

RECORD OF SOCIETY OF ACTUARIES 1981 VOL. 7 NO. 2

INFLUENCING LEGISLATION AND REGULATION

Moderator: BARBARA J. LAUTZENHEISER. Panelists: JANICE M. GREGORY, WILLIAM D. HAGER**, DALE R. GUSTAFSON*

1. The legislative and regulatory processes.
2. What are hearings? What is their purpose, and who participates?
3. A look at how an actuary can affect the process.

MS. BARBARA J. LAUTZENHEISER: If we as actuaries are going to have any influence on legislation and regulations, we must participate in the associated hearings. We must know what to expect, what not to expect, and what the hearing process is all about. Our session this morning will cover these areas. Mr. William Hager will talk to us about the legislative and regulatory processes. Ms. Janice Gregory will share with us her inside view of what the hearings are about, what is their purpose and who participates. Mr. Dale Gustafson is then going to give us a look at how the actuary can affect the process.

MR. WILLIAM D. HAGER: Why should a professional actuary be concerned with what is going on in Washington through the regulatory process and through the legislative process?

In preparation for this morning's meeting, I went through the Federal Register for the last month, and determined those regulations that had been published by various agencies. Just a few of these are: regulations published by the EEOC, publication of regulations by the Joint Board for the Enrollment of Actuaries, regulations by the National Commission on Social Security, PBGC, Health Care Financing Administration, Health and Human Services relating to HMO's, Internal Revenue Service, and the Department of Labor. In the last thirty days, collectively, there were 15 to 20 regulations specifically and directly impacting on the work product of the professional actuary imposing parameters, imposing dimensions, and imposing professional standards upon that professional actuary's work product.

The next thing I did in preparation was to briefly examine legislative activity at the Congressional level. Here are some items that came to my attention: (1) Social Security financing, with implications for the underlying actuarial components; (2) risk retention legislation, again with questions relating to the professional actuary's work product; (3) **the ERISA Simplification Act**; (4) PERISA; (5) risk classification as it relates to HR100 and the Economic Equity Act of 1981; (6) National Health

* Ms. Gregory, not a member of the Society is a professional staff member of the Subcommittee on Social Security, Committee on Ways and Means, U. S. House of Representatives.

** Mr. Hager, not a member of the Society, is General Council for the American Academy of Actuaries.

Insurance; and (7) Worker's Compensation. Thus, it's easy to see that there is a lot going on in Washington that directly impacts on the actuary's work product.

It is against this background that I am so often astounded to hear a small segment of the actuarial professional expressing reservations about attempting to influence legislation. So a third thing I did in preparation for today was to look at a list of registered **lobbyists in Washington**. I only got through the first half of the A's. Let me just list for you some of the professional associations I found with full-time lobbying staffs in Washington: the American Medical Association, the American Bar Association, the American Dental Association, the American Academy of Child Psychiatry, the American Academy of Dermatology, the American Academy of Family Physicians, the American Academy of Ophthalmologists, the American Academy of Pediatrics, the American Institute of Certified Public Accounts. It seems to me that the case for influencing and affecting legislation is made, and it seems equally clear that a profession that does not pay attention to legislation that is affecting its interest, but more critically, one that fails to affect and influence that legislation, is going to face difficult times.

Now that we have established why the professional actuary ought to be interested in the legislative and regulatory processes, let's take a very brief look at the outline of the regulatory process. The focus of the regulatory process, and I am talking about rules and regulations formulated by agencies, is upon an act that is known as the Federal Administrative Procedures Act. Because this act has been enacted by most states, the discussion will relate both to the states and to the federal government even though it will focus primarily on the federal activity. With the complexity of government, there has been a lot of delegation of statutory authority, that is, of Congressional authority, to the various agencies. **This has occurred** as government and our technological lifestyle have become more and more complex. Since it is simply impossible for the United States Congress to set all specifications under many laws, the authority to set these specifications is delegated to the various agencies. The function, then, of the agencies is to fill in the details. An example might be the Federal Trade Commission. Their charge is to regulate "unfair competition." The agency itself has defined what unfair competition is.

