

National Conservation Advisory Council

April, 1981

Interim Report On A Concept For A National Institute for Conservation

PREFACE

In July, 1978, NCAC released a "Discussion Paper on a National Institute for Conservation of Cultural Property." Based on approximately five years of deliberation by the Council and several study committees, the document identifies three major categories of services - information, education, and scientific support - that a national institute might provide, and suggests specific activities within each category. Copies of the "Discussion Paper" were circulated to more than two thousand individuals and organizations with major concern for or programs in the conservation of collections.

This document is a compendium of the most pertinent comments and suggestions offered in response to the "Discussion Paper" and of ideas expressed at six public discussions with conservation-related membership organizations. It raises concerns and answers questions that have surfaced during the last thirty months of concentrated deliberation on the issue of establishing a national institute for conservation in the United States. The narrative that follows should be considered in conjunction with the 1978 "Discussion Paper;" it is intended to supplement the ideas presented in that document.

WHY A NATIONAL INSTITUTE FOR CONSERVATION?

Cultural property is enormously important for understanding the past and the evolution of cultures to the present. The demands placed on properties for scholarly interpretation and accurate presentation of these properties are increasing constantly, especially as the public becomes more sophisticated in its appreciation of these treasures. Conservation, the informed, skilled and ethical care for cultural property, has assumed a central position in the care and presentation of objects of historical and aesthetic importance.

Conservation programs have evolved independently in the United States, often without the benefit of coordination and interaction with other similar programs. This has led to the present network of diverse conservation treatment, training and research programs across the nation. These programs serve an extraordinarily large constituency, considering the number of libraries, archival collections, historical society collections, art, history, science and technology museums, buildings from all eras of

AN ADVISORY BODY ORGANIZED TO CONSIDER NATIONAL NEEDS IN THE
CONSERVATION OF HISTORIC AND ARTISTIC WORKS IN THE UNITED STATES

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our country's past, and monuments of all kinds. The number of individual objects, and even classes of objects, is staggering.

The United States is one of the few nations without a national policy or plan for the care and handling of its historic and artistic treasures, which causes some serious problems for preserving this Nation's cultural patrimony. Until the establishment of the National Conservation Advisory Council in 1973, no forum existed in the United States for sharing information and ideas among the museums, libraries, archives, historical societies, and other agencies with direct responsibility for conservation of collections. Although NCAC has improved significantly the communication about conservation among these institutions, it is unable to provide the sustained level of national attention to conservation required to effectively coordinate and facilitate the exchange of information among existing conservation programs. A nationally coordinated effort is needed to provide sustained encouragement and support for existing and future efforts in conservation practice, training and science. The creation of a national institute for conservation, permanently funded and internationally recognized, would enhance and support existing efforts in conservation treatment, training, research, and scientific analysis, and would support efforts to advance the conservation profession. Only a nationally recognized permanent organization, primarily supported by public funds, could carry forward the variety of necessary administrative and programmatic functions. For example, a national institute could take up and expand some of the activities NCAC is carrying out on a limited basis. Of particular importance would be clearinghouse functions such as: increasing the ability to respond to requests for information from national, state and local legislative and governmental bodies; participating regularly and systematically at meetings of a wide range of organizations with concern for or influence in establishing national conservation planning; consulting with individuals and organizations seeking advice about matters related to national conservation issues; and dissemination of information and reports.

A national institute would be able to encourage and help coordinate the development of a national policy for the care and preservation of cultural property, it could enlist government and non-government cooperation, and seek to establish new levels and sources for sustained funding of conservation from public and private sources. It also could provide expert advice on funding proposals for conservation. While an institute must remain neutral with regard to development of standards of practice or training, certification of professions, and accreditation of programs, it could provide continued encouragement and support to the appropriate professional conservation societies for development of these important guides. For example, it could assist in broad distribution of information about these matters to the public in order to insure general understanding of the fundamental nature of conservation practice. An institute could consult with curators and other managers of cultural collections to help them obtain advice on their conservation needs. It could assist in coordinating the efforts of all existing conservation programs by serving as a liaison among them for the exchange of information and by helping them to make effective use of resources for conservation.

