opportunities through establishment and operation of centers for unemployed and low-income persons, and to give weekly allowances to trainees where appropriate.

The purposes of the legislation were excellent; however,





education agencies at the federal, state, and local levels were bypassed almost entirely in the administration of the program, and the functions of the Secretary of Health, Education, and Welfare are largely advisory.

The Council opposed the legislation prior to its passage, viewing it as one more step in the unfortunate divisions of educational training programs.

Public Aid to Nonpublic Schools

Two emerging crises have accentuated the issue of public aid to nonpublic schools: the economic difficulties of the non-public schools, particularly those essentially sectarian in character; dissatisfaction, on valid or invalid grounds, respecting the quality and equality of public education and the need to provide alternatives of choice.

The economic difficulties of the nonpublic schools have led to the revival of the arguments that these schools serve the public interest, constitute a source of tax saving, and are supportive of the free choice principle.

The counter arguments, none of which are new, include the following: (1) the public interest is not fully and clearly served as long as the *essential* reason for establishing the nonpublic school is to serve a private purpose, whether religious education or other; (2) support of private education essentially for its differences should not be described as a double payment; focus on duplication of payment for secular services should relate to where the job can best be done; (3) nonpublic schools, although somewhat subject to federal and state laws respecting discrimination because of race, religion, social or economic standing, do represent a restrictive form of free choice which cannot be described as fully meeting the public necessity for equal educational opportunity. Appropriate alternatives to public education cannot be provided within such a restrictive framework.

THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS SUSTAINS ITS BASIC OPPOSITION TO THE USE OF PUBLIC FUNDS TO AID NON-PUBLIC SCHOOLS ON THE GROUNDS THAT THE CRISES DESCRIBED ABOVE DO NOT CONSTITUTE SUFFICIENT AND APPROPRIATE REASONS TO CHANGE ITS ESTABLISHED POSITION WHICH ISPREDICATED UPON SAFEGUARDING THE SEPARATION OF CHURCH AND STATE AND UPON PRESERVING THE INTEGRITY OF THE PUBLIC SCHOOLS THROUGH ADEQUATE SUPPORT OF THIS SYSTEM.



NOTWITHSTANDING ITS FIRM OPPOSITION TO PUBLIC AID FOR NONPUBLIC SCHOOLS, THE COUNCIL EXPRESSES ITS BROAD CONCERN FOR THE EDUCATION OF ALL CHILDREN AND TAKES COGNIZANCE OF THE NEED TO COOPERATE WITH NONPUBLIC SCHOOLS AND IN PROVIDING FOR ADEQUATE TRANSITION ARRANGEMENTS RELATED TO NONPUBLIC SCHOOL CLOSUNGS.

Federal Sharing of Educational Costs

Revenue sharing proposals have been made by several administrations as a result of numerous studies and reports submitted by task forces and by public and private individuals and groups. Some propose this type of federal assistance in place of other types of federal assistance programs.

There are strong arguments for and against revenue sharing by the federal government. The stated purposes include restoring balance in the federal form of government; encouragement of leadership by state and local governments in solving their own problems; achievement of a better allocation of total resources by sharing with state and local governments a portion of the tax revenues received by the federal government.

There exists ample evidence that increasingly local and state governments are unable to bear the full costs of quality education for all Americans. The federal government with its preemptive revenue raising ability must come to recognize that not only special programs and circumstances but the entire educational enterprise requires substantial financial support on a consistent and continuing basis.

IN ACCORDANCE WITH THIS BELIEF, THE COUNCIL URGES THE ADMINISTRATION AND THE CONGRESS TO JOIN IN NECESSARY STEPS TO PROVIDE FEDERAL SHARING OF THE COSTS OF EDUCATION CONSISTENT WITH THE FOLLOWING PRINCIPLES:

THE PRESENT FEDERAL CATEGORICAL AID PROGRAMS SHOULD BE CONTINUED, ADEQUATELY FUNDED ON A TIMELY BASIS, AND THERE SHOULD BE ENACTMENT OF LEGISLATION NECESSARY TO PERMIT THE CONSOLIDATION OF PROGRAMS BY LOCAL AND STATE EDUCATION AGENCIES.

