MINUTES OF THE REGULAR MEETING
of the
ADMINISTRATIVE RULES REVIEW COMMITTEE

Time of Meeting: Tuesday, February 12, 1980, 1:15 p.m.

Place of Meeting: Senate Committee Room 24, State Capitol, Des Moines, Iowa.

Members Present: Representative Laverne Schroeder, Chairman; Senator Berl Priebe, Vice Chairman; Representatives Betty J. Clark and John Patchett; Senators Edgar H. Holden and Dale L. Tieden.
Also Present: Joseph Royce, Committee Staff
Brice Oakley, Administrative Coordinator

CONSERVATION

The following rules of Conservation Commission were before the Committee:

CONSERVATION COMMISSION[290]
Registration and numbering, 28.11 ARC 0803..N.....1/9/80
Operation and public participation, 60.2(3)"j", 60.3(5), 60.4 ARC 0804..F.....1/9/80
Contested case proceedings, ch 64 ARC 0805..F.....1/9/80

28.11

Nancy Exline, Waters Section, stated that rule 28.11 formally sets out the procedure they have been following with respect to vessel registration. There were no suggested amendments.

Ch 60

Stanley Kuhn, Chief of Administration, explained the only change in amendments to Chapter 60 since the Notice was with respect to voting--60.3(5)b. The Commission clarified the provision on recommendation by this Committee by substituting "members appointed to the Commission for "sitting members." No comments had been offered by other factions, according to Kuhn.

Priebe reiterated his concern the hearing officer would have too much authority under 60.4(2)d. Kuhn recalled that it had been argued that anyone conducting a proceeding must have sufficient authority to do so in an orderly manner. He pointed out that a hearing which was conducted in an arbitrary or capricious manner would also be a matter of record and the whole hearing process could be challenged

There was discussion as to method followed to ensure that all persons wishing to address an issue would be afforded reasonable time.

Ch 64

Kuhn told the Committee that to date the Commission has never had a request for a contested case proceeding so they relied on expertise of Oakley and the Attorney General's office when drafting Chapter 64 of their rules. The rules were acceptable.

CONSERVATION Cont'd

Kuhn responded to Tieden's question concerning the procedure followed by the Commission in determining the various hunting seasons while complying with Chapter 17A.

PUBLIC HEARINGS IAB Listing

Oakley presented suggestions for additions to the Iowa Administrative Bulletin which, in his judgment, would enhance its usefulness:

1. Publish a separate running list of public hearing dates for rules of various agencies.

Vacancies on Boards and Comm.

2. Include information concerning appointments and vacancies on boards and commissions. Initially, appointments could be published. Oakley was willing to prepare a sample format for Committee perusal showing vacancies to be filled. Following that, an appropriate manner could be decided upon for presenting this information in the Bulletin.

Tieden cautioned that we must be selective in determining what should be published in the IAB.

The Committee was amenable to publishing hearing dates and Chairman Schroeder directed Oakley to work with Royce and Barry in determining proper format.
Schroeder recommended that Oakley submit further information re boards and commissions for Committee consideration at the March meeting.

ENVIRONMENTAL QUALITY

Odell McGhee, Hearing Officer, and Keith Bridsen, Water Quality, represented the Department of Environmental Quality for proposed amendments to Chapter 4 of their Air Quality rules re emission standards for contaminents, ARC 0837, and filed rule 22.4(1)b, water quality, bacterial monitoring, ARC 0835, published in IAB 1/23/80.

McGhee explained that their Notice to amend 4.3(3)a(4) had been amended to include a reference which was inadvertently omitted.

Oakley inquired as to the effect, if any, the amendments to chapter 4 would have on the coal industry. Odell was not sure but indicated the general trend was to be less stringent.

According to McGhee, the Water Quality Commission was in the process of redrafting a more acceptable antidegradation policy to be submitted under a Notice. The first Notice was terminated in IAB 1/23/80 [ARC 0348, Item 2, 16.2(2)].

The Committee was aware that DEQ had been responsive to Committee input with respect to Chapter 22.