What is the definition of a regulation? According to the Administrative Procedures Act, it is the formulation of a policy or interpretation which the agency will apply in the future to all persons engaged in the regulated activity, and it affects groups as opposed to individuals. It is not an individual adjudication or determination. The three basic types of regulations under the Administrative Procedures Act are procedural, interpretive and legislative. Procedural regulations identify the organizational structure of the agency and its methods of operation. They articulate the internal rule making procedure of the agency and are housekeeping in nature. Nonetheless, the Supreme Court has held that agencies, once they promulgate requirements for their own operation must adhere to those requirements. Interpretive regulations include informal policy statements. During the early days of ERISA the Department of Labor suggested through press releases how it would approach problems. The third type in which I believe professional actuaries should be

interested is the legislative or substantive type of regulations. Instead of Congress and state legislatures enacting a statutory provision, the agency, in effect, implements administrative **statutes**. The agencies are exercising their delegated powers. They are applying their regulation prospectively, and it applies generally.

The general steps in promulgating a regulation are: (1) advance notice; (2) some type of participation that may be done either through writing or through a hearing process; and (3) final publications of that regulation thirty days prior to implementation.

Let's discuss very briefly how it is that an agency determines that a regulation ought to be promulgated in the first place. Often internal studies will indicate there is a problem area, and governmental attention is invited. Another approach is Congressional suggestions. Congress is not hesitant in the least when it deals with agency administrators to suggest or recommend regulations in a particular area. Also, private individuals are free to petition agencies, as are other interested parties, suggesting that a regulation is appropriate in a particular area. Finally, a change in economic conditions can also precipitate regulations. The recent Federal Home Loan Bank Board regulation on floating interest rates is an example. Although the savings and loan associations had clamored for a long time for release from the straight life-time mortgage rates that had been in force, it was a change in the economic environment which was the impetus for that regulation.

Once a reason for a regulation and a decision to proceed has been formulated, an agency will typically consult with a cross section of interested parties. The agency wants to extract as much expertise and information as possible with the goal of obtaining a legitimate or appropriate regulation in its first draft. Once a draft is formulated, the agency is required by the Administrative Procedures Act to publish notice of proposed rule making in the Federal Register. The notice must include a summary of the proposal and a statement of the statutory authority under which the agency is promulgating the regulation. The date and time of the hearing must also be included. There are, however, exceptions. An agency can implement a regulation if it makes a determination that a good cause exists and that it is impractical, unnecessary and contrary to the public interest to comply with the formal rule making process.

After the regulation itself has been published and the notice of the proposed regulation published in the Federal Register, the next step is a hearing, although the hearing is not a requirement and is not done with every regulation. A hearing is frequently used with controversial regulations. The agency generally desires to be educated on the feasibility of what it is about to do. It is interested in the impact of the regulation, the extent to which it is going to facilitate public protection, and the cost of complying. The cost of complying is an area that the Reagan Administration seems to be pressing more and more. This is a very critical area and it is an argument to emphasize if you believe a regulation is inappropriate and will be very costly to implement. Agencies are also interested in alternative choices and relevant scientific data. At the hearing itself, the agency will be present, either in a single person or a panel. The agency, if it is the author of the regulation, has the burden of proof. They must show or illustrate that the regulation makes sense.

One of the problems with the regulatory process is that the agency is not directly accountable to the public for the decisions it makes. The Chairman of the Federal Trade Commission has not been elected by the populace, he is appointed. What are controls on the regulatory process and what can people do as they are affected by the regulatory process? First, there is judicial review of what the agencies do. Typically, the review will inquire into whether there is statutory authority, whether the procedures are fair, and whether they have complied with due process. There is indirect legislative control through the appropriation process. It didn't take very long for people who were disgruntled with FTC activity to figure out where their appropriations subcommittee in the U.S. Congress was located and to make their point, the point being that we don't want authorization for studies in whatever the area might be. Congress also has control through the appointment process, as well as through standing committees that investigate what has transpired. The Executive exercises control through the appointment process and the appropriation process. The November elections in the United States had a tremendous impact on the attitude of regulators. Many of them, and I think appropriately so, read a mandate concerning overregulation and a mandate concerning cost/benefit analysis.

I have spent most of my time discussing the mechanics of the regulatory process. The legislative process is more familiar, and I will just remind you of the steps by which a bill becomes a law. A bill, once it is introduced, is typically referred to a committee, then to a subcommittee. After subcommittee consideration, the bill then goes to the full committee which may further mark it up. The committee reports the bill out to the House (or Senate) Floor where it is passed. An identical bill must be passed by the counter body in Congress. If not, a conference committee works out the differences. Finally, the bill is signed into law by the President.

