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COMMITTEE ON WAYS AND MEANS
U.S. HOUSE OF REPRESENTATIVES

ESTATE AND GIFT TAX HEARINGS

STATEMENTS OF PUBLIC WITNESSES TESTIFYING INDIVIDUALLY AND IN PANEL FORM

MARCH 19, 1976

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STATEMENT OF CONGRESSMAN JOHN B. ANDERSON BEFORE THE COMMITTEE ON WAYS AND MEANS, MARCH 19, 1976

Mr. Chairman, Members of the Committee, I am grateful for this opportunity to share my thoughts with you on the question of reform of our current estate tax laws.

"The farmer lives poor and dies rich," as the adage has it, and this has created an inequity in our estate taxing policies. Farming is land-intensive, and land costs have risen drastically. The highly mechanized American farm of the 1970's is also capital intensive. Huge sums must be tied up in imposing and expensive agricultural machines undreamt of by Cyrus McCormack. The rewards to our society are great. Yields per acre of arable land are high, and the prices of agricultural commodities are correspondingly low. American families devote a comparatively small percentage of their income to food purchases. Yet while investment in farming operations is sizeable, the return on invested capital for farmers is modest. Estate taxes on the land and equipment necessary for operating a farm are often an unbearable burden for the heirs of a farmer who wish to continue tilling the family acres.

Several letters from my constituents express the human toll of this unwieldy taxation better than I could. A farm wife in Polo, Illinois writes, "We have mortgages on two farms in Ogle County. My husband is a cardiac, diabetes, and dialysis patient. The increase in land value has horrified me and my children with the estate taxes as they now stand. It will mean we will have to sell -- which we didn't want to do." Another farmer from Harvard, Illinois, in my district writes, "We recently had a death in the family and the Federal and State inheritance tax on our farm nearly knocked us out." "We have witnessed many auctions because when one of the owners dies everything must be sold to pay the taxes" wrote another woman.

This is clearly a situation where our concern for our physical surroundings dictates that we encourage the use of land for agricultural, rather than developmental purposes. In addition, prudence indicates that we should husband the components of our farming industry, including land, equipment, and people, in order to meet the increased demands to be made on U.S. agriculture in the future. These intangible considerations of environment and potential must take priority over monetary evaluation of estates.

Mr. Burleson of Texas has introduced legislation which would take several steps to alleviate this problem. Though I am not in full agreement with all the provisions of the bill, I have cosponsored it to indicate my concern about the situation. In summary, sections 1 and 2 of the bill raise the personal exemption from the present $60,000.00 to $200,000.00, section three increases the marital deduction to $100,000.00 plus 50% of the value of the estate over that figure, and sections four and five provide a method for valuing farms and woodland for estate tax purposes at levels of their current use, rather than assigning higher values for potential uses.

In examining the options before the Committee and the House I would like to express my firm opinion that any changes made in the tax code should be drawn as narrowly as possible. Relief should be extended only to the intended beneficiaries, not to large segments of our wealthier classes. I feel that this necessitates limiting an increased estate deduction only to those estates which consist primarily of family farms, woodlands, or closely held small businesses. The Treasury Department has estimated a $2 billion loss in revenues would result from instituting a $200,000.00 exemption for <u>all</u> estates. This is too high a price to pay. These lost revenues would redound chiefly as unearned income to the lucky heirs of some of the wealthiest decedents in America. At a time when the middle

class taxpayer is chafing relentlessly in the bonds of his present tax burden, it would be unconscionable to make our tax structure more regressive, and increase the possibilities for intergenerational transfer of considerable fortunes. Thus, if we are to attack the problem by raising the Estate tax exemption, I strongly urge that this increase be limited to the kind of illiquid estates we truly wish to preserve. There should also be provisions to assure that the land and assets will be used for the intended purposes for a specific period of time, such as five years. I fully agree that the marital deduction should be brought up to a more realistic figure. This will save the farm widow or widower much unneeded suffering, and will not significantly alter the intergenerational workings of the estate tax structure.

The valuation of farm and woodland according to current use could be an alternative, or used in addition to, an increase in estate tax exemptions. I must add the caveat that any such amendment to the tax code should be carefully drawn to avoid attracting wealthy non-farmers into land speculation. In this regard, some of the 31 states which have adopted measures of this variety have experimented with mandatory ceding of development rights over to public authorities.

Finally, I believe some of the better results envisioned by President Ford's proposals for delay in payment of estate taxes would be achieved through reform of Sec. 6166. The liability for these installment payments should be attached to the estates as a lien, rather than personally to the executor.

By judicious consideration of these alternatives, I believe this Committee and the rest of the Congress can perform an invaluable service for the farmers, small businessmen, taxpayers, and citizens of our country.

Thank you.

STATEMENT OF CONGRESSMAN ED JONES
BEFORE THE
HOUSE WAYS & MEANS COMMITTEE
March 19, 1976

Mr. Chairman, members of the Committee, I appreciate the opportunity that you have afforded me to present some comments during these hearings on proposals to update federal inheritance and gift tax laws. What I am going to say is certainly not going to be original, but I did want to present you with some view of how the present taxing structure affects both family farms and family owned small businesses in my Seventh District of Tennessee.

By and large, my Congressional District, located in the Northwestern portion of Tennessee, is a predominantly rural one whose economy is based upon agriculture and related agr-business. For the most part, our farms and small businesses in my district are family owned. The average sized farm in Tennessee is about 123 acres valued at $516 per acre. That, Mr. Chairman, means that the avearge farm in Tennessee is valued at $64,468 in land values alone. When one considers the terrifically high investment needed to purchase farm implements and farm buildings at today's prices, it is easy to see how farmers in Tennessee can accumulate an estate in excess of $60,000 without really trying to become a large farming operation.

On the small business side of the coin, the same situation holds true. To establish oneself in business even in the small communities of my district takes a great deal of capital investment and in a few years that investment appreciates to the point where the small businessman is worth a good deal more than his original investment.

But the crux of the problem is that in both cases, the net worth of both the small businessman and the farmer, as a general rule, is tied up in capital investments such as land, buildings, machinery, and the like. His assets are not in the form of liquid assets such as cash or bonds. As a result, when the farmer or business owner dies, his heirs are responsible for such a large inheritance tax that they have to sell a large portion of the farm of the business that they don't have anything left to continue the operation of that farm or business.

Mr. Chairman, from a historical point of view, this is a terrible injustice. It means that to continue along our present path will result in the loss of the family farms in this country and the family owned businesses. Both of these institutions hold a prominent position in the historical development of this country and should be offered some protection.

Our large corporations with thousands of stockholders serve their purpose in our economy and so do their little brothers in small towns and in the surrounding countryside. Those small businesses and farms were the cornerstone of this nation when it was founded. To keep them, we have got to offer some protection so that today's family farmers and and businessowners can pass their operations onto their children and the generations ahead.

I would like to take this opportunity to endorse the proposal to increase the estate tax exemption from $60,000 to $200,000 and to raise the maximum marital deduction. In addition, I would also like to see a procedure established to permit the executor of an estate to elect to have land used for farming, woodland, or scenic open space assessed for estate tax purposes on the basis of its current use rather

than its higher potential uses.

Such adjustments in our estate tax laws are essential if this nation is to continue to provide incentives for its people to go into business and operate family farms. Without such adjustments, I am afraid that we will effectively destroy, in a very short time, those family farms still in existence and take away any incentive from our younger men and women who what to go into business for themselves.

Thank you, Mr. Chairman and members of the Committee.

National
Farmers Union

Statement of

David M. Weiman
Legislative Assistant
National Farmers Union

on

Estate and Gift Tax Oversight

before

U.S. House of Representatives
Committee on Ways and Means

March 19, 1976

Mr. Chairman and Members of the Committee:

The National Farmers Union appreciates the opportunity to present its views on this important issue -- an issue that ultimately affects each and every member of our organization and each and every farmer.

Accompanying me is Mrs. Beulah Torgerson of McFarland, Wisconsin and a member of the Wisconsin Farmers Union. Mrs. Torgerson recently experienced the loss of her husband, a life-long family farmer. The loss of her husband was compounded by the shock she received when she sat down with the Internal Revenue Service in an effort to settle her husband's estate. Her plight -- her personal situation -- typifies why changes in these laws are needed. She has a statement to make before the Committee and a letter to submit for the record.

At present, our national convention is being held in New Orleans. Delegates to that convention, in a Special Order of Business, adopted the following resolution regarding needed changes in the estate and gift tax laws:

> "In recognition of the fact that the Ways and Means Committee of the U.S. Congress is conducting hearings on proposed changes in the Federal Tax Codes that will uniquely affect family farmers (and small businesses), this Convention of the National Farmers Union hereby adopts as a 'Special Order of Business' the following resolution:
>
> "The Federal Estate and Gift Tax Laws should be amended to include the following:

"(1) Raising the exemption from $60,000 to $270,000;

"(2) Raising the gift tax exemption from $30,000 to $60,000 per person;

"(3) Utilizing use value taxation basis in determining the value of a farming estate.

"(4) Increasing the annual gift tax exemption from $3,000 to $6,000 per person.

"(5) Allowing transfer of the first $240,000 of farm business and related property to a surviving spouse, tax free, at the time of death.

"Since 1972 delegates to each succeeding Farmers Union Convention have adopted a policy calling for a change in the federal estate codes. We, therefore, commend the Ways and Means Committee for holding these hearings and urge that the Committee act promptly to report legislation to the House floor."

This is not a new issue for us. In 1972, recognizing the problem, our delegates to the National Farmers Union Convention called for a reassessment of the estate tax laws. And, in each of the succeeding years, delegates to National Farmers Union Conventions have adopted a policy that urges Congress to adjust the estate tax exemption.

Family farming is more than the present generation of family farmers on the land -- it's a succession of generations on the land. The family farm is the keystone of our highly successful agricultural system. It must be preserved.

However, the estate tax policy today, rather than sustaining and assisting the creation of the next generation of family farmers, is working against them. In some cases, family farmers are driven from their chosen way of life -- tneir livelihood because of this policy. When that happens, the chain is broken and we find that the often-stated and cherished public policy is operating in opposition to itself.

The present generation of family farmers -- those presently owning and operating the nation's family farms probably paid little or no estate tax when they acquired the land from their family (assuming that's how the land was acquired and that it was acquired more than ten-fifteen years ago). However, inflation in the last several decades has been substantial. Consider the following:

1) farm real estate values in 1975 were, on the average, 11 times greater than 1940; and

2) the value of farm assets has more than tripled between 1960 and 1974 ($50,000 to more than $170,000).

In many cases, the size of the farm is the same. The buildings are the same. The farmhouse is the same. In short, the farming unit has remained unchanged, until the federal government comes around to collect the estate tax. Only then, does that farm become considerably larger.

The problem is obvious. Like small businessmen, farmers generally have all they own invested in the family farm. Liquid assets are generally a small percentage of the enterprise. Therefore, there is great difficulty in paying the taxes due on the estate. According to a 1973 USDA-Economic Research Service Report, "70 to 90 percent of total farm assests are in the form of fixed assets (land and buildings)." Thus, to pay the tax, either part or all of the farm must be sold. When that happens, then family farming is disrupted. The continuity of passing the land from one generation to another is destroyed.

Unfortunately, most farmers don't fully appreciate the impact inflation has had on their farming operation and therefore are generally unaware of their estate tax liability -- the tax that would be owed if they died today. We surveyed several hundred members of the Farmers Union in Wisconsin last January and found that only a third had any idea of the tax liability. Less than half had a will.

Another inequity in this policy is the treatment of the farm wife after the death of the husband. Her contribution, often equal to the husband, is unrecognized. The tax penalty is severe -- and grossly unfair. Many farm wives sit on tractors, work in the barn, and tend to the same chores as their "farmer-husbands". Frequently, they actively assist in the management of the farm by keeping the books, ordering supplies, and assisting with marketing responsibilities. A quick trip through almost any farming community would confirm this. However, that "partnership" is unrecognized for estate tax purposes. That must be changed.

Naturally, we are pleased with the interest in this legislation as evidenced by the scores of bills introduced in the House and Senate. Even state legislatures are looking into the problem. We believe that any bill reported by the Committee should contain an adjustment in the gift and estate tax exemption, mandate use value taxation (as opposed to the market value as is currently used), increase the annual gift tax exemption to $6,000 and very importantly, allow the transfer of the $240,000 to the surviving spouse, tax free, at the time of death.

Mr. Chairman, we are pleased that the Committee is holding these hearings in recognition of the serious hardship -- the unnecessary hardship -- this outdated policy is causing on many farmers throughout this nation. Let's keep the farm in the family and the family on the farm. We urge the Committee to immediately report a bill for consideration by the full House of Representatives.

To the Members of the House Ways and Means Committee:

As the saying goes, "We are never afraid of fire until we get burned." The same is true of the many unjust laws that are in our statutes today.

Many people are not aware of these injustices, until they find themselves in a situation where they are affected personally. Some people accept the consequences, others frown, and another group takes action.

We find there are Federal laws and State laws that can be listed in this category.

I am here referring to the Federal and State Estate Tax. We call it the "Widows Tax."

I became a widow in 1973 and then came the shock of my life time, when I came to settling the estate, which we had set up in Joint Tenancy in 1942.

We started farming on my husband's family farm in 1931 at the depth of the depression. My husband, previous to our marriage, had worked for a small wage for his parents on the farm, and I had been teaching school. I taught school one year after our marriage and I hired a housekeeper to keep the boys fed while I was in school. After that year, my husband said to me, "Why don't you come home and help me on the farm, we'll make more than you will teaching?" The teachers in those days didn't get the wages they do today.

At that time we were renting the farm from his mother on a 50, 50 basis after taxes and insurance were paid.

I had been raised on a farm as a child, so I was well aware of all the work involved. Working outside with chores and milking cows as well as helping in the field. This was the story of my life for forty two years.

We bought the personal property and live stock in 1936 after the death of my husband's mother, with a 100% Farm Security Loan. Then in 1942 we purchased the farm with another 100% loan.

We had developed a Grade A dairy farm and it was my responsibility to keep the milk house and dairy equipment ready at all times for Grade A inspection. During the

spring planting season I was out on one tractor in the field preparing the ground while my husband was on another tractor sowing grain or planting corn.

We had the help of nephews during the summer school vacation to help us with the harvest.

I raised chickens so as to have eggs to pay for our groceries.

Vacations were not in the picture. We farmed for forty years without taking time out for rest or pleasure.

Going back to the 1920's and 1930's I had managed to save approximately five thousand dollars, I also had a small inheritance which brought it up to about $6,000. which I put in the bank in our joint account and it was spent to pay for seed, fertilizer, gasoline, or whatever was the need. In those days we got 78¢ per cwt for milk, 5¢ a pound for hogs, 6¢ a dozen for eggs, and 4 to 5¢ a pound for tobacco. But as we approached the World War II years the economy came up and we were able to pay off the farm and add another forty acres to it.

Our farming was not without it's accidents. My husband fell in the tobacco shed while hanging tobacco and broke a couple of vertebrae,which bothered him the rest of his life, and in 1965 I was run down in the barn by a heifer and broke my leg and as a result I have a metal ball in my hip today.

We sold the farm in 1972 and my husband lived only eleven months in retirement and died of terminal cancer.

Then came the settling of the estate. I found I was paying taxes in such a high bracket, because the tax exemption hadn't come up with the economy. I also found that our Joint Tenancy in the state tax laws had been changed in 1972 so all the forty two years of my hard work on the farm I was supposed to only have earned my bed and board.

When it came to settling my estate the $6,000 of my personal earnings that I had put in to carry on our farming enterprise was only credited dollar for dollar and hadn't come up with the economy.

After forty two years I was only credited with the $6,000 I originally invested and that was it!!!

At this point I absolutely refused to pay on my half of the Joint Tenancy. I said, I'm going to fight to change this unfair law. The Internal Revenue people told me if I could change the law they would honor it.

The Internal Revenue people also told me of a case similar to mine up in Marrithon County, and if it was decided by the Supreme Court in favor of the Joint Tenancy, they would honor my case too. However, it wasn't brought up before the Supreme Court until this week and the judge decided in her favor.

The Bill to change the estate taxes is now up before the Wisconsin Legislature and we are sure their action will be favorable.

In the state of Wisconsin the women started a campaign to change these unfair laws. Our Legislature is now in the process of changing these laws to do away with these inequities.

I also urge this Committee to exercise your influence to legislate action to change the inequities of the Federal Estate Tax laws, bring them in line with the inflation and other changes in the economy, so that the family farm or the small business can be passed on to the heirs without having to sell to pay the taxes.

I agree with Senator Gaylord Nelson when he said, "The sure way to change the historic character of our free enterprise system from reliance on independent, imaginative small businesses and family farms to absolute dependence on massive corporations is to neglect tax reform after discovering proof that the present system is undermining our system."

We sincerely support Senator Nelson's bill.

Respectfully yours,

Beulah Torgerson

3/19/76

STATEMENT OF BRICE M. CLAGETT,

CHAIRMAN, MARYLAND HISTORICAL TRUST,

TO THE COMMITTEE ON WAYS AND MEANS,

U.S. HOUSE OF REPRESENTATIVES,

March 19, 1976.

Mr. Chairman: I am Brice M. Clagett, speaking on behalf of the Maryland Historical Trust, of which I am chairman of the board of trustees. The Trust is the agency of the Maryland State Government charged with historic preservation. Our mandate includes not only preservation of historic structures but also of their surroundings and of as much of our State's traditional rural environment as feasible.

I appear in support of H.R. 3832 and in qualified support of H.R. 1793.

In our efforts, we have found the federal estate-tax law to be the greatest single impediment and the most destructive anti-environmental influence we face. The gist of the problem is the law's insistence on valuing land at its highest development or speculative value, not at its value for the use to which it is put. The result is, of course, that on the death of a farmer or other owner of open land, unless he has enormous and unusual cash resources, his heirs are compelled to sell the land to developers or speculators in order to pay this monstrous tax. This is not only wholly unjust to individual farmers and other citizens, but has disastrous environmental consequences.

Thus the estate tax is in effect operating as a national zoning law providing that all land close enough to an urban area to be affected by speculative values must be put to its most intensive use at the death of the current owner. No more stupid or damaging policy could be imagined. It encourages, indeed requires, unchecked suburban sprawl. We believe it imperative that the law be changed to provide that farmland and other open land be assessed for estate-tax purposes at its value for its existing use. This would make our law conform to the law of every other country that we know of. It would not give any special privilege or favor to farmers or other owners; it would merely tax them at the value of the land to them, and if they want to change its use the higher tax would be recaptured. Nor would such a change, as is sometimes charged, use the tax laws for non-tax, environmental purposes. It is the present law which compels environmental change, in a bad direction. The farmland-assessment principle would not compel anything, but would merely permit owners who wanted to preserve their land to do so.

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The problem is not theoretical or minor, but intensely real, in Maryland and every other area across the nation threatened with development and speculative values. We know of countless examples of farms and open land in Maryland, including the surroundings of numerous historic sites, many of which have been in the same family for hundreds of years, which have been destroyed solely through the operation of the estate tax. We know of hundreds more that will be destroyed soon if the law is not changed. We implore you to act, and to act now.

In the historic-preservation area, the estate-tax law goes directly counter to the federal policy embodied in the Historic Preservation Act of 1966. What could be more ironic than the case of a rural historic site which with its surrounding open space is listed on the National Register of Historic Places, and thereby protected against adverse impact from federal projects, but which is forced to be sold and developed solely by operation of the estate-tax law? Yet this happens, to our knowledge, with great frequency.

Take the case of a farm of 300 acres, owned by Farmer Jones, a widower, who also has farm equipment and other personal property valued at $50,000. Used as a farm, the land is worth $500 per acre. If the estate tax were based on an assessment for that use, Jones' estate would be valued at $200,000 and the tax payable would be $32,700 -- a very large sum for the Joneses, but one which the family might be able to pay and still retain at least most of the farm. However, the farm is within 50 miles of a large city, and speculators and developers have driven up the current price of land in the area to $2,000 per acre.*/ Such prices of course assume conversion of the land to non-farm use -- a conversion which the heirs have no desire to accomplish. Nonetheless, the Internal Revenue Service under existing law assesses the farm at $2,000 an acre. The result is a valuation of Jones' estate at $650,000, and a federal tax payable of $177,200.

