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Privacy Issues and Supplemental Security Income Benefits.
HRD-77-110; B-14031(4). November 15, 1977. 12 pp. + 3
appendices (4 pp.).

Report to Rep. John E. Moss; by Elmer E. Staats, Comptroller
General.

Issue Area: Income Security Programs: Program Effectiveness
(1302); Federal Records Management (1400).

Contact: Human Resources Div.

Budget Function: Income Security: Public Assistance and Other
Income Supplements (604).

Organization Concerned: Railroad Retirement Board; Social
Security Administration; Veterans Administration.

Congressional Relevance: Rep. John E. Moss.

Authority: Privacy Act of 1974 (5 U.S.C. 552a). Social Security
Act Amendments of 1972 (42 U.S.C. 1383). 38 U.S.C. 3301.

A November 1976 report to the Congress recommended that
the Social Security Administration obtain accurate and complete
data on compensation and pensions promptly and regularly from
the Veterans Administration and the Railroad Retirement Board.
These data are used for computing payments.

Findings/Conclusions: The use of inadequate data from these
agencies had resulted in Supplemental Security Income recipients
being overpaid \$60 million and underpaid \$4 million annually.
General Counsel at all three agencies agree with GAO that the
recommendations for accurate and complete data are consistent
with the Privacy Act since the disclosures are for a routine use
compatible with the purpose for which the record was collected.

Recommendations: The Administrator of Veterans Affairs should
revise the routine use notice so that it is more explicit about
the information disclosed to the Social Security Administration
from its system of records entitled "Veterans, Dependents, and
Beneficiaries Compensation and Pension Records" and the purposes
of such disclosures. The Secretary of Health, Education, and
Welfare should direct the Commissioner of Social Security to
prepare a risk analysis to determine what security measures may
be needed to prevent unauthorized access to the various payment
tapes it transmits to the Treasury each month. The Chairman of
the Railroad Retirement Board and the Administrator of Veterans
Affairs should also conduct risk analyses to determine what
security safeguards should be exercised over the transmission of
the compensation or pension income information provided to
Social Security. (SC)

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**REPORT OF THE
COMPTROLLER GENERAL
OF THE UNITED STATES**



**Privacy Issues And Supplemental
Security Income Benefits**

In a November 1976 report to the Congress, GAO recommended that the Social Security Administration get accurate and complete data on compensation and pensions promptly and regularly from the Veterans Administration and the Railroad Retirement Board. This data is used for computing payments.

This report

- discusses the agencies' compliance with Privacy Act requirements in carrying out this recommendation and
- recommends that the Veterans Administration fully inform the public about its disclosures to Social Security and that agencies determine security safeguards that may be needed for data being transmitted.

04237 4436



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-164031(4)

The Honorable John E. Moss
House of Representatives

Dear Mr. Moss:

In your January 26, 1977, letter, you noted that our November 1976 report to the Congress stated that the Social Security Administration had been computing Supplemental Security Income payments with inaccurate Veterans Administration and Railroad Retirement Board compensation and pension income. Consequently, Supplemental Security Income recipients were being overpaid \$60 million and underpaid \$4 million annually.

We recommended that Social Security obtain accurate and complete compensation and pension income data on a timely and continuing basis directly from the Veterans Administration and the Railroad Retirement Board. We also recommended that systems be established, where appropriate, to secure similar data from other Federal agencies.

Following, are answers to the questions you raised.

How is the exchange of information recommended in the report consistent with the Privacy Act?

We believe that our recommendations are consistent with the Privacy Act of 1974 (5 U.S.C. 552a). Furthermore, General Counsel at the Social Security Administration, the Veterans Administration, and the Railroad Retirement Board are of the opinion that the act does not prohibit their agencies from giving necessary information to Social Security to administer the Supplemental Security Income program.

While the Privacy Act generally prohibits agencies from disclosing information from systems of records without the written consent of the subject of the record, there are eleven categories of permissible disclosures without such consent. The disclosures made by the Social Security Administration, the Veterans Administration, and the Railroad Retirement Board fall within the third category--disclosures for a routine use.

A routine use is a use compatible with the purpose for which the record was collected. Guidelines issued by the Office of Management and Budget state that a routine use must not only be compatible with but related to the purpose for which the record is maintained.

