

COMMENTS ON THE OFFICE OF EDUCATION STAFF REPORT

"A Federal Education Agency for the Future"

General Comments

1. The report of the Committee on Mission and Organization shows thoughtful analysis of the current status of the Office of Education and recognizes both the need for changing traditional concepts of the Office's role and for modifying its organizational structure in order to meet the demands which will be made upon the Federal education agency in the future.

2. The Committee has addressed itself principally to organizational arrangements. Of course, organization is important, but policies, procedures, and people are perhaps more important. These aspects of the Office of Education, too, should be considered by the Commissioner in his efforts to strengthen the agency. In this regard, we are in agreement with the views stated in the report that the Office's national perspective and multitudinous duties require staff of broad capabilities and varied professional training and experience; that a Federal education agency should concern itself with the long-term, general national interest in education as an area of governmental interest (apart from the Government's more specific interest, for example, in education to advance the cause of research in the sciences); that this agency should identify major problems in education and contribute to the solution of such problems; and that it should not compromise its effectiveness by too strong an identification with professional pressure groups.

3. Plans for the organization of the Office to meet greater responsibilities in the next decade cannot realistically be made, in our view, without the assumption that the Federal Government will play a greater role in education. The reorganization changes will not of themselves have a bearing on the degree of Federal participation in the Nation's educational system. Only the enactment of new legislation by the Congress could alter this Federal participation to a significant degree. But to fulfill its role in Federal education programs, the Office must exercise great care to select new personnel characterized by breadth of training and outlook; build staff resources in the Office that will enable it to speak with authority as the Government's voice in the field of education, demonstrate courage in identifying and solving significant education problems facing the Nation, and modify some of its close associations with special interest groups. These will be challenges to the agency.

4. We support the view that the Office should be a "monitor" of Federal activities that are related to the Nation's educational system. In this capacity, the Office would study the impact of all Federal education programs, and bring problems involving other Federal agencies or programs to the attention of those agencies, the Secretary, or the Executive Office of the President. It is appropriate and desirable that the Office should make recommendations for the resolution of such problems.

5. We recognize that it is not easy to make needed changes in the Office's role and its organization because of tradition, political climate, vested interest groups, and other factors. However, if the Office of Education is to be looked to as the principal agency concerned with the Federal interest in education, it must be greatly strengthened in order to achieve competence as an adviser on Federal education programs, a sponsor and participant in a significant amount of high quality educational research, a first-hand educational agency, and a valuable adviser within the Executive Branch on matters of national education policy. To a large extent, the reorganization proposed by the Committee would contribute to the strengthening of the Office. While there are alternative organizational patterns which might be considered--each of which would be advantageous in certain circumstances--the proposed plan appears to provide a reasonable approach for the Office to take.

6. Before commenting on more specific details of the Committee's organizational proposal, we would point out three reservations on the report as a whole which we believe are significant. These are:

a. The statement of mission in the report fails to articulate adequately the position of the Office vis-a-vis the Department of Health, Education, and Welfare. It is not sufficient for the Office merely to "deal with" the Secretary; rather, it is the duty of the Office to assist the Secretary in carrying out his responsibilities as the head of the Department in which Federal education responsibilities are assigned. The Office must always recognize that it is to the Secretary that the President looks for advice on educational policy and programs.

b. We recall that one of the most discussed management problems of the Office of recent years is the need for improvement of the educational statistics program. Yet, the report of the Committee is silent on this problem. The failure of the report to provide improvements in the management of this important activity is a significant oversight. The Bureau's views as to the nature of this problem to our knowledge were completely in the Joint HEW-DOE "Task Force Review of the Office of Education Statistical Activities" dated August 9, 1960.

c. The report does not contain any overall view of the responsibilities, duties, and mission of the field staff as unified output of the Office of Education; of relationships between the field staff and the headquarters; of relationships within the regional offices among field representatives of various bureaus; or of field staff relationships to the Department's regional offices. The concept of a field staff for the Office warrants further review and analysis in order to define an integrated approach to the needs of the Office in the field including the mission of the Commissioner's representative.

Comments on specific recommendations

1. Name of Organization--The report proposes to change the Office's name to "United States Education Agency." The usual name for an organization at this level is "service" as noted in the text of the report. The term "agency"

ordinarily creates an independent organization rather than a constituent part of a department of the Federal Government. The prefix "United States" is no longer generally used in titles of Federal organizations, nor would it be desirable in an agency where mission is primarily a domestic one.