Obviously, the family is compelled to sell the farm, probably to a speculator or developer, in order to pay the tax. The result is federally compelled destruction of farmland and open space in a critical environmental area on the border of a metropolitan region, and the acceleration of urban or suburban sprawl with no regard for proper land-use planning. If the house is a historic one, the result is the federally compelled destruction of a historic house, or at least of its surroundings -- the very thing the Federal Government is supposedly trying to

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*/ This is not only a realistic example, but an extremely modest one; speculation often drives the market price of farmland far higher than $2,000 per acre.

prevent through its National Register and other programs. And the result for the Jones family is the gross injustice of being forced off their farm and being compelled to pay an estate tax amounting to a confiscatory 89% of the value of what the estate is worth to them for the purpose to which they wish to put it.

The proposal merely to defer payment of the existing tax over a longer period is obviously no solution. Nor is increasing the exemption an adequate solution, though clearly the exemption ought to be increased on grounds of inflation alone. In the example just given, with a $150,000 exemption the tax would be reduced only from $177,200 to $145,700. A 200,000 exemption would reduce it only to $129,700. These figures are still absurd when applied to farmland at speculative values. Plainly, the only just and environmentally sound solution is to tax farmland and other open space on its values for its existing uses. We in Maryland adopted that method for property taxes many years ago, and other states have increasingly followed our example. It is high time that Congress woke up and followed suit.

I understand that you have heard from relatively few environmental and preservation groups on this issue. Let me assure you that many of them are fully aware of it and feel just as vehemently about it as I do. But most of them have told me that they do not dare to testify because of the fear of losing their tax-exempt status.

We strongly advocate enactment of something like H.R. 3823, in our view the best of the bills you have before you on the farmland-assessment point, together with an increase in the exemption to $200,000 as provided in H.R. 1793 and many other bills.

Bills 3823 and 1793 would make basically the same change in the assessment method, but there are a number of respects in which we think H.R. 3823 is superior:

(1) H.R. 3823 applies the existing-use assessment principle to all properties listed on the National Register of Historic Places; H.R. 1793 does not. Rural National Register properties would be protected by the provisions common to both bills. But the same problem can apply to an urban National Register site; for example, a historic house built and used (and only suitable for) a residence, which happens to be located in an area zoned for high-rise apartments. Assessment on the present development-value basis obviously requires in most cases that the house be torn down and replaced with high-rise apartments, in direct frustration of the federal preservation purpose which led to the National Register listing. So a special provision for National Register properties is necessary, and H.R. 3823 includes such a provision.

(2) Clearly, any legislation must, to avoid becoming a loophole for speculators and developers, provide for a recapture of the higher tax if the land is developed within a certain period. H.R. 3823 makes this period the entire lifetime of the heir, with interest for ten years. H.R. 1793 makes the period only five years, with no interest. We think H.R. 1793 is clearly too lenient and creates the possibility of loopholes. Yet it might be concluded that H.R. 3823 is so strict that it will discourage owners from electing the alternate valuation and therefore will defeat its own purpose. If the Committee concludes that the lifetime provision of H.R. 3823 is too strict, we would suggest a period of perhaps ten or fifteen years, probably without interest.

(3) H.R. 1793 invokes the recapture-of-tax provision only if the land is sold or actually developed; H.R. 3823 also includes, as an event of recapture, rezoning at the request of the owner. We think H.R. 3823 is clearly preferable, especially given the short recapture period in H.R. 1793.

(4) H.R. 3823 includes, as one of the categories to which the use-value assessment would apply, "open space." H.R. 1793 makes this "scenic open space." "Scenic" is a subjective word and we do not see how it could be applied. The bill should include <u>all</u> open space.

(5) H.R. 1793, in an attempt to simplify the recapture provisions of H.R. 3823, provides for recapture of the entire higher tax in the event of any sale. This is clearly wrong; if the sale price is the same as the farm value, on which estate tax has already been paid, obviously no recapture is called for. If the sale price is somewhere between the farm value and the development value, a proportionate recapture, of less than the full amount, is appropriate. The provisions of H.R. 3823 are precise and correct on this point.

* * *

There is one other problem to which I would like to draw the Committee's attention. One of the main objectives of historic and environmental groups, such as ours, is the acquisition by gift of preservation or open-space easements on important properties. Such an easement, whether permanent or for a term of years, obviously reduces the market value of the property by some amount. Of course no owner in his right mind would grant such an easement unless that reduction in market value is recognized for estate-tax purposes, nor would he grant such an easement if a gift tax is going to be imposed on him for doing so.

The law was clear as to proper tax treatment of such easements prior to the Tax Reform Act of 1969. However, that Act, and particularly Sections 2522(c)(2) and 2055(e)(2), introduced grave problems. As interpreted by the IRS, the law is still fairly satisfactory with respect to permanent easements. But the donor of an easement for a term of years apparently must pay a gift tax and/or will not have the reduction in value of his property recognized for estate-tax purposes. The problem is spelled out in an excellent article by Kingsbury Browne, Jr. and Walter G. Van Dorn in an excellent article, "Charitable Gifts of Partial Interests in Real Property for Conservation Purposes," Tax Lawyer, vol. 29, p. 69. They show that the possible dual-benefit problem which led to the provisions of the Tax Reform Act has no application to the estate and gift tax areas, and indeed that where easements are concerned there is no earthly reason why the donor should not receive an income-tax deduction.

Organizations such as ours have found that easements for terms of years are important and effective means of conservation and preservation. There are many valid reasons why some owners are unwilling to grant permanent easements -- perpetuity is a long time -- but are willing to grant easements for a term of years. We urge an appropriate change in the completely arbitrary and unreasonable provisions of existing law which penalize rather than reward the donor of such an easement.

* * *

Attached to this statement are a number of newspaper and other items dealing with the problem to which H.R. 3823 and 1793 are addressed, including Senator Mathias' statement on introducing S. 80 (virtually identical to H.R. 3823), which has some further important newspaper items appended to it.

Death Taxes Compelling Heirs to Sell Farm Land

(New York Times Feb. 15, 1976)

By ROY REED

Special to The New York Times



The New York Times/Gary Settle

Doris and Lloyd Royal at their farm near Springfield, Neb.

SPRINGFIELD, Neb. — Lloyd Royal, 59 years old, drives a 7-year-old Chevrolet with 110,000 miles on it. He lives in an ordinary farmhouse next to a barn lot. If anyone called him rich, he would laugh.

But if he died his wife, Doris, would have to pay $32,000 to the Internal Revenue Service in Federal estate taxes. That's because their modest farm has quadrupled in value since they bought it, thanks to inflation and spiraling land prices. They have become "paper rich."

"There's an old saying that a farmer lives poor and dies rich," Mrs. Royal said this week. "If he died, I'd be in the job market and probably at the minimum wage, because the only thing I know anything about is farming."

Death taxes are making it increasingly difficult for farm families to keep their land. Children who inherit land usually pay even higher taxes than spouses. Just this week, a man near here had to sell his parents' 80-acre farm to pay the death taxes. He sold it to one of the largest landowners in the area—a pattern that has become familiar in the farm country here and elsewhere.

Farmers in New Jersey and on Long Island have also told of hardships because of the tax structure — and many are seeking change.

The inflated land prices that have caused death taxes to become a problem are also keeping young people from entering farming. It now takes at least $250,000 by many estimates to start farming after high equipment prices are added to high land prices.

From her kitchen table, Mrs. Royal has set out to change what she and many others regard as an absurdity in the tax law. She and a handful of friends have rounded up 70,000 petition signers in 42 states asking Congress to act on it.

This election year is apparently going to bring a new attack on the problems of death taxes and prohibitive start-up costs for farmers.

President Ford and several members of Congress have proposed legislation to make estate taxes more bearable for all small and middle-sized estates, including those of farmers. The proposals vary widely.

Senator George McGovern, the South Dakota Democrat, and 16 other Senators representing varied philosophies have introduced another bill to have the Federal Government buy land, lease it to young farmers, then sell it to them at a reduced price after seven years' labor.

The Young Farmers' Homestead Act, as the bill is called, has drawn favorable attention from such varied sources as the National Farmers Union and Progressive Farmer Magazine.

Progressive Farmer, a generally conservative publication, cited projections that 200,000 to 400,000 farms a year would disappear for the next 20 years if today's trend was not stopped.

"The legislation faces up squarely to what probably has to be done if not-rich but bright youngsters are really going to get into ranching or farming for themselves," it said in its January issue.

Estate taxes were no problem to farmers until a few years ago. Federal law exempts the first $60,000 of an estate from the death tax. Most farms were worth nowhere near that when that law was written in 1942.

W. Fred Woods, an economist with the Agriculture Department, estimates that the average value of farm assets in the United States was only $51,440 in 1960. By 1974 that had climbed to $169,744.

Farm values have continued to rise. Land prices in eastern Nebraska are going up more than 20 percent a year, according to observers.

Typical Estate: $320,000

In 1960 the Royals paid $72,000 for their 240 acres—a small farm by Nebraska standards. Today, the land alone would cost close to $300,000. The Royals have become rich in the eyes of the Internal Revenue Service, even though they live little better than they did in 1960.

Gilbert Brody, president of the Wisconsin division of the National Farmers Union, says a farmer who earns $10,000 to $12,000 a year typically leaves an estate valued at about $320,000.

His widow pays a Federal estate tax of $20,200 on that, in addition to smaller state inheritance taxes.

When she dies, the children pay $83,190 in estate taxes, their share being larger because they do not receive the 50 percent marital deduction. According to Mr. Brody, the children probably will have to sell the farm to pay the death taxes.

President Ford has proposed delaying the payment of those taxes until five years after the death of the owner. Then the heirs could elect to pay the tax over 20 years, with the addition of 4 percent interest. Heirs may now stretch the payment over 10 years, but at an interest rate of 7 percent.

Mr. Ford's 20-year proposal would apply only to the first $300,000 of an estate. Descending benefits would be allowed up to $600,000, after which the present 10-year stretch-out provisions would apply.

$200,000 Exemption Proposed

The Royals and their friends do not think much of the Ford proposal. They regard it simply as a postponement of an unjust debt.

"What on earth good is that when you don't have that kind of money in the first place?" a California woman said in a letter to Mrs. Royal.

At least 10 bills pending in the Senate would raise the $60,000 exemption to $200,000 on all estates, farmers' included.

Other bills would require the I.R.S. to assess farmland at its agricultural value and not at the "fair market value" it would bring if sold for some other use.

•Land values here are being pushed up by the growth of Omaha, which is less than 25 miles from the Royals' farm. As the city pushes out, it absorbs farmland at dizzyingly inflated prices and converts it into housing developments and shopping centers.

Many argue that farmers would be less likely to sell to developers if their land was assessed at its value for farming and not for commercial or residential use.

Arthur H. West, president of the New Jersey Farm Bureau, said that Federal estate taxes, inflation and the system of appraising property had imposed unfair burdens on farmers. He added that many New Jersey farmers were actively supporting proposed legislation that would require that the assessment of a property be based on its value for farming.

Mr. Woods, the economist, warned in a recent interview in Washington that changes in the estate tax law should be made carefully if they are not to exacerbate the problem. . .

Assessing land at its value for farming or as open land instead of at fair market value could result in a low-tax device for the wealthy in passing their estates on to their heirs, he said.

"That would run up farmland prices and make it more difficult for producing farmers," he said.

Letters of Hardship

No one knows how many farmers have had to sell land to pay estate taxes, but there are indications that this is happening more often.

Thomas Pulaski, who used to own a 25-acre potato field near Riverhead on Long Island, says he sold his farm because of his tax bill. He drives a truck for a living.

Mr. Pulaski, who lives in Coram, L. I., said: "If I had decided to stay on my farm after my father's death, I'd have spent half my lifetime paying of loans through which my taxes would have been paid." He sold his property to a real-estate developer and made $6,000 profit—after taxes.

Suffolk County, New York State's largest agricultural county because of its potato and cauliflower crops, is trying to encourage farmers to stay by means of a farmland preservation program. In a $60-million project, the county is buying development rights—not the fee title — to the existing 57,000 acres of farmland. In effect, a farmer will get the market value of the property from the county and may keep the land. But he must agree not to use the land for any purpose other than agriculture.

More than half of 258 farmers surveyed last month by the Wisconsin division of the National Farmers Union said they had known farm families that had had to sell all or part of their farms to pay estate taxes.

Many of those who have written to Mrs. Royal have told of hardships caused by the tax. After her campaign was described by the Farm Journal last fall, the magazine received a letter from William Jones of Lakeport, Calif.

"Our orchard land has been in the family for over 100 years," he wrote, "and now because of this unfair tax in an inflationary period, the resources of the family [never more than provided a living for the family during the past 30 years] is now about to be confiscated by the Government for taxes."

Another Californian, William G. Cox of Capistrano Beach, wrote that his family had already lost its farm because of an exorbitant estate tax bill after his mother's death.

"The I.R.S. is killing the goose that lays the golden egg," Mr. Cox wrote. "The big corporations that are buying up the small farms will never pay another death tax on the land because a corporation never dies. Forming trusts and corporations within families seems to be the only way to go now."

Dixon G. Adams, a Springfield lawyer who is donating time to Mrs. Royal's campaign, estimates that 40 or 50 of Sarpy County's 600 farms have been incorporated in recent years to escape or lessen the impact of death taxes. But many farmers resent that alternative. They feel that incorporation would impose more bookkeeping and "red tape" and would diminish their independence, Mr. Adams agrees.

"I don't want to construct a scheme where a farmer has to have a lawyer and a C.P.A. riding on the tractor with him," he said. "We are doing it, though, because of necessity."

Many of the farm wives who write to Mrs. Royal complain of what they believe to be sex discrimination in the Federal tax law. These women dislike being treated in the same way as wives of city residents and millionaires.

Federal law allows a widow to deduct from her tax payment any financial contribution she has made to the family estate, but only if she can prove it with payroll check stubs or the like. Simply working shoulder to shoulder with her husband on the farm for 30 or 40 years is not enough for the I.R.S.

Resentment against that drew Mrs. Royal into her campaign. "I got started one day during the blizzard of 1975," she said. "I had been out in the snow all day helping get the cattle into the barn and then throwing hay to them and getting everything ready for the storm.

"I got back in the house after dark, worn out, and I said, 'Lloyd, do you realize that I haven't contributed a dime to this farm today, according to the I.R.S.?' If he'd have dropped dead the next day, I hadn't done anything at all the day before, as far as they were concerned at the I.R.S."

Mary Heath is a rancher in the sparse sand hills of northern Nebraska, where the grass is so thin that it takes 20 acres to sustain one cow, and where the winters are so grim that only the hardiest can survive.

Her husband, Floyd, died a year and a half ago. She inherited a $40,000 debt along with the ranch. Cattle prices have been depressed for three years.

Now she has had to borrow another $5,000 from the bank to make the first payment on her estate tax. The tax, by her figuring, is $28,000. She has been waiting for months to learn whether the Internal Revenue Service will settle for that.

"When the Government takes my place away from me, it takes my livelihood," she wrote to Mrs. Royal. "I don't know where I can get a job at my age [55] and I'm not old enough for Social Security. This is all the work I know how to do. I wouldn't even be able to get housework for I'm not much good at that, either. My work has been with cattle and hogs.

"I had worked alongside of him from the time we got this place. I don't consider this place a gift. It makes me sick to think I'll lose everything my husband and I worked for. Unless times get better it could very well happen."

February 5, 1976

National Trust for Historic Preservation

National Conference

on

Public Tax Policy: Effect on the
Conservation of the Built Environment

* * *

Federal Taxation: Current Practices, Procedures and Effects

by

John B. Jones, Jr.*/

When a tax lawyer is asked to speak on The Effect of Public Tax Policy on Conservation of the Built Environment, his first thoughts may well be of those intricate and imperfectly integrated rules of Federal income, estate and gift taxes which offer tax benefits for contributions of historic property for conservation purposes. These could be characterized as the benign aspects of Federal tax policy.

We must not forget however that in most societies, including our own prior to this century, historic property often became such by being passed down within a family

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*/ The invaluable assistance of my associate, Michael R. Levy, is gratefully acknowledged.

from generation to generation. It is the Federal estate tax which makes it impossible for this process to continue.

Historic property held in private hands in America today is subject to Federal estate tax at rates which reach 30% after only $100,000 of taxable estate and mount to 77% in very large estates. Under present laws it is sometimes possible to arrange it so this tax is paid only every other generation; it is rarely possible to do better than that. Few families can afford to pay an ad valorem tax of, say, 45% of the value of property twice a century.

The frequency and the rate of estate tax would be bad enough, but we must also recognize that the tax is imposed on the property's "fair market value" which is based upon the property's highest and best use. This seemingly innocuous phrase means that if the property is capable of subdivision and development, the fair market value is the price which the most intense developer will pay for the land. However, assuming that the historic property's present use is economically unproductive, its value to the family is substantially less than the fair market value on which the tax is imposed. By decision to preserve the property rather than to develop it, the family has in effect declined to receive the speculative value of the property which exceeds its current use. Yet they will be taxed on the higher value.

By its insistence upon periodically taxing all privately held property at the speculator's value, the government actually compels families to sell their property to developers in order to generate sufficient funds with which to pay the exorbitant tax. In his most recent State of the Union Address, President Ford alluded to the similar problem created by the imposition of the estate tax upon family farms. This is an, therefore, opportune time to alert Congress to the very same phenomenon occurring in the area of historic preservation. Indeed, there are currently before Congress identical bills, H.R. 3832 and S. 80, which would relieve this problem by basing the estate tax on farms, estates and national register property upon the value of the land as it is being used rather than the speculative value as under present law. Of course, provision is made for recapture of the estate tax saved in the event the heirs try to realize on the untaxed value. Certainly some legislative change of this type must be made if private preservation of historic property is to continue.

BALTIMORE SUN, May 19, 1974

The housing developments are creeping up on the cows. Some 2.7 million acres in the state, or 40 per cent of the land, are in farm production but that amount is dwindling every day. Recognizing this undesirable trend, the state has set up a commission to study how to preserve farmland. This group has set as a goal the preservation of 2.5 million acres.

Disappearing farms

By MICHAEL K. BURNS

In the years of agricultural abundance, not so long ago, United States farm policy was aimed at moving land out of production. That policy did not seem to work so well then but its effects are being felt today when the nation is realizing it might be better off with more farms and farmers.

Rising prices at the supermarket reflect the world's demand for more food. And the environmental movement has inculcated a reverence for open space and a revulsion against the devastation of suburban sprawl. Expansion of the domestic farm system seems to answer these non-farmer needs of society.

Forces are at work to create a coalition between the farmer and the environmentalist to preserve farmland as a privately held public heritage. But the alliance is still in the formative stage. Farmers distrust the conservationist who would freeze the value of his land under land-use laws, and chafe at his efforts to restrict uses of chemical and pesticides. Conservationists and consumers are wary of the producers of ever-more-expensive food and the owners of large spreads of high-priced rural real estate.

Land speculators have perhaps been the key element in the forging of the common interest. Population pressures and the ever-growing highway system created new fortunes for property holders who stood in the path of progress. Farmers did not create the boom, but they were quick to appreciate its possibilities for a windfall. A glut of reckless, shotgun speculation in farms throughout the state followed. And those farmers who sold out made it even harder for their neighbors to resist.

Some 2.7 million acres in the state, or 40 per cent of the land, are in farm production. By one estimate, that amount will dwindle to 1 million acres by the year 2000. Recognizing this undesirable trend, the Maryland Senate last year ordered the Secretary of Agriculture, Y.D. Hance, to make a study of means to preserve farmland. Mr. Hance appointed an 18-member commission with Frank L. Bentz, Jr., University of Maryland vice president for agricultural affairs, as chairman.

The commission has set as a goal the preservation of 2.5 million acres of agricultural land. Members are uncertain how fast farmland will be eaten up in the future: one subcommittee suggests 35,000 acres a year, another 62,000 acres. But they seem to agree that speculation, or investment, is a greater factor than the immediate demand for housing or commercial development.

"Agricultural and commercial forest land acreage will decrease more than three times as much as urban-related land commitments will increase" by 2000, the group said in an interim report. Some of that land will be granted a temporary reprieve, as speculators rent it to farmers, but its fate is sealed. This despite the fact that there will be 50 per cent more people living on an acre of Maryland in 26 years than there are today.

As a commission subcommittee noted, preserving agricultural land can only be based in part on the actual demands of future population growth. Unrelated economic factors influence a number of individual decisions to give up farming and to take advantage of the speculator's offer. Farm prices are expected to increase and provide a return of about 15 per cent on capital (exclusive of land), the commission reported. But a shortage of labor, heavy indebtedness and taxes may encourage all but the dedicated to give up.