We are of the opinion that the disclosure of information to Social Security from records maintained by the Veterans Administration and the Railroad Retirement Board is compatible with and related to the purpose for which those records are maintained. This opinion was reached after reviewing the provisions of the Privacy Act and the Social Security Act.

As added by the Social Security Act Amendments of 1972, 42 U.S.C. 1383(f) provides:

"The head of any Federal agency shall provide such information as the Secretary [of Health, Education, and Welfare] needs for purposes of determining eligibility for or amount of benefits, or verifying other information with respect thereto."

In addition, 42 U.S.C. 1383(e) requires that eligibility for Supplemental Security Income benefits not be determined solely on the basis of declarations by the applicant concerning eligibility or other relevant facts. Relevant information must be verified from independent or collateral sources and additional information obtained as necessary to assure that benefits in the correct amount are provided to eligible individuals.

We believe that 42 U.S.C. 1383(f) amends the purpose for which all systems of records are maintained to include disclosure for Supplemental Security Income verification. Accordingly, a Federal agency can provide Social Security with information from any system of records as long as the data is relevant to the determination of eligibility or amount of benefits for the program, and the disclosure complies with requirements for routine use as set forth in the Privacy Act.

The Veterans Administration can cite another statute (38 U.S.C. 3301) in justification of its disclosures to Social Security. This statute authorizes the disclosure from Veterans Administration's records for many purposes, including "When required by any department or other agency

of the United States Government." This section may be viewed as establishing disclosure to Social Security as a purpose for which the Veterans Administration maintains its records.

It is our opinion that 42 U.S.C. 1383(f) and 38 U.S.C. 3301 are not superseded by the Privacy Act. While this matter may not be completely free from doubt because it has not been tested in the courts, we conclude that these disclosures of information to Social Security are not improper or illegal if Privacy Act procedures have been followed.

Have all agencies notified the public of the exchange of information through Privacy Act notices?

The act requires agencies to publish in the Federal Register at least annually a notice of the existence and character of systems of records. New uses of information in a system must also be published 30 days in advance. The Social Security Administration, the Veterans Administration, and the Railroad Retirement Board have published in the Federal Register pertinent routine uses of records maintained, including the categories of users and the purposes of such uses.

The information disclosed by the Railroad Retirement Board to Social Security is from the system of records entitled "Railroad Retirement, Survivor, and Pensioner Benefit System-RRB." On March 22, 1976, the notice for this system was amended to include the following routine use:

"k. Beneficiary identifying information, entitlement, benefit rates and months paid may be released to the Social Security Administration, Bureau of Supplemental Security Income, to federal, state and local welfare or public aid agencies to assist them in processing applications for benefits under their respective programs."

The information disclosed by the Veterans Administration is from the system of records entitled "Veterans, Dependents and Beneficiaries Compensation and Pension Records-VA." As of September 7, 1976, this system had twenty-defined routine uses, and the Veterans Administration believes that disclosure to Social Security is authorized under the following routine uses:

"7. A record from this system of records may be disclosed to a Federal agency, in response to its request, in connection with the hiring or retention of an employee, the issuance of a security clearance, the reporting of an investigation of an employee, the letting of a contract, or the issuance of a license, grant, or other benefit by the requesting agency, to the extent that the information is relevant and necessary to the requesting agency's decision on the matter.

"8. Transfer of statistical and other data to Federal, State and local government agencies and national health organizations to assist in the development of programs that will be beneficial to claimants and to protect their rights under law and assure that they are receiving all benefits to which they are entitled.

* * * * *

"14. The amount of pension, compensation, or dependency and indemnity compensation of any beneficiary may be released from this system of records to any person who applies for such information."