SOCIAL SERVICES

Judith Welp, Policy, Research and Analysis, and Gary Gesaman, Division of Long Term Care Unit, were present for review of the following:

SOCIAL SERVICES DEPARTMENT[770]

ADC, 41.1(5)"a", 41.2(7), 41.2(7)"a"(1, 4), "b", "c", 41.2(9), 41.3(1, 3, 4), 41.4, 41.4(7), 41.6(2), 41.7(2)"e", 41.7(2)"c" (3, 7), "f", 41.7(8), 41.9(1, 2), 41.10(3)"d", 41.10(4)"b" ARC 0812 *N* 1/9/80
ADC, trusts, 4.16(8) ARC 0831 *N* 1/23/80
Medical assistance, transportation, 78.13, 78.13(5-8) ARC 0830 *N* 1/23/80
Intermediate care facilities, 81.6(11)"j", 81.6(12) ARC 0829 *N* 1/23/80
Intermediate care facilities for mentally retarded, 82.5(11)"e"(4-6), "g", 82.5(12), 82.14(4)"d", "f", 81.14(5), 82.17 ARC 0828 *N* 1/23/80
Work incentive program, appeals, 91.5(2) ARC 0818 *N* 1/9/80
Juvenile home, visits, 101.2(4, 8, 9) ARC 0826 *N* 1/23/80
Mitchellville training school, visits, 102.2(1, 4, 8, 9) ARC 0827 *N* 1/23/80
Eldora training school, visits, 103.2(4, 8, 9) ARC 0825 *N* 1/23/80
Chore service, 146.1(2-7), 149.2(2), 149.3, 149.4(6), 149.6 ARC 0819 *N* 1/9/80

ADC Ch 41

There was brief discussion of amendments to Chapter 41 which dealt with "parents absent from the home" with respect to ADC. Clark raised question regarding new language added to 41.1(5)a which referred to "unpaid public work" by a convicted offender. It was her understanding that the courts would allow support and basic needs as well as restitution. Welp stated that the Corrections Division has indicated this is not a problem in Iowa--Clark interpretation was correct.
Clark called attention to 41.2(7)--assignment of support payments-as being poorly constructed. Welp agreed to request the Board to consider revision for clarity.

Responding to question by Priebe, Welp stated that "support payments" were not replacing "ADC" but the form was merely being revised and renamed.
As to who makes the decision with respect to assignment, Tieden was informed that courts make the determination based on state law Re "good cause", Welp indicated this was tightly defined and would have to documented.

Welp explained that 41.6(8)--trusts--was inadvertently omitted from ARC 0812 so it was submitted as a separate document in ARC 0831. Medical trust would not be counted as income for ADC. Patchett commented that regardless of the type of trust, it would be a judicial matter.
Oakley reasoned it would be "a fact question."

78.13

Welp told the Committee that revision to 78.13 would place the same limitations on medical assistance recipients as those placed on state employees.
Tieden was concerned that the rule was unclear as to record of payment for service performed. It was his opinion a voucher should be signed.
Welp stated that the recipient is paid. She could forsee high administrative costs to the Department if vouchers were required.

SOCIAL SERVICES Cont'd Chs 81, 82

Welp said amendments to Chapters 81 and 82 were similar in setting out requirements for termination or ownership changes of ICF's or ICFMR's.

Schroeder questioned 81.6(12)b which provided: "Upon change of ownership, the new owner or operator shall furnish the department with an appraisal made by a department-approved appraiser. The appraisal shall be based on replacement cost."
He wondered if the task should be performed by a licensed real estate person.

Oakley anticipated problems with the appraising provision and contended it would be "counterproductive." He continued that replacement costs are often higher than so-called market price. Professional appraisers would possibly place a higher value on the basis of replacement on units than they would actually sell for and more than the income potential.
Oakley referred to the last sentence of 81.6(12)c: "The value will be the sale price or appraised value, whichever is less." He favored appraisal based on income potential, replacement cost and market value and then let the Department make the value judgment. In the event of disagreement, it could be contested under some kind of adversary proceeding, in Oakley's opinion.

Schroeder wondered about county appraisals and was told they are not considered by the Department.

Oakley was doubtful the rules address the problem the Department is attempting to resolve.

Priebe recalled that the Department had been requested by the Legislature to address this issue of transfer of ownership. He considered the rules a move in the "right direction" in an attempt to eliminate manipulation of funds by dishonest ICF operators.

Discussion of critera for the appraiser.
Oakley reasoned there were few individuals in the state who could accurately determine the value of a care facility.
It was the consensus of Committee members that the subject should be addressed in the rule.

