

August 8, 1966

MEMORANDUM FOR HONORABLE DOUGLASS CATER

Subject: Guidelines for Compliance of Extended Care Facilities with  
Title VI of the Civil Rights Act of 1964

The following provisions of the guidelines seem to me to be potentially offensive:

Guideline #1 - "The declaration of an open admission policy may not be sufficient to effectuate the desegregation of the facility in some instances..." This is a direct challenge to the good faith of the persons signing the declaration.

Guideline #2 - This guideline prohibits any group, however bona fide, from participating in the benefits of this program unless it has achieved bi-racial status. An Elks Club could not maintain a home for its senior members, a synagogue could not maintain a home for its senior members, etc., even though motivated by a desire to take care of their own rather than an intention to discriminate against others.

Guideline #5 - "Courttest titles (Mr., Mrs., Dr.), wherever used, should be used throughout EXTENDED CARE FACILITIES, ..." It seems ridiculous to attempt to dictate courtesy.

Guideline #10 - "Civil rights leaders" are singled out for special attention. I can't understand what part they have to play in an EXTENDED CARE FACILITY for people who are ill.

EXTENDED CARE FACILITIES should be pleasant places to stay, and the thrust of the guidelines should not be to particularize each detail of desirable or undesirable conduct, but to insure that the facilities are available to all without discrimination. With suggested modifications the proposed guidelines achieve their purpose.

Farris Bryant  
Director