On September 20, 1976, Social Security defined a routine use for the Supplemental Security Income record system that would permit Social Security to disclose such recipients to:

"* * * the Treasury Department to prepare supplemental security income benefit checks, and * * * the States to establish the minimum income level for computation of State supplement. * * *"

The routine uses of this record system were further expanded in November 1976 permitting Social Security to identify recipients to other agencies to obtain information for verification of eligibility. This notice provides:

"* * * Minimum information necessary to identify SSI applicants and recipients to the following Federal and State agencies for their use in preparing information for verification of eligibility for benefits under sections 1631(e); Bureau of Indian Affairs; Civil Service Commission; Department

of Agriculture; Department of Labor; Immigration and Naturalization Service; Internal Revenue Service; Railroad Retirement Board; State Pension Funds; State Welfare Offices; State Workman's Compensation; Department of Defense; United States Coast Guard; and, Veterans Administration. * * *

Both the Railroad Retirement Board and the Social Security Administration notices of routine use are specific about the type of information disclosed, the recipient of the information, and the purpose of the disclosure. On the other hand, the Veterans Administration notice could be more explicit in its disclosures to Social Security.

What agencies are exchanging or will exchange information on Supplemental Security Income with Social Security?

Presently, the Veterans Administration and the Railroad Retirement Board are the only Federal agencies providing benefit data to Social Security for use in the Supplemental Security Income program.

Social Security has begun discussions with Civil Service to obtain similar data for inclusion in the Supplemental Security Income benefit computations and estimates that the necessary data may be provided in April 1978. Social Security is also considering obtaining data from other Federal benefit programs, such as Veterans Administration Education Assistance, Railroad Retirement Board Unemployment and Sickness Insurance, United States military retirement, and Black Lung, Department of Labor. However, no action to determine the necessity and feasibility of obtaining such data is likely before 1978.

What type of information will flow between agencies?
Is it all useful and relevant?

At Social Security's request, the Veterans Administration, in August 1976, furnished magnetic tape files of selected compensation and pension data on all veterans. The tape files consisted of information identifying the recipient (name, sex, address, date of birth, social security number) and Veterans Administration award data (entitlement data, award amount, check payment and deductions, claim number and payment status).

In September 1976 Social Security compared this information with Veterans Administration benefit data provided by recipients already in the Supplemental Security Income record. Recipients whose checks would be increased or decreased were notified of the new amount of payment, the reason for the change, and the effective date of the change. Recipients were given the opportunity to have their prior payment either continued or reinstated if they requested an appeal within 10 days after receiving their notices of change. The October 1976 Supplemental Security Income payments reflected benefit changes resulting from this process.

The Veterans Administration also furnished benefit data in October 1976 and in January and April 1977 because some veterans received benefit increases. This notification process was repeated for those recipients whose checks would be affected.

The Railroad Retirement Board furnished its entire pension record to the Social Security Administration for processing in December 1976. Social Security extracted selected data it considered necessary to verify the amount of Railroad Retirement Board benefits paid to recipients. The extracted data was similar to the type of information received from the Veterans Administration. In January 1977 recipients whose checks were to be corrected were advised of the proposed change and were able to appeal. The Supplemental Security Income payments for February 1977 reflected benefit changes resulting from this process. In addition, the Railroad Retirement Board has provided microfilm of its 1975 and 1976 payment files for use in verifying benefits paid to recipients in prior periods.

Social Security is providing Supplemental Security Income information to the Departments of the Treasury and Justice. The Treasury Department is provided information such as name, address, social security number, payment amount, and the type of recipient--aged, blind, or disabled--for issuing checks. Beginning with checks to be issued after October 1, 1977, a Social Security official agreed to take appropriate action to delete information on the type of recipient from the payment tapes it provides Treasury because such information is not needed by Treasury. The Justice Department is provided information necessary for identifying the recipient and the nature of an alleged offense with related documentation and disposition for fraud cases and claims that are appealed to the U.S. courts.

One primary objective of the Privacy Act is to minimize the amount of inaccurate information which is collected about individuals. The act requires each agency that maintains a system of records to keep only information about an individual that is relevant and necessary to accomplish a purpose of the agency.

While most of the data Social Security obtained from the Veterans Administration and the Railroad Retirement Board was needed to initially verify the accuracy and completeness of compensation and pension payments received by Supplemental Security Income recipients, it should consider developing a mechanism for obtaining information only on recipients who are veterans or railroad retirees. As discussed below, Social Security is studying a system for limiting future data that the Veterans Administration and the Railroad Retirement Board will provide Social Security.

How will information be exchanged?
Will there be computer-to-computer communication?
Is there any potential for
unauthorized access to information?

