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Andy,

If in fact Counsel to Pizza Hut wrote to the Governor, it doesn't show up in our CTRK. Katie would have just shipped it off to Counsel or the appropriate agency in any case.

I assume you want to ignore this altogether.

1c

**Document Originally
Attached to
Following Page**

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April 30, 1991

Rec'd
MAY - 6 1991

Andrew H. Card, Jr.
Deputy Chief of Staff
Executive Office of the President
The White House
Washington, DC 20500

Dear Andy:

I represent the National Frozen Pizza Institute in a matter regarding application of Federal Meat Inspection Act requirements and the marketing of pizzas in schools. In short, Pizza Hut and certain other pizza restaurants wish to be exempt from meat inspection requirements that apply to all other pizza makers who manufacture product for resale in schools and other food service settings.

Yesterday, I was informed by a reporter of a letter sent to Governor Sununu by counsel to Pizza Hut. I must admit some surprise that Governor Sununu would have been bothered with this complex issue, which is an attempt by pizza restaurants to gain a competitive advantage over the frozen pizza industry by avoiding the public health protections that have heretofore protected this market. However, since your offices have been contacted, I would like to provide you the enclosed materials, which are our attempt to objectively outline the history of this issue and the perspective of my client.

Any exemption from the existing meat inspection requirements will set strong precedent for other changes in the federal meat inspection system. The frozen pizza industry feels that exempting from meat inspection pizzas that are manufactured for resale would be an unwise move. However, if pizzas manufactured in restaurants for resale are exempted, so should all other pizzas because there is no public health justification for discriminating against frozen pizzas. Andy, this is a politically volatile issue with good friends of this Administration on both sides, and strong interests from consumer advocates and labor. I feel strongly it would be in

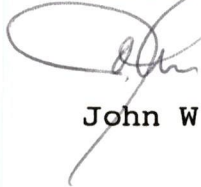
Letter to Andrew H. Card, Jr.
April 30, 1991
Page 2

the best interest of the Administration to precede any change in this system with an opportunity for public comment. Of course, I would appreciate the opportunity to answer any questions that you or others might have regarding this subject.

I trust this letter finds you in good health and enjoying the challenges your job undoubtedly entails.

Warmest regards,

Sincerely,

A handwritten signature in dark ink, appearing to read "John W. Bode", is written over a large, loopy circular flourish.

John W. Bode

JWB:la
Enclosures

**FOOD SERVICE SALE OF
UNINSPECTED MEAT FOOD PRODUCTS**

I. HISTORICAL SUMMARY

For over one year, various pizza restaurants have engaged in the sale of uninspected meat-topped pizzas to schools and other food service facilities. When confronted by meat inspection authorities about its sale of such product, Pizza Hut, Inc., attempted to work with the U.S. Department of Agriculture (USDA) to devise a means of selling uninspected product for use in food service facilities. NFPI expressed its views to appropriate USDA officials regarding the various devices proposed by Pizza Hut, Inc. USDA ruled that it is possible for a pizza restaurant to use a sales agency agreement as basis for compliance with the Central Kitchen Exemption of the Federal Meat Inspection Act (FMIA). Through the use of this exemption, food service workers may pose as "agents" for a pizza restaurant, thus meeting the Central Kitchen Exemption requirement that product be sold directly to consumers at a "satellite facility owned or operated by" the central kitchen operator.

The requirements for such a sales agency agreement were sufficiently clear that the existence of a sales agency agreement would characterize the restaurant as a "food service management company" for purposes of the National School Lunch Act. Thereafter, the Food and Nutrition Service (FNS) ruled that uninspected meat-topped pizzas may not be served in any school participating in the National School Lunch Program (NSLP), effective February 1, 1991.

Recently, leading pizza restaurants have initiated test marketing of pizzas bearing less than two percent meat by weight. Such pizzas would not be amenable to inspection because of the relatively small amount of meat in the product. Reportedly, pizza restaurants intend to use this product as an interim marketing measure while attempting to modify government requirements for meat inspection. At least one small pizza restaurant has expressed the intention to vend to schools partially cooked pizza with separate packages of meat topping ready for food service personnel to spread on the pizza prior to reheating.

In sum, pizza restaurants apparently are now discontinuing the sale of uninspected meat-topped pizzas in schools. Sales agency agreements may continue to be used to avoid inspection of meat-topped pizzas to be sold in other food service facilities which do not participate in NSLP.

II. FEDERAL MEAT INSPECTION ACT REQUIREMENTS

A. Unless Exempted, All Meat Must Be Inspected

Facilities that manufacture or process meat food products, such as meat-topped pizza, are generally subject to continuous inspection by the U.S. Department of Agriculture (USDA). While the inspection is federally funded, the various USDA requirements to ensure wholesome, properly labeled products necessitate significant expenditures by a company under inspection to ensure compliance.

There is one relevant exemption to USDA inspection under the FMIA -- restaurants. Congress excluded these facilities from inspection because (1) a consumer can observe firsthand the sanitation and wholesomeness of a restaurant, and (2) a restaurant has a vested interest in maintaining its good name, an interest protected by its exclusive control over a product from oven to table.

B. Central Kitchen Exemption

In 1984, Congress amended the FMIA to extend the restaurant exemption to restaurant central kitchen facilities. This action permitted restaurants to operate central facilities to service other "restaurants owned by the same person owning or operating the central kitchen." S. Rep. No. 610, 98th Cong. 2d Sess. 3 (1984). This amendment comports with the original restaurant exemption in that by limiting the central kitchen exemption to facilities owned or operated by the same person, a customer in one location would still have a good idea as to the restaurant's general attitude toward sanitation and the restaurant would still have exclusive control.

C. Application of Central Kitchen Exemption in School Cafeterias

To evade inspection requirements, some pizza restaurants have executed "sales agency agreements" with several local school authorities around the country.^{1/} Under these agreements, pizza restaurants have engaged the local school food service authority as its "sales agent" for the purpose of selling meat-topped pizzas to school children. The restaurants making the meat-topped pizzas claim, thereby, to be exempt from inspection by virtue of "operating" a "satellite restaurant." These sales agency agreements, however, require no unique training of school personnel, installation or maintenance of equipment, exclusivity of

^{1/} See Attachment I (Pizza Hut memorandum to sales force).

service, or any other indicia of actually "operating" a satellite restaurant.^{2/}

Although USDA has notified school authorities that these arrangements are not permissible under the National School Lunch Act,^{3/} there has been no indication that pizza restaurants intend to abandon this overly facile interpretation to a limited exemption to the FMIA. In particular, nothing in the pizza restaurants' interpretation of the law would preclude application of its version of the central kitchen exemption from applying to resale of meat food products in cafeterias of colleges, hospitals, nursing homes, or even food service in convenience stores. With such a reading, this would become the broadest exemption in the 83-year history of the FMIA.

FSIS has apparently altered its position on this matter during recent months. On August 31, 1990, the FSIS Administrator, Lester M. Crawford, DVM, Ph.D., advised counsel to Pizza Hut that "sales agency agreements" were insufficient for the purposes of claiming exemption from inspection under the central kitchen exemption.^{4/} On October 3, 1990, however, Dr. Crawford issued another letter stating that FSIS was "now prepared to allow you and other corporations to continue these arrangements."^{5/}

Traditional producers of meat food products have devoted substantial resources to ensure their compliance with the FMIA. They have done so to meet public health requirements of doing business in the food distribution and retail sales market. Restaurants, serving an utterly different market, have not been required to make such investments. Because pizza restaurants are unwilling to bear the cost of meeting meat inspection requirements, they seek to avoid public health requirements that have long applied to the market they are now attempting to enter. NFPI submits that government should not establish a comparative advantage for pizza restaurants by making them exempt from inspection requirements that apply to NFPI members. No public

2/ See Attachment II (Letter from NFPI to Assistant Secretary of Agriculture Jo Ann Smith, October 26, 1990).

3/ See Attachment III (Memorandum from FNS Administrator Betty Jo Nelsen to Regional Administrators, November 27, 1990).

4/ See Attachment IV (Letter from Lester M. Crawford, DVM, Ph.D., to Mr. Payton [sic] George, August 31, 1990).

5/ See Attachment V (Letter from Lester M. Crawford, DVM, Ph.D., to Mr. Peyton George, October 3, 1990).

health justification has been advanced for discriminating against frozen food makers vis-a-vis pizza restaurants.

NFPI urges that, absent compelling public health justification for distinguishing between restaurants and frozen food makers, the same regulatory requirements should apply to both industries.

II. NATIONAL SCHOOL LUNCH PROGRAM REQUIREMENTS

A. Inspection Requirements

As currently constituted, pizza restaurants could sell pizzas to school food authorities as a vendor or supplier, in much the same manner as other foods are sold to schools. Meat-topped pizza vended to schools, as well as any other meat food product, must however, have been produced under USDA's continuous inspection regime, unless exempted. As detailed above, there is no exemption presently applicable to pizza restaurants that would permit sale of uninspected meat-topped pizzas to schools, except by use of the questionable "sales agency agreement."

B. Direct Sales to Students

Under certain circumstances, pizza restaurants could make sales of uninspected meat-topped pizzas directly to students at schools. These sales would, however, render the entity making such sales a "food service management company." See 7 C.F.R. § 210.16. Pizza restaurants apparently refuse to comply with the food service management company requirements intended to ensure local school food authority control over nutritional quality and access of all children to nutritious school meals. As a result, pizza restaurants have chosen not to avail themselves of the use of a "sales agency agreement" to avoid inspection since that device would require them to comply with the requirements of food service management companies.

C. Potential Amendment to the National School Lunch Act

With the options of selling meat-topped pizzas as a food service management company, or engaging in direct sales to students, foreclosed, certain pizza restaurants have considered further amendment of the National School Lunch Act to release them from requirements of food service management companies.

One likely scenario would involve amending a provision of the National School Lunch Act that was adopted as part of the School Lunch and Child Nutrition Amendments of 1986. The provision provides that no school may contract with any food service company, including for a la carte food service, unless that company agrees

to offer free, reduced-price, and full price reimbursable meals to all eligible children. 42 U.S.C. § 1758 (e). Commonly known as the "McDonald's Amendment" after the fast food restaurants, the legislation embodied Congressional concerns over efforts by fast food chains to enter the school lunch market.

Congress recognized that the entry of fast food restaurants into schools would mark a loss of effective school food authority control over the nutritional quality of school meals. Local school authorities could no longer moderate levels of calories, fat, and sodium on participating schools' menus.

Moreover, Congress was concerned that if only more affluent children could afford such food, the NSLP could quite possibly become the "poor kids lunch" in many schools. The entry of fast food restaurants into schools could jeopardize the continued existence of some school lunch programs by decreasing participation in these programs. Without NSLP-provided meals, some children would go hungry because they lack the financial resources to purchase a "fast food" lunch.

Accordingly, the effect of the McDonald's Amendment is to mandate compliance with requirements of the NSLP by all food service companies. Food service companies must to ensure that their menus contain all of the components for which the NSLP Meal Pattern Requirements provide: milk, meat or meat alternative, vegetables or fruit, and bread or bread alternatives. Furthermore, the NSLP's implementing regulations recognize the nutritional imperatives of moderation and variety in the diets of America's school children by making a 21-day menu cycle a mandatory part of any food service company's bid for entry into a participating school. 7 C.F.R. § 210.16(b)(1). Pizza restaurants generally have chosen not to comply with these requirements.

The National School Lunch Act and its implementing regulations contain requirements designed to ensure a wholesome and nutritious variety of meals for all the nation's school children. NFPI strongly supports continued maintenance of National School Lunch Act provisions that ensure all school children have reasonably affordable access to wholesome and nutritious school lunches.

FROM: Harlan Richter, Operation Services
Tad Wampler, New Concepts

Attachment I

Hut.

DATE: 1/30/90

SUBJECT:

SELLING PIZZA TO SCHOOLS

ALL
SCHOOL DISTRICTS
AND
SCHOOL BOARDS
ARE TO BE ADVISED
OF THIS PROGRAM

The purpose of this memo is to ask your assistance relating to the School Food Service Program.

The bottom line is all units selling pizza to school cafeterias must have a signed (USDA approved) Sales Agency Agreement that has been executed by the school and the Legal Department in the Home Office.

There are four practices which must be followed to be operating within USDA regulations. These practices are as follows:

1. The Sales Agency Agreement must be executed by the school and Pizza Hut (yourself and the legal department in Home Office).
2. As stated in the Sales Agency Agreement, the designated areas where Pizza Hut pizza is served must be clearly marked by "point-of-purchase" materials identifying that Pizza Hut pizza is being served. Examples of acceptable P-O-P materials are Pizza Hut posters and table toppers.
3. As stated in the Sales Agency Agreement, Pizza Hut will train school personnel to the standards of quality, cleanliness, and service with respect to serving Pizza Hut pizza. This simply means that we ensure that school personnel meet and follow the "normal" health department standards (i.e. proper temperatures, clean food surfaces, etc.).
4. As stated in the Sales Agency Agreement, a Pizza Hut manager must visit each school site at least once per month to perform a QSC audit using either Delivery or Red Roof standards. The QSC audits should be kept on file at the unit for USDA review.

sign the attached memo, similar to this one, and send it, along with a copy of the attached Sales Agency Agreement, to your District Managers.

Your immediate attention to this matter will help Service Program near the first of March.

Thank you in advance for your prompt attention to this very important matter.

If you have any questions, please don't hesitate to call Tad Wampler at X5323.

National
Frozen Pizza
Institute

1764 Old Meadow Lane Suite 350
McLean, Virginia 22102
(703) 821-0770

October 26, 1990

Honorable Jo Ann Smith
Assistant Secretary of Agriculture for
Marketing and Inspection Services
United States Department of Agriculture
Washington, D.C. 20250

Dear Ms. Smith:

On behalf of the National Frozen Pizza Institute (NFPI), we wish to express our continuing concern over the introduction of uninspected meat-topped pizzas into the School Lunch Program. Recent events indicate that a pizza manufacturer, Pizza Hut, Inc., is proceeding with the implementation of "Sales Agency Agreements" with several local school authorities around the country. As detailed in NFPI's letter of July 17, 1990, implementation of these "Sales Agency Agreements" violates the Federal Meat Inspection Act (FMIA) and the National School Lunch Act (NSLA). In addition, it has come to our attention that Pizza Hut's products are misbranded within the meaning of the FMIA.

On October 3, 1990, the Administrator of the Food Safety and Inspection Service (FSIS), Dr. Lester M. Crawford, issued a letter to Pizza Hut "apparently" exempting Pizza Hut from any inspection requirements in light of the "Sales Agency Agreement." We respectfully submit that this would be a major precedent which expands the central kitchen exemption well beyond the intent of Congress. Indeed, it could create a wholly unmanageable regime of food distribution which would be outside of inspectional requirements. We believe an exemption for Pizza Hut on the basis of the "Sales Agency Agreement" is contrary to common sense, is contrary to law, and is contrary to sound public policy. Each of these points will be discussed below.

This correspondence also will reply to a letter written by Pizza Hut to Dr. Crawford. The Pizza Hut letter, dated September 10, 1990, makes certain erroneous statements which must be corrected as USDA continues to develop a policy to apply the central kitchen exemption of the Federal Meat Inspection Act to fast food restaurants selling products to schools for use in the School Lunch Program.

I. PIZZA HUT CANNOT QUALIFY FOR THE CENTRAL KITCHEN EXEMPTION
BECAUSE IT DOES NOT "OPERATE" SCHOOL KITCHENS

FMIA section 301(c)(2) provides that the inspection requirements of the Act

shall not apply to operations of types traditionally and usually conducted at . . . restaurants For the purposes of this subparagraph, operations conducted at a restaurant central kitchen facility shall be considered as being conducted at a restaurant if the restaurant central kitchen prepares meat or meat food products that are ready to eat when they leave such facility and are served in meals or as entrees only to customers at restaurants owned or operated by the same person, firm, or corporation owning or operating such facility.

21 U.S.C. § 661(c)(2) (emphasis supplied).

As the statute makes clear, to be eligible for the exemption the entree, i.e., pizzas in this case, must be sold to customers at restaurants owned or operated by the maker of the entree i.e., Pizza Hut. As an initial matter, it should be apparent to everyone that the lunch facilities at the various schools are not owned by Pizza Hut. In addition, from both a common sense and legal perspective, school lunch facilities are not owned or operated by Pizza Hut.

A. From A Common Sense Perspective, Pizza Hut Does Not
"Operate" School Kitchen

The term "operate," in the common parlance, would refer to the control of the restaurant or food service facility. This would include such things as occupying and maintaining the site; supplying and maintaining the facility's equipment; providing uniforms for workers who serve meals; cleaning of the facility; hiring, instructing, directing, and disciplining personnel; providing mandated workmen's compensation insurance, unemployment insurance, and Social Security taxes; the actual dispersing of the food and the collection of money; and responding to customer complaints.

It cannot be said that Pizza Hut engages in any of these activities in a school. It is the school, and not Pizza Hut, that occupies and maintains the school cafeteria, supplies and maintains all necessary equipment, and provides appropriate garb for its own cafeteria workers. Pizza Hut does not clean the school lunch facility, or even a section of the school lunch line. Pizza Hut does not provide workmen's compensation insurance, unemployment insurance, or pay Social Security taxes. It does not hire, fire, train, or otherwise direct the school service personnel. It does not serve the product to the school children. Finally, it does not listen to any complaints the school children might raise. It is a great stretch of the word "operate" to say that a company which merely brings pizzas to a back door and bills the school can be said to "operate" the school lunch facility.