Farm prices have shot up all over the state with little relationship to productivity and food prices. Farms that sold for $200 an acre in Frederick county 15 years ago are now worth $30,000 an acre by the new shopping mall. Even residential lots, minus sewer and water, are selling at $4,500 an acre.

In Anne Arundel county, developers are paying $3,000 an acre for average farmland as they leapfrog over sewer-connection bans in Montgomery and Prince Georges counties.

Partially influenced by the expanding Black & Decker power-tool plant, land in the Hampstead area of Carroll county is selling for an unheard of $7,000 an acre. "A couple of years ago, $1,000 was high for land in this area," recalled Paul R. Albaugh, a dairy farmer. "Now, I don't know of any land sold that's going to other farmers . . . they can't afford it."

"I don't think you can talk to a farmer who hasn't lost ground over the last five years," said Carroll Leister, whose grandfather bought the land he farms today. The small parcels of land a farmer rents for $15 to $20 an acre are sold off each year as land values rise, he explained. "The by-pass is going through 25 acres of our land and that will bring more houses," Mr. Leister said. "I guess in five years after the road is built we'll be out of here."

Developers and farmers covet the same type of land, Mr. Leister added. "That's the thing that hurts: they're buying the good flat, cleared land, not the woods or the hilly areas," he said. According to the state, more than 20 per cent of Maryland's "prime" farmland has been lost to urban use.

The commission headed by Dr. Bentz is to make final recommendations on legislation to Mr. Hance next month. So far, the group has explored several possibilities which have been discussed at a series of hearings in the state. The revision of federal estate taxes and state inheritance tax is one promising idea. Senator Charles McC. Mathias Jr., (R., Md.) and Representative Goodloe E. Byron (R., 6th) have introduced bills to change the estate tax, so that heirs are taxed on the agricultural value of farmland instead of on "fair market value." The lower valuation would make it easier for heirs to pay the taxes without selling the farm; if they did or if they developed the land, they would be subject to a retroactive higher levy. The chairmen of the Maryland Environmental Trust and the Maryland Historical Trust support the measure as a valuable open-space tool.

The loss of farmland due to the estate tax valuation has not been extensive. Many heirs are all too willing to sell and farmers do the same thing to create heir retirement annuity. But it does help to keep farms in the hands of those families who want to continue at it, and they are becoming more rare. Herbert and John Wisner of Mt. Zion worked their father's farm since they were children, but had to form a corporation to save the land with a mortgage when it was inherited as an estate. "They should have done something to help the farmer in a situation like this," Herbert Wisner said.

Other plans considered by the agricultural land preservation commission include variations on programs in New York and New Jersey. New York permits farmers to create agricultural districts with powers to prohibit certain local ordinances that interfere with farming, to bar the use of public funds for utilities installation and to receive favorable tax assessment treatment.

The New Jersey plan, which is only a proposal made to the governor, calls for each municipality to set aside a certain percentage of prime farmland for preservation. A state tax on real-estate transfers would pay farmers for the loss of their development rights by having the land use frozen in preserves. Under the New Jersey plan, farmland owners could claim their development-right payment today, or wait on the chance that their rights will appreciate in the future. Speculation could continue in these rights or easements and investors could become richer. But the public would not be the poorer.

Maryland was the first state to pass a preferential farm property tax assessment law, taxing farmland at a lower rate than residential or commercial property. Economists claim the law has helped to keep land in production, though the evidence is tenuous. There is a tax recapture provision penalty if the use is changed, but that is a weak restraint against development.

This year the legislature enacted a law permitting farmers to give the development rights to the state. In exchange for freezing the use of his land in farming, the owner would reduce his local property taxes and reduce the value of his estate for federal taxes upon his death. Without any purchase agreement, however, its chances of success are slim.

From this mix of interests, and of economic incentives, the attrition of farms and farmers may be stemmed. The benefits of open space will be shared by all. Phillip Alampi, New Jersey's agriculture secretary, recently explained how self-interest can work constructively in this field. "Farmers have a selfish interest in preserving open space," he said. "Without it, they will go out of business. Urban and suburban people have a selfish interest in preserving open space. Without it, they may exist, but they will not live."

Mr. Burns is a member of The Sun's staff.

THE SUNDAY SUN
BALTIMORE, MD.
MARCH 16, 1975
SECTION F

Taxes hit farm heirs

It's no secret that the price of farmland has skyrocketed in the last 25 years, even more than the general real estate market, says Dr. Ray A. Murray, extension economist on the University of Maryland's agricultural staff in College Park.

The price boom has been fed by factors like inflation, urbanization and a relentless pressure for larger farming units to match the economies of scale required with bigger farm machinery and a wide array of high-cost variable production inputs.

Among other things, says Dr. Murray, the upward spiral in farmstead valuations has placed most commercial farm owners today in danger of a tax-depletion "holocaust" that will engulf their heirs and one about which their "grandfathers never dreamed," says the researcher.

Legal Armageddon

This Armageddon of the legal world is the requirement that any estate valued at $60,000 or more is subject to federal estate taxes by the Internal Revenue Service. Its battle lines are further sharpened, says Dr. Murray, by the IRS requirement that inheritance taxes be based on fair market value of farmland, rather than its appraised valuation for agricultural production.

"Such discrepancy is painfully noticeable in or near urban areas," the researcher notes.

Since liquid assets frequently comprise less than 5 per cent of total net worth, heirs of deceased farm owners frequently are faced with the urgent necessity of having to sell all or part of the family farm in order to meet required tax payments.

Proper estate planning by a farm owner can avoid such predicaments. Yet even in substantially built up urban areas like Prince Georges county, about 50 per cent of deceased people do not direct disposition of property in wills.

A state-wide program has been launched to help farm families improve their management through a better un-

Continued on Page 4

Taxes hit farm heirs

Continued from Page 1

derstanding of intestacy statutes of the state and the whole concept of transferring property intact to future generations.

Tecnicians trained

One aspect of the plan has been training technicians who are directly involved in estate planning, such as bank trust officers and laywers, the researcher reports. A typical case history in estate planning has been presented by Joel D. Fedder, Pikesville officer in a Baltimore city law firm.

He presented a hypothetical case of a farm owner and his wife, William and Mary Harper, who have four children. He assumed that William Harper died and left farmland valued at $1 million to his wife under a simple will.

Under federal estate tax requirements, Mary Harper was forced to sell about one-fourth of the land, reducing total valuation of the estate to $850,000. When Mary died, even with a will, nearly one-third of the remaining farmland had to be sold to again satisfy tax requirements. The children got only three-fifths of their father's estate and conceivably this could result in a farm not large enough to support a family, despite the large amounts of valuations involved. The entire farm, in this case, would have to be sold.

By contrast, William Harper could have arranged—at least two years prior to his death—to have sold the farm on an installment basis to his children or any other party. This arrangement would have reduced the tax load and provided the cash flow to pay inheritance taxes.

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Senate

SAVING FARMLAND AND HISTORIC SITES

Mr. MATHIAS. Mr. President, wise land use has become a central focus for those who care deeply about environmental quality. The Senate has passed and the House is now considering strong measures designed to foster a more rational land use policy. While I support these efforts to improve our regulatory mechanisms. I most strongly urge Congress to examine not only how the States and counties have managed their land, but also what impact Federal laws have on land use. The starting point for such an examination should be the Federal Tax Code. In this regard, I firmly believe that the Federal estate tax actually compels the elimination of many thousands of acres of agricultural land annually throughout the United States. If Senators are committed to halting unplanned, urban sprawl, then a serious effort to revamp the estate tax laws is in order.

Existing estate tax laws require valuation of farmland, woodland, and open space at its market value for estate tax purposes. This means that when a farmer dies, his land—that may be assessed at $500 an acre for agricultural purposes—will automatically be increased to a commercial market value of $2,000 to $3,000 or more per acre, if the land is close enough to a metropolitan area to be affected by speculative values. The farmers' heirs are forced to sell off the property to pay the taxes, even though they may wish to keep the land in agricultural production.

The very same problem exists for historical properties. This at a time when it is the stated Federal purpose through the National Register of Historic Places and other programs to preserve such valuable landmarks. Historic houses in cities, for instance, are destroyed because of appraisals for Federal estate tax purposes on the lot's value for high rise apartments.

The following, entirely realistic example, illustrates the impact of the estate tax on farmland, woodland, open space, or historical property: Farmer Jones, a widower, dies, leaving his estate equally to his two sons, who wish to continue living on and farming the land. Farmer Jones' estate consists of his farm—300 acres—and farm equipment and other personal property valued at $50,000. Used as a farm, the land is worth $500 an acre. If the Federal estate tax were based on an assessment for that use, Jones' estate would be valued at $200,000 and the tax payable would be $32,700—a very large sum for the Joneses, but one which the family might be able to pay and still retain at least most of the farm. However, the farm is within 25 miles of a large city, and speculators and developers have driven up the current price of land in farmer Jones' area to $2,000 per acre. Such prices, of course, assume conversion of the land to nonfarm use—a conversion which the Jones boys have no desire to see happen. Nonetheless, the Internal Revenue Service under existing law assesses the farm at $2,000 an acre. The result is a valuation of Jones' estate at $650,000, and a Federal tax payable of $117,200.

Obviously, the family is compelled to sell the farm, probably to a speculator or developer, in order to pay the tax. The result is federally compelled destruction of farmland and open space in a critical environmental area on the border of a metropolitan region, and the acceleration of urban or suburban sprawl with no thought for proper land-use planning. If farmer Jones' house is a historic one, the result is the federally compelled destruction of a historic house, or at least of its surroundings—the very thing the Federal Government is supposedly trying to prevent through its National Register and other programs. And the result for the individual family is the gross injustice of being forced off their farm and being compelled to pay an estate tax amounting to a confiscatory 89 percent of the value of what the estate is worth to them for the purpose to which they wish to put it.

On December 18, 1973, I introduced S. 2822 and on May 28, 1974, I introduced with 10 other Senators S. 2541, which represented a refinement of S. 2822. I today introduce with a number of other Senators a similar measure. It only changes the approach of S. 3541 by providing a new method for computing interest that will make the recapture provisions of the bill more equitable.

It provides that should a farmer's family wish to continue the farming operation they would have the option of having the decedent's interest in farmland, woodland, or open space determined by its fair market value, as at present, or by its value as farmland, woodland, or open space.

In order to qualify for this option, the property must have been devoted to one of these above-named uses for a period of 5 years preceding the death of the decedent. Obviously, qualifying for and electing to take the lower valuation will result in a significant tax saving and for so long as the land remains as qualified farmland, woodland, or open space, the tax saving will continue. But should any of the land be converted to a non-qualifying use or zoning be requested by the owner to permit a nonqualifying use, the tax saving will be recaptured by the Government. If all the land is converted or requested rezoned, then the entire tax saving will be recaptured by the Government. If only a portion of the land is involved, then only a portion of the tax savings will be owing to the Government. Determinations as to the extent of recapture in individual cases will be made in the same fashion as such determinations are made for capital gains.

Historic property will be treated in a similar fashion. If the property is listed on the National Register of Historic Places then an election can be made to value the property at its value for historical purposes and not at its market value. The tax saving will continue for so long as the property remains on the National Register. If the property is delisted the tax will fall due.

Should the heirs make a bona fide sale of the property or a portion thereof the tax savings may or may not be partially or totally recaptured depending on the sale price. If the price is below or equal to the low valuation in the original estate then there will be no recapture. If the sale price is equal to or greater than the fair market valuation then there is total recapture of the tax savings. Sale prices falling between the high and low valuations in the original estate will result in partial recapture. In such a case, the tax due at the time of the sale shall be that part of the tax saving which is proportional to the gain realized on the sale. For this purpose, the gain realized shall be expressed as a fraction, the numerator of which is the amount by which the actual sale price exceeded the land's original valuation as farmland and the denominator of which is the amount by which the fair market value of the land exceeded its value as farmland at the time of the original valuation. In no case, however, shall this fraction exceed the value 1.

In all cases where recapture takes place, interest on the tax saving is also due. Such interest is at 9 percent running from the filing date when the election of the lower valuation takes place for a period of 10 years or until revocation takes place. The tax saving and the

interest thereon constitute a lien on the property and can be discharged at any time by payment in full.

At a time of world food shortages and environmental destruction it is critical that we structure our tax laws to encourage good husbandry, agricultural and conservation practices. This measure offers hope of preserving not only our valuable farmland and the farming way of life, but our heritage as well. I am afraid that America is an increasingly rootless society and therefore it has never been more important to safeguard the landmarks of our past. These landmarks nourish the human spirit in countless ways.

There is a strong incentive for compliance in this bill. It affords no tax relief to the undeserving. The fairness of this proposal is clear. It has been recognized in other forms throughout our country. I hope we can act now to solve this problem.

Mr. President, I ask unanimous consent that a number of articles detailing the scope and severity of this problem be included in the RECORD at this point. The first article is by David A. Adelman in the New York Times of May 14, 1972. The second appeared in the Wall Street Journal of May 15, 1974, and was written by Gail Bronson. The third article is by Michael Burns and appeared in the Baltimore Sun of May 19, 1974. The fourth article was written by Isaac Rehert for the Baltimore Sun of February 19, 1974. The final article is by Steven Norwitz and is from the Baltimore News American. I also ask unanimous consent that the bill be printed immediately following these articles in the RECORD.

There being no objection, the bill and material was ordered to be printed in the RECORD, as follows:

By Mr. MATHIAS (for himself, Mr. BEALL, Mr. HUMPHREY, Mr. JAVITS, Mr. MCINTYRE, and Mr. THURMOND):

S. 80. A bill to prevent the estate tax law from operating to encourage or to require the destruction of open lands and historic places, by amending the Internal Revenue Code of 1954 to provide that real property which is farmland, woodland, or open land and forms part of an estate may be valued, for estate tax purposes, at its value as farmland, woodland, or open land (rather than at its fair market value), and to provide that real property which is listed on the National Register of Historic Places may be valued, for estate tax purposes at its value for its existing use, and to provide for the revocation of such lower valuation and recapture of unpaid tax with interest in appropriate circumstances. Referred to the Committee on Finance.

S. 80

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That (a) section 2031 of the Internal Revenue Code of 1954 (relating to definition of gross estate) is amended by adding at the end thereof the following new subsection:

"(c) ALTERNATE VALUATION OF CERTAIN REAL PROPERTY.—

"(1) IN GENERAL.—If the executor of an estate so elects, the value of any qualified real property included in the estate shall be determined by its value for the use under which it qualifies, under paragraph (2), as qualified real property.

"(2) DEFINITION OF QUALIFIED REAL PROPERTY.—For purposes of this subsection, the term 'qualified real property' means real property substantially all of which is, and, for the 60 months preceding to the date of death of the decedent, has been, devoted to—

"(A) farming (including the production of agricultural commodities and the raising of livestock),

"(B) woodland (including land used for the commercial production of trees and land used for scenic and recreational purposes),

"(C) open space, or

"(D) any use, provided that the property is listed in the National Register of Historic Places, either separately or as part of a district so listed.

Such real property shall include residential buildings and related improvements occupied on a regular basis by the owner or lessee of such property or by persons employed by such owner or lessee for the purpose of operating or maintaining the real property and improvements described in this paragraph (2), and roads, buildings, and other structures and improvements functionally related to the uses listed in this paragraph (2).

"(3) ELECTION REQUIREMENTS.—An election under this subsection shall be filed with the Secretary or his delegate at such time and in such form and manner as he may prescribe and shall contain, in addition to any other matter, the name, address, and taxpayer identification number of the person or persons to whom any interest in the property passes under the terms of the decedent's will or by operation of law.

"(4) DEFINITION OF OWNER.—For purposes of this subsection, the term 'owner' means those persons identified in paragraph (3).

"(5) REVOCATION OF ELECTION UPON CONVERSION, REZONING, OR REMOVAL FROM NATIONAL REGISTER.—Upon the occurrence of an event described in paragraph (6), there shall be imposed on the owner a tax equal to:

"(A) the excess of—

"(i) the estate tax computed in accordance with section 2001 with respect to the decedent's taxable estate based on a valuation of the decedent's gross estate made as if the election provided in paragraph (1) had not been made with respect to such portion of the real property as is subject to an event described in paragraph (6), over

"(ii) the estate tax computed in accordance with section 2001 with respect to the decedent's taxable estate but based on a valuation of decedent's gross estate made after taking into account the election provided in paragraph (1) with respect to such real property; plus

"(B) interest on such amount at 9 percent running from the filing date prescribed in section 6075 with respect to the return from the decedent's estate (taking into account any extension of time granted pursuant to law for the filing of the return) for a period of 10 years or until a revocation of election occurs pursuant to paragraphs 6 or 7.

"(6) EVENTS CAUSING REVOCATION OF ELECTIONS.—The tax described in paragraph (5) shall be imposed upon the occurrence of any of the following events:

"(A) the conversion by the owner of the real property with respect to which the election provided in paragraph (1) was made, or any portion thereof, to a use other than one or more of the qualified uses described in paragraph (2); or

"(B) the rezoning of such property to permit a use other than one or more of the qualified uses described in paragraph (2), if such rezoning occurs at the request of the owner; or

"(C) if such property qualified for the election only pursuant to paragraph (2)(d), removal of such property from the National Register of Historic Places.

"(7) REVOCATION OF ELECTION UPON SALE.—If the owner sells an interest in real property with respect to which the election provided in paragraph (1) was made, there shall be imposed on such owner a tax equal to:

"(A) the excess of—

"(i) the estate tax computed in accordance with section 2001 with respect to the decedent's taxable estate based on a valuation of the decedent's gross estate made as if (a) the election provided in paragraph (1) had not been made, or (b) such real property had been valued at an amount equal to the price for which the property is sold, whichever valuation is lower, over

"(ii) the estate tax computed in accordance with section 2001 with respect to the decedent's taxable estate but based on a valuation of decedent's gross estate made after taking into account the election provided in paragraph (1) with respect to such real property; plus

"(B) interest computed as provided in paragraph (5)(B).

"(8) DUTY TO FILE RETURN.—Prior to or upon the occurence of an event described in paragraph (6) or a sale described in paragraph (7), the owner subject to the tax imposed by paragraph (5) or paragraph (7) shall file a return with respect to such tax. Such return shall be made within 30 days after the end of the calendar quarter in which such event occurs.

"(9) LIEN TO SECURE TAX.—If the executor of an estate makes the election provided by paragraph (1), there shall be a lien on the real property with respect to which such election was made in the amount of the tax saving realized by the estate by virtue of such election. Such lien shall be extinguished upon payment of all taxes which become due pursuant to paragraph (5) or paragraph (7) or at such time at which the possibility that any such taxes shall become due terminates, whichever time is later."

"(b) Section 1014(a) of such Code (relating to basis of property acquired from a decedent) is amended by inserting before the period at the end thereof a comma and the following: 'or in the case of an election under section 2131(c) (relating to alternate valuation of certain real property), the value thereof as determined under such section for the applicable valuation date, including any increased value on which a tax is paid as required by paragraph (5) or (7) of that subsection'."

"(c) The Amendments made by this Act shall apply with respect to the estates of decedents dying after the date of enactment of this Act.

[From the New York Times, May 14, 1972]

ESTATE TAXES DRIVE FARMERS OFF LAND

(By David A. Andelman)

Thousands of American farmers are being driven off their lands—forced to sell their farms to real estate speculators, some of them say, because of the method used by the Internal Revenue Service to assess inheritance taxes.

Such taxes are assessed on what the land could be sold for, rather than what it is worth as farmland. Thus, many people who have inherited farms have had to sell them to developers simply to pay the taxes.

As a result, the revenue service is being termed partly responsible for destroying a segment of American agriculture and, at the same time, accelerating the spread of the suburbs to the rural areas of the United States.

Over the last decade, the value of agricultural lands in wide sections of the nation within easy access to metropolitan areas has skyrocketed as land speculators have bought up every available piece of property. The value of this land for agriculture, however, has largely remained constant or has declined.

The Internal Revenue Service insists on assessing all agricultural land at the "price at which property would change hands between a willing buyer and a willing seller."

The result has been that farmers holding property whose value for development is five to 10 times its agricultural worth have been forced to sell their property to the waiting speculators simply to pay their inheritance taxes, which run as high as 25 per cent. Children who would have remained on the land are being forced off.