The Veterans Administration carried its magnetic tapes to the airport where they were mailed air express to expedite the use of the data. Upon arrival at the airport, Social Security received the tapes which were controlled by transmittal documents. The tapes were counted, and the transmittal documents were signed and returned to the Veterans Administration.

The tapes were duplicated once they reached Social Security. After approximately 2 weeks, the Veterans Administration's tapes were returned by registered mail with return receipt requested. The duplicated tapes were placed in Social Security's locked tape library for use in any appeal resulting from notification of Supplemental Security Income benefit change. After about 6 months, the tapes will be erased by Social Security and used again.

The Railroad Retirement Board copied its entire pension record on magnetic tapes. The tapes were mailed to Social Security and were controlled by transmittal documents. The tapes were counted and the transmittal documents were signed and returned to the Railroad Retirement Board. Social Security extracted pertinent data from the tapes and stored the tapes in its locked tape library. After about 6 months, the tapes will be erased so that they can be reused.

The Railroad Retirement Board transmitted the microfilm via regular mail. The only control present was that it telephoned Social Security and advised them that the microfilm was being mailed and the quantity involved. Social Security inventoried and accounted for all the microfilm upon receipt. When not being used, the microfilm is stored in a locked room at Social Security.

Social Security makes daily, supplemental, and recurring payments under the Supplemental Security Income program for which the U.S. Treasury issues checks. Daily payment tapes, which include initial payments, underpayments, and adjustment payments are electronically transmitted from its central office to its Great Lakes Program Service Center where they are then hand-carried to Treasury's Chicago Disbursing Center. Supplemental payment tapes for recipients determined eligible after the date on which recurring payment tapes have been sent to Treasury are transmitted in the same manner and to the same locations as the daily payment tapes. Social Security carries recurring payment tapes to the airport where they are shipped air freight to Treasury's seven regional disbursing centers. It telephones each disbursing center to advise it of the carrier, flight number, and time of expected arrival. Treasury picks up the tapes at the respective airports. No documentation is provided Social Security showing that Treasury actually received the tapes. Instead Social Security relies on Treasury to notify it if the tapes were not received.

Because of the potential for unauthorized access to computer data, the Department of Commerce's National Bureau of Standards has established guidelines for Federal agencies to follow in performing risk analyses to determine the security needed for the handling and storage of such data. Neither the Social Security Administration, the Veterans Administration, nor the Railroad Retirement Board are aware of any unauthorized access to information being transferred. Despite this, however, the agencies have not conducted risk analyses to determine how much security should be maintained over the transmission of the information discussed in this report.

To prevent unauthorized disclosure or modification of personal data contained in the computer tapes, the Secretary of Health, Education, and Welfare; the Chairman of the Railroad Retirement Board; and the Administrator of Veterans Affairs should prepare a risk analysis to determine what

additional measures, if any, may be warranted to secure the transmission of these records. If the risk analyses show that additional safeguards are needed, they should be expeditiously implemented.

Are agencies which receive information from Social Security maintaining it? Disclosing it?

Except as noted earlier, Social Security is not presently sending Supplemental Security Income information to other Federal agencies. However, Social Security advised us that they are studying a system under which the Veterans Administration and the Railroad Retirement Board would place an indicator code in their respective master records for those individuals who receive Supplemental Security Income benefits. The indicator code in the master records would limit the future data provided by these agencies since data would only be provided on those individuals known to be receiving such income. This information would not be used by the Veterans Administration and the Railroad Retirement Board in the administration of their programs, but would permit them to notify Social Security of compensation and pension income changes for only those individuals who also receive Supplemental Security Income payments.

Recommendations to the agencies

We recommend that the Administrator of Veterans Affairs revise their routine use notice so that it is more explicit about the information disclosed to Social Security from its system of records entitled "Veterans, Dependents, and Beneficiaries Compensation and Pension Records" and the purposes of such disclosures.

We also recommend that the Secretary of Health, Education, and Welfare direct the Commissioner of Social Security to prepare a risk analysis to determine what security measures may be needed to prevent unauthorized access to the various payment tapes it transmits to the Treasury each month. We further recommend that the Chairman of the Railroad Retirement Board and the Administrator of Veterans Affairs also conduct risk analyses to determine what security safeguards should be exercised over the transmission of the compensation or pension income information provided to Social Security.