B. Pizza Hut Does Not Operate The School
Kitchen As A Matter Of Law

Pizza Hut has not and cannot meet the common sense test for "operating" the school kitchen. They do attempt, through a novel interpretation of the law, specifically the "Sales Agency Agreement," to say that the school and the school's employees are acting as their "agents." This facile argument does not compel or even permit application of the central kitchen exemption.

Congress, in enacting the central kitchen amendment, indicated the amendment is to be very narrowly construed. S. Rep. No. 610, 98th Cong., 2d Sess. 3 (1984), reprinted in 1984 U.S. Code, Cong. & Admin. News 3852, 3854; see also 51 Fed. Reg. 29905, 29906, col. 2 (Aug. 21, 1986) (preamble to Final Rule implementing statute); 50 Fed. Reg. 33762, 33763, col. 2-3 (Aug. 21, 1985) (preamble to proposed rule).

The reason underlying the exemption is that if a central facility maintains complete control over a product from preparation to consumption by a customer, a geographic separation of the place of preparation and the place of consumption will not mandate federal inspection. In implementing the central kitchen amendment through regulations, the agency expressly stated that the crucial issue in deciding if the central kitchen exemption will apply is whether the producing location maintains control either through ownership or through its employees over the product and the facility where the product is served or sold. 51 Fed. Reg. 29906, 29908, col. 2-3.

Continuous control of the product by the restaurant from the point of its preparation to its service to consumers is an essential part of this single entity concept ... Any deliveries to consumers made by such stores must be carried out by employees of that store in order to maintain the continuous possession of the product.

51 Fed. Reg. 29908, col. 3 (emphasis supplied). Pizza Hut does not use its own employees except to deliver pizzas to the school kitchen door. Pizza Hut does not exercise continuous control. As such, Pizza Hut fails to fulfill the regulatory conditions established to qualify for the central kitchen exemption.

Pizza Hut, lacking either ownership of the school or employment of the cafeteria workers, seeks to apply agency law to claim the trappings of control required by the statute, the legislative history, and the implementing regulations of the central kitchen exemption. When the Pizza Hut "Sales Agency Agreement" is analyzed under agency law, as a matter of law, the agreement does not give Pizza Hut the requisite control.

In determining whether an agency agreement gives one party the right to control, courts traditionally look to several factors:

1. Distinct Business

If both parties to the contract have their own business, neither party is likely to control the other. Restatement (Second) of Agency § 220(2)(b).

Here, the school food service authorities have their own business beyond the service of Pizza Hut pizzas, i.e., preparing and serving school lunches. This supports the conclusion that the requisite control is lacking.

2. Tools And Facilities

If each party uses his own tools and facilities in performance of the contract, neither party is likely to control the other. Restatement (Second) of Agency § 220(2)(e); Comment l, Comment k.

Here, despite unsupported vague statements to the contrary, the equipment and facilities used by the schools to perform under the "Sales Agency Agreement" with Pizza Hut are owned by the schools and controlled by the schools. At the same time, Pizza Hut

uses its own facilities to produce the pizzas and its own delivery personnel and equipment to deliver the pizzas to the cafeteria. At no time does Pizza Hut exercise any distinct control over physical space or facilities at school cafeterias. None of Pizza Hut's proposals contain any specifications whatsoever for facilities or equipment necessary to the establishment of "miniature Pizza Huts" in school cafeterias. Furthermore, it strains the English language to state that the mere taping up of a paper sign reading "Pizza Hut" is enough to be considered "operating a satellite restaurant." This again supports the conclusion that control by Pizza Hut over its products is absent.

3. Basis Of Compensation

If compensation is on the basis of time, control is normally present; if on the basis of job, control is normally absent. Restatement (Second) of Agency § 220(2)(g); Comment j. Here, the school is paid on a commission basis. Pizza Hut pays on the basis of how many pizzas are sold, not how much time school personnel were engaged in Pizza Hut's business. Once again, this militates against the eligibility of Pizza Hut for the central kitchen exemption.

4. Supervision

Beyond these factors, courts will look to actual evidence of control. See generally, Restatement (Second) of Agency § 220. Here, it is clear Pizza Hut does not exercise any meaningful control over its product after delivery to the school. Moreover, Pizza Hut exercises no control at all over school personnel. There are no Pizza Hut personnel, managerial or otherwise, present in the school cafeteria.

We note that Pizza Hut's own memoranda to school authorities concerning this arrangement, with regard to the training of school personnel as to the standards of quality, cleanliness, and service with respect to serving Pizza Hut pizza, states the following:

This simply means that we [Pizza Hut] ensure that school personnel meet and follow the "normal" health department standards (i.e., proper temperatures, clean food surfaces, etc. . . .)

See Attachment I (emphasis supplied). The schools are already under a duty to follow health department standards regardless of the food being served. Pizza Hut apparently imposes no additional or different requirements upon the schools or the food service personnel. Nor is there any requirement that only duly trained cafeteria personnel work as Pizza Hut "representatives." Pizza Hut exercises absolutely no control over personnel.

In light of the above, it is clear that as a matter of agency law, the Pizza Hut "Sales Agency Agreements" do not provide Pizza Hut with control over the product from time of preparation to consumption. Pizza Hut's control over product ends with the delivery man at the back door to the facility. Absent much greater control, Pizza Hut cannot be said to be "operating" the school cafeteria or any portion thereof. Under these circumstances, Pizza Hut cannot be eligible for the central kitchen exemption.

C. Absent Eligibility For Central Kitchen Exemption,
Pizza Hut Must Be Inspected

In its September 10 letter, Pizza Hut raises certain questions, such as why should inspection be required for pizza operations when all a pizza manufacturer does is place previously inspected meat food products on a pizza. Pizza Hut also questioned why sandwiches -- but not pizzas -- are eligible for an exemption when the assembly operations involving previously inspected meat food products is similar between the two products. These questions are not new to FSIS. Indeed, these issues have been controversial in recent years. The resolution of these issues, for the time being, lies in the fact that Congress made the decision that all meat food products are to be inspected and that the agency has consistently ruled that meat-topped pizza is a meat food product. Absent a change in agency policy, applicable to all pizzas, an exemption for one brand would be arbitrary.

D. Inspection Of Pizza Hut Is Necessary
To Ensure Fair Competition

Pizza Hut has argued it is entitled to an exemption so as to "level the playing field," to put Pizza Hut on an equal footing with other restaurants. We agree that there should be a level playing field -- a level playing field for all pizza companies. NFPI's members are inspected. With inspection comes the requirements of facility approval, equipment approval, label approval, inspection overtime charges and other costs; costs which Pizza Hut attempts to avoid. However, since it is operating in the same manner as inspected establishments -- preparation of product at one

location for distribution at another location by a different entity -- Pizza Hut should and must comply with the same requirements. Anything else is unfair competition.

II. THE PURPORTED EXEMPTION FROM INSPECTION REQUIREMENTS
DOES NOT EXEMPT PIZZA HUT FROM LABELING AND
COMPOSITIONAL REQUIREMENTS OF THE FMIA

In the appendix to its September 10 letter, Pizza Hut makes the clearly erroneous claim that "labeling and compositional requirements do not apply to articles exempted from inspection under 21 U.S.C. 661(c)" (capitalization of heading deleted). Pizza Hut's claim of exemption from labeling and compositional requirements is directly contradicted by the explicit language of the United States Senate Report accompanying the legislation that enacted the central kitchen exemption:

Also, the adulteration and misbranding provisions of the meat and poultry inspection Acts would continue to apply, notwithstanding the exemption from the inspection requirements. Thus, consumers would continue to be assured that they will receive wholesome, unadulterated, and properly labeled meat and poultry products.

S. Rep. No. 610, 98th Cong., 2d Sess. 3, reprinted in 1984 U.S. Code, Cong. & Admin. News 3852, 3855. The federal courts have reached the same conclusion. The United States Court of Appeals for the Sixth Circuit, in a case dealing with the retail exemption, noted that despite the inspection exemption, such a facility "remains subject to other USDA regulations, including those relating to adulteration and misbranding." D & W Food Centers, Inc. v. Block, 786 F.2d 751, 753, n.1 (6th Cir. 1986) (emphasis supplied); see also 42 Op. Att'y Gen. 459, 472-474 (1972) ("It is

therefore my conclusion that the adulteration and misbranding provisions of the Act apply to all retail establishments distributing meat in 'commerce'").^{1/} Insofar as the FMIA treats retail establishments and restaurants identically, the misbranding and adulteration provisions of the FMIA are equally applicable to restaurants and, in turn, restaurant central kitchen facilities.

Meat and meat food products, even though produced in an establishment exempt from inspection under the central kitchen exemption,^{2/} are therefore subject to this misbranding and adulteration provisions of the FMIA.

III. PIZZA HUT'S PRODUCT VIOLATES THE MISBRANDING PROVISIONS OF THE FMIA

A meat food product is considered misbranded:

if it purports to be or is represented as a food for which a definition and standard of identity or composition has been prescribed by regulations of the Secretary under section 607 of this title unless (A) it conforms to such definition and standard, and (B) its label bears the name of the food specified in the definition and standard

21 U.S.C. § 601(n)(7).

1/ Pizza Hut argues that the regulatory parameters of the central kitchen exemption exceed the Secretary's authority because those parameters are contained in the same section of the Code of Federal Regulations as the "custom slaughter" and the "territorial exemption" from the inspection requirements, despite the fact that these other exemptions derive from different statutory authority. This argument is of no moment. Explicit authority exists for the Secretary to define the sanitary conditions and practices required of an establishment exempt from inspection under the central kitchen exemption. See § 661(c)(2).

2/ NFPI does not concede that the central kitchen exemption has been, is, or could be correctly applied to Pizza Hut's school lunch activities.

The Secretary has promulgated a standard of identity for meat pizza. That standard provides that "pizza with meat" must contain cooked meat made from not less than 15 percent raw meat and "pizza with sausage" must contain not less than 12 percent cooked sausage or 10 percent dry sausage, e.g., pepperoni. 9 C.F.R. § 319.600 (1990).

Pizza Hut admits that its pepperoni pizza contains only half of the meat required by the standard of identity. See Letter to Lester M. Crawford, DVM, Ph.D., from Theresa Roll Kerwick, September 10, 1990, at 4, ¶ D.2 (Attachment II). Insofar as Pizza Hut's pepperoni pizza does not conform to the standard of identity for the product, it is misbranded within the meaning of the FMIA.

The sale, transportation, or offering for sale of any article which is capable of use as human food and which is misbranded at the time of such sale, transportation, offer for sale or transportation, or receipt for transportation, is prohibited by the FMIA. 21 U.S.C. § 610.

IV. THE APPLICATION OF THE CENTRAL KITCHEN EXEMPTION TO PIZZA HUTS WOULD LEAD TO A WHOLLY UNMANAGEABLE REGIME OF FOOD DISTRIBUTION

A totally new policy justifying application of the central kitchen exemption to Pizza Hut would be, simply put, the broadest exemption granted in the eighty-three-year history of the Federal Meat Inspection Act. Pizza Hut, or any other restaurant or fast food chain, could achieve large-scale distribution of uninspected meat and meat food products merely by executing a "Sales Agency Agreement" with a school district, college cafeteria, public health care administration, or any other large foodservice entity. In addition, Pizza Hut could use the central kitchen exemption to provide meat and meat food products to convenience stores or grocery stores, which would, in turn, act as the Pizza Hut's "satellite restaurants." These arrangements, and many other scenarios, would be in utter disregard of the purposes underlying the meat inspection laws of this nation. Unfortunately, such consequences follow unavoidably from the precedent Pizza Hut urges on FSIS.

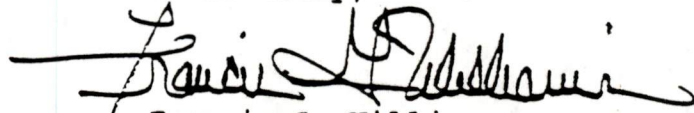
Application of the central kitchen exemption to Pizza Hut would bastardize the very narrow exemption directed by Congress to permit restaurant central kitchens to transport product to satellite facilities truly owned or operated by the restaurants. The central kitchen exemption was designed to ease the burden of Federal regulation on facilities "very similar to traditional

restaurants." S. Rep. No. 610, 98th Cong., 2d Sess. 3, reprinted in 1984 U.S. Code, Cong. & Admin. News 3854. The unwarranted extension of this exemption to restaurant sales to school cafeterias does not comport with the plain language of the statute or express Congressional intent. At the same time, other entities devoted to food service distribution would still operate under the statutory and regulatory requirements of continuous inspection all for the lack of an appended restaurant or catering operation.

V. CONCLUSION

On behalf of the National Frozen Pizza Institute, whose members are the predominant producers of inspected meat topped pizza in America, we respectfully request that USDA carefully review its present course of action with regard to the application of the central kitchen exemption to Pizza Hut and take compliance action against open and notorious product misbranding. The restaurant's attempt to use the exemption to circumvent the meat inspection laws from which school cafeterias currently benefit has been accomplished without regard to a full public airing, principled decisionmaking, or long-term effects on the distribution of meat and meat food products in this nation. We strongly urge USDA to explain the precise requirements of the central kitchen exemption to appropriate parties in a clear and practical fashion.

Yours truly,



Francis G. Williams
National Frozen Pizza Institute



United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park Center Drive
Alexandria, VA 22302

NOV 27 1988

SUBJECT: Sales Agency Agreements for Commercially Prepared Food
in the National School Lunch Program

TO: All Regional Administrators

During the last school year, we became aware that a number of school food authorities (SFA) had entered into contractual arrangements with local commercial firms to provide fresh ready-to-eat pizza (including meat pizza) for use in school lunches and/or for a la carte service.

Commercial firms may sell fresh ready-to-eat pizza to schools as vendors and schools may then incorporate the pizza into their meal service operation as an a la carte item and as part of a reimbursable meal under the NSLP provided that other program requirements are met. However, if the pizza is a pizza with meat toppings greater than three percent raw meat or more than two percent cooked meat, FSIS requires meat inspection at the time of preparation if the pizza is sold to schools through a vendor agreement.

The Food Safety and Inspection Service has given approval to an arrangement whereby a "sales agency agreement" between the commercial firm and the SFA permits "agents" of the commercial firm to sell directly to customers (children) in schools. Such a sales agency agreement permits the commercial firm to operate without meat inspection under FSIS regulations. While the arrangement eliminates the need for meat inspection, lunches containing pizza served under sales agency agreements may not be claimed for National School Lunch Program (NSLP) reimbursement. Pizza or any other food items sold or served under a sales agency agreement cannot be considered part of a SFA's nonprofit food service which is defined, in part, in Section 210.2 of the NSLP regulations as "...food service operations conducted by the school food authority..." Under the sales agency agreement, the commercial firm, through its sales agent, sells directly to its customers and thus "conducts" the operation, not the SFA.

Additionally, the a la carte sale and service of pizza under a sales agency agreement is also not allowable in NSLP schools. Section 9(e) of the National School Lunch Act, added in 1986, requires that a private company operating in a school must offer free, reduced-price, and paid reimbursable meals to all students.

Since this is a complex issue, the following summary may be useful.

1. Pizza Hut may sell pizza to schools as a supplier or vendor. Pizzas with meat would require governmental inspection. For pizzas without meat, there is no requirements for such inspection. These schools may incorporate these products into their normal meal service operation and claim such meals for reimbursement under the NSLP, or offer them in a la carta service.
2. In schools participating in the NSLP, Pizza Hut may not sell pizza, including meat-topped pizza, directly to students under a Sales Agency Agreement either as one part of a meal or a la carte. Pizza Hut may make such sales, however, at schools not participating in the NSLP, under a Sales Agency Agreement. Pizza with meat would be exempt from Federal inspection under this arrangement.
3. Pizza Hut may wish to offer full, reimbursable meals to school children and function as a Food Service Management Company in the NSLP.

Due to the timing of this determination and its effect on current school food service operations, we are providing a grace period until February 1, 1991 for SFAs that have entered into sales agency agreements with commercial firms before further action is taken. Meals served prior to this date through these agreements and meeting other program requirements will be considered fully reimbursable. This period should allow such SFAs a reasonable time to make necessary adjustments in their food service operations.

Please have your staff contact Samuel P. Bauer or Stan Garnett if there are any questions.


Betty Jo Nelsen
Administrator



- Attachment IV

AUG 31 1990

Mr. Payton George
1601 Chapel Hill Drive
Alexandria, VA 22304

Dear Mr. George:

This will confirm the final decisions we discussed in our telephone conversation on August 23 regarding the sale of meat pizzas to schools that participate in the National School Lunch Program.

As you know, Section 301(c)(2) of the Federal Meat Inspection Act (21 U.S.C. 661 (c) (2)) and implementing regulations (9 C.F.R. 303.1(d)) provide for an exemption from the routine inspection requirements for operations of types traditionally and usually conducted at restaurants. Operations conducted at a restaurant central kitchen facility are deemed to be conducted at a restaurant if the restaurant central kitchen prepares products for sale to customers at restaurant outlets owned or operated by the same person, firm, or corporation owning or operating such facility.

After further review, we have concluded that the Pizza Hut "Sales Agency Agreements" do not comport with the intent of the provisions of the statute and regulations authorizing the requisite exemption. Accordingly, the Food Safety and Inspection Service (FSIS) finds proposed business arrangements under the "Sales Agency Agreements" to be unacceptable from the standpoint of providing Pizza Hut with an exemption from the inspection requirements. Further, Pizza Hut officials have been informed that reimbursement payments under the National School Lunch Program cannot be claimed for meat-topped pizzas distributed under a "Sales Agency Agreement." However, as an alternative, Pizza Hut may seek appropriate inspection under the Act for the preparation of meat pizzas at its establishments. Inspection service is available to any person, firm, or corporation that complies with regulatory standards for facilities, equipment and sanitation, and for labeling and composition of meat products.

