Comments on S. 728 and S. 894

Administrative Provisions of S. 728. These provisions provide for the establishment in the Department of Health, Education and Welfare of an Office of Children and Youth to consist of the Children's Bureau, the Bureau of Juvenile Delinquency and such other bureaus as may from time to time be established or transferred to such office by the Secretary. The Chief of the Children's Bureau is to be the head of the Office for Children and Youth, as well as Chief of the Children's Bureau and also Assistant Secretary for Children's Affairs.

It seems entirely logical that the unit of the Department of Health, Education and Welfare responsible for children should be comparable in status and relationship to the Social Security Administration, the Office of Education, the Public Health Service and other major constituent units of the Department. It is not logical that the head of one of the operating units should be designated as Assistant Secretary. None of the other heads of units in this Department hold this title. The policy of having assistant secretaries free to work across unit lines in the Department is sound and should not be violated in this case.

While from one point of view it would be more logical to place additional responsibilities in the field of juvenile delinquency, as provided in the bill, within the Children's Bureau instead of within a separate Bureau of Juvenile Delinquency, because of the inter-relationships between this and other fields of work, there may be good reason for emphasis here and a separate bureau within the Office for Children and Youth might well be established. It will be necessary, however, to coordinate the work in juvenile delinquency very closely with the other research and administrative work in the Children's Bureau. A preferable plan might be to provide for general planning and coordination in an Advisory Council on Juvenile Delinquency and its secretariat and to place in the Children's Bureau responsibility for activities in the field of juvenile delinquency related to research, information, consultation service, and administration of grants.

Section Page Line

103 2 17 We would omit the word "possible" before "means." The bill provides for more direct service in the field of juvenile delinquency than is contemplated by the phrase (1. 16) "study and investigation." Removal of the word "possible" would eliminate this defect.

3 Provisions with regard to the Federal Advisory Council on Juvenile Delinquency are very complicated. We think the number of members of the Council should be reduced and the organizations from which they are drawn should not be specified in the bill.

Title III 303 6 The administrative provisions of the bill with regard to state administration are very complicated. Without trying to suggest specific amendments, we recommend the following plan:

1) Submission of state plans by an interdepartmental committee, composed of representatives from the state department of education, state department of public welfare, the state department of health and such other state departments or state-wide agencies as are concerned with providing services and treatments for delinquency children;
2) Permit parts of the plan to be administered by different state agencies as already contemplated in the bill, with money going from the federal government directly to the administrative agency responsible for each portion;

3) Provide for supervision and coordination of the administration of the plan by the interdepartmental committee on juvenile delinquency, which should have provision for an executive secretary and necessary office expense;

4) Provide for an advisory committee or other body, including representatives of state agencies not having membership in the interdepartmental committee and representatives of juvenile courts, probation, police service and voluntary agencies.

The plan submitted by the interdepartmental committee should include evidence that the advisory committee has been consulted in the development of the plan.

Grants for Special projects--The provisions of Section 205 of S. 894 appear to be preferable to these provisions. S. 894 limits the amount that can be used for special projects to 20 per cent of the sums appropriated for any fiscal year. There is no limitation in S. 728 except for the first year. Grants under S. 894 are restricted to public and other non-profit institutions of higher learning or research institutions while grants under S. 728 may be made to any public or private non-profit organization, agency or institution. We do not believe that direct grants should be made by the federal government to voluntary agencies except for training and research conducted under the auspices of institutions of higher learning. The term "research institution" in S. 894 should be defined.

Other comments on S. 728 follow:

4 13-17 We do not believe it is wise to authorize the Secretary to utilize the services of a member or members of the council in connection with the administration of the act for service in addition to membership on the council.

301 6 1 We question the desirability of specifying that funds may be used for the "location," of delinquent youth. This seems to imply an active program of going out in search of delinquents. It might be better to use some such word as "service to children in danger of becoming delinquent,"

601(b) 11 8 We question the phrase "cooperate with . . . States". This might imply substantial expenditures in states in addition to grants, which do not seem to us in line with the general purpose of the bill.
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
<th>Line</th>
<th>Additional comments on S. 894: The provisions for grants for an initial period for development of plans is a good one.</th>
</tr>
</thead>
<tbody>
<tr>
<td>103</td>
<td>3</td>
<td></td>
<td>The plan suggested in relation to S. 728, dealing with state administration, is applicable here. In other words, an interdepartmental committee, an advisory committee and provision for administrative responsibility for different parts of the plan by different agencies if that seems appropriate are suggested.</td>
</tr>
<tr>
<td>203</td>
<td>7</td>
<td></td>
<td>Same comments regarding administration.</td>
</tr>
<tr>
<td>302</td>
<td>12</td>
<td></td>
<td>Grants for special projects: See above comment relating to research institutions.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>It might be advisable to provide that the advisory committee pass on special projects.</td>
</tr>
</tbody>
</table>

General comment on time limit: It would be desirable to provide for seven years instead of five years as the period for which authorization is made, with provision for a review of experience at the end of five years.