Agency comments and our evaluation

We have included comments from the Department of Health, Education, and Welfare; the Railroad Retirement Board; and the Veterans Administration as appendixes to this report. (See apps. I, II, & III.)

The Veterans Administration does not believe its routine use notice for disclosing veterans compensation and pension income data to Social Security for the Supplemental Security Income program should be redrafted to specifically provide for this disclosure. The Veterans Administration said the existing routine uses are specific and restrictive concerning authorized disclosures, and that further restrictiveness is unnecessary and could lead to inadvertently omitting to an agency a disclosure that would be appropriate. It noted that disclosures made by the agency are limited and that if it furnishes the names and addresses, only essential information required under the Supplemental Security Income program would be disclosed.

We disagree with the Veterans Administration concerning the restrictiveness of its routine use notice and believe that the Privacy Act intended that Federal agencies fully inform the public of those specific instances where information would be disclosed--to whom and for what purpose--without their written consent. The Veterans Administration's routine uses described on pages 3 and 4 are so broad that veterans and the general public reading these notices may not be aware that information maintained by the Veterans Administration is being disclosed to the Social Security Administration.

To provide for subsequent reviews of an agency's compliance with the Privacy Act, Federal agencies are required to account for all disclosures from a record, including the name and address of the agency to which the information was provided. Under such accounting, the Veterans Administration should know to whom it has provided information. We believe, therefore, that in revising the notices to make them more explicit, any inadvertent omission to an agency of a disclosure that would be appropriate should be minimized. Furthermore, it would seem that a simple amendment to the notice could be published to correct any such omissions.

The Department of Health, Education, and Welfare concurred with our recommendation that the Social Security Administration prepare a risk analysis to determine what security measures may be needed to prevent unauthorized access to the various payment tapes it transmits to the Treasury each month. The Department said that preparation of the analysis would be handled on a priority basis and that, if the results show that additional safeguards are needed, it would be established without delay.

The Railroad Retirement Board said that it recognizes the security problems which may arise in transmitting records from one location to another and has recently reviewed its practices of transmitting records to the Social Security Administration. Based partly on this review, the Board is currently in the process of establishing a uniform records transmittal procedure designed both to protect its records being transmitted to the Social Security Administration from unauthorized access and to serve the interests of the public by permitting fast and efficient transmittal at low cost. According to the Board, it hopes to establish and implement such a uniform procedure within the next 2 months.

The Veterans Administration agreed that additional analysis of security measures for the transmission of data may be beneficial in identifying specific cases where safeguards can be improved. It pointed out that although no unauthorized access to information has been noted, an indicator identifying Supplemental Security Income recipients would be added to its automated records to ensure that disclosures are made only in those cases relevant to Supplemental Security Income determinations.

As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House Committee on Government Operations and the Senate Committee on Governmental Affairs not later than 50 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of the report. At that time, we will send copies to the Department of Health, Education, and Welfare; the Railroad Retirement Board; the Veterans Administration; and other interested parties, and make copies available to others upon request.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Thomas A. Stead".

Comptroller General
of the United States



VETERANS ADMINISTRATION
OFFICE OF THE ADMINISTRATOR OF VETERANS AFFAIRS
WASHINGTON, D.C. 20420

SEPTEMBER 2 1977

Mr. Gregory J. Ahart
Director, Human Resources Division
U.S. General Accounting Office
441 G Street, NW.
Washington, DC 20548

Dear Mr. Ahart:

The General Accounting Office (GAO) August 1, 1977, draft report to Congressman John E. Moss on privacy issues related to the Social Security Administration (SSA) obtaining information from the Veterans Administration (VA) has been reviewed. Although the report indicates the VA's routine uses are adequate for disclosure of information for the SSA's Supplemental Security Income (SSI) program, it recommends that we revise our routine use notices to be more explicit about information disclosed by this agency to the SSA. The report also recommends that the VA prepare risk analyses to determine the efficiency of its security over transmission of data from automated records.

Security guidelines have already been reviewed in relation to threats to ADP property and capital equipment and the physical hazards to continuing operation. We agree that additional analysis of security measures for the transmission of data may be beneficial in identifying specific areas where safeguards can be improved.