Further information about procedures for obtaining individual grants of inspection may be obtained from Mr. Robert D. Murphy of the FSIS Processing Operations Staff. His telephone number is Area Code (202) 447-3491.

Sincerely,



Lester M. Crawford, DVM, PhD
Administrator



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

OCT 03 1990

Mr. Peyton George
Pizza Hut, Inc.
Washington, DC

Dear Mr. George:

We have now completed our review of Pizza Huts' policing of the sales agency agreements between the corporation and the school lunch entities. We appreciate your compliance with our suggestions in this regard and are now prepared to allow you and other corporations to continue these arrangements.

The Food Safety and Inspection Service will monitor these activities and may from time to time make further findings.

Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lester M. Crawford". The signature is stylized with a large, looped initial "L" and a long, sweeping underline that extends across the signature.

Lester M. Crawford, DVM, PhD
Administrator

*Rec'd***Regan**
COMMUNICATIONS*Rec'd Too late
for any
action!*

May 23, 1991

FILE

Andrew Card
Special Assistant to the President
for Intergovernmental Affairs
The White House
Washington, D. C.

Dear Andy:

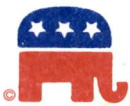
I don't know if you are traveling to Boston tomorrow, but I wanted you to know about something Bank of Boston is doing in honor of the President's visit. They are running full-page ads (attached) in the Boston Globe, Worcester Telegram and Springfield Union congratulating New England's "E" Award recipients and reminding readers of this region's role in global trade. The bank received the award in 1963.

Chad Gifford, the bank's president, will be attending the Steve Pierce event as well as the Export luncheon. Might it be possible for Mr. Gifford to present the President with a framed copy of the ad at the reception? Anyway, just a thought. Hope all is well.

Best regards,



George K. Regan



Republican
National
Committee

Clayton Yeutter
Chairman

1.6
AC HAS SEEN

MAY 1 1991

April 30, 1991

The Honorable Andrew Card
Assistant to the President and
Deputy to the Chief of Staff
The White House, West Wing
Washington, D.C. 20500

Dear Andy:

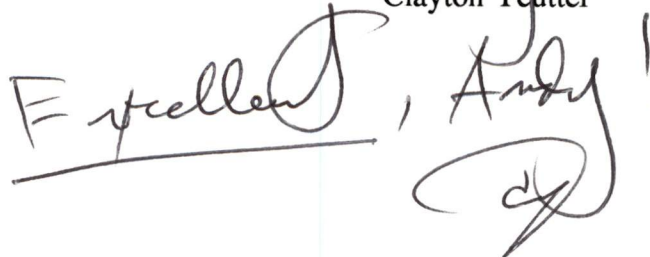
Thank you for speaking to the RNC State Chairmen's Meeting last Thursday. I heard a lot of positive comments about your remarks from the state chairmen and others.

I especially appreciate your making the effort to join us in view of the short time you were able to stay in Florida. Thank you for giving of your time and your talent to the RNC.

Sincerely,


Clayton Yeutter

CY/wdp



A -
Bob arranged
for the
tour.

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bc

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HEADQUARTERS

Milford Commandery, No. 11

Knights Templars

155 Main Street, Milford, Massachusetts

April 2, 1991

Hon. Andrew Card
Assistant to the President
White House
Washington, D.C. 20020

Dear Andy,

I wish to express my appreciation to you and the tour staff for the privilege of having a private escorted tour of The White House on Saturday, March 31, 1991.

Twenty nine Knight Templars accompanied by their wives arrived at the White House at the scheduled hour of 8:00 A.M. and we were received very courteously by the staff at the East Gate and then given a tour by one of the Secret Service Agents that was very informative and rendered most efficiently.

On behalf of the Knight Templars from Massachusetts and Rhode Island, I again say "thankyou" and also inform you that it was a tour that all will remember for years to come.

The tour was the highlight of our trip to Washington and added immensely to the satisfaction of coming to the Nation's Capital and Alexandria, VA where the Easter Sunrise service is conducted annually. Again, "thankyou" for everything.

Sincerely,



Elton C. Jones, Recorder
Milford Commandery #11

Home address:
45 Carney Street
Uxbridge, MA 01569-1808

Jocelyn White
1350 I Street, N.W.
Suite 660
Washington, D.C. 20005

16
AC HAS SEEN

Apr 10, 1991

Dear Andy,

you were great! Thanks so much again for meeting with Mike Bonsignore of Honeywell. I think the meeting was productive for us. I hope it gave you some insight too.

as always, you continue to be a great friend to me and I sincerely appreciate it.

Sincerely,

Jocelyn



OFFICE OF THE PRESIDENT

1.6
ASSUMPTION COLLEGE

500 Salisbury Street, Worcester, Massachusetts 01615-0005 Telephone: 508/752-5615

April 8, 1991

AC HAS SEEN

PERSONAL

Dr. Celeste Colgan
Deputy Chairman
National Endowment for
the Humanities
Washington, DC 20506

Dear Celeste:

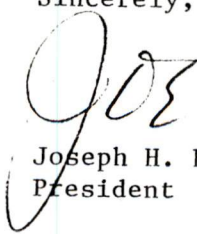
Thank you very much for your note of April 4. When I was in Washington on April 4, I dropped by to see Lynne Cheney about my interest and received encouragement. I presume that she'll speak with you about my visit.

I'll let Andy Card and Ron Kaufman know that Theresa T. Michel is handling the President's appointments to the National Council on the Humanities in the Presidential Personnel Office and that they should let her know of their interest in me. Both Andy and Ron have let me know that they think the National Council would be a good appointment for me, and I'm sure that they'll follow through.

I'd be glad to visit with you in the late summer. Just let me know when you want to see me.

With all best wishes,

Sincerely,


Joseph H. Hagan
President

CC Andy Card ✓
Ron Kaufman



ASSUMPTION COLLEGE

500 Salisbury St., Worcester, MA 01615-0005 Tel.: 508/752-5615

Joseph H. Hagan
President

NATIONAL ENDOWMENT FOR THE HUMANITIES

WASHINGTON, D.C. 20506



April 4, 1991

Dr. Joseph H. Hagan
President
Assumption College
500 Salisbury Street
Worcester, MA 01615-0005

Dear Joe:

I saw your note to Lynne and appreciate your one to me. I am forwarding your resume to Presidential Personnel. The person managing the President's appointments to the National Council on the Humanities is:

Theresa T. Michel
Deputy Associate Director
Presidential Personnel
The White House, Room 145
Washington, DC 20500
Telephone: 202/456-2973

When the time comes to think about replacements for the Class of 1992, probably late summer, we should probably visit.

With best wishes,

Sincerely,

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

Celeste Colgan
Deputy Chairman

cc: T. Michel

CC:wml

05-1.4
AC HAS SEEN

106 Merrymount Road
Quincy, Mass. 02169
(617) 471-5686

April 5, 1991

Mr. Andrew H. Card, Jr.
Assistant to the President
and Deputy to the Chief of Staff
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Dear Mr. Card:

In the event you may correspond with me my new address is noted in the above. I am still attempting to locate a third-year psychiatry residency position. Dr. Peter Regan of Veterans Affairs has yet to reply to my inquiry.

Thank you for any assistance in this regard you may have provided.

Sincerely,

James L. Ross, M.D.

James L. Ross, M.D.

Rec'd
APR 17 1991

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1.6

DEAR ANDREW

I WOULD HOPE THAT THE BASE CLOSING IN NEW HAMPSHIRE WOULD BE PROCESSED OF AN EXCHANGE FROM MILITARY EMPLOYEMNY TO CIVILIAN EMPLOYMENT. I AGREE WITH THE BASECLOSING AT PEASE AFB AND PORTSMOUTH NAVAL BASE BECAUSE THIS IS 1991 NOT 1940.

I SHOULD NOT BE PROVIDING MY CONSULTING WITHOUT A FEE BUT WHAT THE HELL ITS SPRING.

PORTSMOUTH HARBOR MAY BE DEEP ENOUGH FOR AN ENERGY TERMINAL FOR OCEAN DELIVERY OF LIQUID NATURAL GAS, HEATING OIL AND GASOLINE.

BY EXTENDING A PIPELINE WEST WARD TO CONCORD NEW HAMPSHIRE THAT WOULD REDUCE TANKER TRUCK TRAFFIC, REDUCE ENERGY INFLATION AND REDUCE ENERGY CONSUMPTION.

PEASE AFB HAS BEEN SOLD TO ONE DEVELOPER ALL 4400 ACRES I HOPE THAT ENTITY HAS THE BRAINS TO DEVELOP RECREATION AND RESIDENTIAL UNITS. IN MASSACHUSETTS AT MINIMUM 50% OF ALL HOUSING STOCK WAS BUILT BEFORE 1940 AN ENORMOUS REPLACEMENT COST IF DONE IN A SHORT PERIOD. I SAY THAT MY PROPOSALS ARE REDUNDANT THAT WHEN THEY LAID OUT FREIGHT AND PASSENGER RAIL TRACK MANY YEARS AGO THEY WERE SUCCESSFUL IN SPURING COMMERCIAL AND POPULATION DEVELOPMENT BUT WARS CURTAILED THE PROCESS THE TRACK IS STILL THERE FROM BOSTON NORTH STATION TO PORTSMOUTH N.H. MANCHESTER N.H. AND PORTLAND ME..

WITH PROPER LAND USE NEW HAMPSHIRE COULD EASILY HAVE A POPULATION OF 4 MILLION BY 2005 IF ONE FOLLOWS MY CONSULTATION TO THE LETTER.

IF YOU CARE TO SEND ME NAMES OF PRIVATE DEVELOPER OF PEASE I WILL GLADLY RECAP MY PLANS.

THERE ARE MANY OTHER MEANS TO MAKE AMERICA ENERGY INDEPENDENT WITHOUT HIDING COSTS. FOR EXAMPLE IF ALL ELECTRICAL UTILITIES PAID OFF THERE LONG TERM DEBT PAID FOR POLLUTION CONTROL THE STOCK MARKET WOULD DROP CONSIDERABLY HOWEVER THE AMERICAN BANKING INDUSTRY WOULD REBOUND SIGNIFICANTLY THAT IS THE HIDDEN ENERGY COSTS. NUCLEAR POWER PLANTS HAVE NOT PAID FOR THEMSELVES YET. MAY NEVER UNLESS THEY CAN PLAN FOR NUCLEAR WASTE AT NOT ON THE GENERAL TAXPAYERS ACCOUNT BUT BY RATE PAYERS.

SINCERELY YOURS

MR JOHN V VERCELLONE

62 MARLBORO STREET
BELMONT MASS 02178-3660

DO YOU KNOW WHAT I KNOW, HAVE YOU PUT 50,000 MILES ON AN AUTOMOBILE IN 24 MONTHS?

*Know someone who like
Boston, have some children
which are unhappy.*

Andy,

AC HAS SEEN

This little man is now sending certified letters and wants an "RSVP" from our office. I don't even know what he's talking about -- it's totally non-sensical!

lc

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Following Page**

Dear Dennis,

I would appreciate a R.S.D.P. from your office. I have enclosed the health article which is very concerning. My belief is that with the unchecked growth in health care costs this is totally unacceptable.

Probably 50% of those deaths are caused by medical malpractice, negligence.

I have some suggestions to tame the expanding phenomenon of health care now to less than 11% of G.D.P..

Have to get my electric typewriter repaired. Please give me confirmation of a communications link to your office.

I will in the future prevent a cave for restructuring health care to no more than 11% of G.D.P. in the next 10 years.

JOHN V. VANCE VANCE
62 W. 16th St
REINVENT, NY
02178-3660

Heavenly choir
not work.

Goals should be M.D.
not P.N.D. - Bad mistake

Excess Deaths From Nine Chronic Diseases in the United States, 1986

Robert A. Hahn, PhD, MPH; Steven M. Teutsch, MD, MPH; Richard B. Rothenberg, MD, MPH; James S. Marks, MD, MPH

To assess excess mortality from chronic disease in the United States, state age-adjusted combined mortality rates for nine chronic diseases in 1986 were compared with three "minimum" rates—two calculated from rates actually achieved in states and a third estimated as the mortality remaining after elimination of one risk factor for each disease. Hawaii had the lowest mortality rate of combined diseases (305/100 000); state excesses ranged from 0% to 37%. The sum of lowest disease-specific rates in any state was 284 per 100 000, indicating excesses of between 7% and 41%. A minimum mortality rate of 224 per 100 000 was estimated to result from elimination of one risk factor for each of the nine diseases, indicating state excesses from 26% to 54%, or 524 000 US deaths. Reduction of US mortality from the nine diseases to the risk factor-eliminated rate is estimated to be associated with an increased life expectancy at birth of 4 years.

(JAMA. 1990;264:2654-2659)

IN 1986, 1.1 million persons died with an underlying diagnosis of one of nine chronic diseases (stroke, coronary heart disease, diabetes, chronic obstructive pulmonary disease, lung cancer, female breast cancer, cervical cancer, colorectal cancer, or chronic liver disease and cirrhosis¹⁻⁹). Deaths from these causes accounted for 52% of US deaths in 1986.

Many deaths from these diseases are preventable.¹⁰ Known modifiable risk factors include cigarette smoking, hypertension, overweight, high cholesterol level, a sedentary life-style, heavy consumption of alcohol, and failure to use available screening techniques such as mammography and Papanicolaou smear.¹⁻⁹ Herein we review age-adjusted state mortality rates from these nine diseases combined. We propose and assess three measures of excess mortality.

While demographic and geographic comparisons of mortality rates are common in epidemiology, for example, in standardized mortality ratios, mortality maps, and relative survival measures, such comparisons seldom explicitly indicate desirable or achievable mortality levels. In the evaluation of observed mortality rates, two basic forms of desirable or achievable minimum levels are plausible: (1) lowest achieved mortality rates are calculated from mortality rates that actually have been achieved by some population or population segment at some time and place; and (2) risk-eliminated mortality rates are estimates of the mortality level that would be achieved with the elimination of known risk factors.

To assess the extent of preventable, excess mortality from nine chronic diseases in the United States and Washington, DC, in 1986, we compared three measures of excess mortality: two measures of lowest achieved mortality and one measure of risk-eliminated mortality. To examine the effect of lowered mortality rates of the nine diseases, we compared mortality rates with life expectancy at birth in each state. Large

differences among state rates of mortality from the nine diseases combined and large differences between state rates and lowest achieved and risk-eliminated mortality rate minima indicate that state mortality rates from the nine diseases might be substantially lowered and longevity increased.

METHODS

Calculation of Adjusted Nine-Disease Mortality Rates

All deaths in 1986 with one of the nine chronic diseases as underlying cause were ascertained from the National Center for Health Statistics Mortality Detail data tape^{11,12}; numbers of deaths were stratified by the decedent's age, race (white or black and other), sex, and state of residence. Deaths were linked to corresponding 1986 postcensal population estimates.¹³ For each state, we calculated mortality rates for the nine diseases combined, age-adjusted to the 1980 US population by 5-year age groupings.¹⁴

Determination of Minimum Mortality Rates

Two lowest achieved mortality rates were used: (1) the rate in that state that had the lowest overall age-adjusted mortality rate, and (2) the rate constructed by using the sum of the lowest age-adjusted rates for each disease found in any state. For example, Hawaii had the lowest age-adjusted rate (153.8/100 000) of coronary heart disease and Wyoming had the lowest age-adjusted rate (15.2/100 000) of colorectal cancer. The sum of nine minima yields the aggregate of age-adjusted achieved minimum rates. This minimum can be thought of as the rate of these diseases in a utopian state that had the lowest rates for these diseases found in any state.

From the Division of Surveillance and Epidemiologic Studies, Epidemiology Program Office (Drs Hahn and Teutsch), and the Center for Chronic Disease Prevention and Health Promotion (Drs Rothenberg and Marks), Centers for Disease Control, Atlanta, Ga.

Reprint requests to Mailstop G-34, Division of Surveillance and Epidemiology, Centers for Disease Control, Atlanta, GA 30333 (Dr Hahn).

To calculate a risk-eliminated mortality rate, we used population-attributable risk (PAR) estimates. A PAR is the proportion of deaths (or other outcomes) attributable to an exposure or risk factor, for example, the proportion of lung cancer deaths in a population attributable to cigarette smoking. A PAR is calculated as:

$$PAR = \frac{\sum [P_n (RR_n - 1)]}{1 + \sum [P_n (RR_n - 1)]}$$

where Σ is the sum of parenthesized products for each level of the risk factor, P_n is the prevalence of exposure to a risk factor at a given level (eg, former or current smoker), and RR_n is the relative risk for the disease at that risk factor level. For several risk factors, for example, cigarette smoking, cholesterol level, and blood pressure, we calculated PARs for several exposure levels (eg, current, former, and never smokers; cholesterol levels of <5.20, 5.20 to 6.20, and ≥ 6.21 mmol/L; and systolic blood pressures of <140, 140 to 159, and ≥ 160 mm Hg).

Population-attributable risk calculations require knowledge of the prevalence of risk factors for the outcome and relative risks of the outcome associated with those risk factors. We used estimates of recent prevalences of known risk factors for the nine diseases in the US population from "Health United States 1988,"¹⁵ from surveys conducted by the National Center for Health Statistics (Second National Health and Nutrition Examination Survey, Health Interview Survey), and from other studies. We used relative risk estimates for known risk factors for the nine diseases either directly available or calculable from published studies.

For many chronic diseases, several known risk factors contribute to mortality. Methods are available to estimate the PARs for multiple risk factors. Unfortunately, the data required for estimation, ie, the proportion of the population exposed to each combination of risk factors and the relative risk associated with exposure to that combination, seldom are available. We, therefore, estimated the effect of elimination of one risk factor for each of the nine chronic diseases, considering each risk factor as a stand-alone cause.