Now that we have the framework of the regulatory and legislative process in mind, let's talk very briefly about affecting regulations and legislation. It is not that difficult to influence the U.S. Congress if you have accurate, technical and competent information. If you have actuarial information that bears on a component of the legislation, I am always amazed at how readily it is received. That simply is because Congress does not want to get into the position of passing bad legislation. Bad legislation serves no one. To influence regulation and legislation, "the earlier, the better," even before the first draft of the bill is out floating around. It is really too late, generally, to influence legislation from a highly technical standpoint once it is out on the Floor. It can be done and it is done, but from a pragmatic standpoint it is much too late. On the other hand, don't get stuck on the hearing process. The hearing process in Congress is crucial and glamorous. But there is a lot that goes on behind the scenes that affects what the final legislation looks like.

There is a lot of activity in Washington that affects the professional actuary's work product. And we must recognize that "Truth" delivered up on a platter to the U.S. Congress means nothing. Truth must be sold, it must be advocated, and it must be illustrated with respect to the issue at hand. The actuary's work product ultimately comes to bear and to be used in the pragmatic world whose rules are formulated in the political

process. The actuarial professional is at a crossroad, and the issue is whether to begin a very concerted effort to affect legislation and regulation that impacts on the actuary's work product. I urge you to do so. For if you do not, others will do it for you.

MS. JANICE M. GREGORY: There really isn't a question of whether the actuarial profession ought or ought not get involved in the political process, because it is involved already both by giving **advice** and by not giving **advice**. Conclusions that you, as actuaries, reach, and informations that you produce, affects what the policy makers decide to do. And in turn, the demands that policy makers are making on your profession are going to affect that profession. Actuarial science is not an abstract science divorced from the practical concerns of the public. As an example, population projections are of great concern to a subcommittee that is now actively considering changing the age at which full retirement benefits are available under Social Security. That is a **huge** impact that comes from the actuarial profession. At the same time, members of Congress are making increasing demands on the actuarial profession. They are no longer enamored of a best guess; they are asking for ranges of possibilities, ranges of projections.

Much of the actuaries' impact is obtained through the hearing process. There are many types of hearings. The major type of hearing is informational hearing. Usually, there is an issue, or a group of issues, and anyone who desires to attend and speak may do so as long as there is space and time available. Another type of informational hearing involves invited participants. An example is a hearing our subcommittee held last fall to develop information and lay out parameters concerning population projections. Another type of hearing is an oversight, or investigative, hearing. For example, we might investigate how actuarial projections are made in Social Security with an eye to expressing the weaknesses in the way those projections are made. A third type of hearing is a legislative hearing. Such a hearing directly addresses a proposed bill, and tries to determine which portions of the bill do or do not make sense. The fourth type is a mark-up hearing. In such a hearing the actuary is not a witness, so much, as a resource to provide members with the implications and costs of various policy choices.

I would like to stress that what you do and say before and after the hearing is just as important as the formal hearing process itself. Before the hearing, you should talk to the staff people and get an idea of where the members are coming from, what their previous positions are, what their questions are likely to be, what the key issues are, and so on. This helps you know what to say during the hearing to provide information that will be of help to Congress. After the hearing, you must go back and follow up. If you have a point you are particularly concerned about, check again, keep talking, keep in touch with the process.

What should you say at a hearing? Neither overestimate nor underestimate a Member of Congress. They will not understand all the technical aspects, but they will understand with unerring instinct what the policy choices are. They will hone in on any inconsistency in reasoning.

Congress makes many demands on the actuarial profession. You, as an actuary, will have the most impact if you are as honest as possible and make clear what is a fact, what is an opinion, and what is something you think will happen but has a lot of variables in it. More members of Congress are coming to understand that the actuarial process does not provide one final answer, but that it is a continual refinement process. Be aware of the occasional need to remind a Member of Congress that actuaries do not make predictions; actuaries make projections. Although Congress is becoming more sophisticated in this regard, there is still the tendency to push for a prediction. This type of thinking leads to blaming the actuary for the present financial problems of the Social Security System, for example. So it is very important for the actuarial profession to be very clear with Congress in saying, "this we are sure about, but this depends upon a certain set of assumptions."