THERE SHOULD BE MAJOR EXPANSION OF FEDERAL FUNDING THROUGH GENERAL AID MEASURES AND/OR BY MEANS OF AN EQUALIZATION TYPE PROGRAM.



FEDERAL FUNDING PROVISIONS SHOULD NOT PERMIT DIRECT FUNDING OF NONPUBLIC EDUCATION PROGRAMS.

FEDERAL FUNDS OF ALL TYPES SHOULD BE ALLOCATED WITH MINIMAL FEDERAL CONTROL THROUGH STATE EDUCATION AGENCIES.

ALL FEDERALLY SUPPORTED EDUCATION PROGRAMS, INCLUDING THOSE NOW ASSIGNED TO OTHER AGENCIES (EXCEPT THOSE SPECIFICALLY FOR TRAINING FEDERAL AGENCY PERSONNEL, INCLUDING ARMED FORCES) SHOULD BE ADMINISTERED BY THE U.S. OFFICE OF EDUCATION PENDING ESTABLISHMENT OF A DEPARTMENT OF EDUCATION AND MANPOWER.

ANY LEGISLATION INVOLVING FEDERAL FUNDING OF EDUCATION SHOULD CONTAIN PROVISION FOR JUDICIAL REVIEW AS TO ITS CONSTITUTIONALITY.

REVENUE SHARING AS A MEANS OF PROVIDING FINANCIAL SUP-PORT FOR STATE AND LOCAL GOVERNMENTS SHOULD SPECIFICAL-LY RECOGNIZE THE EDUCATION AGENCIES.

THE COUNCIL FURTHER URGES THAT THE PRESIDENTIAL COM-MISSION ON SCHOOL FINANCE GIVE FULL CONSIDERATION TO THE ABOVE PRINCIPLES IN ITS RESEARCH AND FINDINGS.

Summary

The various forces and trends set forth in this chapter point up the fact that there are conflicting roles being developed of all three levels of government that must be resolved if the goal of quality education is to ever be attained in the United Status.

As the federal government increasingly has taken a larger role in education there has been a definite trend in federal legislation and federal administrative practice to dilute state education authority or to bypass the state education agencies. The a have been the creation of independent quasi-administrative councils, program administration in other than education agencies at all levels of government, provision for authority only to reside and comment on local district applications, and the increase of federal agencies into direct relationships with local school districts in performance contracting.

These actions appear to ignore the fact that education is a



state responsibility, recognized and accepted in every state constitution, with the authority for implementing this responsibility directed by either constitution or statutes to the state education agencies.

THE COUNCIL REAFFIRMS THE LONG-HELD POSITION THAT ALL FEDERAL EDUCATION PROGRAMS SHOULD BE ADMINISTERED AT THE FEDERAL LEVEL BY THE UNITED STATES OFFICE OF EDUCATION. WE FURTHER REAFFIRM THE POSITION THAT SUCH PROGRAMS BE ADMINISTERED AT THE STATE LEVEL BY THE AGENCY DESIGNATED BY THE STATE CONSTITUTION AND STATUTES. IN THE CASE OF ELEMENTARY AND SECONDARY PROCEAMS THE DESIGNATED AGENCY IS THE STATE EDUCATION AGENCY.

THE COUNCIL URGES THAT INDIVIDUAL MEMBERS SEEK TO DISCUSS AND CLARIFY FEDERAL-STATE EDUCATIONAL RELATIONSHIPS WITH THEIR GOVERNORS AND MEMBERS OF CONCRESS.

To avoid the wasteful duplication of effort at any and all levels of government mentioned at the beginning of this publication, there must be an opportunity for all levels to do those things each can do best and to make every effort to exercise authority to complement the constructive efforts of other levels.

The determination of roles for federal and state agencies and personnel has been the main concern of this work; it is to be carnestly hoped that the discussions presented will form a spring-board for such determination. As new forces enter upon the a ene and as old ones reemerge, reexamination of roles must be a constantly recurring phenomenon.