To calculate a risk-eliminated mortality rate, we used the risk factor that, as a stand-alone cause, accounted for the largest portion of mortality from that disease. To estimate a risk-eliminated mortality rate for the nine diseases combined, we summed the largest contributors to mortality for each disease. The overall risk-eliminated mortality rate is the mortality rate that would be ob-

Table 1.—Mortality and Excess Mortality Rates (per 100 000) From Nine Chronic Diseases, 1986*

State	No. of Deaths	Mortality Rate	Excess Rate	Percent Excess	Rank by Rate
Alabama	17 641	412.4	187.98	45.6	27
Alaska	778	391.9	167.45	42.7	34
Arizona	12 787	370.0	145.64	39.4	44
Arkansas	11 168	381.6	157.19	41.2	38
California	107 317	410.0	185.60	45.3	29
Colorado	10 153	373.5	149.10	39.9	41
Connecticut	14 682	391.3	166.91	42.7	36
Delaware	2972	461.3	236.90	51.4	7
District of Columbia	2988	432.4	207.97	48.1	23
Florida	68 452	399.4	174.96	43.8	33
Georgia	24 040	442.8	218.37	49.3	17
Hawaii	2817	304.7	80.34	26.4	51
Idaho	3546	367.9	143.54	39.0	46
Illinois	56 247	455.4	231.03	50.7	11
Indiana	26 808	459.0	234.56	51.1	8
Iowa	14 833	391.3	166.92	42.7	35
Kansas	11 325	373.5	149.06	39.9	42
Kentucky	18 454	467.1	242.75	52.0	5
Louisiana	17 522	442.2	217.80	49.3	18
Maine	6263	443.7	219.34	49.4	16
Maryland	18 391	440.6	216.24	49.1	20
Massachusetts	29 729	414.5	190.05	45.9	26
Michigan	44 618	483.1	258.68	53.5	1
Minnesota	17 632	360.1	135.70	37.7	47
Mississippi	11 988	440.3	215.92	49.0	21
Missouri	25 703	411.6	187.25	45.5	28
Montana	3238	377.1	152.72	40.5	40
Nebraska	7459	370.0	145.60	39.4	45
Nevada	3635	451.5	227.10	50.3	13
New Hampshire	4631	425.2	200.85	47.2	25
New Jersey	39 428	458.1	233.68	51.0	10
New Mexico	4521	357.5	133.14	37.2	48
New York	97 827	473.7	249.30	52.6	3
North Carolina	28 580	451.7	227.32	50.3	12
North Dakota	2628	335.9	111.46	33.2	50
Ohio	54 652	468.6	244.16	52.1	4
Oklahoma	15 938	441.2	216.76	49.1	19
Oregon	12 556	409.3	184.85	45.2	30
Pennsylvania	65 604	446.4	221.95	49.7	15
Rhode Island	5748	458.1	233.69	51.0	9
South Carolina	14 127	463.1	238.68	51.5	6
South Dakota	3445	382.6	158.17	41.3	37
Tennessee	23 139	450.7	226.28	50.2	14
Texas	54 005	372.5	148.12	39.8	43
Utah	4014	335.9	111.53	33.2	49
Vermont	2522	430.9	206.46	47.9	24
Virginia	23 384	437.8	213.36	48.7	22
Washington	18 310	400.9	176.52	44.0	32
West Virginia	10 615	480.9	256.46	53.3	2
Wisconsin	22 854	406.2	181.81	44.8	31
Wyoming	1442	378.9	154.45	40.8	39
US total	1 103 142	427.4	202.9	47.5	...

*Risk-eliminated minimum rate is 224.5 per 100 000. (Adapted from MMWR. 1990;39:17-20.)

tained if the greatest cause of mortality for each of the nine diseases were eliminated, assuming no changes in the prevalences of other risk factors for the same outcomes.

Calculation of Excess Mortality

For each of the three minimum rates (two that derive from lowest achieved

rates and one from risk elimination), an excess rate for each state can be calculated by subtracting that minimum rate from the observed state rate. The excess can be expressed as the proportion of the state rate above the minimum, ie, excess proportion is equal to observed rate minus minimum rate divided by observed rate.

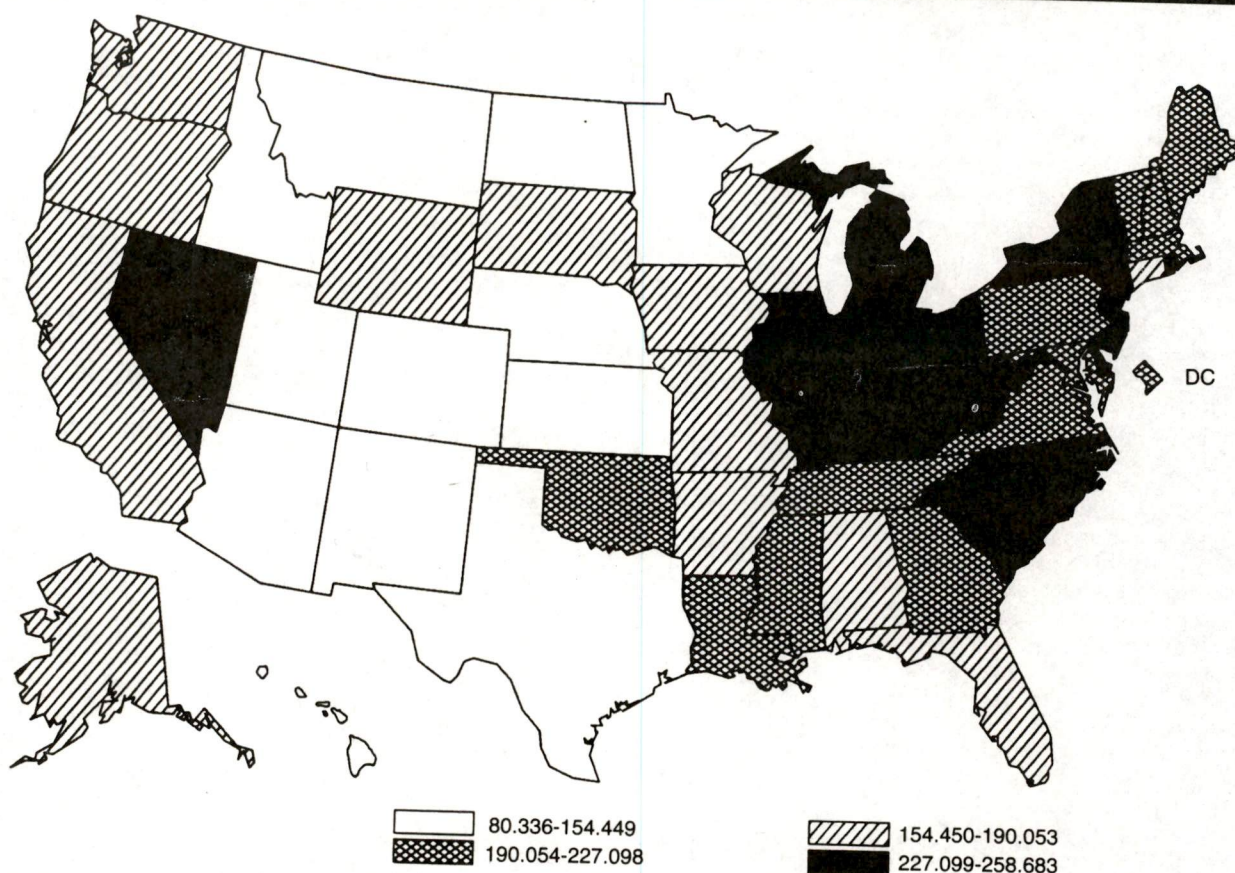


Fig 1.—Excess mortality from nine chronic diseases, 1986. Risk-eliminated minimum is 224.4 per 100 000. Rates per 100 000 are shown per quartile, adjusted for age to US population, 1980. From the Centers for Disease Control, Atlanta, Ga, and the National Center for Health Statistics Epidemiology Program Office, Washington, DC. (Adapted from *MMWR*. 1990;39:17-20.)

Assessment of the Effect of Excess Mortality

To assess the effect of different mortality rates from the nine diseases, we compared age-adjusted mortality rates in each state with life expectancy at birth in the same state.¹⁶ We used a scatter plot and calculated a linear regression of life expectancy on mortality from the nine diseases combined.

RESULTS

In 1986, the overall mortality rate for the nine selected chronic diseases in the US population, age adjusted to the US population in 1980, was 427.4 per 100 000 (Table 1). Michigan had the highest rate (483.1/100 000); Hawaii had the lowest rate (304.7/100 000) (Table 1 and Figs 1 and 2). We used the rate in Hawaii as a lowest achieved mortality rate. The combined lowest state mortality rates for the nine diseases, age adjusted to the 1980 US population, was 284.1 per 100 000, 33.5% lower than the US mean mortality rate from these diseases.

Of nine risk factors examined singly for their contribution to deaths from the nine diseases, the largest proportion, 33%, was attributable to cigarette smoking (Table 2). Examined one at a time, five other risk factors also contributed large proportions of death from these causes: obesity (24%), a sedentary life-style (23%), high cholesterol level (23%), hypertension (21%), and diabetes (8%). Other risk factors—heavy alcohol consumption and nonutilization of mammography and Papanicolaou smears—contributed a maximum of less than 1% each (although they contributed substantial proportions of deaths from specific diseases: chronic liver disease, breast cancer, and cervical cancer, respectively). Because these risk factors were considered one at a time, the proportions are not additive. They indicate the maximum reduction in mortality that would follow elimination of each risk factor.

The sum of the greatest number of deaths attributable to any one risk factor for each disease (Table 2), for exam-

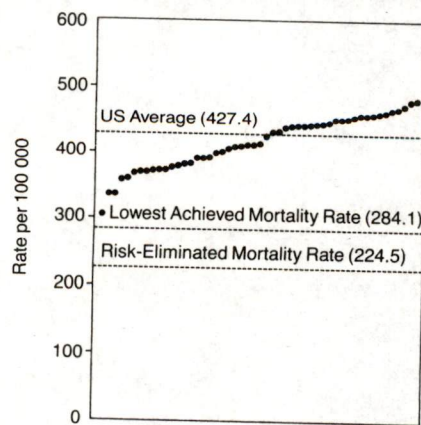


Fig 2.—Mortality and excess mortality from nine chronic diseases, by state, United States, 1986. Each dot represents the mortality rate in one state.

ple, cholesterol for coronary heart disease, obesity for stroke, and smoking for chronic obstructive pulmonary disease, was 523 570, or 47.5% of deaths

Table 2.—

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Table 2.—Number of Deaths and Proportions of Deaths (%) Attributable to Risk Factors for Nine Chronic Diseases*

Risk Factor	Disease									Total
	Coronary Heart Disease	Stroke	Chronic Obstructive Pulmonary Disease	Lung Cancer	Cervical Cancer	Breast Cancer	Colorectal Cancer	Cirrhosis	Diabetes	
Total No. of Deaths	593 111	149 204	71 099	125 511	4543	40 534	55 811	26 151	37 178	1,103,142
Current/former smoking, % ²⁷	148 879 (25.1) ²⁸	35 931 (25.1) ²⁸	57 791 (81.3) ²⁸	108 164 (86.2) ²⁸	1443 (31.8) ²⁸	...	...	...	9703 (26.1) ²⁸	361 911 (32.8)
Cholesterol level ≥ 5.20 mmol/L, % [†]	253 194 (42.7) [‡]	...	...	...	...	...	...	...	...	253 194 (23.0)
Hypertension (systolic blood pressure ≥ 140 mm Hg), % [‡]	171 121 (28.9)	47 431 (31.8)	...	...	...	...	...	...	7409 (19.9) [#]	225 962 (20.5)
Obesity ($\geq 110/130\%$ of desirable weight), % ^{***}	190 456 (32.1) ^{**}	68 483 (45.9) ^{**}	...	...	...	...	...	...	3049 (8.2) [#]	261 988 (23.7)
No regular exercise, % ^{††}	205 254 (34.6) ³⁸	43 063 (28.9) ^{††}	...	...	...	...	8369 (15.0) ⁴⁰	...	...	256 686 (23.3)
Alcohol (≥ 1 oz of ethanol/d), % [§]	...	...	...	...	...	...	...	8385 (32.1) ⁴²	...	8385 (0.7)
Diabetes, % ^{§§}	77 709 (13.1)	6993 (4.7)	...	...	...	...	...	...	...	84 701 (7.7)
Never use mammography, % ^{¶¶}	...	...	...	...	...	7823 (19.3) ^{##}	...	...	...	7823 (0.7)
Never use Papanicolaou screening, % ^{***}	...	...	...	...	1658 (36.5) ^{†††}	...	...	...	...	1658 (0.2)

*Deaths attributed to risk factors are additive by row (ie, risk factors), but not by column (ie, disease).

†Mean of male and female prevalences from the National Center for Health Statistics.²⁹

‡Relative risk in men only, 49 to 82 years of age, recalculated from Stamler et al.³⁰

§Prevalence of hypertension among persons with diabetes estimated from the National Center for Health Statistics.³²

||Framingham sample, whites aged 47 to 74 years, recalculated from Kannel and Stokes.³³

¶Framingham sample, whites aged 47 to 74 years, recalculated from Kannel et al.³⁴

#Males with diabetes employed at El DuPont de Nemours and Co recalculated from Pell and D'Alonzo.³⁵

**Metropolitan relative weight (MRW) among whites in the Framingham Study (MRW = [actual weight/desirable weight] $\times$ 100) recalculated from Hubert et al.³⁶

††Persons 18 to 65 years of age who reported being either sedentary or irregularly active.³⁷

‡‡Recalculated from Herman et al.³⁸

§§United States population aged 20 to 74 years, including persons with self-reported diabetes and those with undiagnosed diabetes as determined by National Diabetes Data Group criteria (ie, fasting plasma glucose level ≥ 7.8 mmol/L or fasting plasma glucose level < 11.1 mmol/L with 1- and 2-hour plasma glucose levels ≥ 11.1 mmol/L).⁴³

||||Framingham sample, whites aged 35 to 57 years, recalculated from Kannel and McGee.⁴⁴

¶¶Women 40 years and older.⁴⁵

***For US women, ages 20 to 79 years, in 1985.⁴⁷

†††Risk of mortality in Icelandic women not using Papanicolaou screening between 1970 and 1974 compared with women using Papanicolaou screening recalculated from Johannesson et al.⁴⁸

from these causes, equivalent to the excess proportion with the risk-eliminated mortality rate for the United States as a whole. Thus, a risk-eliminated mortality rate can be estimated as 224.5 per 100 000 (ie, $[1 - (523\,570/1\,103\,142)] \times [427.4/100\,000]$). Risk factors involved in this minimum were smoking, cholesterol, obesity, a sedentary life-style, and heavy consumption of alcohol.

Excess mortality varied substantially with choice of minimum (Table 3). Using the lowest state rate of the nine diseases combined as the minimum, state excesses ranged from 0% (in Hawaii) to 36.9% (in Michigan); for the United States as a whole the excess was 28.7% or 320 000 deaths in 1986. Using the combined lowest state rates for each of the diseases, the range was 6.8% to 41.2%; for the United States as a whole the excess was 33.5% or 370 000 deaths. Excesses calculated for the United States as a whole using the risk-eliminated mortality rate were substantially higher, accounting for an excess of greater than 25% even in the state with

Table 3.—Excess Mortality Rates* and Excess US Deaths From Nine Chronic Diseases With Three Minima

	Lowest Achieved Mortality Rate		Risk-Eliminated Mortality Rate (Greatest Population-Attributable Risk for Each Disease) (224.5)
	State With Lowest Rate (304.7)	Sum of Lowest State Rates for Each Disease (284.1)	
Percent excess lowest state	0.0	6.8	26.4
Percent excess highest state	36.9	41.2	53.5
Percent excess US population	28.7	33.5	47.5
No. of attributable deaths, US population	320 000	370 000	524 000

*Mortality calculated per 100 000.

the lowest rate, and for 524 000 deaths in the United States as a whole.

Mortality rates from the nine diseases in the states showed a negative association with life expectancy in the same states (life expectancy = $81.98 - 0.01921 \times$ mortality; $r = -.6$) (Fig 3). Washington, DC, was an outlier, with a life expectancy in 1980 of 69.2 years. A decrease of one per 1000 in mortality

from the nine diseases was associated with an increased population life expectancy of 1.9 years. Were it possible to eliminate mortality from the nine diseases, life expectancy would increase to 82 years. With a reduction of mortality from the nine diseases to the risk-eliminated mortality rate, 224.5 per 100 000, the linear regression model predicts an increase in population life expectancy to

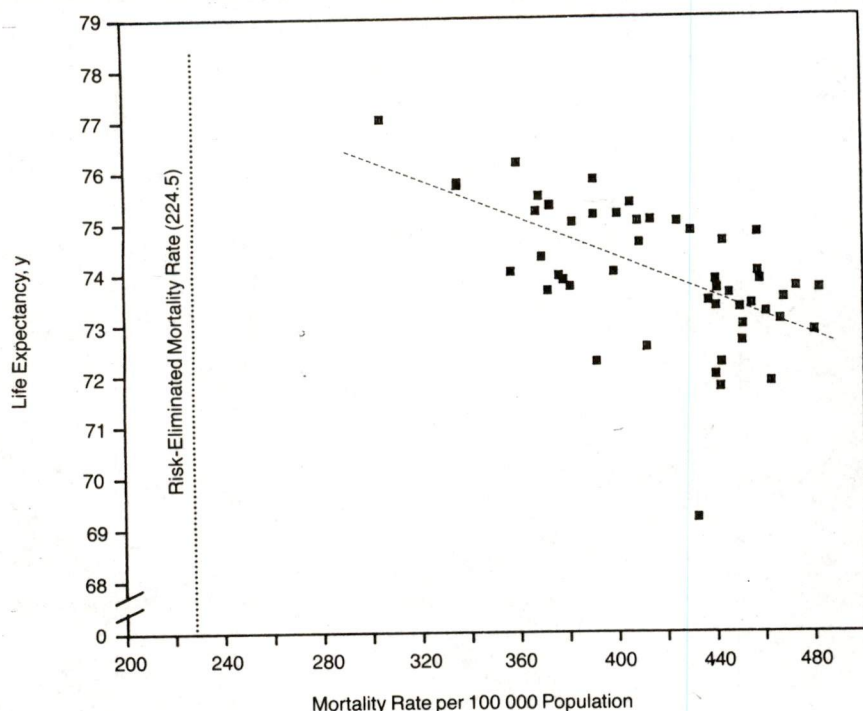


Fig 3.—Life expectancy and mortality rates from nine chronic diseases in states. Regression is life expectancy = 81.98 - 0.019(mortality).