Let me illustrate demands being made upon actuaries by Congress in the Social Security area. We haven't made a single best guess for some time. The Trustee's Report contains three predictions: the pessimistic, the intermediate, and the optimistic. But our subcommittee has been asking the Social Security Actuaries to go beyond the three estimate approach and give us a range of numbers. We did this in two key areas in the past year. The first was involved critical estimates for short term financing. We took the Trustees' projections and added, for the first time, the effect of economic cycles. We presented to the members not just one number, not just three numbers, but a range of possible outcomes over the next five years. The other area involved population projections. We invited a panel of experts to come in and talk about the range of **possibilities** and the pressure points that make the difference between the different ends of the range. Thus, Congress is making demands on the actuarial profession that are real, that are likely to have ripple effects in what you do in your every day work, and about which you should certainly be aware any time that you come and talk to Congress.

MR. DALE R. GUSTAFSON: In my remarks I will review and outline who the actuary might interface with in this process, the kinds of interface that might take place, and the degree of formality that may be involved. After outlining these aspects, I will describe a number of examples from my own experience.

An interface may take place with the legislature, either at the state or federal level. It can take place with an administrative or executive arm of the government, such as the insurance department at the state level, or the Securities and Exchange Commission, the Internal Revenue Service, or the Federal Trade Commission as examples at the federal level. There are a very large number of nongovernmental organizations whose interests may interface with the actuaries. Prominent examples are the Financial Accounting Standards Board, the American Institute of Certified Public Accountants, and the National Association of Life Underwriters.

A second consideration is what kind of interface takes place. It can, and often is, simply a one-on-one meeting. Also, commonly, it will be with a committee or subcommittee of either the legislature or the bureau or agency involved. It can be directly with the legislator or legislators, or the senior official of an agency, or, very commonly, with the staff of the various groups.

Finally, the degree of formality also can vary quite widely. Typically, the one-on-one situations are quite informal, although that is not always the case. At the other extreme, a formal hearing of a legislative committee or some other agency is usually conducted on a quite formal basis. Here a quite typical format will be for each of the invited, or permitted, participants to have submitted a formal, written statement in advance. Then on the occasion of the hearing, the individual will make a brief oral summary and argument relative to his position. Finally, very frequently, the hearing officer or other members of the hearing group will engage in dialog and ask questions of the individual. In effect, sometimes it reaches the level of cross-examination.

Now for some examples. First let me talk about some of my experiences with the 8% policy loan interest rate legislative program of a few years ago. I became very actively involved in this program over the first two or three years. I would be invariably identified as an actuary representing the Northwestern Mutual. Almost invariably, I would be identified as speaking for a specific group of companies that were actively managing the lobbying program, and also often identified as speaking for the American Council of Life Insurance whose Bill was being pushed. During this process, I became very favorably impressed with the dedication and high quality of the state legislative system. As background for this, you must realize that in a typical state, between 5 and 15,000 Bills may be introduced during one legislative session. Not all of them must be seriously addressed by each legislator, but each legislator must deal with a minimum of several hundred different pieces of legislation. When you realize that typically a given state legislator will have specialized expertise in only one, or at most, a very few areas, you get some idea of the special skills he must develop to deal with subjects that are outside of his experience. Also quite typically, the legislator is suspicious of big business. Thus, with the 8% policy loan interest rate bill, the focus of attention was to explain to either individual legislators or committees how this bill was going to work to the advantage of the citizens of his state, rather than merely line the pockets of the big, rich, distant insurance companies.

This context makes it easy to describe the process. The actuary must establish a relationship that does not cast him in the role of the city slicker down trying to run a con game on the country folk. He must attempt to establish with credibility that it is in the best interests of the citizens of the state to pass this piece of legislation. At all costs, the image of "I am an expert down here to explain this to you" must be avoided. You have to know what you are talking about and convince the individual or group that you know what you are talking about without appearing to be arrogant, superior, or condescending.

In this legislative process, of course, the interface was very frequently with the insurance departments. Their support for this piece of legislation was hard to come by and quite typically insurance related bills are almost impossible to pass without the active support of the insurance commissioner.

Also, the hearing process frequently involved the National Association of Life Underwriters. Their local association executive committee or special legislative committee would be considering what position their

association should take on this bill. These were some of our most difficult, and at the same time, most interesting hearings. Here we were dealing with people knowledgeable on the subject. They just had a different point of view.