Gary Gesaman commented that the idea of replacement value was used in order to eliminate some other more subjective value that could be attached to the homes. He added that for all practical purpose there was no new construction of care facilities in the state at this time due to "1122 review and certificate of need law". Those in existence, in essence, have a franchise in the area where they are located and there is a value associat with that which should not be included in the appraisal value of the property. He concluded that if the facility has gone through

SOCIAL SERVICES Cont'd

"1122 review and certificate of need has been approved," that approval adds to the value of the property because it literally ensures that another facility would not be built in the vicinity. Clark was aware of an exception to the last sentence of remarks by Gesaman.

91.5(2)

Amendment to 91.5(2) was acceptable as published.

Chs 101-103

Welp pointed out that amendments to Chapters 101 to 103 were made as requested by this Committee. No further recommendations.

Ch 149

Chapter 149 pertaining to the chore service program was being amended to limit the service to those over 65 years of age and the handicapped. The services would be limited to those which were essential in order for recipients to remain in their own homes.

Schroeder and Clark expressed concern that wall washing service was to be eliminated. It was their contention this was more important that cleaning the attic. 149.1(2)
Welp pointed out that attics would be cleaned to remove fire hazards.
Schroeder requested that the Department reconsider reinstating wall washing service.

Property Disposition

In response to question by Patchett, Welp agreed to research the matter of property to which the Department of Social Services has taken title. There were no apparent guidelines or procedures to follow.

TRANSPORTATION DEPT.

The Department of Transportation was represented by Robb Forrest, Director of Office of Driver License. The following rules were before the Committee:

TRANSPORTATION, DEPARTMENT OF[820]
Driver's license, school, [07,C] 13.5(2)"b" ARC 0810...N.....1/9/80
Motor vehicles, financial responsibility, [07,C] 14.3, 14.4(1-4), 14.5(1), 14.6(1, 4, 6, 7) ARC 0811 ...N.....1/9/80
Primary road access control, [06,C] ch 1 ARC 0817...F.....1/9/80

School Permit

Forrest said 13.5(2)b was being amended to comply with Code requirements for establishing a need for a school license for students under age 16. Holden commented that he has introduced legislation on the subject. Students could get a permit to drive to school to participate in extracurricular activities such as music or debate. The responsibility would be given to the school superintendent to determine whether a child needed the special permit.
Schroeder wondered if that responsibility would subject the superintendent to any liability.
Discussion of minimum distance and whether it should be defined explicitly. One mile was suggested as being a reasonable minimum. Oakley thought common sense would surely dictate.

DOT Cont'd 07C Ch 14

The major change in Chapter 14 (07,C), implementing financial responsibility statutes, was the duration of proof which was lowered to two years from three years.

Re security required of the uninsured driver, Schroeder asked what becomes of the accrued interest from this fund. It was his opinion it should revert to the individual. Forrest agreed to pursue the issue.

06C Ch 1

When this meeting was rescheduled for afternoon, the DOT representative responsible for primary road access control rules was unable to appear because of another commitment. It was decided that the rules should be delayed until the March meeting.

Motion Delay

Holden moved to delay for 70 days rules of Transportation Ch 1, 06C and that they be placed on the March agenda. Carried viva voce.

CREDIT UNION DEPARTMENT

Betty Minor, Director, and James Brody, Deputy, Credit Union Department, were present for review of the following rules:

CREDIT UNION DEPARTMENT[295]
Small employee groups, ch 5 ARC 0813...N.....1/9/80

CREDIT UNION DEPARTMENT[295]
Share drafts, real estate loans, insolvency, chs 7, 10, 11 ARC 0814 .F.....1/9/80

Other interested persons included: Ron Riley and John Sullivan, Iowa Credit Union League, F. Richard Thornton and David Butler Iowa Bankers Association, Marcia J. Hellum, Iowa Consumer and Industrial Loan Association, and Lowell Gose, Farmers Union.

Ch 5

Discussion of Chapter 5. Minor indicated that primary changes were made in definitions in 5.1(1) and (2) and in 5.6 which set criteria for a small employee group to leave the parent credit union.