Most of this pressure has been focused on the spreading areas on the fringes of the suburbs where metropolitan America is pushing out to meet rural America—areas such as the farther reaches of Suffolk County, L.I.; suburban Phoenix, Ariz.; the extreme northwestern part of Cook County in Illinois, and the Sierra Foothills region of California.

"Once farmland is given to the speculators, that's the final step as far as agriculture is concerned," said James E. Cross, a farmer in semirural Cutchogue, L.I. "You're taking land that took 25,000 years to develop, an amazing land that is rich and fertile, and overnight you bring in bulldozers and sock houses on it. We all pay for it in the long run."

Another Cutchogue farmer, John Wickham, cited the situation of a neighbor with a 60-acre farm in one of the best potato-producing areas in the United States.

The neighbor, who had asked not to be identified by name, inherited the farm from his mother two years ago upon her death. The farm was worth about $800 an acre if used for agriculture. But the revenue service valued it at $3,500 an acre, which Mr. Wickham noted "is the fair development value," and the tax alone came to about $1,200 an acre.

CALLS SALE "FORCED"

"This means that this chap is a very good farmer," he added, "but he had to take out a tremendous mortgage to pay the inheritance taxes, a mortgage with 9 or 10 per cent interest, and he simply can't pay it off—not with today's price of potatoes. So he has to sell it. In actuality, they [the Federal Government] forced its sale, very simply."

In Barrington, Inn., Xaver Schmid, a 72-year-old farmer who is worried about the problem that will arise when he dies, cited the case of a 90-year-old neighbor who died and left a 500-acre farm to his wife.

"They haven't sold the farm yet," Mr. Schmid said, "as the estate is still in probate. But his wife is nearly 90, and when she dies taxes will be levied all over again and the sons will have to sell the farm for sure to pay taxes."

That the situation became most acute very recently is largely attributable to the newly developing pattern of change in suburban America.

GROWTH ON FAR FRINGE

The 1970 census revealed that the fastest growing segment of the United States was the suburbs and the fastest shrinking was the rural areas. But of even greater significance was the evidence that the fastest growing segment of the suburban population was in the so-called "exurban areas"—those counties on the far fringe of the suburbs, between suburbs and countryside.

It is here that the real estate speculators are most busily at work and where the pressures on the remaining farmers are the strongest.

There are no statistics to show how many farms are going to speculators. Many are quietly sold but continue to be farmed for several years, even decades, under "lease-back" arrangements, until the land becomes so valuable that the speculator finally moves in and puts a halt to the farming.

NEED FOR LEGISLATION SEEN

A spokesman for the Internal Revenue Service, Edward Work, said, "We've been aware of the problem really for several years and, of course, what it boils down to is that under the law we have no alternative but to set the tax on the value the land sells for rather than on the value the property would be used for.

"It would take legislation to change the practice."

The legislation on which the current revenue service practices are based dates to the Revenue Code of 1916. Section 208.1, of which says that property must be valued at its fair market value. A service spokesman said, "It has been applied consistently since that date."

There have been numerous attempts at reform. Representative Graham Purcell of Texas, sixth-ranking Democrat on the House Agriculture Committee, has introduced each year for the last four years a bill providing for a change of the valuation criteria.

At last count, there were six bills before the House Ways and Means Committee and one in the Senate, all waiting for action that their sponsors generally believe will probably never come.

"Each year they get buried in the hearings on general tax reform," Mr. Purcell said in a recent interview. "Ways and Means just happens to like the extra revenue the law pulls in the way it stands."

The extent of the problem and the concern it has aroused in agricultural America is indicated by the search for the methods to circumvent the revenue regulations.

In the Dade County area surrounding Miami, almost all farms have by now been incorporated. The corporate farmer is able each year to transfer a small amount of stock—up to $3,000 apiece is tax-exempt under gift tax statutes—to his children as gifts, easing the final impact of inheritance taxes when he dies.

A few states, including New Jersey, California and Maryland, have either set up or given serious consideration to establishing agricultural land use districts. They require farmland under regulation to remain in farming for a certain period of years, usually at least 10, or indefinitely. But in many areas, the revenue service has not chosen to recognize these districts for estate tax purposes.

ACCEPTED BY GOVERNMENT

In California, the Land Conservation Act of 1965 enables a farmer to contract with the county government not to put farmland up for sale for at least 10 years, enabling the state to assess the land at agricultural rates. And, state officials said, the Federal Government has accepted the state assessments for Federal purposes.

But a new and more recent law may change this. It provides that if not enough of this restricted land is sold in an area, the county assessor may use the income of the land as a means of determining its value for assessment purposes.

Joseph A. Janelli, governmental affairs specialist of the California Farm Bureau Federation, is concerned that "the I.R.S. just might say this new law is a temporary expedient and we do not have the right to do it this way."

ARRANGEMENTS ARE URGED

Mr. York, the revenue service spokesman, said "there is a possibility" that an agricultural land use district "could affect the valuation—in effect discounting the valuation in some situations." But he said, even so, the value would never reach the agricultural value.

So, the California federation has begun to advise members to make their proper arrangements well in advance of death—giving land or corporate shares in land to their children over the years to take advantage of the gift tax exemption.

"All this is fine," said Mr. Wickham, the Long Island farmer. "But I can't do this. I need cash loans on my property each year in order to operate. If I go to a bank and say I've given shares to my children, that I don't have clear title, they'll throw me right out."

Dean F. Tuthill, a professor of agricultural economics at the University of Maryland, said that there were only a handful of states that had been able to figure out any method of easing the burden of estate taxes for their farmers.

COAST LAW CITED

Most special agricultural taxing districts set up to help farmers are applied only to local property taxes and not to federally administered estate taxes.

Professor Tuthill cited, as one attempt to ease Federal taxes, California's statute, which he said was a prototype for other methods of "preventing intensive development of farmland," including a bill in Maryland last year that would have allowed farmers to sell their development rights to the local county, farming it themselves but paying considerably lower taxes.

Systems such as this or one newly instituted in Suffolk County, L.I.—where the county plans to purchase, at the start, some 3,000 acres of prime farmland at speculative prices from the farmers, then lease it back to the owners—are other solutions proposed by agricultural economists in place of changes in the revenue law.

"There are so few ways open to preserve this valuable resource," Mr. Wickham concluded. "If the I.R.S. continues to follow this policy, it will put all agriculture out of business on Long Island within a generation. And who knows what will happen everywhere else in this country?"

[From the Wall Street Journal, May 15, 1974]

THE 251-YEAR-OLD MANSION PROVIDES FEELING OF "ROOTS" BUT DOMINATES THEIR LIVES

(By Gail Bronson)

SHIRLEY PLANTATION, Va.—To walk inside the venerable brick mansion here with its paneled rooms and its oil portraits of long-dead ancestors, is to enter into the measured pace of the 18th Century.

It is easy, in the shadowy half-light of a fading afternoon, to envision a style of life two centuries removed from the busy world outside—to imagine squires with powdered wigs gathered around the Chippendale dining table, drinking sherry from graceful crystal glasses. Thomas Jefferson dined at Shirley. Robert E. Lee's mother was born here.

But C. Hill Carter, the 20th Century owner of Shirley, is not a squire, and he doesn't have a powdered wig. He has a crew cut, and should you visit his 251-year-old mansion 25 miles east of Richmond in the Virginia tidewater country, you may find him in paint-spattered shoes and baggy overalls, touching up an outbuilding. He often does such work himself—to save money.

Nor do Mr. Carter, his wife, Helle (rhymes with Nellie), and their three children dine very often at that splendid table of polished mahogany on the main floor. They usually eat at a picnic-type table in the basement, seated on folding chairs beneath the bare pipes that service their 1910 sink. They eat in the basement because they want to maintain the main floor in all its 18th Century elegance, full of valuable antique furniture and American art.

RUINOUS TAXES

That is the commitment that has shaped the lives of Hill and Helle Carter—a commitment to maintain and preserve an 18th Century mansion on a 20th Century income. More than that, they are committed, despite rising expenses and the threat of ruinous taxes to pass Shirley on to their children and their children's children. They intend to keep Shirley in the Carter family, where it has remained for nine generations.

"In our society nobody has any roots," Mr. Carter drawls. "Everybody's mobile. When people come here and tell me how lucky I am to own Shirley, I'm right proud. We're determined to stay and keep these things."

Plenty of folks come to see Shirley. To help offset expenses, Mr. Carter opened Shirley to tourists some years back, posting a billboard near Williamsburg and distributing brochures locally. Last year, more than 10,000 people visited the plantation, often getting a guided tour by Mr. Carter himself, who clearly relishes the opportunity to take time off from endless odd jobs around the plantation to recall his family history and the glories of the past.

The white porticoed mansion dates back to 1723, but Shirley Plantation itself is even older. It was founded in 1613, only six years after the colonists arrived at Jamestown. While the land belonged to tobacco farmer Edward Hill, the Shirley mansion wasn't built until his daughter Elizabeth married John Carter, the son of a giant in colonial Virginia, William Robert (King) Carter.

RANDOLPHS, LEES, AND BYRDS

Contemporaries called him King because he owned a huge chunk of what is now the state of Virginia. King Carter amassed his wealth by deeding defaulted land to himself as land agent for Lord Fairfax and England. He lived quite comfortably on another plantation, cultivating tobacco with the help of 1,000 slaves. Over the years, his descendants intermarried with such leading Virginia families as the Randolphs, Lees and Byrds.

By comparison, King Carter's ninth-generation descendant has come down in the world—although, on paper at least, Hill Carter is a wealthy man.

"I reckon I'm worth $1.5 million," he mutters bashfully. "But I still feel like I'm scrambling to pay the grocery bills." Despite his assets, Hill Carter barely nets $15,000 a year, mainly from his tourist trade and some land he rents to a gravel company. To convert his assets to spendable cash he'd have to do the one thing he is committed not to do: sell Shirley Plantation.

The problem of maintaining a large estate isn't unique to the Carters. Many families find the financial burden too much or the way of life unappealing; usually, they sell their property for development or for some sort of institutional or foundation use. In Britain, the National Trust accepts country estates from owners who provide endowments to maintain the property in perpetuity for public access. In return the family may live there rent-free. The National Trust for Historical Preservation in the United States accepts property gifts with endowments, and Colonial Williamsburg buys land for the tourist trade. But Hill Carter wouldn't consider passing Shirley out of strict family control.

As a result, Hill and Helle struggle hard to keep Shirley both livable for the family and attractive to tourist. For Hill, life is a

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walls that need spackling and plumbing that needs fixing; currently, he's trying to complete some formal gardens around the house and build a driveway to the main highway. Helle opened a gift shop last year in one of the outbuildings and also hopes to start a small restaurant operation in another building.

Shirley Plantation mirrors much of Southern history in its evolution from tobacco plantation to wheat farms to the homestead that Hill Carter inherited. "My grandfather was wounded at Chancelorsville and was forced to quit working around 1884," says Hill, "so my dad started farming when he was 16. He never got an education, and financial things weren't easy for him. He spent all his time farming just to feed his family through the Depression."

Hill inherited the estate in 1952 through an elaborate plan to keep Shirley in the family; soon, the farmland was leased to others, a gravel mining company had leased several hundred other acres, and the Carters were seeking to build up tourist traffic to the house itself. "When other people are out on Sunday drives, I'm showing people around the house," says Hill.

Still, life at Shirley has its compensations. Hill and Helle enjoy sitting out back watching the historic James River roll by; many evenings are spent entertaining friends in Shirley's stately and ornate dining and drawing rooms. Though the family usually eats in the basement, the children, Charles, 11, Randy, 10, and Harriet, 9, are allowed the run of the house and property. "I don't want to turn this place into just a museum," says Helle.

Whether Hill Carter will succeed in his ambition to keep Shirley intact for his children—and whether they will want to stay at Shirley—is open to question. Hill figures the inheritance tax alone on Shirley would be about $650,000 at present rates.

But Hill and Helle figure it's worth the effort. "If money was the only thing in the world, I'd leave," says Hill. "But it's not. Most of the important things in the world can't be bought and sold," Helle adds. "It's gratifying when people come and appreciate this as part of their heritage."

[From the Baltimore Sun, May 19, 1974]

DISAPPEARING FARMS

(By Michael K. Burns)

In the years of agriculture abundance, not so long ago, United States farm policy was aimed at moving land out of production. That policy did not seem to work so well then but its effects are being felt today when the nation is realizing it might be better off with more farms and farmers.

Rising prices at the supermarket reflect the world's demand for more food. And the environmental movement has inculcated a reverence for open space and a revulsion against the devastation of suburban sprawl. Expansion of the domestic farm system seems to answer these non-farmer needs of society.

Forces are at work to create a coalition between the farmer and the environmentalist to preserve farmland as a privately held public heritage. But the alliance is still in the formative stage. Farmers distrust the conservationist who would freeze the value of his land under land-use laws, and chafe at his efforts to restrict uses of chemical and pesticides. Conservationists and consumers are wary of the producers of ever-more-expensive food and the owners of large spreads of high-priced rural real estate.

Land speculators have perhaps been the key element in the forging of the common interest. Population pressures and the ever-growing highway system created new fortunes for property holders who stood in the path of progress. Farmers did not create the boom, but they were quick to appreciate its possibilities for a windfall. A glut of reckless, shotgun speculation in farms throughout the state followed. And those farmers who sold out made it even harder for their neighbors to resist.

Some 2.7 million acres in the state, or 40 per cent of the land, are in farm production. By one estimate, that amount will dwindle to 1 million acres by the year 2000. Recognizing this undesirable trend, the Maryland Senate last year ordered the Secretary of Agriculture, Y. D. Hance, to make a study of means to preserve farmland. Mr. Hance appointed an 18-member commission with Frank L. Bentz, Jr., University of Maryland vice president for agricultural affairs, as chairman.

The commission has set as a goal the preservation of 2.5 million acres of agricultural land. Members are uncertain how fast farmland will be eaten up in the future: one subcommittee suggests 35,000 acres a year, another 62,000 acres. But they seem to agree that speculation, or investment, is a greater factor than the immediate demand for housing or commercial development. "Agricultural and commercial forest land acreage will decrease more than three times as much as urban-related land commitments will increase" by 2000, the group said in an interim report. Some of that land will be granted a temporary reprieve, as speculators rent it to farmers, but its fate is sealed. This despite the fact that there will be 50 per cent more people living on an acre of Maryland in 26 years than there are today.

As a commission subcommittee noted, preserving agricultural land can only be based in part on the actual demands of future population growth. Unrelated economic factors influence a number of individual decisions to give up farming and to take advantage of the speculator's offer. Farm prices are expected to increase and provide a return of about 15 percent on capital (exclusive of land), the commission reported. But a shortage of labor, heavy indebtedness and taxes may encourage all but the dedicated to give up.

Farm prices have shot up all over the state with little relationship to productivity and food prices. Farms that sold for $200 an acre in Frederick county 15 years ago are now worth $30,000 an acre by the new shopping mall. Even residential lots, minus sewer and water, are selling at $4,500 an acre.

In Anne Arundel county, developers are paying $3,000 an acre for average farmland as they leapfrog over sewer-connection bans in Montgomery and Prince Georges counties.

Partially influenced by the expanding Black & Decker power-tool plant, land in the Hempstead area of Corroll county is selling for an unheard of $7,000 an acre. "A couple of years ago, $1,000 was high for land in this area," recalled Paul R. Albaugh, a dairy farmer. "Now, I don't know of any land sold that's going to other farmers . . . they can't afford it."

"I don't think you can talk to a farmer who hasn't lost ground over the last five years," said Carroll Leister, whose grandfather bought the land he farms today. The small parcels of land a farmer rents for $15 to $20 an acre are sold off each year as land values rise, he explains. "The by-pass is going through 25 acres of our land and that will bring more houses," Mr. Leister said. "I guess in five years after the road is built we'll be out of here."

Developers and farmers covet the same type of land, Mr. Leister added. "That's the thing that hurts: they're buying good flat, cleared land, not the woods or the hilly areas," he said. According to the state, more than 20 per cent of Maryland's "prime" farmland has been lost to urban use.

The commission headed by Dr. Bentz is to make final recommendations on legislation to Mr. Hance next month. So far, the group has explored several possibilities which have been discussed at a series of hearings in the state. The revision of federal estate taxes and state inheritance tax is one promising idea. Senator Charles McC. Mathias Jr., (R., Md.) and Representative Goodloe E. Byron (R., 6th) have introduced bills to change the estate tax, so that heirs are taxed on the agricultural value of farmland instead of on "fair market value." The lower valuation

would make it easier for heirs to pay the taxes without selling the farm; if they did or if they developed the land, they would be subject to a retroactive higher levy. The chairman of the Maryland Environmental Trust and the Maryland Historical Trust support the measure as a valuable open-space tool.

The loss of farmland due to the estate tax valuation has not been extensive. Many heirs are all too willing to sell and farmers do the same thing to create heir retirement annuity. But it does help to keep farms in the hands of those families who want to continue at it, and they are becoming more rare. Herbert and John Wisner of Mt. Zion worked their father's farm since they were children, but had to form a corporation to save the land with a mortgage when it was inherited as an estate. "They should have done something to help the farmer in a situation like this," Herbert Wisner said.

Other plans considered by the agricultural land preservation commission include variations on programs in New York and New Jersey. New York permits farmers to create agricultural districts with powers to prohibit certain local ordinances that interfere with farming, to bar the use of public funds for utilities installation and to receive favorable tax assessment treatment.

The New Jersey plan, which is only a proposal made to the governor, calls for each municipality to set aside a certain percentage of prime farmland for preservation. A state tax on real-estate transfers would pay farmers for the loss of their development rights by having the land use frozen in preserves. Under the New Jersey plan, farmland owners could claim their development-right payment today, or wait on the chance that their rights will appreciate in the future. Speculation could continue in these rights or easements and investors could become richer. But the public would not be the poorer.

Maryland was the first state to pass a preferential farm property tax assessment law, taxing farmland at a lower rate than residential or commercial property. Economists claim the law has helped to keep land in production, though the evidence is tenuous. There is a tax recapture provision penalty if the use is changed, but that is a weak restraint against development.

This year the legislature enacted a law permitting farmers to give the development rights to the state. In exchange for freezing the use of his land in farming, the owner would reduce his local property taxes and reduce the value of his estate for federal taxes upon his death. Without any purchase agreement, however, its chances of success are slim.

From this mix of interests, and of economic incentives, the attrition of farms and farmers may be stemmed. The benefits of open space will be shared by all. Phillip Alampi, New Jersey's agriculture secretary, recently explained how self-interest can work constructively in this field. "Farmers have a selfish interest in preserving open space," he said. "Without it, they will go out of business. Urban and suburban people have a selfish interest in preserving open space. Without it, they may exist, but they will not live."

[From the Baltimore Sun, Feb. 19, 1974]

ENDANGERED LABEL ON EAST COAST FARMS

(By Isaac Rehert)

The East Coast farmer has been changing to a rare and endangered species just when a crowded congested society has come to need him most.

For decades, while built-up concrete areas have been growing around big cities like warts, farmers, caught in the crunch of fast-rising costs and shrinking profits, have been abandoning agriculture.

The old-timers are carrying on, expanding and consolidating their holding, but with the increased capitalization, it becomes almost impossible for a youngster to break in unless he inherits. And increased valuation of land for development purposes is a continuing temptation to the farmer simply to sell his holdings for the building of supermarkets and retire from the field.

As if crowding by urban areas, skyrocketing capitalization and the cost-price squeeze were not enough, certain government tax policies have also tended to pressure farmers into getting out; and now, land-use legislation, one version of which has already been introduced into the Maryland General Assembly, has farmers worried. They fear that by legislative fiat, their equity, their security, their retirement bank account that they keep deposited in land, may be wiped out.

The extinction of the East Coast farmer, like the extermination of other rare and endangered breeds, is more a problem for the public than it is for the breed. Quite aside from the production of food (which for the first time in memory is becoming increasingly critical), quite apart from nostalgia for "old time rural values" and a way of life that keeps looking better the further we pass from it, farms—at least green open spaces—are essential to ecology, to keeping a balanced environment, to maintaining an esthetic harmony.

Whereas in other areas real estate taxes are based on the highest market value of land—which usually would be its speculative value for development—in Maryland, farm land is taxed as farm land—which means lower rates, commensurate with its lower earning ability when used for growing crops.

But the federal government has not seen fit to follow a similar practice. There are no federal real estate taxes, but there is a federal estate inheritance tax, and the Internal Revenue Service insists on assessing all agriculture land at the "price at which property would change hands between a willing buyer and a willing seller."