As a small aside, before we leave the state level, I would comment that the policy form approval process is an area where you are most likely to get involved personally in the hearing process. Frequently, our **contacts** with the insurance department in this area are by correspondence and by telephone, but it is also true that often we have to visit and sit down with members of the insurance department to explain why they should approve a given policy form, or to figure out what adjustments must be made in order to secure their approval. It is certainly appropriate to view that as a part of the hearing process. It is also true that in certain circumstances the policy approval process will lead to formal hearings.

Now outside the state level, I would like to comment on just a few examples. Here, typically, my experience has been as representative of the American Academy of Actuaries, although I believe the first example I will give was not in that role.

By act of Congress a number of years ago, the U. S. Civil Rights Commission was established. The Commission comprises a group of senior experienced citizens who have been appointed to full-time positions, provided with some staff and financing, and charged with examining the state of civil rights in any aspect of society they choose to examine. They decide from time to time what aspect of our life they are going to examine, and then after they have conducted hearings, decide whether or not they need to recommend to Congress that action needs to be taken to correct wrongs.

A couple of years ago they decided to examine whether or not Congress needed to act to correct sex discrimination practices in the insurance business. They scheduled several days of hearings in Washington, D. C., inviting quite a number of individuals to appear before them. Several actuaries were included. A number of state regulators were included; a couple of them were quite vocal feminists. The celebrated Herb Dennenberg was included. A number of college professors were included, and finally some prominent spokespersons for the feminist movement were invited.

My appearance was as an actuary and as the actuary of the Northwestern Mutual. I don't remember for sure, but I don't believe I was identified as a spokesman for the profession; it was merely stated that I was prominent in the profession. I, and others like me, made statements to the effect that the insurance business has moved very rapidly and effectively to remove the forms of unfair discrimination that existed in the past. However, we hit pretty firmly on the propriety of sex differentiation in the pricing of insurance and annuity products. This became one of the focuses of the hearing. I remember nothing significant about the testimony or cross-examination of the various actuaries involved. I felt we all handled ourselves rather well. However, I remember two specific pieces of testimony by two other people very vividly. My guess is that they substantially influenced the commission.

First, an economist from Harvard gave a very simple and articulate example by citing a simplified pension plan. He stated that you fund \$9 for each dollar of pension benefit to be granted to individuals aged 65. On the average, the males will collect the pensions for eight years and the females will collect theirs for ten. Thus, ignoring interest, if the pension plan comprises all males, the plan has a good deal of money left over that it has nothing to do with, and, on the other hand, if the plan is all females, it runs out of money and goes broke.

A little later on in cross-examining one of the feminist representatives, a member of the commission referred to this simple numerical example, supported its essential financial validity, and asked this person to respond to the apparent unfairness of unisex pricing for annuities. Her response was quite classic. In effect, she stated that insofar as unisex pricing did impose a cost burden on males for annuities and grant a modest bargain to females, it was "only just retribution for centuries of abuse and discrimination."

I do know that the U.S. Civil Rights Commission did not recommend to Congress that there was in its view a need for corrective legislation because of sex discrimination in the insurance business. I would guess that it was these two pieces of testimony that helped them reach that conclusion.

I would like to conclude my remarks by commenting on certain aspects of being a spokesman for the American Academy of Actuaries. Through committee chairmanship, Board and executive service, and a term as President, I have had a few occasions to be identified as speaking for the American Academy of Actuaries. Here I think specifically of a Senate committee hearing on whether or not the Securities and Exchange Commission (which was under the jurisdiction of this committee) was discharging its responsibilities appropriately, an appearance before the Public Oversight Board of the American Institute of Certified Public Accountants having to do with the interface of the accounting and the actuarial professions, and an all-day meeting of a group of officers of the American Academy of Actuaries and the entire Financial Accounting Standards Board with some of its staff.

These groups almost invariably are dealing with individuals who are identified with an organization. Thus, the individual will invariably say something like the following: "My name is Dale Gustafson. I am Vice President and Actuary of The Northwestern Mutual Life Insurance Company, but I am here today as President of the American Academy of Actuaries and am presenting a statement by the Academy." Variations on that may be that individuals will be appearing for a single enterprise. It is also true that individuals sometimes appear speaking only for themselves. However, most typically it is a person speaking for a trade association, a professional organization, or some other structured organized group.