Hellum voiced objections to the rules. The following is excerpted from her statement which had been submitted to the Department prior to today's meeting:

> 1. The definition of small employee group in the rules goes beyond the statutory provisions relating to small employee groups. The Iowa legislature provided an exemption from the common bond requirement by allowing an employee group to join a credit union when they have an insufficient number of members to form or conduct the affairs of a separate credit union (Section 533.4(13)). Any seven residents may form a credit union (Section 533.1). Rule 5.1 should be amended to conform to the limitations imposed by statute.
>
> Specifically, we oppose the automatic designation of two to one hundred employees of a single employer as a small employee group. Of the 292 small loan offices in Iowa, 28% have one hundred or fewer accounts. Without the significant advantage of a nexus to the workplace and payroll deduction, these offices are still able to sustain their operations at a profit. The automatic designation of one hundred or fewer employees as a small employee group assumes that a group of that size is unable to form or conduct the affairs of a separate credit union. That assumption is unwarranted. Small loan offices, which not only operate profitably but contribute significant tax revenues to the state coffers are able to sustain themselves as a competitive institution with fewer than one hundred accounts. It is not unreasonable to assume that a credit union could also operate with one hundred or fewer accounts.

We also oppose the discretionary designation of one hundred to three hundred employees of a single employer as a small employee group. This figure is much too high to qualify as a group that could not form or conduct the affairs of a credit union. Fully 54% of all small loan offices in the state of Iowa have from one hundred one to three hundred accounts, for a total of 82% of the offices with three hundred or fewer accounts. These offices operate successfully even though their expenses are substantially higher and without the legislative preferences granted to credit unions.

Subrules 5.1(1) and (2) should be amended and combined to state that two to one hundred fifty employees may be designated as a small employee group if they meet the criteria in paragraphs "a" through "d".

2. Notice of the hearing required under Rule 5.1 should be available to competing financial institutions. This will facilitate the maintenance of a competitive balance among the various financial institutions and provide a check upon what could easily become blanket approval of the absorption of small employee groups into large credit unions.

3. Subrule 5.3(2) should be amended to require a showing the small employee group status has been designated to the target group and that the target group has requested to be served by the applicant credit union. There is only a requirement in this rule that the small employee group have made an application to the credit union for services. The subrule should be clarified.

4. Subrule 5.3(3) should be clarified and its terms further defined. For example, what is a "sound" credit union? There is no indication in this subrule as to what the Credit Union Department is looking for; the rule needs to be expanded to put credit unions on proper notice of the type and extent of evaluation that will be required.

5. Rule 5.4 requires the Administrator provide notice to a credit union of its application to absorb a small employee group. Similar notice of disposition should be provided for groups seeking designation as a small employee group. There are two stages in the procedure for a credit union to absorb a small employee group; the rules should provide as much protection to the group seeking employee status as to the credit union.

Credit unions are granted special privileges not afforded to competing financial institutions. As credit unions grow and expand beyond their originally comtemplated function, they encroach on the functions and services provided by other institutions which do not have the same advantages. It is important that we maintain a balance among the various institutions, to preserve those entities which have contributed to the prosperity of this state. These rules do not preserve or establish a proper balance. We thank you for the opportunity to present our comments concerning ARC 0813 and hope they will be duly considered in the constructive manner in which they are offered.

We additionally request that we be provided a concise statement, pursuant to Section 17A.4(1)(b), of the principal reasons for and against the rule you may finally adopt, including in that statement the reasons for overruling the arguments in opposition to the rules.

Minor said that inference that 2 to 100 would be automatically designated a small employee group was incorrect. They must apply to a credit union for service and that credit union must in turn apply to the Department. From those two applications, a determination would be made. The same criteria applicable to a 101 to 300 group would be used. The Department investigation would determine whether a separate credit union should be chartered. Regarding, 5.4 Minor pointed out that the rule provides for written notice of denial of application so the small employee group can apply to another credit union.

Riley commented that Hellum's analogy regarding the successfulness of small loan companies must fail when it is analyzed in light of the philosophical differences and statutory genesis between credit unions and small loan companies. He added thst credit unions, by and large, loan at twelve per cent essentially while small loan companies can charge up to thirty-six per cent. Small loan companies go the market place for funds while CU's rely on member deposits.

Responding to Oakley, Hellum named Dial Finance as an example of a small loan company. Oakley reminded that small loan companies are small only in terms of the size of loans made.
He thought it unfair to equate CU operation with small loans.