2. Board of Advisors--If a board of advisors in the field of education is to be created, the members of such a board should represent the public. Such a board should, however, be appointed not by the President but by the Secretary of Health, Education, and Welfare or by the Commissioner of Education. We take note, also, that a 1974 statute never utilized (Public Law 432, 83rd Congress) already provides for an advisory committee to the Secretary. The Secretary would appoint the committee members, a majority of whom would be other than professional educators, to propose studies of national concerns and make recommendations on Federal policies and programs in the field of education.

3. Bureau structure--As a general proposition, there are many advantages in the Committee's recommendation to establish a bureau structure based on major functions of the Office. A principal feature of this plan, namely the separation of grant administration from the research or quasi-research activities of the Office appears desirable. This proposed separation of these activities would, as we understand it, preserve the integrity of the branches handling grant operations in the existing divisions of the Office. The report rightly observes, however, that different kinds of personnel are required to perform the research and administration functions and that the head of a Federal aid administration bureau should be a skilled administrator rather than an educational specialist or researcher. Furthermore, the chiefs of the proposed "centers" are potentially leading figures in American education and will be successful only if their qualifications as professionals are of the highest order. Such individuals, focusing their attention on those areas of American education which pose problems of national importance, would require the support of strong professional, research-oriented, staffs to carry out the duties of the "centers."

We would, however, question several aspects of the proposed bureau arrangement, as follows:

a. Vocational education--The report recommends maintaining the integrity of the Division of Vocational Education in order to continue working relationships which have proved satisfactory in the past. This proposal is an exception to the functional organization otherwise recommended. In his February Message to the Congress on American Education, the President set forth his objective to modernize vocational education programs. We believe that it would be detrimental to this objective if the traditional patterns of operation of the vocational education programs were to remain unaffected by a reorganization which is designed to permit the Office to carry out its current and potential responsibilities more effectively.

V Financial Aid Branch in the Division of Higher Education; Aid to State and Local Schools Branch in the Division of State and Local School Systems; and the entire Division of School Assistance in Federally Affected Areas.

b. Separate bureaus for elementary, secondary and for higher education-- The report recommends organizational separation of grant programs providing Federal assistance for elementary and secondary education from those serving higher education. If such a separation is to be made, attention should be given to certain consequences which might be anticipated. Such a dichotomy of grant administration would seem to rigidify existing channels of aid administration, both those going through State agencies and those dealing directly with school districts and institutions. Yet there may be quite legitimate reasons for a closer direct contact between the Office of Education and local school districts in particular programs (in addition to aid to federally affected areas). Also, there may at some time in the future be need for directing certain Federal aids for higher education through States instead of to institutions. In addition, a broader concept of Federal aid to education may later occasion a closer organizational relationship between aid activities serving both elementary and secondary and higher education than has existed in the past. These factors support the idea that serious consideration be given to establishing a single bureau for grant administration.

c. Facilitation of policy decisions-- The report recommends that each bureau chief be provided with an assistant for program operations whose concern would be to analyze, develop, and evaluate the operations of the Bureau. Thought should also be given to the needs which the bureau chief may have for planning his program activities, as contrasted with the operational or administrative aspects of his duties, and for evaluating program activities in terms of carrying out effectively the responsibilities which are expected of him. At the same time, care should be taken not to create an administrative superstructure which is so large as to actually impede the decision-making process at both the bureau level and the Commissioner's level.

d. International Bureau-- The creation of a bureau for international activities should depend on whether or not the activities which are likely to be assigned to it in the foreseeable future are sufficient to warrant Bureau status. These activities admittedly do not fit themselves readily into any of the other functional areas of the Office. However, it must be recognized that it is the policy of this Administration to assign primary responsibility for foreign affairs activities to the foreign affairs agencies of the Federal Government and that no decisions have yet been made to give the Office of Education new assignments, statutory or otherwise, in the field of international education.

e. Educational statistics-- The educational statistics activity performed by the Office of Education is in need of substantial improvement, as the Office is well aware. The first requirement of such improvement is to recognize the need for statistical program planning and coordination at the Commissioner's level, carried out, very likely, as a part of the job of the overall program planning staff recommended by the Committee. Such a planning staff would be able to advise the Commissioner on needs for educational statistics and on gaps in available information (including the priority with which such gaps should be filled). With the assistance of all parts of the Office of Education,

this staff would develop the Office's overall statistical program, taking into account the needs of all units of the Office as well as of other parts of the Government and of the public for such statistics. The program developed by this staff would, of course, have to fit within the capacity of the educational statistics unit of the Office in order to assure that the Office's statistics will be both timely and meaningful.