77.62 years, greater than that of any state currently and 3.85 years greater than the mean of 73.77 years estimated for the US population from the regression equation.

COMMENT

A variety of achieved mortality rate measures have been used in analyses of mortality. In the 19th century, Farr¹⁷ assessed "excess deaths" by comparing age- and sex-specific rates of mortality in different regions of England, with a low rate found in a "healthy region." More recently, Guralnick and Jackson¹⁸ took the mean of the five lowest cause- and age-specific rates of death found in any US state to compute an "index of unnecessary deaths." Woolsey¹⁹ used as a minimum the lowest age-specific disease rates found in a region of the United States.

Achieved minima also have been estimated in international comparisons. In a comparison of all-cause mortality, Uemura²⁰ took as an "historical minimum" the lowest age-adjusted rate found in any nation since 1950. Doll and Peto²¹ used lowest international age-adjusted rates to estimate avoidable cancer mortality in the United States; they also have estimated excess cancer mortality attributable to specific risk factors. Similarly, in the assessment of excess

mortality from six chronic diseases in the United States, Rothenberg and Koplan²² propose both lowest achieved and risk-eliminated mortality rates.

Each of the three alternative minimum mortality rates in this analysis provides a reference point for assessing the excess burden of chronic disease in the United States. The burden is large by any measure (Fig 2). Use of different age-adjusted minima affects the excess rate and percentage in states but does not change the rank order. Though none of the minima represents a rate that may be fully achievable by elimination of known risk factors, all indicate a considerable potential for prevention. A linear regression model suggests that elimination of the single risk factor causing the greatest number of deaths from each disease, assuming no other changes in age-specific mortality rates from other diseases, would increase life expectancy in the population by almost 4 years. The international ranking of US life expectancy would rise to second or third place, following Japan and alongside Switzerland.²³

In the estimation of excess mortality, the relative merits of different minima should be noted. Lowest achieved mortality rates are calculated based on mortality rates alone and do not require additional information. However, they

depend on the variation in rates found among the populations compared; if there is little or no variation, there is little or no excess. Moreover, lowest achieved mortality rates give no indication of the source of differences in rates or excesses.

In contrast, risk-eliminated mortality rates are constructs that require assessment of risk-factor prevalences and associated relative risks. However, they are not dependent on variations in observed mortality rates. Another advantage for public health is that they indicate risk factors responsible for excesses, suggesting appropriate interventions. Because information on prevalence and relative risk does not consider the latency between exposures and outcomes, risk-eliminated mortality rates should be viewed as estimates rather than as precise indicators.

Population-attributable risk estimates based on stand-alone risk factors may be higher (and risk-eliminated mortality rates lower) than true values because persons exposed to a given risk factor also may have been exposed to other risk factors for the same condition. However, PARs estimated herein may be lower than true values, if outcomes other than those considered also are (positively) associated with the exposure in question. We summed only deaths associated with one risk factor for each disease, while the same risk factors are known to affect others of the nine diseases. While PARs for multiple risk factors for a certain outcome cannot be calculated in the absence of appropriate prevalence and relative risk information, the "true" PAR associated with these risk factors must lie between the minimum (which assumes completely overlapping exposures) and the maximum (which assumes completely exclusive exposures).

In addition, we have been conservative in our PAR estimations, taking only well-established associations between risk factors and outcomes. Some evidence, however, indicates that the same or related risk factors also are associated with others of the nine diseases, for example, high cholesterol levels and colorectal cancer.²⁴ Thus, the mortality rate achievable by elimination of the risk factors considered in this analysis may be lower than the estimated risk-eliminated mortality rate.

In this analysis, we adjusted for age but not for sex or race. The distribution of males and females does not differ greatly by state, and our conclusions would be altered little by adjustment. Adjustment for race in addition to age produces few substantial changes in state rankings: 19 states do not change

rank and four or more rates adjusted among the differences in modifiable black-white mortality is attributable and an additional difference in statistics, with utilization.

We have been conservative because of the focus of the study. While the diseases in the environment that differ in behavioral factors of interest within the population.

Because each state's population of excess deaths is the same, the United States thus gives a number (excess deaths) state deaths.

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References

1. Center for Disease Control. *MMWR*.
2. Center for Disease Control. *United States*.
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4. Center for Disease Control. *1986*.

rank and only seven states change by four or more. We have not presented rates adjusted for differences by race among the states because racial differences in mortality rates are largely modifiable.²⁵ Thirty-one percent of the black-white difference in adult mortality is attributable to known risk factors, and an additional 38% is attributable to differences in socioeconomic characteristics, which may include access to or utilization of health care.²⁶

We have chosen states for comparison because states are the principal locus of public health administration. While there may be risks for the nine diseases associated with the physical environment in a state, it is more likely that differences are due to known behavioral, personal, and genetic risk factors of individuals who currently reside within those boundaries.

Because the excess proportion for each state is age adjusted to the US population, it indicates the proportion of excess deaths assuming the state has the same age distribution as the whole United States. The excess proportion thus gives only an approximation of the number of excess deaths in the state (excess deaths = excess proportion $\times$ state deaths from nine diseases).

Though there are nonpreventable (for example, genetic) contributors to mortality for many diseases, our understanding of what must be changed in the population to achieve lowered mortality levels from the nine diseases and to increase longevity is reasonably well established. Preventable exposures include cigarette smoking, hypertension, overweight, high cholesterol, lack of exercise, heavy consumption of alcohol, and failure to use screening techniques such as mammography and Papanicolaou smears. Both reduction of exposures to known risk factors and increased utilization of known screening measures are important means in the control of chronic disease, particularly in disadvantaged populations. The critical challenges remain to implement established knowledge, to increase awareness and motivation for healthy living, and to provide resources for equitable access to appropriate care.

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DEVE ROSE BANNED
from Hall of Fame FOREVER? Wrong

At Large

With Dennis L. Breo

The other Super Bowl question— Can the NFL police its drug policy?

Last year at this time, during the yawning 2-week countdown to Super Bowl XXIV in New Orleans, television station WJLA-TV in Washington, DC, capitalized on the reporters being held captive to hype the big event.

The TV station presented the players' union and the reporters a copy of its "investigative exposé" about alleged shortcomings in the National Football League's drug program. This TV show, entitled "Illegal Procedure," alleged a failure by the NFL and its drug adviser Forest S. Tennant, MD, to police its antidrug policy in an accurate and fair manner.

The TV report parroted an earlier print version in *Sports Illustrated*. Both reports were based, in large degree, upon transcripts of NFL drug-suspension hearings and the comments of suspended players and/or Tennant's employees, some of whom may have been paid by the media for their information and views. Charges against the NFL included varying estimates of the drug problem: to fit divergent audiences, lack of confidentiality, contamination of urine samples, invalid testing thresholds to indicate drug metabolites, and "more cop than doc."

The TV show also accused Dr Tennant and the NFL of discrimination by selectively releasing positive test results for the use of marijuana and cocaine—allegedly divulging the names of black players and covering up the names of white players.

These charges, coming on the eve of the Super Bowl, created a firestorm of publicity—precisely what the TV station sought. Most sensational was the TV station's claim that "in the past 10 years," three "white quarterbacks" had tested positive for cocaine use without being subject to disciplinary action, an allegation in apparent contrast to the dozens of black athletes who had been suspended during the 1988 season.

The NFL, for its part, termed the report a "journalistic Molotov cocktail—innuendo and unsubstantiated reporting in an irresponsible manner. A volatile mixture of drugs and racism

were thrown against the wall."

Dr Tennant, for his part, refused comment, but the organization he serves as executive director, Community Health Projects, Inc (CHP), headquartered in West Covina, Calif, issued a "fact sheet," terming the accusations "mythical, unsubstantiated charges."

Drug use and abuse in the NFL is not the most important issue medicine will face during the coming year, but the issue is intriguing, if only because of the enormous visibility of the players, the enormous dollars of the business, and the experience of the NFL as one prominent employer against drug abuse.

Last March, shortly after the TV show made its charges, Tennant submitted what he calls a long-planned resignation of his 4-year NFL advisory position. Months later, new NFL Commissioner Paul Tagliabue told the *Los Angeles Times*, "Tennant was satisfactorily handling his duties. The charges against him by the players and media were unfair. He did a fine job and had a good program. The problem was his unnecessary visibility." The newspaper quoted unnamed NFL sources as saying Tennant "is a competent scientist who, unlike some scientists, enjoys performing on television, where he isn't competent. The TV camera makes him look immature, evasive, and uncertain."

About the time this appraisal was made, Dr Tennant was in the Hollywood television studios of Cable News Network being groomed for a special July 11 appearance on the call-in format of "Larry King Live." With this appearance, Dr Tennant broke his silence. In a subsequent series of exclusive interviews with this reporter, he has explained his view of the controversy.

A penchant for preaching

For starters, Forest Searls Tennant is not your typical "sports doc." A master salesman, he worked his way through medical school at Kansas University by selling fine china and crystal door-to-door. He is a self-made millionaire in real estate who "still owns the

first piece of property I bought for \$500 some 25 years ago in Hutchinson, Kan." As an independently wealthy man, the workaholic Tennant can devote his time and energy to his various medical and public health crusades and what he calls his "preaching."

A recognized expert in treating drug dependence, with credentials dating back to the 1960s when he ran the US Army's antidrug programs in Europe, Tennant is paid \$80 000 a year to run the CHP, a nonprofit California corporation that was established in 1974 and that today operates 27 neighborhood drug and medical clinics throughout Southern California. His clinics treat 2000 hard-core drug addicts every week.

He has also served as a drug adviser for the Los Angeles Dodgers, the California Department of Justice, and the California Highway Patrol. In addition, he is a civic leader, a researcher, and a motivational speaker who gives 100-plus seminars and speeches every year.

Although he was a near world-class miler during his undergraduate days at the University of Missouri, Tennant is not particularly a sports fan. For one thing, he says he's "too jumpy to sit through a game." For another, he has better things to do, like creating a new foundation to research dependency disorders and chronic pain.

"In America," Tennant says, "we worship athletes too much." He adds, "When I went to college, anybody who could get admitted to graduate school and who chose to play pro sports, instead, was considered irresponsible. Once I was accepted to medical school, my track coach told me that if he ever saw me seriously training again for competitive running, he would withdraw his friendship!" Tennant, 49, earned his MD, although he still stays in shape by running every day and by "doing more pushups than anybody my age possibly could."

Hanging in his office in West Covina, Calif, right next to the gavel from his year as the town's mayor, is a plaque proclaiming the bastardized Latin, *Illegitimi non carborundum tatum*—

"Don't let the bastards grind you down!" More to the point, as he once told an interviewer, Dr Tennant believes, "I've not only ruffled some feathers, I've run them over like a steamroller. If I don't have some adversaries out there, I'm not accomplishing anything."

Tennant accomplished quite a bit with the NFL.

He was hired by then-NFL Commissioner Pete Rozelle shortly after the 1986 cocaine-overdose deaths of college basketball star Len Bias and professional football defensive back Don Rogers. These drug-related deaths, combined with pressure from the NFL Physicians' Society and vocal parent groups, forced Rozelle to act. The image of NFL players as role models for youth was being shattered.

Tennant accepted the job "in the hope that I could use the NFL as a model to clean up drug use among college and high school athletes, as well as point the way toward successful corporate anti-drug programs." He first became involved in drug-abuse programs back in 1968 as a military surgeon during the Vietnam War, and, as an old pro, he expected criticism.

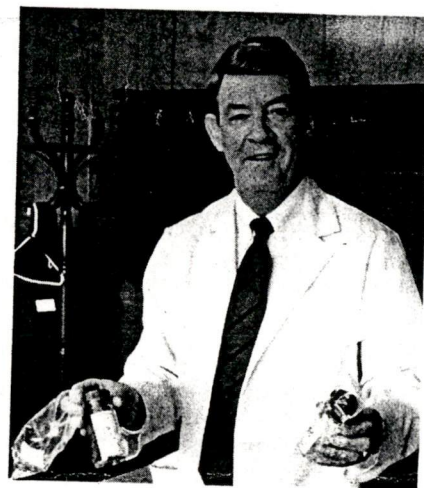
"The rules are simple," he says. "If you have the authority to test for drug abuse, to educate and treat the drug users, and to discipline those who will not or cannot give up their drugs, then drug use will drop. And, at the same time, the users, suppliers, and supporters of drug use will cry out about alleged inaccuracy of testing and alleged violations of their privacy and civil liberties. Anytime I hear 'inaccurate test' or 'invasion of privacy,' I suspect drug use. This is the usual response of users and this is the position taken by the players."

When he signed on in July 1986 as the NFL's first drug adviser (for a retainer of \$50 000, subsequently increased to \$100 000), he stepped into an epidemic of cocaine and marijuana abuse among NFL players.

The annual February "time and testing trials" for college football players drafted into the NFL include mandatory urine tests for cocaine and marijuana. In 1986, 57 of the 328 collegians, the cream of the college-football crop, tested positive for cocaine or marijuana, primarily cocaine. This is 17%, or one of every six players. Tennant says that similar results were obtained later that summer when rookies and veterans alike reported to preseason training camps. He emphasizes, "And there were only crude screening tests available then."

By the end of the strike-shortened 1987 NFL season, Tennant estimates,

Photos: Dennis L. Breo



Dr Brown (left) thinks the NFL's drug situation is "immensely better" after the efforts of its first drug adviser, Dr Tennant (right), who demonstrates a testing kit for steroids, the drug problem of the future.

"At least one of every four players in the NFL had a significant abuse problem with cocaine, marijuana, steroids—or alcohol. We're always going to have an alcohol problem, and the NFL has yet to really address its steroid problem, but in 1988 we decided that we could clean up cocaine and marijuana."

In 1988 the NFL acted, suspending dozens of players for abuse of marijuana and cocaine. "We suspended so many I lost count," he recalls.

'Mission accomplished!'

The 5-foot, 11-inch, 160-pound Tennant and the high-tech program of drug testing he implemented were instrumental in cutting down and suspending all-pro NFL behemoths like Lawrence Taylor (defensive lineman, New York Giants), Stanley Wilson (running back, Cincinnati Bengals), and Dexter Manley (defensive lineman, Washington Redskins).

Most of the suspended players were black, including all three of those named. Not surprisingly, the NFL players' association was not happy. The players' unhappiness, combined with the enterprise of the news media, led to the subsequent charges of testing inaccuracy and racism against Tennant and the NFL. Tennant was not surprised. "Within 48 hours of my appointment," he said, "the players' union had challenged in court the legality of the drug tests."

Tennant, who claims to be mellowing, is content to rest on his record. "Mission accomplished!" he says of his NFL years.

"In 1989," he says, "only two of 340 college draftees tested positive for cocaine and marijuana; in 1990, the figure was one of 350; and the figures for this

February's rookie time and testing camp is expected to be zero. We put out the fire [of cocaine and marijuana abuse]." Tennant concludes, "The suspensions got the message out that the NFL means business. By 1989, I was essentially out of a job."

He adds, "The criticism comes with the territory. The NFL is a visible target and its employees are submerged in silence. Who have you ever heard of who works for the NFL, except Rozelle, Tagliabue, and Tennant? Once we told the public that their sports heroes were on drugs, that the days of Joe DiMaggio are gone, the world needed a scapegoat and I was that scapegoat."

Furthermore, he says, "This was essentially charity work for me. My salary of \$50 000-\$100 000 was donated to CHP, and our program expenses ran much more. The phone bills alone cost \$20 000, if they cost a nickel. But I must say that the NFL put up the money to run the program right."

He admits that he occasionally "appeared uncertain with the media. That's because whenever I gave a talk around the country—even if it were a scientific talk on the role of brain receptors in drug dependency—I was still identified as the NFL's drug adviser and there would be questions from the news media about the NFL. Was I talking about brains in general or football players' brains?"

"Well, since I was prohibited from discussing my NFL work under the terms of the 1987 arbitrator's ruling over collective bargaining, I often came across as evasive and uncertain. People who know me told me I should have quit the minute I was gagged. I was never successful with the media at reconciling my conflicting roles of being a compe-

ergy-limiting conditions, GHB may play a role in reducing energy-substrate demand and consumption and in preventing the production of free radicals.⁴

GHB acts synergistically with ethanol to produce CNS and respiratory depression; ethanol also increases the endogenous levels of GHB.⁴ GHB may potentiate the effects of narcotic analgesics and skeletal muscle relaxants and may be potentiated by the actions of benzodiazepines and neuroleptics.⁵ Although antagonism may occur with d-amphetamine, naloxone, haloperidol,

and drugs used for absence seizures,⁴ these experimental antagonists have not been assessed as possible treatments for GHB overdose. Anecdotally, naloxone has not been effective in treating a limited number of GHB-related poisonings.