A national institute could help to resolve serious problems encountered by conservation activities that must survive from grant to grant, such as training programs. Most of the organizations that provide support for conservation are reluctant to provide support for more than a few years, resulting in major cut-backs in seemingly well-established and important programs. Sustained and coordinated support of conservation also would permit long-term study of problems that are fundamental to all programs, problems that cannot be resolved with the limited resources of existing conservation activities.

HISTORICAL PERSPECTIVE

The concept of a national institute for conservation and the momentum to delineate its responsibilities and to create it did not originate with the National Conservation Advisory Council. Rather, NCAC has served as a forum for the interpolation of ideas and suggestions from a number of sources, into a proposal for a national institute. This responsibility was a major charge to NCAC in 1973 when it was organized through the voluntary association of twenty institutions with major responsibilities or programs in conservation. Since 1978, NCAC has continued to focus attention on the concept of a national institute to refine the general concept into a firm proposal. In recommending establishment of a national institute in the United States, NCAC follows on previous efforts made during the last twenty-five years. Some of these efforts, undertaken by conservation professionals, are summarized in order to put NCAC's role into a historical perspective. In addition to these professional efforts, it also should be noted that twelve years ago, in response to a challenge from the United States Congress, two related reports were developed - the Belmont Report, and the Whitehill Report. This present effort, to establish a national institute for conservation, is in many ways a third response to that challenge, and builds on recommendations from these earlier reports.

In 1955, Fellows of the International Institute for Conservation of Historic and Artistic Works met and drafted "A Proposal Relating to a National Laboratory for Conservation of Cultural Resources in the United States," a five-page document that was approved by the Association of Art Museum Directors in May, 1956. In following up on this document, it became clear that such a proposal needed to be promoted by a major organization. In 1958, the idea was brought to the attention of the American Association of Museums. In 1969, AAM published the Belmont Report which recognized that the conservation problems of museums would require long-term and gradual attention, with substantial support from the Federal Government. In 1970, the American Group of the International Institute for Conservation drafted "Twelve Recommendations Concerning National Needs for Conservation of Historic and Artistic Works." In 1974 NCAC President Edward Gilbert was provided with these documents, in order that NCAC might build and expand on the ideas contained in them. "Twelve Recommendations Concerning National Needs for Historic and Artistic Works" subsequently was adopted by the American Institute for Conservation at its Annual Business Meeting in 1975, and was published in the AIC Bulletin (AIC 15, No. 2).

In addition to the suggestions contained in these documents, NCAC attempted through its study committees to identify additional functions for a national institute that were not included in them.

In 1977, following endorsement by NCAC of the general concept of a national institute, a special study committee was appointed to prepare a discussion document on a national institute suitable for circulation to more than 2,000 individuals and organizations with direct responsibility for cultural property. Simultaneously, a special committee of the American Institute for Conservation circulated a questionnaire to a random sample of AIC Fellows to elicit their reactions to a national institute. The results of this survey strongly favored creation of a national institute with certain limitations. These limitations were presented to and accepted by NCAC, and were incorporated into the "Discussion Paper on a National Institute for Conservation of Cultural Property," released in July, 1978.

In 1979, in response to requests from members of the American Institute for Conservation, NCAC prepared a dialogue on the concept of a national institute. This document served as a basis for formal discussion between the two organizations at the 1980 Annual Meeting of the American Institute for Conservation in San Francisco. Following these discussions, the American Institute for Conservation passed a resolution in support of the concept of a national institute, with several stipulations. These stipulations are included in the following sections of this report.

CONDITIONS FOR ESTABLISHING A NATIONAL INSTITUTE FOR CONSERVATION

Before addressing the sections of the 1978 "Discussion Paper" dealing with the services a national institute should provide, it is necessary to identify the conditions that our letters of comment lead us to believe will be required for achieving support by conservation professionals and organizations.