CREDIT UNION Cont'd

Hellum said the analogy was to bring the matter into perspective in terms of size and whether there should be an automatic designation.

Preibe took the Chair.

Oakley urged implementation of the rules.

Holden indicated he did not agree with the Hellum analogy. He raised question as to the construction of 5.1. He wondered what criteria would be used re 5.1(1)--1 to 100 employees. He interpreted paragraphs a to d as applying only to 5.1(2). Oakley referred Holden to 5.3 re investigation by the administrator.
Holden maintained the Department had effectively "eliminated the common bond."
No formal action taken.

Chapter 7

Butler spoke in opposition to share draft rules. He said the General Assembly set out 22 specific procedures to be followed before share drafts could be issued. He pointed out that none of these are mentioned in the rules. He argued it was "unreasonable to allow $1 out of every $5 to be locked up in this experiment." Further, he noted the rules contained no solvency standards.

Priebe pondered what justification the Committe would have to object to the rules. He reasoned they could not object merely on the basis of the economic factor or the times. Butler considered the rules to be "unreasonable."

In response to Oakley, Minor said the Department regulates credit unions based on the Code and administrative rules. The Code specifically spells out liquidity reserve as well as the 22 points and they are part of the application.

Oakley recommended that the form referenced in 7.2(2) be described in the rule and that a number be assigned to it.

Chapters 10 and 11

There was brief discussion of application of Chapter 10. With respect to Chapter 11, Oakley indicated he was not comfortable with total exemption as to solvency factor and he asked Minor to review the position of the Department.
Minor took the position that insolvency was thoroughly defined in the Code.
Oakley preferred to include in the rules some factor as to how "insolvent" a group could become and under what circumstances. Committee members shared Oakley's concern but thought an amendment could be filed separately to avoid further delay in the implementation of those before them today.
Minor pointed to §533.6 of the Code as their authority to withdraw a charter if a group fails to activate themselves.
No formal action by Committee.

Recess — Vice Chairman Priebe recessed the meeting at 3:25 for 5 minutes.

Reconvened: — Meeting was reconvened at 3:35 with Schroeder in the Chair.

REVENUE
Special
Review
Ch 20
71.12

At this Committee's request the following items were added to the Agendum for special review: Revenue Department, Chapter 20 dealing with sales tax on prepared foods; and rule 71.12 pertaining to evaluation of agricultural land for property tax. Agency representatives included Carl Castelda, Deputy Director, Michael Cox, Gene Eich, Brian Bruner. Dr. Marvin Juluis, Iowa State University, was also present.

Castelda led the discussion of Chapter 20. Committee members had expressed concern as to possible inconsistencies in the tax on prepared foods.

Castelda noted that certain prepared foods can be purchased with food coupons and some cannot. An example of the latter was Kentucky fried chicken. He quoted from §422.45(12) of the Code which sets out exemptions from tax and the exceptions. Castelda recalled a case in 1971 where the Ky. Fried Chicken Co. of Cleveland, Ohio took the Secretary of Agriculture to the U.S. Supreme Court because they felt the Secretary was being discriminatory in not allowing them to be a part of the food stamp program. The Court ruled that the Secretary had the authority for his position. The basis of the decision was that the intent of the food stamp program is to provide coupons to enable persons to obtain a low cost nutritional diet. The Court considered Ky. fried chicken to be a high cost specialty food. Because the chicken is not eligible for food coupons the Department has taken the position it is not exempt from tax under the food exemption.

Castelda continued that the Department recognizes that fried chicken purchased at a delicatessen counter would be exempt from sales tax. The U.S.D.A. takes a similar position that fried chicken can be bought in a grocery store with coupons.

The Department takes the position they cannot ignore the US Supreme Court Decision, thus, Kentucky fried chicken is not exempt from the sales tax.

Castelda referred to a general problem confronted in the administration of the sales tax exemption. Delicatessens working in conjunction with the Iowa Retail Grocers Association have taken the position, with which the Department agrees, that to constitute a meal, if plastic service is given, the meal will be taxed.

Priebe pointed out instances where the law is being circumvented by allowing the customer to pick up the silverware away from the counter. He recommended that the rules go through a hearing process.

REVENUE Cont'd

Castelda was doubtful the Department could improve the situation by rule. They have relied on Court cases to define a meal.