The focus of public education efforts should be that products such as GHB that are promoted for physiologic effects act on the body as drugs. In this context, advertising terms such as "natural," "organic," or "supplement" do not imply safety or legality.

References

1. Food and Drug Administration. Gamma hydroxybutyric acid (Press release). Rockville, Md: Food and Drug Administration, November 8, 1990.
2. Swygert LA, Maes EF, Sewell LE, Miller L, Falk H, Kilbourne EM. Eosinophilia-myalgia syndrome: results of national surveillance. *JAMA* 1990;264:1698-703.
3. Vayer P, Mandel P, Maitre M. Minireview: gamma-hydroxybutyrate, a possible neurotransmitter. *Life Sci* 1987;41:1547-57.
4. Mamelak M. Gammahydroxybutyrate: an endogenous regulator of energy metabolism. *Neurosci Biobehav Rev* 1989;13:187-98.
5. United States Pharmaceutical Convention, Inc. USP dispensing information. Vol 1B. Drug information for the health care professional, 1990:2914.

Trends in Lung Cancer Incidence and Mortality—United States, 1980-1987

MMWR. 1990;39:875-883

LUNG CANCER is the most common fatal malignant neoplasm in the United States. Based on current smoking patterns, the substantial public health burden of smoking-related lung cancer will continue during the next several decades. This report describes trends in lung cancer incidence from 1980 through 1986 and lung cancer mortality from 1980 through 1987.

Incident cases* for 1980-1986 were determined using data from the Surveillance, Epidemiology, and End Results program of the National Cancer Institute (NCI). Deaths** for 1980-1987 were identified using total mentions from the multiple cause-of-death data files compiled by CDC's National Center for Health Statistics. The denominators for both rates were derived from intercensal population estimates.¹ Rates were standardized to the 1970 age distribution of the U.S. population. Race-specific rates are not reported for races other than white and black because appropriate denominators were not available.

From 1980 through 1986, the age-adjusted lung cancer incidence rate per 100,000 persons increased from 52.4 to 55.5. Although rates fluctuated for males, for females they increased steadily from 28.4 to 36.3 per 100,000. Incidence in males was higher among blacks than whites; rates for females did not differ by race.

Trends for lung cancer death rates paralleled those for incidence rates. From 1980 through 1987, the age-adjusted death rate per 100,000 persons increased from 46.2 to 52.1. Although death rates for males did not change substantially, rates were consistently higher for blacks than for whites. For

females, the rates increased steadily but did not differ by race.

For males, lung cancer death rates were higher for older age groups but did not change substantially for any age group. For women aged ≥ 55 years, death rates increased consistently for both blacks and whites. The greatest difference by race occurred for men aged 35-44 years; for this age group, the death rate was 2.3 times higher for blacks than for whites.

Reported by: Chronic Disease Surveillance Br, Office of Surveillance and Analysis and Program Svcs Activity, Office on Smoking and Health, Center for Chronic Disease Prevention and Health Promotion, CDC.

CDC Editorial Note: Lung cancer is the second leading cause of death among black males (after coronary heart disease).² The excess morbidity and mortality from lung cancer among black men compared with white men is greatest for the 35- to 64-year age group.³

Cigarette smoking accounts for approximately 85% of lung cancer cases.⁴ Since 1914, national surveys have consistently shown that the prevalence of smoking has been higher in black men than in white men;⁵ in addition, blacks tend to use brands with higher tar and nicotine content.^{6,7} However, black men and women initiate smoking at slightly older ages than white men and women⁴ and smoke fewer cigarettes per day. The extent to which these differences in smoking patterns or other host or environmental factors contribute to the difference in lung cancer mortality is unknown.

The higher prevalence of smoking among black men and women reflects a decreased likelihood of quitting rather than a difference in initiation; this de-

creased likelihood is characteristic of all socioeconomic levels and ages.^{5,6} Smoking-cessation programs that recognize the smoking patterns of black men and women may be more effective and ultimately assist in lowering the lung cancer death rate.

For both black and white females, the similar increases in age-specific lung cancer incidence and death rates are consistent with historically increasing trends in smoking prevalence. Based on these trends, the increases in lung cancer incidence and mortality for females are not projected to plateau until after the year 2013.⁸

Epidemiologic and clinical studies have provided extensive information on the health benefits of smoking cessation.⁹ For example, after 10 years of smoking cessation, the risk for lung cancer is reduced to 30%-50% of the risk among continuing smokers.⁹ The national health objectives for the year 2000 include reducing the prevalence of cigarette smoking among adults to $\leq 15\%$, from a 1987 baseline of 29%.¹⁰ Recent declines in smoking prevalence, especially among black males, are encouraging. However, continued progress in both smoking-prevention and smoking-cessation efforts is essential to achieving this objective and protecting the population from the health hazards of tobacco use. These efforts must take into account the adverse effects of marketing strategies by the tobacco industry that target high-risk groups.

References available

*International Classification of Diseases for Oncology, rubric 162, which includes trachea, bronchus, and lung.

**International Classification of Diseases, Ninth Revision, rubric 162, which includes malignant neoplasm of the trachea, bronchus, and lung.



*Referred to
Bill Canary*

Mayor of Providence

Vincent A. Cianci, Jr.

April 4, 1991

Mr. Andrew Card
Deputy Chief of Staff
The White House
Washington, DC 20500

Dear Andy,

I tried to reach you this week regarding our application for a Community Partnership grant from the Office for Substance Abuse Prevention at HHS (1H86SP04150-01). The grant would provide \$2.5 million to the City of Providence over five years, and is extremely important to my administration. We have tentative approval at the staff level; I'm working now to ensure the grant is awarded.

When I called, you were in Florida with the President. However, your staff was extremely helpful to me in your absence. Stacy DelGrasso put me in touch with Sky Babb at HHS, who also has been very cooperative. I hope you will speak to Sky, and impress upon him how important this grant is to me personally.

I really appreciate your being on my radio show; you were an excellent guest, and kept my phone lines busy. I'm sure glad you didn't run for Governor, because now you can help me with my ratings as Mayor of the City of Providence.

The drug education grant will be an important part of a very large assault on poverty we intend to launch. We are going to make a massive effort to address the causes of joblessness, family breakdown, neighborhood blight, substance abuse, violent crime, low graduation rates and other pathologies -- all at once. We hope to spend \$350 to \$400 million, a very large amount of money for a small city and state. I would be honored to have the Bush Administration as a partner in an enterprise that will be a model for other central cities. The Community Partnership grant will get things started.

Sincerely,

VINCENT A. CIANCI JR.
Mayor of Providence



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133

1.6
AC HAS SEEN

SENATOR W. PAUL WHITE
2ND SUFFOLK AND NORFOLK
DISTRICT
ROOM 309
TEL. 722-1643

Lucia
APR 22 1991

COMMITTEES:
BANKS AND BANKING
(CHAIRMAN)
ETHICS (CHAIRMAN)
POST AUDIT AND OVERSIGHT
(VICE-CHAIRMAN)
PUBLIC SERVICE
(VICE-CHAIRMAN)
CRIMINAL JUSTICE
EDUCATION
GOVERNMENT REGULATIONS
JUDICIARY

April 8, 1991

Andrew Card, Deputy Chief of Staff
The White House
1600 Pennsylvania Ave.
Washington, D. C. 20500

Dear Andy:

Just a brief note to thank you and your staff for obtaining passes to the White House for Dr. Cochran and his family. I am most appreciative of your assistance in this matter. We had encountered no success until your kind intervention.

Any time I may reciprocate, please let me know.

With personal best wishes, I remain

Sincerely,

Paul
W. PAUL WHITE
Senator

WPW:ml

Michael R. Bonsignore
Executive Vice President and
Chief Operating Officer

Honeywell Inc.
Honeywell Plaza
P.O. Box 524
Minneapolis, MN 55440-0524
612 870-2297

AC HAS SEEN

Rec'd
APR 19 1991

April 16, 1991

Mr. Andrew H. Card, Jr.
Deputy to the Chief of Staff
The White House
Washington, D.C. 20500

Dear Andy:

Thank you for the warm welcome last Wednesday, and the opportunity to review Honeywell's activities in energy conservation. I hope our extensive involvement on both the supply and demand side of the energy equation can be of some use to the Administration in broadening the context of the national energy strategy. We are world leaders in both the industrial automation and building energy controls markets, and active in 90 countries.

Thanks for your suggestions of other Administration officials we should meet. We will follow-up with each of them. I will keep you posted on our progress. Meanwhile, please do not hesitate to contact me if I can be of assistance to you in the energy policy debate.

Best regards,

White

MRBonsignore370

cc: Glen Skovholt
Jocelyn White



GRESHAM COMMUNICATION

AC HAS SEEN

Rec'd
APR 26 1991

D101 - 803-538-5402
WRIT - 803-538-5402
WWBD - 803-245-2411
WWLT - 803-793-4422

April 17 1991

Dear Andy

I met the President of our
in Santa S.C. last month.
I told me to mail this
book through you and he
would be sure to get it.

*Q-
I sent
book to
gift
unit.
JC*

I'm enclose for your
record just some copies
of photo with President

Thank you
Rube

The Preedy May 11, Columbus Dr C.



My Home in Florida (From Rascon)



ROGERS & ASSOCIATES

PUBLIC RELATIONS/PUBLIC AFFAIRS
MARKETING COMMUNICATIONS

file

April 22, 1991

Mr. Andrew Card
Assistant to the President and Deputy to the Chief of Staff
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Dear Mr. Card:

We are writing on behalf of the National D.A.R.E. (Drug Abuse Resistance Education) program to ask for President Bush's support of National D.A.R.E. Day, Thursday, September 12, 1991. D.A.R.E. is the largest and most successful drug education program in the U.S. Taught in all 50 states, the program just recently was expanded to include grades K-12 and will impact more than 20 million students in 1991 alone.

This year D.A.R.E. is hosting the "National D.A.R.E. Day Poster or Letter to President Bush Contest." Millions of D.A.R.E. students across the country are being ask to illustrate or write to President Bush on "Why D.A.R.E. Makes a Difference." Two grand prize winners will be flown to Washington, D.C., along with their D.A.R.E. officers, to hand deliver all entries to the White House.

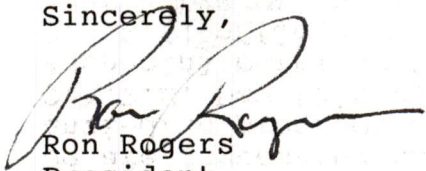
We are requesting that President Bush, as an avid supporter of anti-drug programs including D.A.R.E., participate in National D.A.R.E. Day this year. We would like the White House to host a special ceremony for the two winning students and their D.A.R.E. officers with President Bush, First Lady Bush and Drug Czar Bob Martinez in attendance. This special ceremony would acknowledge these D.A.R.E. students and officers for their outstanding anti-drug efforts.

As in past years, Congressmen Mel Levine and Frank Wolf along with Senator Dennis De Concini are endorsing a joint resolution to officially declare September 12, 1991, National D.A.R.E. Day.

As D.A.R.E.'s public relations representative, we will be in touch to follow up with this request. In the meantime, please feel free to contact me if you have any questions.

Thank you for your consideration.

Sincerely,


Ron Rogers
President

CC: Bobbie Greene-Kilberg
Kathy Super

ROGERS & ASSOCIATES

PUBLIC RELATIONS/PUBLIC AFFAIRS
MARKETING COMMUNICATIONS

April 22, 1991

Ms. Kathy Super
Deputy Assistant to the President
for Appointments and Scheduling
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Dear Ms. Super:

We are writing on behalf of the National D.A.R.E. (Drug Abuse Resistance Education) program to ask for President Bush's support of National D.A.R.E. Day, Thursday, September 12, 1991. D.A.R.E. is the largest and most successful drug education program in the U.S. Taught in all 50 states, the program just recently was expanded to include grades K-12 and will impact more than 20 million students in 1991 alone.

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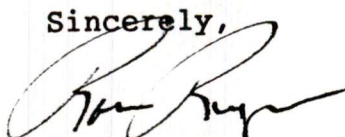
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Thank you for your consideration.

Sincerely,



Ron Rogers
President

CC: Andrew Card
Bobbie Greene-Kilberg

ROGERS & ASSOCIATES

PUBLIC RELATIONS/PUBLIC AFFAIRS
MARKETING COMMUNICATIONS

April 22, 1991

Ms. Bobbie Greene-Kilberg
Deputy Assistant to the President for Public Liaison
Room 128, OEOB
The White House
1600 Pennsylvania Avenue, NW
Washington, D.C. 20500

Dear Ms. Greene-Kilberg:

We are writing on behalf of the National D.A.R.E. (Drug Abuse Resistance Education) program to ask for President Bush's support of National D.A.R.E. Day, Thursday, September 12, 1991. D.A.R.E. is the largest and most successful drug education program in the U.S. Taught in all 50 states, the program just recently was expanded to include grades K-12 and will impact more than 20 million students in 1991 alone.

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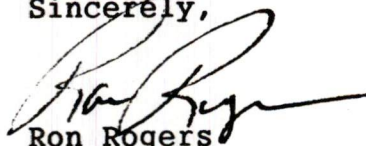
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As D.A.R.E.'s public relations representative, we will be in touch to follow up with this request. In the meantime, please feel free to contact me if you have any questions.

Thank you for your consideration.

Sincerely,



Ron Rogers
President

CC: Andrew Card
Kathy Super



D.A.R.E. WILL TEACH OVER 5 MILLION CHILDREN DRUG RESISTANCE SKILLS IN 1991

This year, over 5 million additional school children across the country will learn the skills they need to resist pressure to take drugs or join gangs, thanks to the highly acclaimed D.A.R.E. (Drug Abuse Resistance Education) program. Since its inception, D.A.R.E. has already taught drug resistance skills to over twenty million students worldwide.

D.A.R.E. is a police officer-led series of classroom lessons that teach children in grades K-12 how to resist pressure to experiment with drugs and alcohol. In 1983, Chief Daryl Gates of the Los Angeles Police Department (LAPD) recognized the need for a comprehensive, long-term educational approach to prevent substance use among children. With the cooperation of the Los Angeles Unified School District (LAUSD), the D.A.R.E. Program, which employs law enforcement officers as regular instructors, was developed. Initially, D.A.R.E. focused on elementary school children. It has subsequently become a comprehensive program for grades K-12. The D.A.R.E. program has proven so successful that it has expanded into more than 3,500 communities in 50 states, Australia, New Zealand, American Samoa, Canada, Puerto Rico, and in Department of Defense Schools worldwide.

D.A.R.E. AMERICA Launched To Meet Demand

The overwhelming national and international demand for the D.A.R.E. program led to the creation of a national non-profit organization, "D.A.R.E. AMERICA." The program has been supported by D.A.R.E. AMERICA since 1984. Headquartered in Los Angeles, D.A.R.E. AMERICA serves as a resource to communities, helping them establish and improve local D.A.R.E. programs.

D.A.R.E. AMERICA supports officer training, provides educational materials for students, regularly monitors instruction standards and program results, and develops national awareness for the D.A.R.E. program.

Nathan Shapell, Chairman, Shapell Industries, presides over D.A.R.E. AMERICA's National Board of Directors, which is comprised of a national representation of business and community leaders.

D.A.R.E. Training Is Unique

D.A.R.E. goes far beyond traditional drug abuse programs. Typically, these programs emphasize drug identification and the harmful effects of drugs and alcohol. They warn children not to use these substances, but don't teach them how to resist the pressures to try them. D.A.R.E. gives children skills to recognize and resist the subtle and overt pressures that cause them to experiment with drugs and alcohol.

"I've been out there and witnessed the program in action," said President George Bush. "D.A.R.E. sends these police officers into the classrooms to work with the kids, build their self-esteem, teach them that they can refuse when they're pressured to try drugs."

DARE PROGRAM 5TH/6TH GRADE CURRICULUM

The following outlines the D.A.R.E. curriculum. One lesson is presented each week throughout a grade school semester.

1. **PERSONAL SAFETY PRACTICE** — Acquaints students with role of police and practices for student safety.
2. **DRUG USE AND MISUSE** — Helps students understand harmful effects of drugs.
3. **CONSEQUENCES** — Helps students understand the negative consequences of drug use and the positive consequences of saying no to drugs.
4. **RESISTING PRESSURES TO USE DRUGS** — Makes students aware of kinds of peer pressure they may face and helps them learn to say no to offers to use drugs.
5. **RESISTANCE TECHNIQUES — WAYS TO SAY NO** — Teaches students ways to say no in resisting various types of pressure.
6. **BUILDING SELF-ESTEEM** — Helps students understand that self-image results from positive and negative feelings and experiences.
7. **ASSERTIVENESS: A RESPONSE STYLE** — Teaches that assertiveness is a response style that enables a person to state his or her own rights without loss of self-esteem.
8. **MANAGING STRESS WITHOUT TAKING DRUGS** — Helps students recognize stress and suggests ways to deal with it other than by taking drugs.
9. **MEDIA INFLUENCES ON DRUG USE** — Helps students develop the understanding and skills needed to analyze and resist media presentations about alcohol and drugs.
10. **DECISION MAKING AND RISK TAKING** — Helps students apply the decision-making process in evaluating the results of various kinds of risk-taking behavior, including that of drugs.
11. **ALTERNATIVES TO DRUG USE** — Helps students find out about activities that are interesting and rewarding and are better than taking drugs.
12. **ROLE MODELING** — Older student leaders and other positive role models that do not use drugs talk to younger students to clarify the misconception that drugs are in the majority.
13. **FORMING A SUPPORT SYSTEM** — Students develop positive relationships with many different people in order to form a support system.
14. **RESISTING GANG PRESSURE** — Helps students identify situations in which they may be pressured by gangs and evaluate the consequences of the choices available to them.
15. **DARE SUMMARY** — Helps students summarize and assess what they learned from the program.
16. **TAKING A STAND** — Students present their own commitment to the class which helps them respond effectively when pressured to use drugs.
17. **CULMINATION** — Student graduation from the D.A.R.E. program.