In order to effectively serve the conservation constituency, a national institute must be created in a manner that guarantees the autonomy of existing, independent activities. The national institute for conservation must not supplant existing organizations. Rather, it should enhance and support existing efforts in treatment, training, research, scientific analysis and improvement of the conservation and related professions. Most of the conditions for achieving support from the conservation constituency are related to questions of professional oversight, governance and access. A national institute for conservation must be responsive to a system of professional oversight. The limited size of the conservation profession in the United States, the "Code of Ethics of Conservators," and the magnitude of conservation needs in the United States combine to make it imperative for a national institute to respond to priorities identified by the conservation profession. In order to assure the necessary level of responsiveness, a permanent national conservation advisory council must be retained or created with representatives from training programs, professional societies, cooperative and institutional conservation and research facilities, conservators in private practice, and funding agencies in the public and private sectors.

This will assure that the institute interacts regularly with the individuals and programs comprising the network of conservation service organizations in the United States. Such interaction is essential to effective and efficient provision of conservation support and to national conservation planning. Conservation programs, organizations, and individuals would maintain an independent, regular communication with a national institute as it initiates and carries out programs and services. Its success will depend largely on the amount of voluntary interaction between it and these other programs. The institute's role should be supportive to the conservation profession, not managerial. The national institute should have no authority to require subordination to its policies by independent programs or practitioners. Rather, the programs, policies, and ideas emanating from a national institute must be voluntary with regard to adherence by practitioners.

In order to assure that the programs and policies of an institute do respond to this professional oversight, the board of directors of the national institute must also be constituted with a majority of its members from the conservation profession. The board should be established on a rotating basis, with balanced representation from the various conservation disciplines and conservation science, and supplemented by officials from cultural institutions. Policies approved by the board should benefit from regular interaction with the broad conservation constituency. This can be accomplished by requesting appropriate conservation organizations to designate representatives to the board, or by making the board of the national institute directly responsible to the permanent advisory council on conservation.

Another key element for achieving support from the conservation profession is to assure that the national institute is administratively independent from presently existing governmental or private institutions and agencies. No matter how a charter for the national institute may be designed, administrative autonomy from existing programs will be necessary to assure that the institute's programs and policies remain flexible and responsive to the needs of the conservation profession. Such autonomy also will assure that the institute remains independent bureaucratically from the regulations and impositions of any single benefactor. An institute must look to both government and private sources for sponsorship; this does not require that it become a division of some existing agency. It should be established as an administratively independent entity, perhaps under some existing or new legislation. Effective coordination for conservation among existing programs will require this independence.

Access to the services of a national institute is an issue of major importance to conservation professionals. The ratio of practitioners to volume of need is immeasurable, a situation that demands optimum use of the expertise of conservators, conservation scientists and related professionals. A substantial number of practitioners are employed in private practice, either on a full or part time basis, and contract their time to institutions and organizations. Access to the services of a

national institute must be available on the same basis to conservation professionals employed in different situations, private or institutional. If an institute is to be effective in helping to facilitate advances in conservation practice, the opportunities for interaction must not be based on the particular employment situation of the professional.

Exclusion of primarily professional issues from the purview of an institute is considered a basic requirement for any proposal. An institute should not develop or enforce standards of practice and training, certification of professions or accreditation of training programs. It should rely upon the professions to provide these standards, and operate its programs based on them. In situations of disagreement over professional issues, the institute should maintain a position of neutrality.

As with professional issues, it also is considered essential that a national institute maintain a neutral position with regard to new information. For example, in the development of new testing and treatment methods or in the generation and distribution of information, an institute must not attempt either directly or indirectly to influence or legislate the use of a treatment or policy by conservators. This is particularly important with regard to how federal and private foundations and agencies might interpret and therefore favor such a procedure over an alternative preferred by the individual conservator.