In answer to Priebe, Castelda said that Ky. fried chicken would not be exempt from the tax even if they left the silverware for the customer to pick up because of the Supreme Court case.

Committee was disturbed about the inequity.
Holden wanted to avoid a dual system in the same establishment.
He preferred clarification as to what is taxable.

Priebe urged that action be taken to correct inconsistencies.
Schroeder asked if the Department had attempted to draft legislation to resolve the problem. Castelda indicated they could provide something this year or include it in their legislative package for 1981.
Clark suggested substituting "food" for "meals" in 422.45(12).
Castelda cautioned that a larger problem could be created.
He agreed to study federal statutes and work with the Retail Grocers Association in an attempt to resolve the matter.

71.12

Eich and Julius led the discussion with respect to the increase-decrease factors which have surfaced due to the factor 24 being used as an equalizer.
Representative Horace Daggett addressed the Committee briefly as to his concern re the formula.
Priebe requested the old figures and the new ones for comparison.
At the request of the Committee, Department officials indicated they would review the matter and co-operate in any way possible.

Rules O.K. as Published

The following rules were acceptable as published and no department representative was requested to appear before the Committee:

BEEF INDUSTRY COUNCIL[145]
Organization, rules of practice, excise tax, chs 1-3 ARC 0821 .N..... 1/23/80

COMMERCE COMMISSION[250]
Soil conservation protection standards, ch 9 ARC 0832 .F..... 1/23/80

ENERGY POLICY COUNCIL[380]
Procedures for rulemaking, declaratory rulings, contested case proceedings, chs 7-9
ARC 0820 .....N.....1/9/80

HEALTH DEPARTMENT[470]
Barbers, license fees, 1o0.6(3, s. 9) ARC 0822 .F..... 1/23/80

HEALTH DEPARTMENT[470]
Mortuary science examiners, 146.1(1-8, 11), 146.2, 146.3(6,7), 146.4(2-4), 146.5(1, 2, 5-7, 9, 12), 147.1, 147.2(2, 3, 5, 7, 12, 13), 147.3, 147.5(1-6, 8), 147.5, 147.7 ARC 0807 .N.....1/9/80
Barber examiners, continuing education, 152.10(1) ARC 0806 .N.....1/9/80

MENTAL HEALTH ADVISORY COUNCIL[566]
Organization, ch 1 ARC 0808 F.....1/9/80

NURSING HOME ADMINISTRATORS[660]
Reciprocity, 2.7(1), (2), filed emergency ARC 0809 .N.x.FE.....1/9/80

PUBLIC INSTRUCTION DEPARTMENT[670]
Graduate teacher education programs, ch 20 ARC 0824 N..... 1/23/80

REGENTS, BOARD OF[720]
Conduct of public hearing, 11.4 ARC 0815 ...F.....1/9/80
University of Northern Iowa, 14.1 ARC 0816 F.....1/9/80

REVENUE DEPARTMENT[730]
Assessor education commission, 125.2 ARC 0834 .N..... 1/23/80

COMPTROLLER Rule 5.3 — There was brief discussion of Rule 5.3 of the Comptroller's rules which relate to access to official records and information. The filed rule was published in IAB 1/23/80 as ARC 0823 and had been included under the "No Representative" grouping of rules.

Delay — Priebe had some question regarding 5.3 and moved that a 70-day delay be imposed to allow for further study and that it be placed on the March agendum of this Committee. Motion carried.

March Meeting Time — Priebe indicated preference for afternoon sessions of this Committee and moved that the March meeting be scheduled for afternoon. There were no objections.

NCSL Meeting — Schroeder noted that he had given tentative approval for Royce to attend an NCSL meeting in Denver, Colorado, February 14 to 16, 1980. No opposition was voiced.

Staff Salary — Priebe moved to increase Royce's salary two full steps from his current salary of $17,950 annually--the new rate to be $19,531. The increase shall become effective with the first pay period in March with the understanding that the salary will be reviewed again in July 1980. Motion carried.

Minutes — Priebe moved to approve the minutes of the January meeting as submitted. Carried viva voce.

Chairman Schroeder adjourned the meeting at 5:00 p.m. Next regular meeting to be held March 11, 1980.

Respectfully submitted,

Phyllis Barry

Phyllis Barry, Secretary

APPROVED

Lawrence Schroeder

Chairman