It is recognized by the participants that statements of this sort are developed by a similar process in an organization. All of the various organizations have some form of representative committee structure and/or paid staff involved in the development of these statements. It is recognized that virtually never will a particular statement represent a monolithic, unified view by every single member of an organization.

However, it is also expected that if there is wide disparity of opinion within an organization, either that wideness will be explicitly described or the organization will not make a statement.

In this frame of reference, the burden is on the actuarial profession, and specifically in what I am talking about, the American Academy of Actuaries, to make sure that its committee structure and its representation system is representative of its constituency. We must and we do bend every possible effort to be sure that we have probed the spectrum of opinion on a given issue and make straightforward statements only when they represent a quite broad consensus. Naturally, it is not practicable to run a poll on each issue. There is never time, even if it were an effective technique. Rather, we strive to have representation in the committee structure and provide opportunities for member input.

Our world is changing very rapidly. The actuaries' involvement with the legislative and regulatory process has accelerated greatly in the past decade. That acceleration of involvement will continue in the immediate future. More of you are involved now than used to be the case. More and more of you will be getting involved. I hope you find the legislative and regulatory process as fascinating, interesting and satisfying as I have.

MR. JEROME F. SEAMAN: Several months ago the Academy issued a statement to the SEC on independence questions related to public accounting firms. As I understand it, the SEC did not accept the viewpoint of the Academy of Actuaries. What was learned concerning effectiveness of presentations from that experience?

MR. HAGER: I wasn't involved in that instance. However, part of the reality of the legislative or regulatory process is that you are never assured that your position or your viewpoint, once articulated, is going to be accepted and implemented into the regulation or the legislation. I believe, as an outsider and an attorney, that you should articulate your view, and advocate it in the most intense way you know how. But once you have done that, the matter is out of your hands. You win some and you lose some, but you play the game in terms of optimizing your impact.

MR. GUSTAFSON: I was involved with the independence issue before the SEC. Now while it is true that the SEC did not take the action that we were recommending, we did get our point of view understood. We haven't heard the end of that issue yet. I think we were satisfied that we had effectively utilized the hearing process.

MR. HERBERT ORENSHEIN: It is possible to influence legislation if you don't have a personal relationship with the people on the committee or their staff?

MS. GREGORY: I have seen entire amendments come from a single letter. On the other hand, go ahead and try to develop a personal relationship. Follow your letter with a phone call if you cannot go there. Talk to someone on the staff. If you get a response from your letter, and you feel there is more that needs to be said, say it.

MR. GUSTAFSON: A personal relationship helps, and it becomes critically important when attempting to influence legislators and their vote. I know how the ACLI works. If you want to give a certain legislator some advice, the best way is to find a chief executive officer of a life insurance company from his home district who knows him.

MR. CHARLES E. ROHM: How can I determine which Congressman or Senator is involved in a given piece of legislation. How can I determine which subcommittees are involved and who are the key staff people? How do I get to those people? Finally, am I better off working as an individual or through a group such as the American Academy of Actuaries or the ACLI?

MS. GREGORY: Start with your local Congressman. He will be able to tell you who the key staff people are, and to open the door to them for you.

MR. GUSTAFSON: As to whether you should work as an individual or through a group, you must look at the specifics. You can't act independently without a great risk of duplication. The ACLI or the Academy may have already done a lot of hard work on the same thing. So find out initially if the associations are involved. And if so, determine if you want to support the associations' effort or to take a different position.

MR. HARVEY SOBEL: The organization Common Cause has documented the relationship of campaign contribution by Political Action Committees (PAC) and the voting record of various Congressmen. Should the Academy be engaging in this type of activity?

MR. WILLIAM HAGER: My opening paragraph when I go to talk with staffers goes something like this. "I am speaking on behalf of the American Academy of Actuaries. We have no PAC. We have 6,500 members which, from a pragmatic standpoint, means we have zero political clout. What we can deliver to you, we believe, is accurate and concise information that can come to bear on the legislation."

I think, if you look at it pragmatically, that is the expertise that the actuarial profession can deliver. We can't deliver money, we are never going to be able to deliver votes from a realistic standpoint, but we can get a high profile through the deliverance and advocacy of credible information.