However, the present estimates and forecasts activity would not appropriately be assigned to the program planning unit of the Commissioner's Office. The making of forecasts and estimates is a professional statistical operation which can best be performed adequately in the general educational statistics unit which can encourage and enforce proper professional standards. It is recognized, of course, that legislative and program development and other activities at the Commissioner's level require staff personnel proficient in applying the information made available by the statisticians to legislative, program and other policy situations. Such personnel should be provided in the Commissioner's Office.

A first-rank statistical program for the Office demands that data collection, the setting of statistical standards, and tabulation of data be performed by a highly qualified central statistical unit. Hence, a central statistical unit is needed not only to carry out one of the basic responsibilities of the Office of Education set forth in its 1867 organic act, but also to perform a service activity for other parts of the Office. Because the central statistical unit would not deal solely with data related to the activities of the proposed Bureau of Research and Development, its placement in that Bureau may well be detrimental to its relationships with other bureaus and units. Accordingly, it would seem appropriate that consideration be given to creation of a separate organizational unit for statistical and forecasting activities with the present Educational Statistics Branch as a nucleus. As the report recommends, the statistical clearance function activities should be included within the educational statistics unit. Any inter-bureau conflicts which might arise from the exercise of the clearance function at this level can be resolved under general managerial policies and procedures of the Commissioner.

If, on the other hand, ^{the} statistical function is located in the research and development bureau, it would appear essential that the facilities at the Commissioner's level for determining data needed for managerial and overall planning purposes be greatly strengthened and that adequate arrangements be provided there for assuring that the statistical program is indeed Office-wide in its scope and that conflicts as to priorities and concerns of the several bureaus are adequately considered and resolved.

4. Office of the Commissioner--any advantages of decentralizing administrative and housekeeping activities as proposed by the Committee may well be offset by the increases in costs which would result from such a decentralization. An organization of the size of the Office of Education does not lend itself to

a layering of administrative activities. In addition--and particularly if the Division of Administration is to be incorporated within the Commissioner's Office, as proposed by the report--the Commissioner might well be provided with a highly qualified managerial assistant on his personal staff who could advise him on matters of Office-wide administrative management at a higher level than can the administrative personnel who are actually performing the day-to-day operational activities. Such an assistant should be a professional career manager well acquainted with Federal administrative policies and methods. Finally, the function of program analysis and planning in the Commissioner's Office should not be combined with legislative liaison activities. The legislative liaison staff would be engaged primarily in seeing that legislation is enacted or in providing information to members and committees of Congress to the Office of the Secretary, to the Bureau of the Budget, and others. This is a demanding activity and the urgency of legislative demands would tend to detract from the time and talents available for the program planning activity. Program planning necessarily should be conducted with an eye focused well beyond current congressional problems and limitations.

In a field which is financially, socially, and economically as important as education, the Commissioner badly needs a small highly-competent program planning staff which can serve him in analysis and in long-range program and policy development. For example, educational policy is closely related to general manpower policy and national requirements for skilled manpower in various fields. Similarly, the rapid developments on the science front, in which the NSF and many other agencies have substantial programs, require the Office to orient its long-range program plans with an awareness of developing needs. More adequate long-range analysis of national resource needs for education, including facilities and manpower as well as finances, also is highly desirable. Performance of many of these analytical functions require the services of a few high-caliber economists, statisticians, and experts from other professional fields outside the conventional educational expertise (with which the Office now is largely staffed). Such a staff might also assist the Commissioner in important cross-cutting functions in the statistical programming area, such as development of general statistical plans and liaison with Budget Bureau.

5. A National Library of Education--The desirability of creating a new educational library of the sort recommended in the report depends upon whether an additional national resource in this area is necessary, or whether the material which would be available in such a library is already readily available to potential users in various facilities--principally university collections--around the Nation. In other words, it would be necessary to determine whether the need for a facility parallel to the "National Library of Medicine" would be required to meet a similar need in the field of education. If it is intended that the library of education would primarily serve the staff needs of the Office of Education, it should be pointed out that a decision was reached as long ago as 1947 that a central departmental facility would more adequately meet the needs of all Department personnel.