Any land within easy access to metropolitan areas can attract numerous willing buyers eager to acquire all they can for speculative purposes. The result has been that in some areas, land values have skyrocketed to five to ten times what they would be for agricultural land.

And so, when parents die and their children inherit the land, they find themselves billed for a federal inheritance tax—which may run as high as 25 per cent—that is so high they are forced to sell the land to speculators in order to pay it.

In one instance, land that was worth $800 an acre for agricultural purposes was valued by the IRS at $3,500 an acre, which was its "fair development value." The tax alone came to about $1,200 an acre, and the farmer had no choice but to sell it for development in order to pay. In fact, the federal tax laws had simply forced the farmer off the farm and the land out of farm production.

It is not merely IRS administrative policy but explicit legislation that says that property must be valued at its fair market value, and so it will take new legislation to make a change.

This year, Senator Charles McC. Mathias, Jr., (R., Md.) introduced a bill that would change the practice, bringing it into line with that used in Maryland and other states, so that the IRS, in considering the value of land for tax purposes, would use its value as an actual earning resource rather than its market value.

In a Senate statement, Mr. Mathias pointed out that without such legislation, everytime a farm passed to an heir, the heir would be paying most or all of the income he could earn from his farm land just to pay the taxes. The situation is impossible, and "the effect of this (IRS) policy is to force many farm families to sell their farms in order to pay the estate tax—regardless of their attachment to the land or to the occupation of farming. And the result of such forced sales is, in the end, a grave and immeasurable cost to the community."

His bill includes safeguards that prevent land held by speculators from qualifying at the lower rate of tax, namely that the property must have been used as farm, wood or open scenic land for at least five years prior to and must continue to be used that way for five years after the estate tax return is filed.

One of the interesting developments in the farm land picture is that because of the world-wide food shortage and the energy and fertilizer shortages, farm commodities have been increasing in value so rapidly that with next year's harvest the value of farm land may nearly equal its value for development.

From the publics' point of view, at least one aspect of the situation has become perfectly clear. Despite the name "agribusiness," farms are not merely business; they are a natural and esthetic resource of the entire community, and the East Coast farmer, who is their steward, as a rare and endangered species, needs some help to be saved.

[From the Baltimore News American]

FEDERAL TAX GRAB COUNTERED: STATE ACTS TO SAVE FARMS

(By Steven Norwitz)

In upper Harford County, John Brown (not his real name) tills a 650-acre farm he'd like to turn over to his children when he dies.

But farmer Brown estimates that when he passes on, his family will face a federal estate (inheritance) tax of $400,000.

As a result, the Brown family will be forced to do what the Johnson family did with their 100-acre farm in Havre de Grace a few years back—sell it to developers.

The federal estate inheritance tax, which often amounts to a third of the development value of a farmer's land, is one reason why Maryland loses an estimated 35,000 acres of farmland a year to development, according to the state Department of Agriculture.

In 1969, the latest year for which figures are available, 44 percent of Maryland's land areas, or about three million acres, was devoted to agricultural use.

It is projected that the amount of farmland in the state will drop to 2.4 million acres, or 38 percent of the state's land area, by 1986.

To help slow the trend, the Maryland legislature this year passed a bill designed to aid the farming family that wants to pass its farm down from one generation to the next.

For farmers who agree to permanently turn over the development rights of their land to the state, the bill provides that the farms would be assessed at their agricultural value, about $600 an acre, instead of potential development value, now ranging from $2,000 to $3,000 an acre.

The aim is to significantly cut the federal estate tax on the property, enabling the family to keep the land for its agricultural use.

"This would help people who have had farms that have been in the family for generations and want them to be kept in the family," says T. Allan Stradley, president of the Maryland Farm Bureau.

The state, meanwhile, would preserve some of its open spaces and maintain a $425 million a year industry.

While the bill is considered a good concept, its effective implementation hinges on two unknowns.

"First," says state Sen. James Clark, Jr., D-Howard, a co-sponsor of the bill, "we're not absolutely certain the IRS (Internal Revenue Service) will recognize this."

The federal government does its own assessing of property when calculating the estate inheritance tax.

"Second," Clark adds, "if you give up the development rights to your property and the property all around you is turned into subdivisions, the plan won't work."

If these roadblocks are worked out, however, Clark feels "there are a good many people who will go for it." Clark himself would be one of them.

The senator runs a 500-acre farm on Rt. 108 across the road from Columbia. "The estate tax on this would definitely cause us to lose the land," he says.

"But I wouldn't hesitate a minute (to give up the development rights to the property) if I was assured I wouldn't have development all around me. Agriculture is all we've ever done; that's all we want to do."

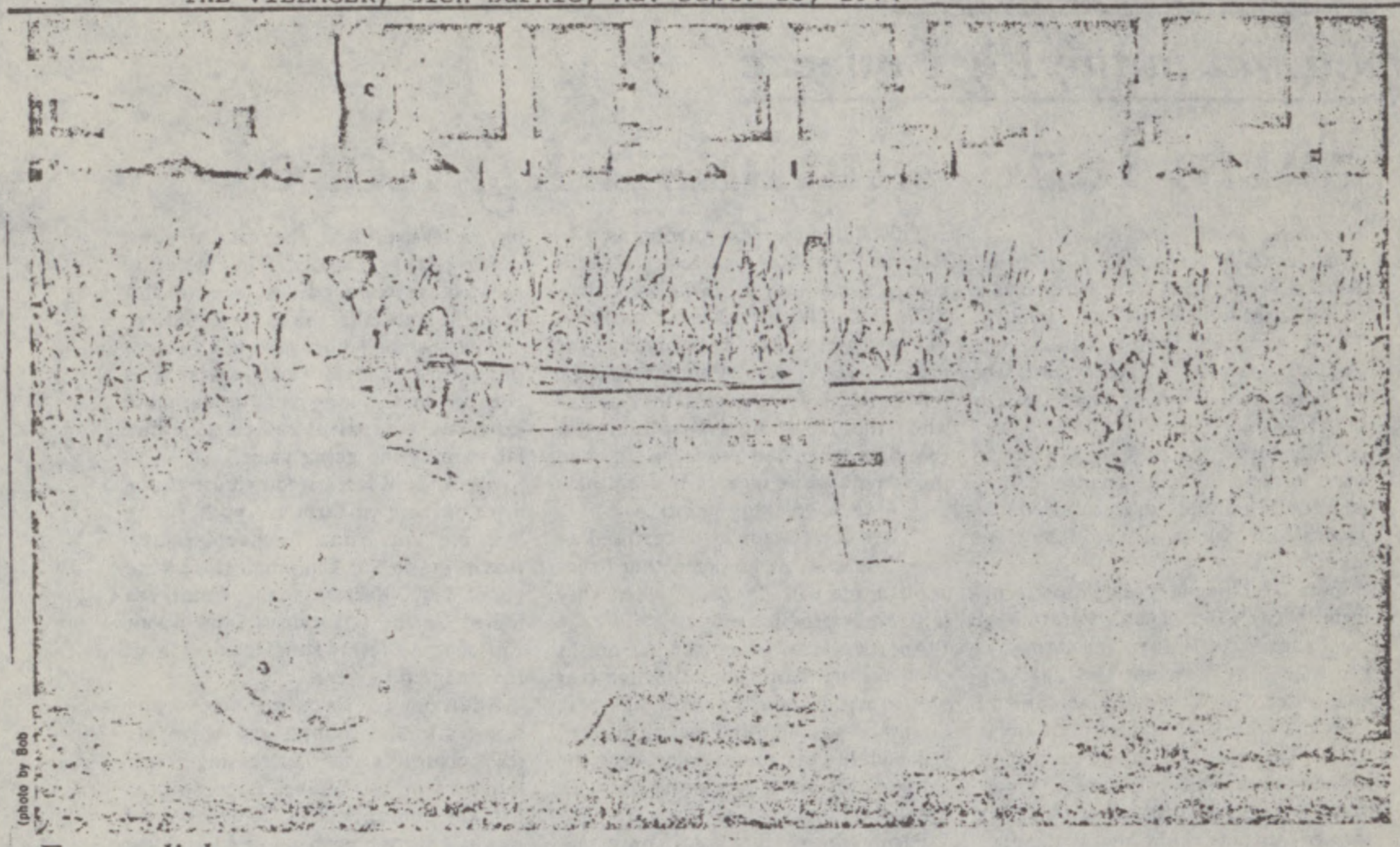
While many farmers will be leery of giving away the huge profit potential of their property. Sen. William S. James, D-Harford, cosponsor of the bill and president of the Maryland Senate, says the bill is "just a start" in the state's effort to preserve its agricultural land.

Eventually, James notes, Maryland may adopt a plan similar to one in New Jersey which authorizes the state to purchase outright the development rights to a farmer's land.

"The New Jersey green acres program," James says, "has permanently preserved one million acres (of its 1.4 million acres of farmland) by this approach."

This summer a state Commission on the Preservation of Agricultural Land is to offer sweeping recommendations on steps the state should take to accomplish this purpose.

THE VILLAGER, Glen Burnie, Md. Sept. 25, 1974



(photo by Bob

Farm plight

Developments such as these townhouses near Crofton are slowly encroaching on available farmland in Anne Arundel County. According to Ray Chapman, who is shown on his farm near Crofton about 150 farms in Anne Arundel county "go under" each year, the victims of high inheritance taxes and increased costs of production. According to Mr. Chapman, where the townhouses stand was also a farm, not too long ago.

Caught in the Big Squeeze

Farm land diminishing here

by Jacquie Jackson

Old MacDonald had a farm.

And when he died he left his 300 acre farm to his son. But his son, who would have liked to stay on the family farm, had to sell it.

Why? The Big Squeeze.

Inheritance taxes, land speculators, high equipment, fertilizer, and seed costs, and the high cost of farm labor are all a part of the Big Squeeze which last year alone pushed farmers off of over 35,000 acres of land in Maryland. Anne Arundel county, close to two urban centers but traditionally a farming area, is becoming one of the prime victims of the Big Squeeze.

For Example: suppose that when Farmer MacDonald died he left his son a 300 acre farm and personal property valued at $50,000. Under present Federal inheritance taxes, Farmer MacDonal's son would have to pay over $117,000 in inheritance taxes; a sum few could raise without selling at least part of the land.

The reason for the high taxes is that Farmer MacDonald's land is located near two urban centers and land values in the area have been driven up by rapid development and speculation. Because Federal inheritance taxes are calculated on the market value of the land rather than its agricultural value. Farmer MacDonald's son's taxes are calculated by valuing the land at about $2,000 per acre instead of its agricultural value of $500 per acre.

Even though the first $60,000 value of the farm is exempt from Federal inheritance taxes, the remaining taxes are much more than the average family can afford.

According to Ray Chapman, who farms near Crofton and is president of the Anne Arundel County chapter of the Maryland Farm Bureau, the problem is a very real one facing farmers in the county.

He says it is not that people are forced to leave their homes, but that they cannot afford to stay on there. High inheritance taxes coupled with other factors in the "big squeeze" prevent many people from staying on as farmers, he said. In fact, he said, "I think most people would want to stay on their farms if they could get away from taxes..."

Another factor which Mr. Chapman sees as contributing to the farmers' plight in Anne Arundel county is the recent building moratorium in Virginia, Prince Georges and Montgomery counties. This, he said, will also drive land prices up as speculators and developers move into the county.

There is some hope, however, that the plight of young farmers inheriting their parents' property may be eased by a bill jointly introduced into the Senate and House of Representatives by Senator Charles McC.Mathias and Representatives Goodloe Byron and Marjorie S. Holt.

The bills, if passed, will provide for farmland and woodland to be assessed at agricultural values providing that inheritors of farms must continue to use the land for farming or as open space. If they do not use the land for these purposes, they must pay the higher inheritance taxes. Should the land be sold later at a value above its value as farmland, a provision of the bill allows the government to retrieve taxes and thus prevent speculators from taking advantage of a tax break designed to protect farmers and their way of life.

If passed, the bill will also protect many historical homes which might be destroyed when sold because the inheritors could not afford to pay the inheritance taxes.

According to Brice Clagett, Chairman of the Maryland Historical

Continued on page 14A

Caught in the Big Squeeze

Farm land diminishing here

Continued from page 1A

Trust, and a farmer in Friendship. Federal estate taxes were never meant to hit anyone but the very wealthy. "They were set in the 1930s when $60,000 was a lot of money, and the environmental effect of these taxes is ludicrous."

"The idea," he said, of having an historic and pretty county (Anne Arundel) ruined over a Federal government tax is a hard thing to take."

Even if he manages to hold on to his farm through the trials and travails of the Federal tax system, the farmer is going to have a tough time making ends meet. Not only must he contend with the whims of nature, but he is hard-hit by inflation and a myriad of inflation-connected problems.

According to Mr. Chapman, a farmer's income is low and as the man at the bottom of the food chain, he makes the least profit sometimes barely managing to keep his head above water. "A farmer," said Mr. Chapman, "has a unique business because he sells wholesale and buys retail."

Some of the things which he listed as contributing to the squeeze on farmers include the high cost of equipment, seed, and fertilizer. "Fertilizer" he said, "is sky-high if you can get it. It costs twice as much as it did three years ago." As an example he pointed out that tobacco has only increased about $.15 per pound in the past two years, but the cost of fertilizer for tobacco has more than doubled.

"It can happen easily," he said, "that you put in a crop and make less money than you paid for it."

This statement was corroborated by Robert Pumphrey, secretary of the county farm bureau, who said that, "The cost of fertilizer has doubled, but unless you have a really good crop, you lose money." Mr. Pumphrey, who sells produce locally, said that people who stop in to buy from him will complain when the prices go up, and that after a while they "just won't pay, they have a breaking point."

"They don't seem to understand or care," he said, as he noted that "they don't argue with the A&P when they raise their produce prices."

Another area where the farmer is really feeling the pinch is the high cost of farming equipment. As Mr. Chapman puts it, "the pickup truck I just bought cost almost twice what the old one did, but it sure won't do twice the work."

Farm equipment costs have increased by leaps and bounds over the last few years, but the farm product revenues have not increased enough to hold the line.

In fact, according to the USDA, if the costs of food had increased as much as wages in the past 20 years, then the average household would pay over $750 more per year for food than it already pays. On the average, however, the farmer receivesonly about 46 per cent of the entire food dollar, with the rest being spread between wholesalers and processers. (Recent figures show that a farmer gets only 9 cents of the cost of a loaf of bread.)

The prices which the farmer receives for his produce vary greatly due to fluctuations in supply and market demands, and although prices can skyrocket overnight, they tend to come down just as rapidly. The prices of most other commodities tend to stay elevated once they have increased.

The cost of labor, too, has become prohibitive, and in many cases, it is cheaper in the long run to purchase expensive equipment rather than hire laborers at the going rates.

All of these factors contribute to the attrition rate of farmers, both young and old, in Anne Arundel county. According to Mr. Chapman there were about 1,500 farms in the county as tallied by the last census, and about 150 of these farms shut down each of the intervening years.

Additionally, there are few young farmers in the county, and there are few prospects for increasing their numbers in the future. According to Mr. Chapman, in 10 to 20 years there will be a terrific problem in agriculture because most of the farmers "will just be gone."

As Mr. Chapman puts it, "How can a man continue to farm with low prices on what he's producing when someone offers him $12,000 an acre for his land. If he lets the land go, it will provide for him the rest of his life.

"It's a losing game. Someday I'll probably have to sell my land. I'm not looking forward to it, but what can you do?"

Baltimore Sun
June 20, 1974
Peter A. Jay

How Much Growth? –Big Issue for State

Obscured though it is by the gaudier public distractions of this third Watergate summer, the land-use issue is still with us.

Questions of growth—to halt it, control it or encourage it—provide the dominant theme in campaign after campaign across the nation and throughout Maryland this year. Along with the state of the economy, with which it is inextricably intertwined, growth is probably the major public question in the country—the Nixon administration's disinterest in land-use legislation notwithstanding.

It wasn't many years ago that the no-growth people were a noisy minority but nothing more. Economists spoke of an ever-increasing gross national product as though it were a blessing that would be continued forever and forever; to suggest that growth was not progress, that bigger was not better, would have been seen as both obtuse and unpatriotic.

Now, the people who caused the problems of growth are the ones pressing hardest to solve them. In the suburbs, it is the people in the new subdivisions, more often than not, who lead the battles against further rezoning. In Colorado, Oregon and Vermont, the newcomers, the people who fled crowding elsewhere, are the most outspoken advocates of "holding the line."

Vermont's Gov. Thomas P. Salmon, who is from Connecticut, won his seat in 1972 on an anti-development campaign of "Vermont for the Vermonters." Former Gov. John A. Love of Colorado, I believe it was, declared once that of the newcomers to his state, "every one wants to be the last s.o.b. to move here."

Eventually, in every fast-growing county or town or state, there comes a point at which the newcomers outnumber the natives and seize control. It is happening in Maryland at the state level now because of the fierce growth of Montgomery and Prince Georges counties.

It is a bit odd, considering this, that the question of Maryland's land and what to do about it hasn't yet become much of an issue in the nascent 1974 political campaigns for state office. Governor Mandel has been too busy trotting off to China, coping with little brush-fire incidents here and there, signing bills and relighting his pipe to spell out a clear land-use policy for his next administration—if there is to be one. And nobody has been pressing him very hard about it.

The Governor can be expected to take credit for the rather plain and unadorned land-use bill enacted by the 1974 General Assembly with his strong backing, and it is a fact that although some environmental groups have been critical of the measure as inadequate it is a genuinely useful piece of legislation.

But much more remains to be done in this field, and now is the time for officeholders and officeseekers alike to start talking about it. How, for example, can the frighteningly rapid process that is consuming Maryland's best farmland in gulps of thousands of acres each year be arrested? There are some potential answers kicking around, and candidates ought to be discussing them.

One bill that would help plug the annual drain of farmland, introduced by Maryland Representative Goodloe E. Byron (D., 6th), is now before the House Ways and Means Committee. The bill, like an identical Senate measure by Senator Charles McC. Mathias, Jr. (R., Md.), would require that farmland and woodland be assessed for federal estate-tax purposes on the basis of their value for agriculture or forestry, not for development.

Enactment of the bill would eliminate the forced liquidation of family farms that now occurs when a farmer dies and his heirs, unable to pay an inheritance tax based on development value, must sell the property.

This bill, or one like it, will be necessary if a state such as Maryland, which has valuable agricultural land adjacent to expending urban areas, is to preserve its rural character and farm productivity as the Twentieth Century draws to a close.

Thus far, though, the issue of land and its use has not caught the attention of politicians on the stump, and it seems likely that we will hear far more talk about sordid little scandals over the next few months than we will serious discussion about the shape of our state and its future.

STATEMENT REGARDING PROPOSALS AFFECTING TAX TREATMENT OF CHARITABLE CONTRIBUTIONS TO TAX EXEMPT INSTITUTIONS

Presented to: Committee on Ways and Means, United States House of Representatives

Honorable Al Ullman, Chairman

Submitted by:

American Association of Presidents of Independent Colleges and Universities. Presidents of 102 colleges and universities belong to the Association. (List annexed as Exhibit "A").

National Association for Hospital Development. Members are executives of over 600 hospitals located nationwide and charged with obtaining funds from the private sector to meet hospital needs. (List annexed as Exhibit "B").

National Association of Independent Schools. An association of 850 independent elementary and secondary not-for-profit schools. (List annexed as Exhibit "C").

48 New York colleges and universities. (List annexed as Exhibit "D").

The Christian and Missionary Alliance, a church denomination serving as a missionary - sending organization with over 900 missionaries. The United States constituency is represented by over 1,200 local church groups. The Christian and Missionary Alliance operates three colleges, four retirement centers and four convalescent and nursing homes. (List annexed as Exhibit "E").

(List continued on next page)

The Church of the Nazarene, a church denomination serving both the United States and Missionary fields with about 600 missionaries and 7,473 ministers in the United States. The United States constituency is represented by 7,427 congregations with a membership of 430,128 and Sunday School enrollment totalling 1,175,212 and 68 Districts. The Church of the Nazarene operates 8 liberal arts colleges, one Bible college, and one Seminary. (List annexed as Exhibit "F").

The Conservative Baptist Foreign Mission Society with a constituency of 2,000 churches and a membership of over 500,000. The Society operates 2 seminaries and 3 colleges.