STATE

Alabama Alaska American Samoa Arizona Arkansas California Canal Zone Colorado Connecticut Delaware Florida Georgia Guam Hawaii Idaho Illinois Indiana Iowa 1 Kansas Kentucky Louisiana Maine Maryland Massachusetts Michigan Minnesota Mississippi Missouri Montana Nebraska Nevada New Hampshire New Jersey New Mexico New York

North Carolina

North Dakota

Ohio

STUDY COMMISSION MEMBER

O. P. Richardson

Keith J. Andarson Mrs. Mer: Eatham *William Hayr fond Harvey Z. Such Walter T. Coultas Francis S. Castles E. Dean Coon Raymond J. Fay Howard E. Row Olm W. Seay Oscar H. Joiner Richard G. Tennessen Teichiro Hirata *Harold Farley Emmett J. Slingsby Sam Mercantini *Richard N. Smith Lawrence Simpson D. E. Elswick William F. Beyer, Jr. Kermit S. Nickerson Quentin L. Earhart Thomas J. Curtin Alex Canja Farley D. Bright Frank L. Lawell, Jr. *Delmar A. Cobble Ralph Hay LeRoy Ortgiesen *John R. Gamble Robert L. Brunelle Victor J. Podesta P. H. Barck Lorne H. Woollatt ^o Jerome Melton Vernon L. Eberly

CHIEF STATE SCHOOL OFFICER

LeRoy Brown

Marshall L. Lind Milton deMello Weldon P. Shofstall A. W. Ford Wilson Riles Francis A. Castles Donald D. Woodington William J. Sanders Kenneth C. Madden Floyd T. Christian Jack P. Nix Franklin Quitugua Shiro Amioka D, F. Engelking Michael Bakalis John Loughlin Paul F. Johnston C. Taylor Whittier Wendell P. Butler William J. Dodd Carroll McGary James A. Sensenbaugh Neil V. Sullivan John W. Porter Howard B. Casmey Garvin Jolinston Arthur Mallory Dolores Colburg Cecil E. Stanley **Burnell Larson** Newell J. Paire Carl L. Marburger Leonard J. DeLayo Ewald B. Nyquist A. Craig Phillips M. F. Peterson Martin W. Essex



Paul E. Spavde

STUDY COMMISSION STATE MEMBER Oklahoma Amos Kimberling Oregon Jesse V. Fasold Pennsylvania Neal V. Musmanno Puerto Rico Harris F. Bunker Rhode Island *Arthur R. Pontarelli South Carolina ^eJesse A. Coles, Jr. South Dakota Peter L. Tooliey Tennessee ^eR. E. Brinkley Texas Charles W. Nix Trust Territory of Leonard Kaufer the Pacific Islands Utah Lerue Winget Vermont Herbert Tilley Virginia Fendall R. Ellis Virgin Islands Charles W. Turnbull Washington "Thomas R. Deering West Virginia *Ernest Berty Wisconsin Robert C. Van Raalte Wyoming Paul D. Saudifer

Chairmen of the Study Commission William R. Marsh of Alaska, 1968 John W. Scay of Florida, 1969 Arthur R. Pontarelli of Rhode Island, 1970 Jesse A. Coles, Jr. of South Carolina, 1971 CHIEF STATE SCHOOL OFFICER

Leslie R. Fisher
Dale Parnell
David H. Kurtzman
Bamon Mellado
Fred G. Burke
Cyril B. Busbee
Donald Barnhart
E. C. Stimbert
J. W. Edgar
R. Burl Yarberry

Walter D. Talbot Joseph H. Oakey Woodrow W. Wilkerson Charles W. Turnbull Louis Bruno Daniel B. Taylor William C. Kahl Robert G. Schrader

Special Editing Committee William R. Marsh, Alaska Chairman Jack Waters, Florida Virginia Cutter, Texas

Study Commission Secretary Blanche E. Crippen



^{*}Served on Planning Committee