A final condition for proposing a national institute is that it must not compete for existing funding on which current conservation programs depend. A major purpose of a national institute would be to stabilize and enlarge the scale of funding available for all phases of conservation programming. If properly carried out, the effort to coordinate and stabilize will yield more efficient use of effort by the few professionals in conservation, improve the visibility and therefore increase the fundability of conservation and open new funding prospects not achievable by small and scattered organizations. It is obvious that a national institute will be a major asset if it attracts additional funding for conservation. In order not to compete for funding with existing programs, it is clear that the major portion of the cost of establishing and maintaining a national institute must be provided as a separate and non-competitive appropriation from the government.

FUNCTIONS OF A NATIONAL INSTITUTE FOR CONSERVATION

Comments received on the 1978 "Discussion Paper" and views expressed at public meetings leave little doubt that functions proposed in the 1978 document are appropriate for a national institute of conservation. However, they should be regarded as examples of the services needed to support conservation, not as an all-inclusive list.

The needs of the conservation profession will change, and priorities among the services provided by a national institute will require periodic re-evaluation. It is clear that a national institute will be unable to implement all services at once. However, a great many of the services can

be started by providing additional financial assistance to the existing network of conservation programs. Some of the in-house administrative and programmatic services can be started and then expanded as funding resources become more stable and priorities more certain.

The 1978 "Discussion Paper" proposes three basic categories for national institute activity: information services, education services, and scientific support services. In summary, the three broad categories of functions are considered of equal priority. Each category contains examples of specific activities that a national institute might perform. They are listed here according to the approximate ease of implementation by a newly formed organization.

A. Information Services

1. Assemble and make accessible a library of conservation literature.
2. Respond to requests for information concerning conservation problems from conservation specialists and custodians of cultural property.
3. Arrange for on-site consultants at request of institutions and organizations responsible for the conservation of cultural property.
4. Disseminate through publication or support of publication the results of research, development, and testing conducted by the national institute and elsewhere.
5. Publish standards for testing conservation materials.
6. Collect, store, and dispense conservation data and examination and treatment records that have been catalogued and arranged for immediate access nationwide, probably through computerization.

B. Education Services

1. Seek a permanent base of funding for conservation training programs.
2. Sponsor conservation seminars or workshops for users of conservation services, such as museum administrators and trustees.
3. Promote or sponsor continuing education for professionals in conservation.
4. Promote effective ways to communicate to the public and users of conservation services information on the aims, values, needs, limitations, and accomplishments of conservation.

C. Scientific Support Services

These projects initially would be carried out by existing facilities, with support from a national institute for conservation. At some time in the future, activities not able to be handled by existing laboratories might require the development of a national institute laboratory. Under no circumstances

would such a laboratory enter into competition with existing facilities.

1. Analytical and technical assistance in support of conservation practice.
2. Development of materials and testing standards.
3. Development of conservation materials and techniques.
4. Establishment of an information center for facilitating the communication of scientific information, in conjunction with the institute's information services division.

Also envisioned as future national institute activities are: the investigation of the chemical, physical and biological mechanisms in deterioration and decay of cultural property; and the determination and characterization of component materials in artifacts and the study of the chemical/physical interaction of the materials within the artifact as it ages.

A number of comments have led to serious consideration of how best to implement each of these services and when they should be started. Because information, education, and scientific support services are equally important, an over-emphasis on any single category might lead to the neglect of other services. Efficient advances in conservation capability in the United States require a balanced pattern of growth among the services provided. For example, it would be non-productive for training programs to educate larger numbers of conservators if the public, as comprised by both institutions and private owners, are not convinced of the need to employ them. Therefore, it is recommended that all three categories of service be implemented at the same time, even if on a limited basis.

Time will be required to establish a national institute to full operating capacity and to have it begin to provide all the services envisioned. There is general agreement that some of the services proposed for a national institute could be started now, under existing programs, with a plan to incorporate and expand them later into the programs of a national institute. There also is universal agreement that the services provided by a national institute should build on existing programs in the United States. Only those services and programs that cannot be provided through the independent network of conservation programs in the United States should be considered as in-house projects.