RITA WARREN
4309 Ramona Drive Apt. D
Fairfax, Virginia 22030
Tel. (703) 352-1553

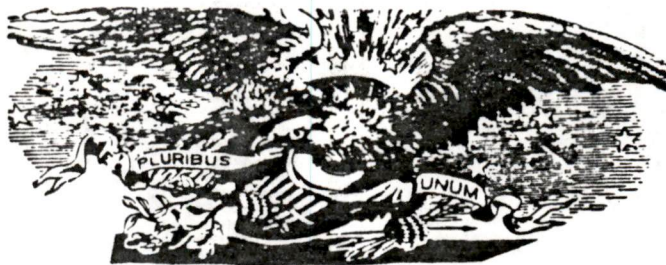
APR 29 1991

AC HAS SEEN

4/29/1991

Dear Andy -
I hope you are well, I have received a
nice letter from President Bush, I shall
cherish it, thank you for being my
friend, enclosed I am sending you
the good news about Moscow as you
can see "With God All things are possible."
I know that this mission of love
will reach many hearts in the Soviet
Union, for only God can bring peace
in the hearts of man and women. We
are hoping to meet with President Bush
before we leave, for his support will
mean a lot to us. Again thank you
and God Bless you and your
family. Love prayer & peace.

Rita



RITA WARREN
4309 Ramona Drive Apt. D
Fairfax, Virginia 22030
Tel. (703) 352-1553

Press Release

Rita Warren, author of God's Champions, has organized a dramatization of early Christianity in the vicinity of Red Square, Moscow. With the permission of Soviet Officials and with the support of friends, a group of 13 people dressed in original costume, and a man portraying Jesus will be leaving from National Airport.

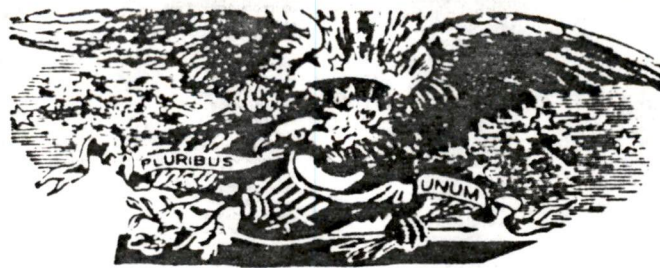
They will be leaving on a Pan Am flight at 12:00 Noon, Saturday, June 1st to Kennedy Airport. They will board a non-stop flight to Moscow and will return on June 8th, arriving at National Airport at 6:00 pm.

It is our hope to bring to the Soviet people a message of Faith, Love and Peace. We would like to express to President Mikhail Gorbachev our deepest gratitude for having opened the door to Freedom of Religion. We also are very grateful to our founding fathers for giving us our Freedom of Religion. America is indeed a Nation under God.

God Bless,

Rita Warren and Friends

For more Information Contact Rita Warren at (703) 352-1553.



RITA WARREN
4309 Ramona Drive Apt. D
Fairfax, Virginia 22030
Tel. (703) 352-1553

The Honorable President George H. Bush
The White House
1600 Pennsylvania Ave. NW
Washington, DC 20500

April 23, 1991

Dear President Bush:

I am writing to thank you for your kind letter. I shall always cherish it. I would also like to express our gratitude for your great leadership. Our prayers have been answered: first to see the ending of the war before Easter, and our brave men and women back home. Also, our prayers have been answered for the great mission that we are about to embark on to dramatize in Moscow our early Christianity as we do here at the U.S. Capitol every Easter.

We are bringing the Soviet people a great message of Faith, Love, Peace and Freedom of Religion, which President Mikhail Gorbachev has been able to achieve for his people and the world.

The American people often take for granted the precious gift of freedom that we so cherish in our Country. We are blessed to have a President with great faith in God and wisdom not only to head our country but also the world.

Lord willing, we will be leaving for Moscow on June 1 and returning on June 8. Hoping that our message of Love, Peace and Faith will reach the hearts of the peoples of the Soviet Union and the world.

We would appreciate, if possible, to meet with you before we leave for Moscow. Your blessing will mean a great deal to us.

Please keep us in your prayers. We keep you and your family in our prayers. Thank you for all that you are doing for us all, and God bless you always.

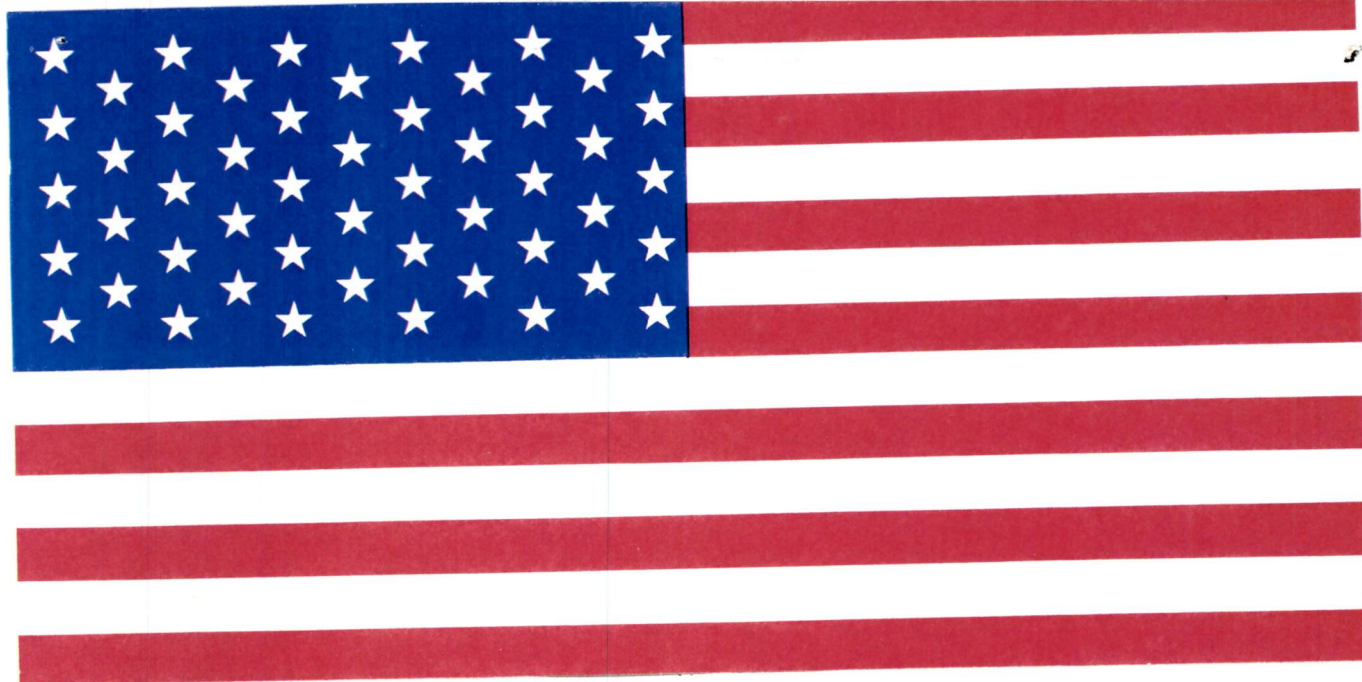
Love, Prayer, Peace

Sincerely yours,

Rita Warren and Friends

Rita Warren and Friends

*This is a letter I
copy the letter to
have sent to
Pres. Bush*



GOOD FRIDAY - U. S. CAPITOL - 1985-1991



"FATHER, FORGIVE THEM...
THEY KNOW NOT WHAT THEY DO."

CHRIST died for All of Us

ХРИСТОС-УМЕР-ЗА-НАС-ВСЕХ



EASTER - U. S. CAPITOL - 1985-1991

CHRIST has risen for All of Us

ХРИСТОС-ВОСКРЕС-ЗА-НАС-ВСЕХ



AC 100 0000

Fork Union Military Academy

POST OFFICE BOX 278

Fork Union, Virginia 23055

804-842-3212

APR 29 1991



4/24/91

Dear Mr. Card,

The special tour that you set up for us is greatly appreciated. I thank you for all the time and effort you put in to make it possible for our visit. The trip to the White House is something that I will remember. It was a pleasure meeting you.

Sincerely,

Andrew Young

Fork Union Military Academy

POST OFFICE BOX 278

Fork Union, Virginia 23055

804-842-3212

AC FMS JLN

APR 29 1991



Dear Sir:

I wish to extend my gratitude to you because of the time taken out of your schedule to accommodate us with a tour of the White House and a chance to see President Bush. It was a great experience and it meant a lot to me and my classmates.

Sincerely,

Anthony Bailey

AC HAS SEEN

Alvin Williams

45-91

f.i.

Andy,

To reiterate, I appreciate your sending my paper work to Row. He responded with a nice and active note.

I'm sure Linda informed you of my temporary assignment. I'll call you as soon as the end is clear.

Thanks again and keep me in your thoughts,

your friend,

Alvin

Gregg Ward

AC HAS SEEN

1.6

Dear Andy:

April 5

Lynn Martin called yesterday to tell me that she had decided to hire another candidate for the Deputy Secretary position. I was obviously disappointed but very impressed that she took the time to call personally.

I want to thank you for all the help you provided. While I still think that Lynn and I would make a great time, I am confident that her choice and her new team will be highly successful and serve the President well.

Hope my phone calls over the last 2 months weren't too much to put up with... please thank Linda for me for being on the front line!

Thanks again, Andy.

Gregg

Gregg Ward
8815 Surrey Ct.
Alexandria, Va
22304



THE IRVINE COMPANY

1-4
AC HAS SEEN

Larry Thomas
Vice President
Corporate Communications

April 5, 1991

Mr. Andrew H. Card Jr.
Deputy Chief of Staff
The White House
Washington, D.C. 20500

Dear Andy:

I was delighted to have the chance to visit with you at some length last night. I'm glad that things are going so well for you and that you're taking full advantage of this marvelous opportunity to serve the President.

Come back again when you can spend some time by a pool -- in a bathing suit, not in a business suit.

Cordially,

Larry Thomas

LT:an



AC HAS SEEN

Rec'd 1.6
APR 26 1991

UNIVERSITY OF SOUTH CAROLINA

COLUMBIA, S.C. 29208

JOHN M. PALMS
PRESIDENT

Phone: (803) 777-2001
Fax: (803) 777-9480

April 24, 1991

Mr. Andrew H. Card
Assistant to the President and
Deputy to the Chief of Staff
The White House
Washington, DC 20500

Dear Mr. Card:

Thank you very much for your support of the Strom Thurmond/Lee Atwater Fellowship Dinner on April 16. It was a wonderful evening, and I deeply appreciate your being a part of this worthy endeavor. This fellowship is an important means by which the University can encourage young people to enter public service. You have enabled us to anticipate with confidence our having the resources to build from Senator Thurmond's generosity in advancing education and public service in Lee's name.

Thank you. I look forward to seeing you again.

Sincerely,

A handwritten signature in cursive script that reads "John M. Palms".

John M. Palms

JMP/mmg



1.6
AC HAS SEE

Roger D. Semerad
President

April 16, 1991

Rec'd
APR 17 1991

Mr. Andrew H. Card, Jr.
Assistant to the President
and Deputy Chief of Staff
The White House
Washington, D.C. 20500

Dear Mr. Card:

I am delighted to inform you that the RJR Nabisco Foundation will announce the winners of our NEXT CENTURY SCHOOLS competition today.

We have chosen 15 winners from 40 finalists, who will receive awards totaling \$9.7 million over the next three years.

Eight grants went to elementary schools, one to a middle school and six grants were awarded to senior high schools. The awards went to 13 different states across the country.

As you know, the competition was rigorous and demanding; indeed, we know of no other corporate sponsored education competition like it.

I have enclosed some information on the winners for you.

Sincerely,



RDS:lsa
Enclosure

RJR Nabisco Foundation
Suite 525
1455 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 626-7200
FAX: (202) 626-7208



News Release

FOR IMMEDIATE RELEASE

Contact: Tracey Riese,
RJR Nabisco
(212) 258-5779 or
David Sandor,
Cassidy & Associates
(202) 347-0773

PIONEERING PUBLIC SCHOOLS RECEIVE \$9.7 MILLION IN GRANTS

WASHINGTON, April 16, 1991 -- The RJR Nabisco Foundation today awarded more than \$9.7 million to 15 public schools across the country to fund radical, community-based education initiatives.

Through the Foundation's NEXT CENTURY SCHOOLS (NCS) program, each school will receive up to \$250,000 per year to implement its reform efforts through 1994. An advisory board composed of notable education, business and public policy leaders helped to select the winning proposals from a pool of more than 1,600 applicants.

"The NEXT CENTURY SCHOOLS program addresses the failure of public education by rewarding educators who challenge the system and try fundamentally new ways to teach. Rather than tinker at the margins, the NCS grant winners have volunteered to be educational pioneers and devise model programs that can be adapted by local communities nationwide." said Louis V. Gerstner, Jr., Chairman and CEO of RJR Nabisco, Inc.

Winning reform initiatives include the creation of new learning environments, bold programs for at-risk students, proactive plans to increase parental involvement and learning, and new methods to improve math and science skills.

- more -

"The NEXT CENTURY SCHOOLS program empowers those on the front lines of education to challenge basic assumptions about our system of education, to test their ideas, and to create models of excellence for schools all over the country," said Dr. Floretta McKenzie, former Superintendent of Washington, D.C. Public Schools.

The NEXT CENTURY SCHOOLS program was launched in 1989 to recognize and reward entrepreneurial reform in public education in grades K-12. The RJR Nabisco Foundation has set aside \$30 million for a five-year program to promote the development of new educational approaches that can be replicated in public schools throughout the United States.

"Only fundamental, systemic reform will reverse the decline in American education. The enterprise and pioneering spirit of NEXT CENTURY SCHOOLS educators moves this reform effort forward," said Roger D. Semerad, President of the RJR Nabisco Foundation.

The RJR Nabisco Foundation received more than 1,600 proposals for this year's program. Applications were judged on the likelihood of improving the performance of children in school. Highest priority was given to bold proposals that demonstrated extensive community support and included comprehensive plans for expansion and replication.

Following are the 1991 NEXT CENTURY SCHOOLS:

Chelsea High School, Chelsea, MA
Denali Elementary School, Fairbanks, AK
Paul Dunbar High School, Baltimore, MD
Franklin Junior High School, Brainerd, MN
John Marshall High School, Los Angeles, CA
Morgan County Primary School, Madison, GA
Orem High School, Orem, UT
Ortega Elementary School, Austin, TX
Pepperell Intermediate School, Opelika, AL
Piscataquis Community School, Guilford, ME
Rancho Viejo Elementary School, Yuma, AZ
Sir Francis Drake High School, San Anselmo, CA
John A. Snively Elementary School, Winter Haven, FL
Union House Elementary School, Sacramento, CA
Winston-Salem/Forsyth County Elementary, Winston-Salem, NC

Detailed information about the risk-taking programs of each NEXT CENTURY SCHOOL is available upon request. (Note: Schools interested in guidelines for next year's competition can contact the RJR/Nabisco Foundation, 1455 Pennsylvania Avenue NW, Suite 550, Washington, DC 20004)

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1991 NEXT CENTURY SCHOOLS

PROGRAM DESCRIPTIONS

Chelsea High School, Chelsea, Massachusetts

GOALS: To offer dropouts a way to re-enter school, raise student achievement, foster close student-teacher relationships, and empower teachers to collaborate in the design of schedules, programs and materials.

PROGRAM: Chelsea will create the "Pathways School," a model for teenagers unable to attend schools with traditional schedules. "High Expectations Learning Program" classes will be offered to dropouts from 2:30 to 8:30 p.m. to give students an opportunity to make up course work. In addition, the "Pathways School" will provide full-time schooling 2:30-8:00 p.m. for 50 adolescents focusing on issues such as chemical dependency, family dysfunction, abuse, and parenting.

Chelsea High School serves 1,050 students and for years has been rated Massachusetts' most "at-risk" educational institution with the state's highest drop-out rate of 51%. Nearly 75% of the students come from homes where English is not the first language. 25% of teenagers are parents.

GRANT: \$704,550

Denali Elementary, Fairbanks, Alaska

GOAL: To improve math and science instruction through the introduction of curriculum based on an understanding of community, culture and the environment.

PROGRAM: One of 33 schools in Fairbanks, Denali Elementary is a "downtown" school with a high proportion of poor and minority students. A new math-science focus requires radical changes in curriculum and instruction.

The curriculum will be based on student outcome. Denali will build on intercultural education recognizing Alaska's cultural diversity and will utilize an outdoor classroom to give students hands-on learning experiences. A two-week summer science program will be added, and Denali will emphasize in-depth teacher training. New community, business, and university partnerships will make it possible to have a scientist in residence.

GRANT: \$748,500

RJR Nabisco, Inc.
1301 Avenue of the Americas
New York, New York 10019-6013
(212) 258-5600

Paul Dunbar High School, Baltimore, Maryland

GOAL: To upgrade math, science, and technology learning at both Dunbar and feeder middle schools.