We disagree that the VA's routine uses should be redrafted to specifically provide for the SSI program disclosure. The existing uses are specific and restrictive concerning authorized disclosures. The disclosures made by this agency are limited. If SSA furnishes the names and addresses, we will disclose only the essential information required under SSI. Further restrictiveness is unnecessary and could lead to an inadvertent omission of an agency to which disclosure would be totally appropriate.

[See GAO note]

The report indicated that disclosure authority, other than that contained in the Privacy Act, is also present in section 1383(f) of title 42, U.S.C. This agency has not found it necessary to render

Mr. Gregory J. Ahart
Director, Human Resources Division
U.S. General Accounting Office

a formal opinion as to whether this section gives agencies the authority to release pertinent information to SSA in addition to the provisions of the Privacy Act, inasmuch as the existing routine uses mentioned above authorize this disclosure. In this connection it might also be pointed out that section 3005 of title 38, U.S.C. specifically provides for exchange of information between the VA and the SSA.

As recommended by the GAO report, and although no unauthorized access to information has been noted, an indicator identifying SSI recipients will be added to VA automated records to ensure that disclosures are made only in those cases relevant to SSI determinations.

Thank you for the opportunity to review this draft report.

Sincerely



MAX CLELAND
Administrator

GAO Note:

Deleted comments relate to matters presented in the draft report which have been revised in the final report.



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20001

SEPTEMBER 2 1977

Mr. Gregory J. Ahart
Director, Human Resources
Division
U.S. General Accounting
Office
Washington, D.C. 20548

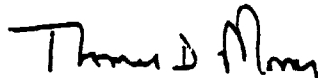
Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your "Report to Congressman John E. Moss on Privacy Issues Related to the Social Security Administration obtaining Information From Selected Federal Agencies For Computing Supplemental Security Income Benefit Payments." We believe the report provides an accurate account of the Social Security Administration's procedures relative to the information obtained from other Federal agencies for purposes of computing Supplemental Security Income benefit payments.

We concur with the report's recommendation that SSA prepare a risk analysis to determine what security measures may be needed to prevent unauthorized access to the various payment tapes it transmits to the U.S. Treasury each month. Preparation of the analysis will be handled on a priority basis and if the results show that additional safeguards are needed, they will be put in place without delay.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,


Thomas D. Morris
Inspector General

UNITED STATES OF AMERICA
RAILROAD RETIREMENT BOARD
844 RUSH STREET
CHICAGO, ILLINOIS 60611

August 12, 1977

JAMES L. COWEN
CHAIRMAN

~~MEMBER~~
~~MANAGEMENT MEMBER~~

Earl Oliver
Management Member

Honorable Elmer B. Staats
Comptroller General of the United States
United States General Accounting Office
441 G Street, N.W.
Washington, D. C. 20548

Dear Mr. Staats:

This has reference to the letter of August 1, 1977, from Mr. Gregory J. Abbott, Director of the Human Resources Division of your Office, to Mr. James L. Cowen, Chairman of the Railroad Retirement Board, requesting that the Board review and submit its comments on your proposed draft report to Congressman John E. Moss concerning the exchange of records between several agencies and the Social Security Administration for use in the administration of the Supplemental Security Income program.

The Board has reviewed the proposed draft report and has found that it accurately reflects the Board's practices with respect to the transfer of records to the Social Security Administration for use by that agency in the administration of the Supplemental Security Income program. The Board would, however, like to comment with respect to the section of the draft report concerning the method by which the Board transmits records to the Social Security Administration.

In recognition of the security problems which may arise in the transmission of records from one physical location to another, the Railroad Retirement Board has recently reviewed its practices with respect to the transmittal of records to the Social Security Administration. Based in part on this review, the Board is currently in the process of establishing a uniform records transmittal procedure designed both to protect Board records being transmitted to the Social Security Administration from unauthorized access and to serve the interests of the public by keeping the costs of transmittal low and permitting fast and efficient transmittal. Hopefully, such a uniform procedure will be established and implemented by the Board within the next two months.

Sincerely yours,

FOR THE BOARD

R. F. Butler, Secretary



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(105019)