Many of the services proposed in the 1978 "Discussion Paper" are provided already on a limited basis, and they can be expanded with an infusion of support from a national institute. For example, some of the results of research, development and testing already are disseminated through various professional conservation and related publications. However, a national institute could compile and disseminate relevant information, on a regular basis, through its information services division. Conservation seminars and workshops can and have been sponsored by existing organizations and programs; however, they cannot be sponsored with the frequency needed until a national program helps to underwrite costs of

conducting them and assists in their organization. Important scientific support services, such as analytical services, are being provided on a limited basis. However, the number and volume of these services can only be expanded if a national institute encourages and helps to support an expansion through existing programs around the nation.

Any discussion of the services to be provided by a national institute for conservation should restate its primary purpose beyond services to the conservation constituency: service to the cause of conservation generally. The principal function must be that of an encouraging, facilitating and coordinating agency. Although it would not regulate government or private programming, a national institute would provide coordination of the work of all of these groups as they affect conservation. It would act as a liaison to insure the most effective use of the human and financial resources devoted to conservation, and would improve visibility of conservation, and of the need for conservation, among the public at large. It would bring an understanding of the philosophy and the views of conservation to federal and private foundations, to government agencies legislating policies affecting conservation, and to legislators and public officials. With the gradual expansion of the numbers and kinds of services provided by conservators and conservation agencies, active coordination and the ability to communicate with government agencies are imperative. The policies and regulations of the Department of Energy, the Environmental Protection Agency and the Occupational Safety and Health Administration, for example, affect the routine, daily practice of conservation. A national institute alert to these actual and potential problems can effectively represent the field of conservation of cultural property before these federal agencies. As with each of the other categories of services, a national institute would have to draw on the combined expertise of all conservation professionals to formulate advice or comment on issues affecting conservation. The combination of in-house staff and the expertise of independent programs would permit strong response to critical issues.

It is important to re-emphasize the services and programs that are considered inappropriate for a national institute for conservation. A national institute is not an appropriate setting for a major training program in conservation or for a centralized treatment facility. Treatment would be undertaken only as required as a part of a specific research project. Neither is a national institute intended to be a center for establishing professional standards, or for accreditation or certification programs. Professional issues are the responsibility of professional societies; a national institute should only participate as requested by these societies in supporting their activities and in circulating relevant information. All of these services are available through the network of existing conservation programs. A national institute should help to facilitate the expansion of these programs or encourage development of new programs as needs are identified. Any other policy would violate the plan to build on the existing system of independent programs.

ORGANIZATIONAL PERSPECTIVE OF A NATIONAL INSTITUTE FOR CONSERVATION

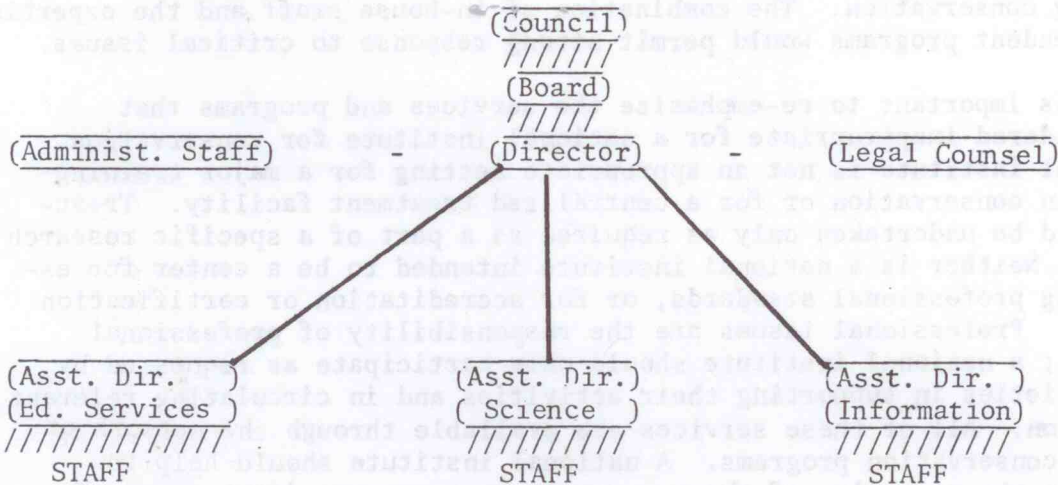
The organizational structure of a national institute for conservation