General Council of the Assemblies of God, a church denomination serving both the United States and foreign fields with nearly 1,900 ministers. The United States constituency is represented by 8,920 churches with a membership of almost 5 million. The General Council operates 27 colleges.

Beloit College, Beloit, Wisconsin.

Carleton College, Northfield, Minnesota.

Carnegie-Mellon University, Pittsburgh, Pennsylvania.

Choate Rosemary Hall, Wallingford, Connecticut.

Clark University, Worcester, Massachusetts.

College of the Holy Cross, Worcester, Massachusetts.

Doane College, Crete, Nebraska.

Drexel University, Philadelphia, Pennsylvania.

General Conference of Seventh-day Adventists, Washington, D. C.

Hendrix College, Conway, Arkansas.

Holy Cross Hospital, Fort Lauderdale, Florida.

(List continued on next page)

Knox College, Galesburg, Illinois.

Lafayette College, Easton, Pennsylvania.

LeTourneau College Fund, Longview, Texas.

Middlebury College, Middlebury, Vermont.

Millikin University, Decatur, Illinois.

Mount Olive College, Mount Olive,
North Carolina.

Mount Holyoke College, South Hadley,
Massachusetts.

Mayo Foundation, Rochester, Minnesota.
A charitable corporation dedicated
to medical practice, medical education
and medical research.

Northfield Mount Hermon School,
East Northfield, Massachusetts.

University of Notre Dame, Notre Dame,
Indiana.

Smith College, Northampton, Massachusetts.

The Society for the Propagation of
the Faith, New York City.

Westmont College, Santa Barbara, California.

Worcester Polytechnic Institute, Worcester,
Massachusetts.

World Literature Crusade, Chatsworth,
California.

Oral testimony by: Conrad Teitell, member, Prerau & Teitell,
New York City.

Dated: March 1, 1976

SUMMARY OF TESTIMONY

I. THE TAX LAWS SHOULD CONTINUE TO ENCOURAGE SUPPORT OF CHARITABLE ORGANIZATIONS BY CONCERNED CITIZENS.

Public charities perform a vital role in our society and the public would be adversely affected by enactment of proposals removing or reducing tax incentives to contributors. The history of our tax laws shows ever increasing tax incentives to supporters of charitable organizations which benefit the public. Now is not the time to reverse that trend.

The charitable deduction is not a loophole. It differs from other deductions and tax preferences in that it is not economically motivated. Other deductions redound to the individual taxpayer's benefit. Charitable contributions are voluntary and redound to the benefit of our nation. Any reduction of current incentives to charitable contributions would, in effect, be an indirect tax on publicly supported charitable organizations.

[See pages 7-10]

II. THE FOLLOWING PROPOSALS WOULD SUBSTANTIALLY REDUCE CHARITABLE GIFTS AND BEQUESTS AND WOULD NOT BE IN THE BEST INTERESTS OF THE NATION.

A. We oppose any proposal which would place a 50% or other ceiling on the estate and gift tax charitable deductions (or a 50% or other ceiling on the charitable deduction under any unified transfer tax).

B. We oppose any proposal which would tax appreciation on property contributed to publicly supported charitable organizations at death, during lifetime, or both.

[See pages 10-15]

III. AMONG ALL OF THE DEDUCTIONS THE CHARITABLE DEDUCTION IS UNIQUE. IT IS SOCIETY THAT BENEFITS THE MOST BY ALLOWING CHARITABLE DEDUCTIONS, NOT INDIVIDUAL DONORS. DONORS WOULD BENEFIT MORE ECONOMICALLY BY NOT MAKING CHARITABLE GIFTS.

[See pages 15-16]

TESTIMONY

Mr. Chairman and Members of the Committee:

I am Conrad Teitell, a member of the New York City law firm of Prerau & Teitell, and appear before you in the capacity of special counsel to a number of charitable organizations which have the same general interests and have consolidated their testimony so as to conserve the Committee's time.

The organizations on whose behalf I appear are:

The American Association of Presidents of Independent Colleges and Universities; the National Association for Hospital Development; the National Association of Independent Schools; 48 New York colleges and universities; The Christian and Missionary Alliance; The Conservative Baptist Foreign Mission Society; The Church of the Nazarene; Beloit College; Carleton College; Carnegie-Mellon University; Choate Rosemary Hall; Clark University; College of the Holy Cross; Doane College; Drexel University; the General Conference of Seventh-day Adventists; the General Council of the Assemblies of God; Hendrix College; Holy Cross Hospital; Knox College; Lafayette College; LeTourneau College Fund; Middlebury College, Middlebury, Vermont; Millikin University; Mount Olive College; Mount Holyoke College; the Mayo Foundation; Northfield Mount Hermon School; the University of Notre Dame; Smith College; The Society for the Propagation of the Faith; Westmont College; Worcester Polytechnic Institute; and World Literature Crusade.

We thank you for this opportunity to present our views and support your efforts to make our tax laws more equitable.

I. THE TAX LAWS SHOULD CONTINUE TO ENCOURAGE SUPPORT OF CHARITABLE ORGANIZATIONS BY CONCERNED CITIZENS.

First and foremost, the charitable contribution deduction is not a loophole. It differs from other deductions and tax preferences in that it is not economically mandated. Other deductions redound to the individual taxpayer's benefit. A donor is economically ahead by not making a charitable gift because the tax savings are smaller than what he parts with. Charitable contributions are voluntary and redound to the benefit of our nation.

A reduction of current tax incentives to charitable contributors would reduce charitable gifts and result in decreased services to the general public. Reduced tax incentives would, in effect, be indirect taxes on publicly supported charitable organizations.

Schools, hospitals, churches, health, social welfare and other publicly supported charitable organizations perform a vital role in our nation. If the services rendered to the general public by charitable institutions were to be diminished because of reduced private support, the public would suffer immeasurably. The importance of the services to the nation rendered by the institutions

represented at these hearings need not be reviewed. They are well known and we stand on our record of serving our communities, states and the nation. We do emphasize that if our services to the general public are to continue and expand to meet new needs, tax incentives to those who support worthy charitable organizations should be increased, not decreased.

Historical, philosophical and practical reasons why current tax benefits for donors should be continued. In no country is private philanthropy as important a part of the national character as in the United States. The inception early this century of our federal tax laws encouraged rather than curbed the generosity of Americans. Since 1917 the government has stimulated private voluntary support by granting tax deductions to those who give to schools, churches, hospitals, health, social welfare and other publicly supported charitable organizations.

Congress has continually increased the tax incentives for charitable giving, starting out with a 15% ceiling on charitable gifts and increasing it over the years to the present 50% of adjusted gross income (contribution base) ceiling -- with a 5 year carryover for any "excess".

<u>The government has practical reasons for encouraging voluntary financial support</u>. We need the services provided by schools, churches, hospitals, health organizations and other charities. If support for their work does not come from private sources, from where will it come?

Charitable contributions by concerned citizens have enabled educational institutions to maintain freedom of academic inquiry. They have insured separation of church and state. Voluntary charitable contributions have offered the means of maintaining the historical balance between government services and voluntary initiatives, the antithesis of a totalitarian society. The charitable contribution deduction enables our citizens to participate in making decisions, rather than concentrating further power in the hands of the government.

The increased tax incentives for charitable gifts over the years has resulted in expansion and development of charitable organizations which now more than ever depend upon private philanthropic support.

A vast corps of volunteers give not only their money but also their time to charitable organizations. If our private institutions become government institutions, much of this volunteer time is likely to be lost.

The Congress has stated on many occasions that the government is compensated for any loss of revenue by its relief from financial burdens which otherwise would have to be made by appropriations from public funds and by the benefits resulting from promotion of the general welfare.

As the Treasury itself has said: "Private philanthropy plays a special and vital role in our society. Beyond providing for areas into which government cannot or should not advance (such as religion), private philanthropic organizations can be uniquely qualified to initiate thought and action, experiment with new and untried ventures, dissent from prevailing attitudes and act quickly and flexibly.

"***In doing so they enrich the pluralism of our social order***" (Treasury Report on Private Foundations, Committee on Ways and Means, U. S. House of Representatives, Washington: U. S. Government Printing Office, February 2, 1965, P. 5.).

II. THE FOLLOWING PROPOSALS WOULD SUBSTANTIALLY REDUCE CHARITABLE GIFTS AND BEQUESTS AND ARE STRONGLY OPPOSED AS NOT BEING IN THE BEST INTERESTS OF THE NATION.

A. Ceiling on deduction for bequests. Current law allows an unlimited estate tax charitable deduction. One proposal would put a ceiling of 50% on the estate tax charitable deduction.

This proposal would drastically decrease bequests now going to charitable organizations. Such a limitation would be an indirect tax on charitable organizations of the federal estate tax imposed on the gift because the charity would not receive the entire bequest, but the bequest reduced by estate taxes. For practical purposes, this is the same as the charity receiving the entire bequest and then having the federal government levy a tax on the property owned by the charity.

Virtually every charitable organization can point to a number of significant bequests of an entire estate or a substantial part of an estate.

Bequests to (1) the Mayo Foundation (which operates the Mayo Clinic, Mayo Graduate School of Medicine and Mayo Medical School, and (2) Doane College, Crete, Nebraska, serve as examples.

The Mayo Foundation in a recent two year period received:

1. An entire estate (less some very minor specific bequests) which

totalled $1,025,365. This estate was left to the Mayo Foundation for research in cancer and heart disease. The Mayo Foundation has major emphasis in both areas and is receiving National Institute of Health grants to support work in these areas.

2. The Mayo Foundation received another entire estate (less $8,000 in specific bequests) which totalled $453,247. This was left as an unrestricted gift and was greatly needed to buttress endowment.

3. The Mayo Foundation has been named as one of three charities to share equally in an estate totalling approximately $4,000,000. This bequest is also unrestricted.

Although these are huge sums of money, these gifts should be viewed in the context of the Mayo Foundation's research and education expenses which exceed $20,000,000 annually. Adverse tax laws would decrease the funds essential for the Mayo Foundation's work. Where would the Mayo Foundation look to replace its lost support?

Doane College is a small liberal arts college in Crete, Nebraska. It recently received an entire estate (except household goods and personal effects) of $346,421.84 for the Doane College Library Trust Fund. The building fund for a new library received $80,000, approximately $25,000 was added to the library budget for new books and periodicals and the balance has been invested in the Library Trust Fund, the income from

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which goes towards improving the library's book holdings.

This is a tremendous boost to its academic program of Doane College. Where will Doane College look to replace this type of gift if the tax laws are changed so as to reduce the amount of the gift actually received by the College?

No economic enhancement inures to a decedent or his family as a result of a charitable transfer at death. Testamentary charitable transfers diminish the estate otherwise available for the family or other private persons.

Testamentary charitable transfers effect redistribtuion of wealth.

Every deductible dollar paid to charity is devoted to public purposes and in many instances substitutes for federal revenues otherwise needed. In other cases, these transfers fund activities for the public benefit which the government would not, or could not, undertake. In all events, the wealth transferred to charity has been redistributed. It is permanently diverted from the decedent and his family to public use. Any change in the estate tax laws which reduces the funds available for charity will result in diminishing the private sector's ability to sustain eleemosynary institutions. Their existing economic problems will be exacerbated.

A percentage limitation on testamentary charitable transfers would reduce the amount available to charity by more than the taxes levied on the transfer. There would be an indirect effect of such a tax -- a reduction in bequests.

We support the American Law Institute's position in the paper submitted to the Committee by Professor A. James Casner of the Law School of Harvard University.

> "The 100% charitable deduction in the field of transfer taxation should be retained, either under a dual tax system or a unified tax". See Committee print, Prepared Statements Submitted by Witnesses Invited to Appear before The Committee on Ways and Means to Participate in Panel Discussions on Tax Reform, Panel No. 10, Estate and Gift Tax Revision, February 27, 1973, page 265.

If a limit is placed on the federal estate tax charitable deduction, charitable bequests will be subtantially decreased because the bequests will be diminished by estate taxes. If a limit is placed on the gift tax charitable deduction -- either under the current gift tax law or under a unified transfer tax -- a donor could actually have to pay a gift tax on a lifetime charitable gift. This could result in a marked decrease in lifetime charitable gifts. It would be inconsistent to allow an income tax charitable contribution deduction as a tax incentive, and then impose a gift tax (or unified transfer tax) on the charitable gift.

B. Gifts of appreciated property to publicly supported organizations. When revisions of the estate and gift tax laws have been considered, proposals have often been made to tax the appreciation on death -- just as if the decedent sold the property just before death and then contributed the cash proceeds. We ask that gifts of appreciated property to publicly supported charitable organizations not be subject to such a rule.

Gifts of appreciated property are a major source of support for most publicly supported charitable organizations. The tax treatment of appreciated property gifts was thoroughly considered by Congress in connection with the Tax Reform Act of 1969 and reflects an evident purpose to retain tax incentives for these gifts. We strongly urge that current law remain unchanged; otherwise a major source of charitable support would be drastically decreased.

III. CONCLUSION

Among all of the deductions the charitable deduction is unique. It is society that benefits the most by allowing charitable deductions, not individual donors. Donors would benefit more economically by not making charitable gifts.

Current news abounds with articles concerning the inadequacy of the financial resources of all types of charitable organizations. Never in our history have charitable organizations found themselves in comparable circumstances -- in which they are unable to carry on assigned roles without using and depleting endowment and obtaining additional current contributions.

It is no answer to suggest that direct government funding will substitute for funds lost through reduction of tax incentives or taxes on property passing to charity. Funds siphoned off in general revenues reach the public through the charitable stream in the most remote sense, if at all. Reducing current tax incentives would reverse the objective of less, rather than more, government intervention.

Mr. Chairman and members of the Committee, thank you again for this opportunity to present our views. We ask that any new tax law continue the long-established and essential tax incentives to charitable giving which undergird our nation's educational, religious, hospital, health, social welfare and other charitable organizations.

We are aware of the time pressures and heavy work load of the Committee and have made our remarks as brief as possible. If the Committee wishes amplification on any point, we would appreciate the opportunity to submit a supplemental statement. We are available, if the Committee wishes, to meet with members of the Committee's staff.

AAPICU

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EXHIBIT "B"

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NATIONAL ASSOCIATION FOR HOSPITAL DEVELOPMENT

JOHN R ADAMS
533 SHASTA WAY
MILL VALLEY CA 94941

JAMES I ADLER
CONSULTANT
CHARLES R FELDSTEIN & CO INC
221 N LA SALLE STREET
CHICAGO IL 60601

ALABAMA HOSPITAL ASSOCIATION
ATTN G C LONG JR EXEC VP
BOX 3237 EASTHROOK STATION
MONTGOMERY AL 36109

ALASKA STATE HOSPITAL ASSN
ATTN M K LAMPMAN EXEC DIR
1135 WEST EIGHTH SUITE 7
ANCHORAGE AK 99501

DON L ALBERTSON
VICE-PRESIDENT
SISTER KENNY INSTITUTE
1800 CHICAGO AVE
MINNEAPOLIS MN 55404

CHARLES I ALEE
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1111 W LA PALMA AVE
ANAHEIM CA 92801

M GRANT ALEXANDER
FOUNDATION OFFICER
METHODIST HOSPITAL FOUNDATION
MEMPHIS TN 38104

MARY ALEXANDER
DIRECTOR COMMUNITY RELATIONS
MERCY HOSPITAL
1000 N VILLAGE AVE
ROCKVILLE CENTRE NY 11570

MICHAEL J ALEXANDER
ASSISTANT ADMINISTRATOR
HOLY SPIRIT HOSPITAL
NORTH 21ST ST
CAMP HILL PA 17011

ROBERT C ALEXANDER
DIR OF DEVELOPMENT
MEASE HOSPITAL & CLINIC
DUNEDIN FL 33528

MRS PHYLLIS ALLEN
ASST SECRETARY
AKRON GEN MED CNTR FDN
400 WABASH
AKRON OH 44307

RALPH ALLEN
DIR PR & DEVELOPMENT
GODDARD MEMORIAL HOSPITAL
909 SUMNER ST
STROUGHTON MA 02072

AMER ASSN OF FUND RAISING
COUNCIL INC
500 5TH AVENUE
NEW YORK NY 10036

PHILIP T ARCHILLES
1004 N MAIN ST
BELTON TX 76513

MRS AMPARO ARECHABALA
CO-ORDINATOR DEVELOPMENT
UNIV MIAMI HOSPITALS
1475 N W 12TH AVE
MIAMI FL 33136

ARIZONA HOSPITAL ASSOCIATION
LIBRARY
4202 EAST RAYMOND ST
PHOENIX AZ 85040

DAVID B ARNOLD
DIRECTOR OF DEVELOPMENT
FRIENDS HOSPITAL
ROOSEVELT BLVD & ADAMS AVE
PHILADELPHIA PA 19124

MELVIN J ARNOLD
EXEC VICE PRESIDENT
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200 AVENUE F N E
WINTER HAVEN FL 33880

ARKANSAS HOSPITAL ASSOCIATION
ATTN R M BUSFIELD JR PHD DIR
1501 N UNIVERSITY AVE STE 400
LITTLE ROCK AR 72207

OREN ART
DIR OF DEVELOPMENT
WILSON N JONES MEMORIAL HOSP
500 N HIGHLAND AVE
BOX 1258
SHERMAN TX 75090

STEVEN T AST
DIRECTOR OF DEVELOPMENT
UNIV OF CALIF SAN FRANCISCO
745 PARNASSUS AVE
SAN FRANCISCO CA 94143

WALTER C AVERY
GREATER S E COMMUNITY HOSP
1310 SOUTHERN AVE
WASHINGTON D C 20032

JUDITH A BABCOCK
PUBLIC RELATIONS DIRECTOR
ROCHESTER GENERAL HOSPITAL
1425 PORTLAND AVE
ROCHESTER NY 14621

BERNE BACHRACH
DIR DEVELOPMENT COMMUNICATIONS
NORWOOD HOSPITAL
800 WASHINGTON ST
NORWOOD MA 02062

WILLARD BAILEY
DIR OF DEVELOPMENT
CHILDRENS HOSP MEDICAL CENTER
3245 BURNET AVE
CINCINNATI OH 45229

ROBERT L BAKER
DIR OF PUBLIC RELATIONS
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1044 N FRANCISCO CAE
CHICAGO IL 60622

JAMES A BALDWIN JR
ASSOC DEAN FOR DEVELOPMENT
SCHOOL OF MEDICINE
UNIV OF MIAMI
BOX 520875 BISCAYNE ANNEX
MIAMI FL 33152

JAMES H BALMOS
DIRECTOR OF PUBLIC AFFAIRS
WATERBURY HOSPITAL
64 ROBBINS ST
WATERBURY CT 06720

JACOB M BARD
DIRECTOR OF DEVELOPMENT
JACKSON PARK HOSPITAL FDN
7531 STONY ISLAND AVE
CHICAGO IL 60649

MAURICE E BARKER
DEVELOPMENT COORDINATOR
ST LUKES HOSPITAL
44TH & WORNALL ROAD
KANSAS CITY MO 64111

PETER C BARNARD
DIRECTOR OF DEVELOPMENT
MAINE MEDICAL CENTER
22 BRAMHILL ST
PORTLAND ME 04102

DON BARNES
DIRECTOR OF PUBLIC RELATIONS
ST FRANCIS HOSPITAL CENTER
101 N 17TH AVENUE
BEECH GROVE IN 46107

HAROLD M BARNETT
DIRECTOR OF DEVELOPMENT
RIDEOUT HOSPITAL
INSTITUTE FOR DEVELOPMENT
BOX 231
MARYSVILLE CA 95901

STEVEN M BARNEY
DIRECTOR COMMUNITY RELATIONS
ST MARYS HOSP MED CNTR
720 S BROOKS ST
MADISON WI 53715

PATRICIA BARRETT
DIRECTOR OF DEVELOPMENT
ST JOSEPH HOSPITAL OF KIRKWOOD
525 COUCH AVE
KIRKWOOD MO 63122

TOM BASHWINER
DIRECTOR OF DEVELOPMENT
MERCY HOSPITAL
116 DAYTON ST
HAMILTON OH 45011

DAVID BASSIN
DIRECTOR OF DEVELOPMENT
BETH ISRAEL HOSPITAL
330 BROOKLINE AVE
BOSTON MA 02215

GEORGE H BAUGHMAN JR
V P FOR DEVELOPMENT
LUTHERAN MEDICAL CENTER
4520 4TH AVE
BROOKLYN NY 11220

JAMES BEAM
DIRECTOR OF PUBLIC AFFAIRS
MARTIN LUTHER HOSPITAL
1825 W ROMNEYA DR
ANAHEIM CA 92803

RUSSELL C BECKWITH
VICE PRESIDENT-CONTROLLER
MEMORIAL MEDICAL CENTER
FIRST & MILLER STS
SPRINGFIELD IL 62705

MRS VICKI PEAKS BEIZE
PLANNING & DEVELOPMENT
COORDINATOR
RIVERSIDE GENERAL HOSPITAL
3204 ENNIS
HOUSTON TX 77004

JOHN BELL
DIRECTOR OF DEVELOPMENT
THE METHODIST HOSPITAL
221 N E GLEN OAK
PEORIA IL 61603

KENNETH V BELL
DIRECTOR OF DEVELOPMENT
ST EDWARD MERCY HOSPITAL
1411 ROGERS AVE
FORT SMITH AR 72901

JAMES P BERLUTI
14 COBB TERRACE
WALPOLE MA 02481

RICHARD W BESSE
DIRECTOR OF DEVELOPMENT
CROUSE-IRVING MEMORIAL
HOSPITAL INC
736 IRVING AVE
SYRACUSE NY 13210

DOROTHY J BEST
ASST DIR OF DEVELOPMENT
BURLINGTON CO MEMORIAL HOSP
175 MADISON AVE
MT HOLLY NJ 08060

SARAH BEYNE
EDITOR/WRITER
NATIONAL HEALTH CARE GROUP
ARTHUR YOUNG & COMPANY
ONE IBM PLAZA
CHICAGO IL 60611

MRS MILDRED BINIK
DIRECTOR OF DEVELOPMENT
METROPOLITAN HOSPITAL
201 N 8TH ST
PHILADELPHIA PA 19106

RAYMOND T BIRCH
DIRECTOR OF DEVELOPMENT
METHODIST HOSPITAL
7500 TIMBERLAKE DR
SACRAMENTO CA 95823

EDWIN H BISHOP
DIRECTOR OF PUBLIC RELATIONS
VARIETY CHILDRENS HOSPITAL
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MIAMI FL 33155