PROGRAM: A city-wide high school with a health careers emphasis, Dunbar will develop a restructuring strategy called "RAP" (Raise Academic Performance) to address the unpreparedness of students. "RAP" is comprised of five components: weekend study with mentors and peer tutoring; a Dunbar Summer Scholars "RAP" program; a faculty and curriculum development institute; the Parent Involvement Program; and a research and evaluation component. "RAP" will be coordinated with the local business community and will receive assistance from Johns Hopkins University and two historically black colleges.

GRANT: \$657,957

Franklin Junior High School, Brainerd, Minnesota

GOALS: To improve learning and create greater parental involvement in education.

PROGRAM: Franklin's present calendar-driven system will be changed to a student-centered, outcome-based system. This will provide extended learning opportunities for students on a daily, weekly, and yearly basis. Students will work with the same core teachers for two years in an interdisciplinary setting. Mastery learning will change the grade system to an A,B, or Incomplete model.

Parents will have constant involvement by phone, electronic mail, cable television and school visits. This parent communication system will provide parents access to daily homework assignments, test schedules, class activities, and absence/tardiness notification. An annual "Parents Day" will allow mothers and fathers to attend school in place of their children on a "regular" school day so they can follow typical schedules and see how education has changed.

GRANT: \$566,200

John Marshall High School, Los Angeles, California

GOALS: To promote more efficient use of resources and improve the educational development of students through the application of private industry management practices.

PROGRAM: John Marshall will develop a "lighted" school, open and available beyond the traditional school day. Through school-based management led by John Marshall's "Shared Decision-Making Council," students, staff, parents and members of the community will control the new direction of the school through six committees.

Teachers will be cloistered into "houses of learning" and teamed with counselors and a defined group of students. The teams of students and their parents, guardians, teachers and counselors will stay in the same "house of learning" throughout high school.

GRANT: \$713,261

Morgan County Primary School, Madison, Georgia

GOAL: To improve early learning through greater parental involvement.

PROGRAM: The only K-2 school in this rural county, Morgan proposes to increase parent participation through both a Family Support Program and a Family Learning Center. These will provide parent-to-parent support on a continuous basis and will help parents and children learn after school. Ten "home liaison" persons will visit four families each at least once a week. Liaisons will work to establish a calendar of activities to support the children, provide educational materials and arrange school visits and tutoring.

GRANT: \$274,957

Orem High School, Orem, Utah

GOALS: To transform math and science instruction by developing computer software on-site and to improve the cost-efficiency and productivity of math education.

PROGRAM: The traditional textbook and lecture approach will be abandoned and replaced with computer-based technologies. Orem will develop an interactive video/computer/workbook-based course for Algebra II and Chemistry. The materials will be developed by classroom teachers and professors from Brigham Young University. The materials will be designed for individualized instruction and are intended for distribution to other schools and for adult education. Potential revenues from resale of the completed course would go to a local non-profit foundation.

GRANT: \$749,500

Ortega Elementary School, Austin, Texas

GOAL: To expose at-risk Hispanic and African-American students to learning experiences common to other children.

PROGRAM: Ortega proposes "Labs to Enrich and Accelerate Learning" (LEAL). LEAL is comprised of 7 learning labs that provide interdisciplinary instruction in science, math, literature, computers, music, art, and gymnastics. Instruction will be experiential, project-based, and related to real life situations. For example, in the literature lab, students will be immersed in books for two weeks and then will publish their own books through a writing workshop. The school day will be expanded by 45 minutes and after school and homework labs will be added.

GRANT: \$741,018

Pepperell Intermediate School, Opelika, Alabama

GOAL: To offer a new learning environment that will build self-esteem, improve problem-solving, and emphasize "learning how to learn."

PROGRAM: "Project Space" is designed to offer a new learning environment: the Pepperell Teaching and Learning Center (TLC). The TLC will restructure classrooms, extend the school day, expand the school year, and serve adults and students in the community. Grade levels will be removed and students will be immersed in language activities. Textbooks will be replaced by a variety of printed materials and technological tools.

With the school proposed as a new "galaxy" (learning environment), the "stars" (students) will work within "dimensions," which are similar to grade levels but as students reach plateaus in their learning, they move to the next dimension instead of waiting for a full school year to end. Oral progress conferences will replace report cards. The role of textbooks will be reduced and a core curriculum which identifies competencies required for all students will be developed.

GRANT: \$750,000

Piscataquis Community School, Guilford, Maine

GOAL: To undertake a complete restructuring of the entire school.

PROGRAM: Located in the eastern Appalachian highlands, Piscataquis has a history of innovation in education. Teachers will develop a "common core" of learning to incorporate knowledge, skills, and values for current disciplines. They will eliminate tracking and provide accelerated English, math and science. Teachers also will use interdisciplinary teaching and mastery-based assessment that includes portfolios, projects, and demonstrations.

Teachers will be connected by network to a database of student information about reading and math performance to assist in the development of Individualized Learning Plans (ILP). The University of Maine will manage a site-based Masters of Education in Teaching at the school.

GRANT: \$570,993

Rancho Viejo Elementary School, Yuma, Arizona

GOAL: To provide early learning experiences to at-risk children aged 3-5 years-old.

PROGRAM: "Project Jump Start" will send a van into the community to provide learning experiences to children in low income, Hispanic neighborhoods across the county. The outreach program trains parents to prepare their children for school. Vans are also used for at-risk students in school and in the evenings for the instruction of adults.

GRANT: \$322,733

Sir Francis Drake High School, San Anselmo, California

GOALS: To improve academic achievement among all students and change the life of the teacher.

PROGRAM: This model program for both high achiever and at-risk secondary school students is an integrated studies program designed and implemented by teachers and the principal. The program will run during a 200-day school year and include both classroom instruction and community-based projects aimed at serving real community needs in the San Francisco area.

GRANT: \$708,000

John A. Snively Elementary School, Winter Haven, Florida

GOAL: To improve education of at-risk students.

PROGRAM: Serving a rapidly growing Hispanic population in an industrial migrant housing community, Snively will develop the "Step Ahead" program. Under the initiative, the school year will be extended to 210 days, with a school-wide core curriculum and integrated teaching units. A Family Resource Center will offer adult education for parents to learn alongside students both at home and at school. There will also be student-parent participation in the curriculum, home visits by teachers, and family transportation and child care for pre-schoolers during "Step Ahead" field trips. Of 375 Snively parents, 325 have signed a statement of intent to enroll their children in the program.

GRANT: \$750,000

Union House Elementary School, Sacramento, California

GOAL: To undertake fundamental curriculum reform.

PROGRAM: Union House will reform the curriculum based on 9 multi-disciplinary themes. They will seek total involvement of the community, students, and parents in the development of the program. The initiative also includes an extended school day for tutoring and greater use of technology for instruction.

GRANT: \$731,950

Winston-Salem/Forsyth County Elementary School, Winston-Salem, North Carolina

GOAL: To offer greater parent interaction with students.

PROGRAM: School officials have devised a new school to serve 360 children from ages 3-11 near the site of an operating business. Open on a year-round, 11-hour per day basis, the program will feature greater parent-employee interaction with students and individualized instruction.

GRANT: \$750,000

For more information on any of these radical reform initiatives, please contact David Sandor, Cassidy and Associates at (202) 347-0773 or Tracey Riese, RJR Nabisco at (212) 258-5779.



**Buckingham
Personnel Services**

Chestnut Green
470 Washington Street
Norwood, Massachusetts 02062

(617) 762-7888

Rec'd

APR 15 1991

Dear Andy:
I enjoyed your letter of Sept 1990 -
I know you are very busy!

Andy: I'm planning on going to:
"The South Shore Chamber Trip to Washington."
April 28-30 - (arriving April 27th)

A long time ago - You promised
you'd try - Is it possible to
tour White House? To see the
President? To see Barbara Bush -
The elegant First Lady? We could
send you our itinerary in advance.

Please try ~~Andy~~ I'm waiting
for your ~~new cards~~!! **HOLD sent 5/24**
Be Happy and Have some fun too!

Sincerely,

Ann Buckingham



ANN BUCKINGHAM
PRESIDENT

**BUCKINGHAM
PERSONNEL SERVICES**
PERMANENT AND TEMPORARY PLACEMENT

SPECIALISTS

470 WASHINGTON ST.
NORWOOD, MA 02062

Home
617-762-0083
TELEPHONE
617-762-7888

Rec'd

FEB 20 1991

FEBRUARY 14, 1991

DEAR ANDY:

AC HAS SEEN

IT IS WITH DEEP GRATITUDE
AND APPRECIATION THAT I WRITE TO
SINCERELY THANK YOU FOR THE MOST COUR-
TEOUS AND WARM WELCOME THAT YOU GAVE
TO ME ON JANUARY 25, 1991.

I AM MOST GRATEFUL FOR THE
TIME YOU TOOK FROM YOUR VERY IMPORTANT
DUTIES ON BEHALF OF OUR PRESIDENT OF
THE UNITED STATES.

THANK YOU SO MUCH FOR THE GIFT

— THE SPECIAL GIFT — THAT CERTAIN WILL
LONG STAY IN MY HEARTS, A PRICELESS
VIEW OF THE REAL GOODNESS OF AMERICA!

KATHY AND I WILL REMEMBER^{ING} YOU IN
OUR PRAYERS AND ASKING GOD TO HELP YOU
AND YOUR FAMILY.

and Joe

RICHARD E. HARDING

file
VA handling

March 12, 1991

Mr. Andrew H. Card, Jr
Assistant to the President of the United States
Deputy Chief of Staff
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. Card:

Enclosed please find a copy of my recent letter to Governor John Sununu.

In this letter I have asked the Governor if he might assemble the machinery necessary to collect all of the Combat Battle Flags flown by our troops during Operation Desert Storm in order that USS *CONSTITUTION* might wear these flags as part of a national program to honor the President and our military men and women during the Fourth of July celebration this summer.

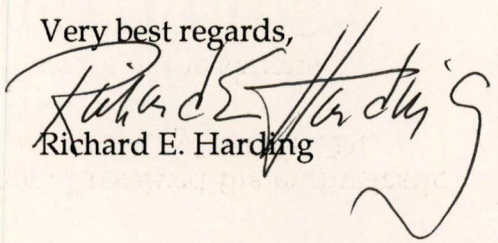
In a meeting yesterday afternoon, I received the enthusiastic support of the Commanding Officer of USS *CONSTITUTION*, CDR David M. Cashman, USN.

Mr. Card, I believe you are well aware of the serious problems the people of New England are facing at this time. Is there a better tool with which our new Governor might raise the public confidence while highlighting efforts to revive the New England economy? Certainly, USS *CONSTITUTION* is an appropriate, available and cost effective vehicle for this endeavor.

I have taken the liberty of copying Governor Weld my letter to Governor Sununu and have mailed blind copies to Mr. Mark Robinson, Governor Weld's Chief of Staff, and Mr. Harold Hestness, one of the Governor's most influential advisors.

Mr. Card, I sincerely hope you may be favorably disposed to assist in this matter. If I may be of any assistance, please do not hesitate to telephone me at (617) 891-8494.

Very best regards,


Richard E. Harding

cc: Harold Hestness
Mark Robinson

RICHARD E. HARDING

March 11, 1991

Copy

Honorable John Sununu, Chief of Staff
Office of the President of the United States of America
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Governor Sununu:

Watching President George Bush deliver his speech to the Congress Wednesday night, I could not help but remember last Fourth of July at the Charlestown Navy Yard in Boston where I had the distinct pleasure of conversing briefly with you while you were waiting to be piped aboard USS *CONSTITUTION*.

At that time, who could have foreseen the aircraft carrier *John F. Kennedy*, then in Boston Harbor to salute USS *CONSTITUTION*, joining hundreds of ships, thousands of planes and hundreds of thousands of our Army, Navy, Air Force, Coast Guard and Marine Corps troops in sailing half way round the world to join a military operation very similar to, and even more successful then, the one conducted by USS *CONSTITUTION* nearly two hundred years earlier.

When the President spoke of having a party for the returning troops, a friend of mine, Mr. Leo Kelley of Marshfield called to say, "Wouldn't it be wonderful to have USS *CONSTITUTION* take the salute of our nation from Castle Island while flying all of the Combat Battle Flags used by our troops during Operation Desert Storm?"

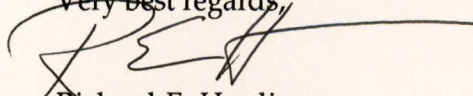
If you recall that beautiful sunlit day last July, nearly a hundred thousand spectators spilled over the Boston waterfront and Castle Island to honor *CONSTITUTION*, *KENNEDY*, and *EAGLE*. Can you imagine a more powerful scene this summer, or a more appropriate day, a better stage, or a grander symbol from which our citizens might salute our Commander in Chief, his military commanders and the United States troops who did so much for freedom while soothing the sting of Vietnam?

I am writing therefore, to inquire whether you might agree to use your good offices to collect those Combat Battle Flags and set in motion the necessary machinery to plan and implement an appropriate ceremony for the Fourth of July next? Even if President Bush, General Powell, and General Schwarzkoph could not be aboard during the turnaround cruise, they might still visit *CONSTITUTION* and receive the salute of the nation aboard a naval warship in the harbor.

This afternoon, Mr. Kelley and I are meeting with Commander David Cashman, Commanding Officer of USS *CONSTITUTION*, to receive his personal opinion concerning this proposal. Should he have no objection to our proposal, I shall immediately forward this letter to you and ask CDR Cashman to pursue the matter through navy channels. I shall also take the liberty of copying this letter to Governor Bill Weld whom I am sure would welcome the opportunity to serve the nation as would the people of New England.

Governor Sununu, thank you for your time and consideration. Please let me know if I may be of any assistance.

Very best regards,


Richard E. Harding

cc: CDR David Cashman, Commanding Officer, USS *CONSTITUTION*
Mr. Leo Kelley, Marshfield, Massachusetts
Honorable William Weld, Governor, Commonwealth of Massachusetts

220729 DOCUMENT= 1 OF 1 PAGE = 1 OF 1
OPID KG
DOCDATE 910311 THE WHITE HOUSE
RECTYP IBA WASHINGTON
MEDIA L
STAFF JOHN SUNUNU
NAME MR. RICHARD E. HARDING
STREET 37 SILVER HILL ROAD
ADDR WESTON MA 02193
SUBJECT SUGGESTS THE ADMINISTRATION ARRANGE TO HAVE
THE USS CONSTITUTION FLY ALL COMBAT BATTLE
FLAGS USED DURING DESERT STORM FOR THE FOURTH
OF JULY HOMECOMING/VICTORY PARADE
SUBCODE HO020
ND013 FE004
INDCODE 4000
RPTCODE CS
ACTION CSSUNU ORG 910314 C 910314
99VA RAA 910319 ATTN: ED DERWINSKI

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Aa

K-d

Do you recall where Mr.
Harding's letter to JHS went? -
Depense; WHMO?

L-L



Lu'd
MAR - 4 1991

March 1, 1991

AC HAS SEEN

The Honorable Andrew Card
Deputy Chief of Staff
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Dear Mr. Card:

On behalf of the Congressional Youth Leadership Council, I would like to take this opportunity to thank you for addressing our students.

The students attending the National Young Leaders Conference are selected for outstanding leadership, citizenship and high academic achievements and they were quite enthusiastic about your presentation. It was one of the highlights of their week in our Nation's capital.

We at the Council enjoyed working with you on this conference and we appreciate the special efforts you made on our students' behalf.

Again, thank you for giving us your valuable time and for your interest in the National Young Leaders Conference. We look forward to the opportunity of working with you again in the future.

Sincerely,

Ellen F. Dalton
Director
National Young Leaders Conference

EFD/mal

GEORGE D. BAKER
CAROLYN F. BIGDA
WILLIAM T. BRACK
ANN S. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
KAREN JUDD LEWIS
ROBERT J. MARTINEZ
JOHN J. McMACKIN, JR.
GEORGE G. OLSEN
SALLY B. PFUND
DAVID A. STARR
MARY LYNNE WHALEN
J. D. WILLIAMS

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
LAWYERS

1101 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036

AC HAS SEEN
Rec'd
MAR - 4 1991

TELEPHONE
(202) 659-8201
TELECOPIER
(202) 659-5249
OF COUNSEL
BARNABY W. ZALL

March 1, 1991

The Hon. Andrew Card
Assistant to the President
and Deputy to the Chief of Staff
The White House
Washington, D.C. 20500

Dear Andy:

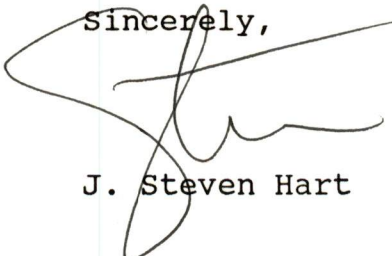
I want to thank you and the Governor for taking time to meet with J.C. Watts, the newly elected Corporation Commissioner from Oklahoma.

You many not know that J.C. has a nationwide following as an inspirational speaker. He has been on the speaking tour for the Fellowship of Christian Athletes and Big Brothers since 1978 when he was a nationally known college football quarterback with the Oklahoma Sooners.

J.C. did not use the opportunity to make his pitch that the time is right to bring a new message to inner city blacks. His message is that the current welfare system needs to be replaced by an incentive program. J.C. also does a nice job on how the democratic party "monopoly" offers only tokenism to blacks. I will send you a copy of one of J.C.'s complete speeches.

J.C. is eager to serve the President in any way. Vin Weber, who has heard J.C. at his best, suggested that J.C. move around the country and recruit other black Republican candidates. Any suggestions you have would be appreciated.

Sincerely,


J. Steven Hart