need not be complex; it is envisioned as a resource and center for support of existing conservation programs and efforts. Most of the activities identified in the discussion of functions can be accomplished by drawing on and supporting existing conservation programs. Only those efforts that cannot be accomplished effectively or efficiently by existing activities are viewed as potential in-house operations. Education and information services can be implemented with modest staff and space. Scientific support services will require a larger staff and more space. In addition, the institute will need to provide space for a director, legal counsel and administrative personnel. The board of directors and the permanent advisory council will be comprised mainly by volunteers who will be assisted by the institute's administrative staff.

No matter how the institute is enacted, it should have an organizational structure that guarantees its autonomy and administrative independence. The following general organizational chart avoids problems. For example, if it were considered useful for an important representative of a governmental agency to participate, this could be accomplished at the Council level without serious legal complications.

- (Council) --Large
- Board --Small
- //////
- Staff --As Required

A more detailed organizational structure, demonstrating the functional areas of a national institute, is proposed in the following chart.



There are paradigms for largely autonomous agencies such as the one envisioned as a national institute for conservation. For example, the National Trust for Historic Preservation may have some elements in its structure that could be a model for certain features of a national institute.

Created in 1949 by Federal legislation, it has a Federal charter which gives it considerable influence when it comes to fund raising. The charter specifies that the Board should have three government officials in ex-officio positions for advice and support, and also specifies that at least six additional trustees should be chosen from the private sector. Their Board is in fact quite large, and they have many dozens of trustees which they find useful in channeling information in from the field and communicating their thinking out to the field. There are also elements in the structure of the National Institutes of Health, especially as related to extramural services, that support some of the elements of this proposal. Although these organizations are huge compared to the envisioned scale for a national institute, they are useful references for discussion of possible structures.

A special ad-hoc committee of NCAC, charged with drafting a possible charter for a national institute for conservation, is considering a variety of mechanisms for creating the institute. A key element of this charter will be provision of the previously described conditions for establishing an institute, interaction with and compliance to the priorities identified by the conservation profession. The charter for a national institute must include authority for it to grow, to be able to expand its programs to meet national needs identified in the future, and to supplement on an incremental basis support for conservation. Any effort to establish a national institute without this authority or without a permanent base of ongoing support would result in a future need to duplicate all of the investigative and consultative efforts of the last twenty-five years that led to this proposal.

It is clear that improvement of the national conservation capability will require substantial funding. A national institute will require major support, probably from both the Federal Government and private sources. A discussion of funding for a national institute for conservation includes two elements. The first is funding for basic administrative and programmatic costs of maintaining the institute. In order for an institute to serve and focus effectively on conservation in the United States, it must have a permanent and stable source of funding to support its internal operations.

The second element is funding to support existing conservation projects and programs and to undertake new projects identified as priorities by the conservation profession. This will require the national institute to have some influence on funding policies and priorities. At present, there are several sources of funding for conservation training, practice and research. Unfortunately, no systematic mechanism exists for appraising these funding organizations of the levels of support required. There is no central agency responsible for focusing exclusively on the funding needs of conservation programs and projects. It is not unusual for a funding organization to change its policy regarding conservation support to conform with other areas of its responsibility; nor is it uncommon for a funding organization to change a conservation policy without the advice of the profession.