JAMES J BLOCK
DIRECTOR OF DEVELOPMENT
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709 SOUTH 10TH ST
LA CROSSE WI 54601

E W BLOSE
DIR PERSONNEL & PR
ART CENTRE HOSP
5435 WOODWARD AVE
DETROIT MI 48202

BRIAN K BOGERT
ADMINISTRATOR
MERCY MEDICAL CENTER
375 E PARK AVE
DURANGO CO 81301

DAVID E BOAZ
EMMA PENDLETON BRADLEY HOSP
1011 VETERANS MEMORIAL PARKWAY
EAST PROVIDENCE RI 02915

G E BOKINSKY
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DONALD A BORKOWSKI
DIR OF PUBLIC RELATIONS &
DEVELOPMENT
ST JOSEPHS HOSPITAL
5000 W CHAMBERS ST
MILWAUKEE WI 53210

ROBERT N BOSWELL
DIR OF FUND DEVELOPMENT
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OF SANTA CLARA VALLEY
15825 SAMARITAN DRIVE
SAN JOSE CA 95124

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DIRECTOR PUBLIC INFO
CHRIST COMMUNITY HOSPITAL
4440 W 95TH ST
OAK LAWN IL 60453

JAMES L BOWERS
DIRECTOR OF DEVELOPMENT
TUCSON GENERAL HOSPITAL
3838 N CAMPBELL AVE
TUCSON AZ 85719

LINDA J BOYLAN
DIRECTOR OF DEVELOPMENT
RIVERSIDE HOSPITAL
350 N WALL ST
KANKAKEE IL 60901

DONALD A BRADLEY
PRESIDENT
MORRISTOWN MEMORIAL HOSPITAL
100 MADISON AVE
MORRISTOWN NJ 07960

WAYNE J BRADLEY
DIR OF PUBLIC RELATIONS
ST ELIZABETHS HOSPITAL
1506 S ONEIDA
APPLETON WI 54911

GEORGE A BRAKELEY JR
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2051 WAUKEGAN RD
DEERSFIELD IL 60015

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ROCHESTER MN 55901

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DIRECTOR
ALISO-PILO ASSN
3060 SAN PASQVAL
PASADENA CA 91107

WILLIAM F BROCKMAN
ASSISTANT ADMINISTRATOR
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309 S MAIN ST
BLUFFTON IN 46714

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ADMINISTRATOR
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MT EPHRAIM & ATLANTIC
CAMDEN NJ 08104

GORDON M BROWN
DIRECTOR OF DEVELOPMENT
METHODIST HOSPITAL OF BROOKLYN
506 SIXTH ST
BROOKLYN NY 11215

JOHN A BROWN
VICE PRESIDENT FOR DEVELOPMENT
INGALLS MEMORIAL HOSPITAL
ONE INGALLS DRIVE
HARVEY IL 60426

MICHAEL L BROWN
DIRECTOR OF DEVELOPMENT
BERNALILLO COUNTY MED CNTR
2211 LOMAS BLVD N E
ALBEQUERQUE NM 87106

RAYMOND W BROWN
DIRECTOR OF DEVELOPMENT
VIRGINIA MASON HOSPITAL
925 SENECA
SEATTLE WA 98101

ROBERT A BROWN
EXECUTIVE DIRECTOR
MILLS MEMORIAL HOSPITAL FDN
100 S SAN MATEO DR
SAN MATEO CA 94401

ROGER D BROWNING
VICE PRES/EXEC DIRECTOR
ALBANY MEDICAL CENTER FDN
43 NEW SCOTLAND AVE
ALBANY NY 12208

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LITTLE ROCK AR 72201

ARTHUR P BRYANT
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SHAWNEE MISSION KS 66204

JACK G BRYAN
DEVELOPMENT DIRECTOR
HERRICK MEMORIAL HOSP
2001 DWIGHT WAY
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SANFORD A BRYE
ASSOCIATE IN DEVELOPMENT
AITA BATES HOSPITAL
WEBSTER & COLBY
BERKELEY CA 94705

PATRICIA A BUCHMANN
HEALTH PROGRAM ANALYST
NYC HEALTH & HOSP CORP
125 WORTH ST
NEW YORK NY 10013

MRS MARLENE C BUMBERA
ASSIST DIR OF DEVELOPMENT
ST JOSEPH HOSPITAL
BOX 5627
ORANGE CA 92667

JOHN J BURNS
ASSOC DIR DEVELOPMENT
PRESBY UNIV PENNA MED CNTR
51 N 39TH ST
PHILADELPHIA PA 19104

JOHN R BUSH
ASSOCIATE FOR DEVELOPMENT
U OF TEXAS SYSTEM CANCER CNTR
TEXAS MED CNTR
6723 BERTHER
HOUSTON TX 77071

JOHN R BUSICK
DIRECTOR OF DEVELOPMENT
ST BARNABAS HOSPITAL
183RD ST & THIRD AVE
BRONX NY 10457

EDWARD G BUTLER
DIRECTOR OF DEVELOPMENT
RIVERSIDE COMMUNITY HOSPITAL
4445 MAGNOLIA AVENUE
RIVERSIDE CA 92501

RAY J CALABRESE
BOARD MEMBER
BERWICK HOSPITAL
522 E 3RD ST
NESCOPECK PA 18635

DALE CADLWELL
ASST ADMINISTRATOR
PROVIDENCE HOSPITAL
700 N E 47TH AVE
PORTLAND OR 97213

CALIFORNIA HOSPITAL ASSN
ATTN WILLIAM M WHELAN DIR
925 L STREET SUITE 1250
SACRAMENTO CA 95814

JACK M CAMPBELL
ADMINISTRATOR
WILSON N JONES
MEMORIAL HOSPITAL
500 N HIGHLAND
SHERMAN TX 75090

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DIRECTOR OF DEVELOPMENT
HOLZER MEDICAL CENTER
JACKSON PIKE
GALLIPOLIS OH 45631

CAREER PLANNING CENTER
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SANTA ANA CA 92706

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2800 BENEDICT DRIVE
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DIR OF COMMUNITY RELATIONS
ST ELIZABETH HOSPITAL
21ST ST & EASTERN AVE
COVINGTON KY 41014