The lack of a central agency results in tenuous attention to conservation problems and priorities, and reduces important communication among organizations presently funding conservation. A national institute would focus continuously on conservation needs and problems in the United States, and through its communication with conservation professionals and programs, would be able to establish priorities and influence conservation funding. It is imperative for a national institute to communicate with and influence the policies of organizations funding conservation and also to supplement that funding, through an in-house capability, for urgently needed services, projects and research that are not fundable by other programs.

There is no intent in this proposal to usurp the prerogatives of existing funding programs for conservation; rather, it is intended explicitly that funding programs of a national institute for conservation would focus on needs that are not met by the existing programs. Neither is there any intention for the basic administrative and programmatic costs of maintaining the institute to be placed in competition for existing funding. If the national institute is to support, help coordinate, and expand the conservation capabilities of the United States effectively, it is imperative that its creation not reduce existing or planned increases in support for conservation training, treatment and research services. However, a regular, predictable source of funding is essential to the creation of an institute and to the conduct of services. A review of present sources and levels of funding for conservation, and their relative instability, demonstrates the absolute necessity for the institute to have a capacity to fund extramural conservation programs, either through a system of grantmaking or contracting, or through a combination of both. The deletion of a funding element for the national institute would limit severely its effectiveness, especially in the area of scientific support.

A NATIONAL INSTITUTE AND THE BROAD CULTURAL COMMUNITY

Beyond the previously described direct services and support of the existing conservation network, a national institute will have considerable impact on the broad cultural community, as represented by museums, libraries, archives, historical societies and related institutions. Conservation and preservation are basic components of these institutions' goals; in fact, the responsibility for care of collections is identified in most of their official definitions. For example, both the American Association for Museums and the Institute for Museum Services identify conservation as a major priority among the responsibilities outlined in their definition of a museum.

Drawing national attention to the conservation needs of collections will help cultural institutions attract higher levels of support for their conservation programs, from both private and governmental sources. Through workshops, seminars and publications, it also will provide their trustees, administrators, curators, and technical personnel with an opportunity to understand the problems and processes of conservation.

Indirectly, these institutions will benefit from the services provided by a national institute to their conservation facilities. For

example, conservators will have access to scientific support services, such as analysis and testing of materials used in treatment; to an information bank for examination and treatment data; and to opportunities for continuing education. These services will help increase the capabilities of conservation facilities, and indirectly will enhance the provision of conservation services within the institution.

INTERNATIONAL RAMIFICATIONS OF A NATIONAL INSTITUTE

Many of the major nations of the world have national conservation programs of some kind, and there are several important international conservation organizations, such as the International Institute for Conservation. Unfortunately, there is no central agency in the United States capable of establishing and maintaining regular communication with these programs.

Important information is generated by conservation efforts in other nations. Yet, only a small portion of it is filtered into the conservation network in the United States. A great deal of the information is not published; and some of that which is published would need to be translated and abstracted before it could be disseminated.

A national institute for conservation would be an ideal instrument for regular communication with the international conservation community. It could establish systems for sharing information, and could abstract and disseminate widely pertinent information important to conservation. It also might tie into data bases that exist in several nations.

CONCLUSIONS

The vast majority of comments on the 1978 "Discussion Paper" deal with three issues: governance; access; and formulas for providing services. Comments on the first issue, governance, make clear that the charter for a national institute and the policies established after its creation must respond to the needs identified and exemplified by the individuals and organizations that comprise the conservation constituency. Only those individuals that are intimately acquainted with the practice of conservation can guide effectively the policies of a national institute. In order for the institute to remain responsive to the needs of conservation in the United States, it must benefit from continual oversight by a permanent advisory council and by a board of directors responsible to that advisory council.

The second issue, access, requires that the services provided by a national institute be available to all conservation professionals and programs on an equal basis, with built-in policy assurances that larger programs will not overshadow opportunities for equal access by smaller programs or individual needs.

Concerning the third issue, formulas for providing services, NCAC realizes that further specific delineating of the services to be provided