JAMES E CARSON
DIRECTOR OF DEVELOPMENT
WESLEY HOMES INC
1833 CLIFTON ROAD N E
ATLANTA GA 30329

LYMAN H CASEY
ASSISTANT ADMIN
ST FRANCIS MEM HOSPITAL
900 HYDE ST
SAN FRANCISCO CA 94109

ROBERT F CASHEL
VICE-PRESIDENT
BERND BRECHER & ASSOC
292 MADISON AVE
NEW YORK NY 10017

C W CHADWICK
DIRECTOR OF DEVELOPMENT
DEACONESS HOSPITAL
5501 N PORTLAND
OKLAHOMA CITY OK 73112

J GRANT CHAPLINE
DEVELOPMENT DIRECTOR
GOOD SAMARITAN HOSPITAL
1000 MONTAUK HWY
WEST ISLIP NY 11795

KENNETH L CHESLEY
EXECUTIVE VICE PRESIDENT
AMERICAN FUND RAISING SERVICES
600 WINTER STREET
WALTHAM MA 02154

MICHAEL E CLAFFEY
VICE-PRESIDENT FOR DEVELOPMENT
MICHAEL REESE MEDICAL CENTER
29TH STREET & ELLIS AVE
CHICAGO IL 60616

EUGENE E CLAIR JR
VICE PRESIDENT FOR DEVELOPMENT
NEW ENGLAND BAPTIST HOSPITAL
91 PARKER HILL AVE
BOSTON MA 02120

JAMES F CLARKE
DIRECTOR OF DEVELOPMENT
KETTERING MEDICAL CENTER
3535 SOUTHERN BLVD
KETTERING OH 45429

ROBERT CLARK
DIRECTOR OF DEVELOPMENT
SETON HOSPITAL
600 WEST 26TH ST
AUSTIN TX 78705

OTIS L CLASBY
HOSPITAL ADMINISTRATOR
JOSEPHINE GENERAL HOSPITAL
715 N W DIMMICK ST
GRANTS PASS OR 97526

FRANK E CLEGG
DIR OF DEVELOPMENT
GOOD SAMARITAN HOSPITAL
310 S LIMESTONE
LEXINGTON KY 40508

RICHARD CODD
DIRECTOR FOR DEVELOPMENT
LONG BEACH COMMUNITY HOSPITAL
1720 TERMINO AVE
LONG BEACH CA 90804

DONALD F COESTER
EXECUTIVE DIRECTOR
VARIETY CHILDRENS HOSPITAL
6125 S W 31ST STREET
MIAMI FL 33155

FREDERICK K CODY
ST JOHN HOSPITAL
22101 MOROSS RD
DETROIT MI 48236

VIRGINIA COIGNEY
DIRECTOR DEVELOPMENT
DANBURY HOSPITAL
24 HOSPITAL ROAD
DANBURY CT 06810

JOHN W COLBY
ADMINISTRATOR
ST LUKES MEMORIAL HOSPITAL
S 711 COWLEY
SPOKANE WA 99210

RONALD W COLE
DIRECTOR OF CLIENT DEVELOPMENT
1303 AVOCADO DRIVE SUITE 200
NEWPORT BEACH CA 92660

PHILIP M COLEMAN
DIR OF COMMUNITY RELATIONS
CANDLER GENERAL HOSPITAL
P O BOX 9787
SAVANNAH GA 31402

WILLIAM H COLEMAN II
DIRECTOR OF DEVELOPMENT
HOLY CROSS HOSPITAL
BOX 23460
FT LAUDERDALE FL 33307

COLORADO HOSPITAL ASSOCIATION
ATTN ARVID BREKKE PRES
2140 SOUTH HOLLY STREET
DENVER CO 80222

CONNECTICUT HOSPITAL ASSN
DR FRED HYDE
VP FOR PUBLIC AFFAIRS
BOX 1966
NEW HAVEN CT 06509

J E CONNELL
DIRECTOR OF PLANNED GIVING
PRESBYTERIAN MED CNTR
UNIVERSITY PENNA
51 NORTH 39TH ST
PHILADELPHIA PA 19104

JOHN CONNORS
DIRECTOR COMMUNITY RELATIONS
ST JOSEPH HOSPITAL
1835 FRANKLIN ST
DENVER CO 80218

CARL E CONRAD
DEVELOPMENT DIRECTOR
CHILLICOTHE HOSPITAL
348 E SYCAMORE ST
COLUMBUS OH 43206

W DANIEL CONROYD
VICE-PRESIDENT
LOYOLA UNIV OF CHICAGO
820 N MICHIGAN
CHICAGO IL 60611

MAX C COPPOM
SECRETARY
W NEBRASKA GEN HOSPITAL
4021 AVENUE B
SCOTTSBLUFF NE 69361

PATRICIA A CORNELL
DIRECTOR OF DEVELOPMENT
SKOKIE VALLEY COMM HOSP
9600 GROSS POINT RD
SKOKIE IL 60076

L M CORNISH JR
FIRST NATIONAL BANK TOWER
TOPEKA KS 66603

HOWARD J CROCKEIT
EXECUTIVE VICE PRESIDENT
GAYLORD HOSPITAL
BOX 400
WALLING FORD CT 06492

ARTHUR CULLEN
DIR INFORMATION SVCS
PERTH AMBOY GEN HOSP
PERTH AMBOY NJ 08861

FRANK J CUNNEEN
DIRECTOR OF DEVELOPMENT
HOSPITAL OF ST RAPHAEL
1450 CHAPEL ST
NEW HAVEN CT 06511

KAY CURREY
DIRECTOR OF PUBLIC RELATIONS
LUTHERAN MEDICAL CENTER
BOX 3434
OMAHA NE 68103

CHARLES P CUSHMAN
GONSER GERBER TINKER STUHR
105 WEST MADISON
CHICAGO IL 60602

JOHN E DALEY
DIR OF FUND DEVELOPMENT &
PUBLIC RELATIONS
BORGESS HOSPITAL
1521 GULL ROAD
KALAMAZOO MI 49001

KEN DAPONTE
DIR OF MED CTR RELATIONS
HOLLYWOOD PRESBYTERIAN MED CTR
1300 N VERMONT AVE
LOS ANGELES CA 90027

JOHN E DAVIS
DIRECTOR OF DEVELOPMENT
ST VINCENT CHARITY HOSPITAL
2351 EAST 22ND ST
CLEVELAND OH 44115

EDYTHE M DAVIS
DIRECTOR OF RESOURCE
DEVELOPMENT
ST FRANCIS HOSPITAL
825 GOOD HOPE ST
CAPE GIRARDEAU MO 63701

ROBERT L DAVIS
DIR OF COMMUNITY RELATIONS
LITTLE COMPANY OF MARY HOSP
4101 TORRANCE BOULEVARD
TORRANCE CA 90503

SAMUEL DAVIS
EXECUTIVE PRESIDENT
MOUNT SINAI HOSPITAL
2215 PARK AVE
MINNEAPOLIS MN 55404

RALPH P DAY
DIRECTOR OF DEVELOPMENT
PENNSYLVANIA HOSPITAL
8TH & SPRUCE STS
PHILADELPHIA PA 19107

GEORGE A DE FOREST
PUBLIC RELATIONS DIRECTOR
SHORE MEMORIAL HOSPITAL
NEW YORK & SUNNY AVENUE
SOMERS POINT NJ 08244

ASSOCIATION OF DELAWARE HOSPS
ATTN JACK CROSS DIR
5 EAST REED STREET
DOVER DE 19901

DONALD W DE ROSEN
DIRECTOR GRANT MGMT
HENRY FORD HOSPITAL
RM 251 NURSES RESIDENCE
2799 W GRAND BLVD
DETROIT MI 48202

DIRECTOR OF DEVELOPMENT
HEALTH CARE
FINANCIAL CONSULTANTS
2 NORTH STREET
HINGHAM MA 02043

DIRECTOR OF DEVELOPMENT
ST PATRICK HOSPITAL &
HEALTH FOUNDATION
525 W PINE ST
MISSOULA MT 59801

MISS PAT DISHMAN
PUBLIC RELATIONS DIRECTOR
MIDLAND MEMORIAL HOSPITAL
2200 WEST ILLINOIS
MIDLAND TX 79701

DIST OF COLUMBIA HOSPITAL ASSN
ATTN WILLIAM M BUCHER EXEC VP
2021 K STREET N W SUITE 300
WASHINGTON D C 20006

MRS MARGARET M DOANE
DIR OF DEVELOPMENT
ST JOHNS HOSPITAL
1328 22ND ST
SANTA MONICA CA 90404

MERT DOBSON
DIRECTOR OF DEVELOPMENT
QUEEN OF THE VALLEY HOSPITAL
1000 TRANCAS ST
NAPA CA 94558

VERNON J DOCKERY
DIRECTOR OF DEVELOPME T
ST FRANCIS HOSPITAL
355 RIDGE AVE
EVANSTON IL 60202

JOHN W DOLAN
DIRECTOR OF DEVELOPMENT
ST VINCENTS HOSPITAL
130 W 12TH ST
NEW YORK NY 10011

DERMOT A DOLLAR
DIRECTOR COMMUNITY REALTIONS
BURLINGTON CTY MEMORIAL HOSP
175 MADISON AVE
MOUNT HOLLY NJ 08518

JOHN F DONOVAN
DIRECTOR OF DEVELOPMENT
SALEM HOSPITAL
SALEM MA 01970

TOM DORON
DIR P R & DEVELOPMENT
CARRAWAY METHODIST MED CNTR
1615 N 25TH ST
BIRMINGHAM AL 35234

CALVIN H DOUGLAS
DIRECTOR OF DEVELOPMENT
SHADYSIDE HOSPITAL
5230 CENTRE AVE
PITTSBURGH PA 15232

STANLEY J DOUGLAS
DIR OF PR & DEVELOPMENT
ST JOSEPHS HOSPITAL
555 E MARKET ST
ELMIRA NY 14902

JOHN DREVES
DIRECTOR COMM REC & DEV
ST ELIZABETH HOSPITAL
20TH & EASTERN AVE
COVINGTON KY 41014

WALTER G DRISCOLL PHD
DIR OF FACILITIES DEV
ST VINCENT HOSPITAL
25 WINTHROP ST
WORCESTER MA 01610

TIM W DRISKILL
DIRECTOR DEFERRED GIVING
HILLCREST MEDICAL CENTER
1120 S UTICA
TULSA OK 74104

JOHN L DRUHAN JR
MIDWEST REPRESENTATIVE
NEWKIRK ASSOCIATES INC
6852 W 176TH PLACE
TINLEY PARK IL 60477

L WILLIAM DUNCAN
IOWA METHODIST HOSPITAL
DES MOINES IA 50308

R JOHN DUNDAS
DIR PUB REL & DEV
ANCLOTE PSYCHIATRIC CENTER
BOX 1224
TARPON SPRINGS FL 33589

CHARLES DUNN
DIR DEV & COMM REC
DEACONESS HOSPITAL
600 MARY STREET
EVANSVILLE IN 47710

THOMAS DUNWORTH
DIRECTOR OF DEVELOPMENT
EVANSTON HOSPITAL
2650 RIDGE ROAD
EVANSTON IL 60201

EDWARD F DYAS JR
DIRECTOR OF DEVELOPMENT
JFK COMMUNITY HOSPITAL
JAMES STREET
EDISON NJ 08817

WALTER E DYER
DIR OF DEV
COMMUNITY MEN GEN HOSP
5101 S WILLOW SPRINGS RD
LA GRANGE IL 60525

SILAS EDMAN
V P PLANNING & DEV
THE CHILDRENS MED CENTER
OF NY FUND
NEW HYDE PARK NY 11040

RICHARD D EDWARDS
ASSOC DIR OF DEVELOPMENT
GEORGETOWN UNIV
37 & O STS N W
WASHINGTON D C 20007

KENNETH R EDWARDSEN
DIRECTOR OF DEVELOPMENT
HAWTHORNE COMMUNITY HOSPITAL
11711 GREVILLA AVE
HAWTHORNE CA 90250

WALTER O EICHENBERGER
DIR OF DEV
ROBERT PACKER HOSPITAL
GUTHRIE SQUARE
SAYRE PA 18840

J E EISELEIN
SPECTROM
PR ASSOC
115 LAUREL DR
SANFORD FL 32771

MR WILLIAM H ELIOT
ST MARY HOSPITAL
308 WILLOW AVE
HOBOKEN NJ 07030

JOHN C ELLER
DIRECTOR OF PLANNED GIVING
SWEDISH COVENANT HOSPITAL
5145 N CALIFORNIA
CHICAGO IL 60625

C S ELLIOTT
EXEC DIRECTOR
VIRGINIA BAPTIST HOSPITAL
LYNCHBURG VA 24503

WILLIAM J EMIG
ASST ADMINISTRATOR
ST MARYS HOSPITAL INC
3700 WASHINGTON AVE
EVANSVILLE IN 47750

JOHN T ENGLISH
MEDICAL FUND DIRECTOR
KANSAS UNIV ENDOW ASSOC
RAINBOW BLVD AT 39TH ST
KANSAS CITY KS 66103

DAVID A EPSTEIN
TRUSTEE
WEST JERSEY HOSPITAL
MT EPHRAIM AVE
CAMDEN NJ 08104

STUART P ERICKSON
ASSISTANT ADMINISTRATOR
ST ELIZABETH COMM HEALTH CNDR
555 S 70TH ST
LINCOLN NE 68510

MRS JOHN A ERICKSON
DIRECTOR OF DEVELOPMENT
THE CHILDRENS MEDICAL CENTER
1735 CHAPEL ST
DAYTON OH 45404

JAMES M EVANS
8522 SPARTAN RD
FAIRFAX VA 22030

GEORGE F FAIRHURST
DIRECTOR OF DEVELOPMENT
NORTHRIDGE HOSPITAL FDN
8444 RESEDA BLVD
SUITE 6
NORTHRIDGE CA 91324

JANICE M FALASZ
SECRETARY
CENTRAL DV PAGE HOSPITAL
O NORTH 025 WINFIELD RD
WINFIELD IL 60190

JAMES T FARLEY
ST JOHN HOSPITAL
22101 MOROSS RD
DETROIT MI 48236

GUY B FARNSWORTH
DIR OF COMMUNITY RELATIONS
ST AGNES HOSPITAL
530 W FLORADORA ST
FRESNO CA 93728

ERIC FELDMAN
DIRECTOR OF PUBLIC RELATIONS
ST VINCENTS MEDICAL CENTER
OF RICHMOND
355 BARD AVE
STATEN ISLAND NY 10310

HARRY J FEY
COMMUNITY RELATIONS DIRECTOR
ST MARYS HOSPITAL
101 MEMORIAL DRIVE
KANSAS CITY MO 64108

RICHARD J FIELD
DIR PUB & DEVELOPMENT
MEMORIAL HOSPITAL
1901 ARLINGTON ST
SARASOTA FL 33579

LAWRENCE J FITCH
DIRECTOR OF DEVELOPMENT
SCOTT & WHITE HOSPITAL
TEMPLE TX 76501

DAVID D FLEMING
VICE PRESIDENT-DEVELOPMENT
GALESBURG COTTAGE HOSPITAL
695 N KELLOGG ST
GALESBURG IL 61401

FOLKE K FLODEN
MEMORIALS HOSPITAL FDN
BOX 841
MODESTO CA 95353

FLORIDA HOSPITAL ASSOCIATION
ATTN JACK F MONAHAN EXEC VP
BOX 6905
ORLANDO FL 32803

RICHARD E FLOWER
DIRECTOR OF DEVELOPMENT
PHELPS MEMORIAL HOSPITAL
NORTH BROADWAY
NORTH TERRYTOWN NY 10591

DAVID L FORD
ASSOC ADMIN
NEW ROCHELLE HOSPITAL
BOX 321
NEW ROCHELLE NY 10802

JAMES C FORKNER JR
DIRECTOR OF HOSPITAL
DEVELOPMENT
EMANUEL HOSPITAL
2801 N GANTENBEIN AVENUE
PORTLAND OR 97227

VINCENT S FOSTER
COMMUNITY RELATIONS DIRECTOR
POINT PLEASANT HOSPITAL
OSBORN AVE
POINT PLEASANT NJ 08742

WAYNE B FOSTER
ADMINISTRATOR
CHILLICOTHE HOSPITAL
CHESTNUT ST
CHILLICOTHE OH 45601

THE FOUNDATION CENTER
888 SEVENTH AVE
NEW YORK NY 10019

WILLIAM A FOWLER
DIRECTOR OF DEVELOPMENT
PENROSE HOSPITAL
2215 N CASCADE AVE
COLORADO SPRINGS CO 80907

JAMES B FOX
DIRECTOR OF DEVELOPMENT
THE STAMFORD HOSPITAL
SHELBURNE RD
STAMFORD CT 06902

WALTER S FREDERICK
DEVELOPMENT CONSULTANT
PACIFIC MEDICAL CENTER
CLAY AT BUCHANAN ST
SAN FRANCISCO CA 94120

MAURICE FREMONT-SMITH
DIRECTOR OF DEVELOPMENT
ST ELIZABETHS HOSPITAL
736 CAMBRIDGE ST
BOSTON MA 02135

LYNN D FRENCH
UNIVERSITY HOSPITAL
UNIVERSITY OF WASHINGTON
SEATTLE WA 98105

KENNETH C FRENDLEY
DIRECTOR OF DEVELOPMENT
HIGH PLAINS BAPTIST HOSPITAL
1600 WALLACE BLVD
AMARILLO TX 79106

ROBERT N FRIDLEY
EXEC DIR DEACONESS FDN
6150 OAKLAND AVE
ST LOUIS MO 63139

DON FRY
DIRECTOR OF DEVELOPMENT
GOOD SAMARITAN HOSPITAL
1015 N W 22ND AVE
PORTLAND OR 97210

ROBERT FULTON
DIRECTOR OF DEVELOPMENT
FRESNO COMMUNITY HOSPITAL
BOX 1232
FRESNO CA 93715

JAMES F FUTRELL
DIRECTOR OF DEVELOPMENT
COLUMBUS-CUNEO-CABRINI MED CTR
2520 N LAKEVIEW AVE
CHICAGO IL 60614

FRANCIS X GALLAGHER
PUBLIC RELATIONS DIRECTOR
LITTLE COMPANY OF MARY HOSP
2806 W 95TH ST
EVERGREEN PARK IL 60642

RONALD E GAMBA
COMMUNITY RELATIONS DIR
THE ANNE ARUNDEL GEN HOSP
FRANKLIN & CATHREDRAL STS
ANNAPOLIS MD 21401

BAILEY H GALLISON
DIR OF PUBLIC RELATIONS
MERCY HOSP & MED CNTR
4077 FIFTH AVE
SAN DIEGO CA 92103

JAMES H GARRETT
ASSISTANT TO PRESIDENT
SPARKS REGIONAL MED CNTR
1311 S FYE ST
FORT SMITH AR 72901

ALAN L GAUDYNSKI
DIRECTOR OF DEVELOPMENT
MADISON GENERAL HOSPITAL
202 SOUTH PARK ST
MADISON WI 53715

DON GENT
WELBORN BAPTIST HOSPITAL
401 S E SIXTH ST
EVANSVILLE IL 47713

GEORGIA HOSPITAL ASSOCIATION
ATTN GLENN M HOGAN EXEC DIR
92 PIEDMONT AVENUE N E
ATLANTA GA 30303

JEFFERY E GEREW
DIRECTOR OF DEVELOPMENT
MICHAEL REESE MEDICAL CENTER
29TH STREET & ELLIS AVE
CHICAGO IL 60616

CLIFFORD GETZ
DEVELOPMENT DIRECTOR
CENTRAL KANSAS MED CNTR
3515 BROADWAY
GREAT BEND KS 67530

PETER W GHIORSE
ASST DIRECTOR OF DEVELOPMENT
ST VINCENTS HOSPITAL &
MEDICAL CENTER OF NY
153 WEST 11TH STREET
NEW YORK NY 10011

RICHARD G GIBBONS
FIELD REPRESENTATIVE
THE FOOTE SYSTEM
2651 EAST 21ST ST 101
TULSA OK 74114

JOAN GIFFORD
DIRECTOR OF DEVELOPMENT
MC KAY-DEE HOSPITAL CNTR
3939 HARRISON BLVD
OGDEN UT 84402

DALLAS L GLADSON
ESKATON
2233 WATT AVE
SUITE 278
SACRAMENTO CA 95825

GLENN GLAUSER
BOX 87 R R 1
BRISTOLVILLE OH 44402

WALTER GOEDEKE
DEVELOPMENT DIRECTOR
DEVELOPMENT OFFICE
APPALACHIAN REGIONAL HOSPITALS
BOX 8086
LEXINGTON KY 40503

ERWIN C GOERING
DIRECTOR OF DEVELOPMENT
HURON ROAD HOSPITAL
13951 TERRACE RD
CLEVELAND OH 44112

ROBERT BRUCE GOLDENBERG
DIRECTOR OF DEVELOPMENT
CHILDRENS HOSPITAL
561 S 17TH ST
COLUMBUS OH 43205

R H GOETTLER
PRES R H GOETTLER & ASSOC
50 WEST BROAD ST
COLUMBUS OH 43215

TERRANCE S GORNE
FOUNDATION DIRECTOR
STOUGHTON HOSPITAL FDN INC
900 RIDGE ST
STOUGHTON WI 53989

RALPH G GOULD
DEVELOPMENT DIRECTOR
MOUNT SINAI HOSPITAL
500 BLUE HILLS AVE
HARTFORD CT 06112

STANLEY K GRAHAM
V-P FOR DEVELOPMENT
THOMAS JEFFERSON UNIVERSITY
11TH & WALNUT STS
PHILADELPHIA PA 19107

VERNON C GRAHM
4728 C PARKWAY
SACRAMENTO CA 95823

WILLIAM V GRAHM
DIRECTOR OF DEVELOPMENT
LONG ISLAND COLLEGE HOSPITAL
340 HENRY ST
BROOKLYN NY 11201

THE GRANTSMANSHIP CENTER
1015 WEST OLYMPIC BLVD
LOS ANGELES CA 90015

PHILIP GRAY
DIRECTOR OF DEVELOPMENT
SANTA MONICA HOSP MED CNTR
1225 15TH ST
SANTA MONICA CA 90404

JOSEPH T GRECO
ASSOCIATE DIRECTOR
BARNES HOSPITAL
4969 BARNES HOSPITAL PLAZA
ST LOUIS MO 63110

JOHN P GREELEY
1511 THIRD AVE
SEATTLE WA 98101

HARRY H GREEN PRESIDENT
PRESBYTERIAN INTER COMMUNITY
HOSPITAL FDN
12401 E WASHINGTON BLVD
WHITTIER CA 90602

JAMES C GREEN
DIRECTOR PUBLIC RELATIONS
CHARLOTTE MEMORIAL HOSPITAL
BOX 2554
CHARLOTTE NC 28201

HENRY E GRIM
THE CHRIST HOSPITAL
DIRECTOR OF DEVELOPMENT
2139 AUBURN AVE
CINCINNATI OH 45219

CHARLES I GUSTAFSON
ADMINISTRATOR
ROUGUE VALLEY HOSP DEV FUND
2825 BARNETT RD
MEDFORD OR 97501

CLEMENT P GURKO
ASSISTANT ADMINISTRATOR
MARIAN HOSPITAL
BOX 1238
SANTA MARIA CA 93454

RON GUZIAK
DIRECTOR OF DEVELOPMENT
NORTHWESTERN MEMORIAL HOSPITAL
SUPERIOR ST & FAIRBANKS CT
CHICAGO IL 60611

WILLIAM R HADEN
ASST DIR FOR DEVELOPMENT
THE UNIV OF ROCHESTER MED CNTR
260 CRITTENDEN BLVD
ROCHESTER NY 14642

LARS HALAMA
EXECUTIVE VICE PRESIDENT
PRESBYTERIAN HOSPITAL CNTR FDN
1100 CENTRAL AVE S E
ALBUQUERQUE NM 87106

EDWARD E HALE
GONSER GERBER TINKER STUHR
105 W MADISON ST
SUITE 402
CHICAGO IL 60602

FRANK R HALL
EXECUTIVE DIRECTOR
DESERT HOSPITAL FOUNDATION
DRAWER 1627
PALM SPRINGS CA 92262

MRS ANN D HAMILTON
DIR DEV & PUBLIC RELATIONS
ST VINCENT HOSP & MED CNTR
2213 CHERRY ST
TOLEDO OH 43608

DAVID B HANAMAN
EXECUTIVE DIRECTOR
ALTA BATES HOSPITAL FOUNDATION
REGENT & WEBSTER STREETS
BERKELEY CA 94705

GEORGE D HANCOCK JR
VICE PRESIDENT
CHILDRENS HOSPITAL
226 E CHESTNUT ST
LOUISVILLE KY 40202

GENE A HANNAH
DIRECTOR COMMUNITY RELATIONS
MONTGOMERY BAPTIST HOSPITAL
2105 E SOUTH BLVD
MONTGOMERY AL 36111

J LAIRD HANSON
DIR OF DEV
UNIV OF CALIF-LA
B2-325 MARION DAVIES
CHILDRENS CLINIC
LOS ANGELES CA 90024

MRS RUTH E HARDY
DIRECTOR PUBLIC RELATIONS
SAINT BARNABAS MED CNTR
OLD SHORT ROAD
LIVINGSTON NJ 07039

TIMOTHY H HARN JR
PUBLIC AFFAIRS & DEV DIRECTOR
ST JOSEPH HOSPITAL
BOX 1625
TACOMA WA 98401

MRS CYNTHIA A HARPER
DIRECTOR OF DEVELOPMENT
LYNCHBURG GEN-
MARSHALL LODGE HOSP
TATE SPRINGS ROAD
LYNCHBURG VA 24504

W B HARRIS JR
DIR OF DEVELOPMENT
TEXAS TECH UNIV
SCHOOL OF MEDICINE
BOX 4569
LUBBOCK TX 79409

ROBERT A HARRISON
73 SHALLOWFORD ROAD
APT 7
CHATTANOOGA TN 37404

ROBERT L HART
VICE PRESIDENT FOR DEVELOPMENT
CALIFORNIA PODIATRY HOSPITAL
1770 EDDY ST
SAN FRANCISCO CA 94115

ROY L HARTMAN
DIRECTOR OF DEVELOPMENT
UNION MEMORIAL HOSPITAL
33RD & CALVERT STS
BALTIMORE MD 21218

THOMAS W HARVEY
DEVELOPMENT DIRECTOR
SMYTH COUNTY COMMUNITY HOSP
SNIDER ST
MARION VA 24354

MALCOLM S HAYDEN
DIR OF DEVELOPMENT
GRANT HOSPITAL OF COLUMBUS
309 E STATE ST
COLUMBUS OH 43215

RICHARD B HAYES
DIR MEDICAL CENTER DEVELOPMENT
DUKE UNIV MED CNTR
DURHAM NC 27710

E JESS HAYS
MED ADMIN OFFICER
NWC DISPENSARY
CHINA LAKE
CHINA LAKE CA 93555

RAY HECKENDORN
VICE PRESIDENT-DEVELOPMENT
NATIONAL BENEVOLENT ASSN
115 N JEFFERSON
ST LOUIS MO 63103

RICHARD HECKERT
PERSONNEL OFFICE
ST JOSEPH HOSPITAL
250 COLLEGE AVE
LANCASTER PA 17604

VINCE HEFLEY
DIRECTOR PUBLIC RELATIONS
SPOHN HOSPITAL
1436 THIRD ST
CORPUS CHRISTI TX 78404

ELEANOR R HELDT
VICE-PRESIDENT
MEM & CHILDRENS MED CTR FDN
2801 ATLANTIC AVE
LONG BEACH CA 90801

GILBERT D HERETH
DIRECTOR OF DEVELOPMENT
ST LUKES HOSPITAL
130 E BANNOCK
BOISE ID 83702

JOAN HENRIKSEN
DIRECTOR OF PUBLIC RELATIONS
CARDINAL GLENNON MEMORIAL
HOSPITAL FOR CHILDREN
1465 SOUTH GRAND
ST LOUIS MO 63104

WADE C HENRY
EXECUTIVE VICE PRESIDENT
METHODIST EVANGELICAL HOSP
315 E BROADWAY
LOUISVILLE KY 40202

JACK HERMAN
VICE PRESIDENT FOR DEVELOPMENT
THE MOUNT SINAI HOSPITAL
FIFTH AVE & 100TH ST
NEW YORK NY 10029

DONALD A HESSEMER
DIRECTOR PR/DEVELOPMENT
HOTEL DIEU HOSPITAL
2021 PERDIDO ST
NEW ORLEANS LA 70112

ALLEN M HICKS
PRESIDENT
COMMUNITY HOSP OF INDIANAPOLIS
1500 NORTH RITTER AVE
INDIANAPOLIS IN 46219

DONALD L HICKS
DIRECTOR OF DEVELOPMENT
ST JOSEPH HOSPITAL
BOX 5627
ORANGE CA 92667

ORTON HICKS
DIR OF DEVELOPMENT
MARY HITCHCOCK HOSP
HANOVER NH 03755

MISS DOROTHY L HIGGINS
DIRECTOR OF DEVELOPMENT
NEW ENGLAND MED CTR HOSPITAL
171 HARRISON BOX 231
BOSTON MA 02111

H H HILL
ASST ADMINISTRATOR
BATTLE CREEK SANITARIUM HOSP
197 N WASHINGTON AVE
BATTLE CREEK MI 49016

ROBERT M HILL
DIRECTOR OF DEVELOPMENT
VALLEY PRESBYTERIAN HOSPITAL
15107 VANOWEN ST
VAN NUYS CA 91407

FRANZ L HISEY
DIRECTOR OF DEVELOPMENT
JOHN L HUTCHESON MEM HOSP
FORT OGLETHORPE GA 30741

JOE HOCHDERFFER
DIR DEVELOPMENT
PARKVIEW HOSPITAL
2200 RANDALIA DRIVE
FT WAYNE IN 46805

HARRY HOCHSTADT
EXECUTIVE VICE-PRESIDENT
CEDARS OF LEBANON HOSPITAL
1321 N W 14TH ST
MIAMI FL 33125

SALLY HOFF
DIR OF PUB RELATIONS &
FUND DEVELOPMENT
ST LUKE HOSPITAL OF PASADENA
2632 E WASHINGTON BLVD
PASADENA CA 91107

JAMES J HOLLERN
DIRECTOR DEVELOPMENT &
PUBLIC RELATIONS
1575 CASE RD
COLUMBUS OH 43224

E W HOLLIS
28733 CRESTRIDGE RD
PALOS VERDES CA 90274

MRS BARBARA E HOLMES
COORDINATOR-FUND DEVELOPMENT
SWEDISH MEDICAL CENTER
501 E HAMPDEN AVE
ENGLEWOOD CO 80110

DR JOHN W HONEY
ADMINISTRATOR
MEMORIAL HOSPITAL OF
SAN LEANDRO
2800 BENEDICT DRIVE
SAN LEANDRO CA 94577

C RODNEY HORNER JR
V P FOR DEVELOPMENT
UNITED HOSPITALS OF NEWARK
15 SO 9TH ST
NEWARK NJ 07107

J LLOYD HORTON
DIRECTOR OF DEVELOPMENT
ALL CHILDRENS HOSP
801 SIXTH ST SOUTH
ST PETERSBURG FL 33701

HOSPITAL ASSOCIATION OF HAWAII
ATTN OLLIE BURKETT EXEC DIR
PACIFIC TRADE CENTER STE 765
HONOLULU HI 96813

HERBERT G HOWARD
ASSOC FOR DEVELOPMENT
MASS GENERAL HOSPITAL
32 FRUIT ST
BOSTON MA 02114

R CLINTON HOWARD
FUND DIRECTOR
NORTHWEST KIDNEY CENTER
1102 COLUMBIA STREET
SEATTLE WA 98104

THOMAS R HOWERTON
EXEC DIRECTOR
DURHAM COUNTY HOSPITAL CORP
C/O THE WATTS HOSPITAL
CLUB BLVD AT BROAD ST
DURHAM NC 27705

BARBARA HOWETT
SISTERS OF PROVIDENCE OF WASH
PROVIDENCE HOSPITAL
P O BOX 1076
EVERETT WA 98203

ALLEN E HOWLAND
SECRETARY
AKRON GENERAL DEVELOPMENT FDN
400 WABASH AVE
AKRON OH 44307

RAYMOND B HOXENG
DIRECTOR OF DEVELOPMENT
THE CHILDRENS HOSPITAL
1056 E 19TH AVE
DENVER CO 80218

GEORGE H HUBERS
DIRECTOR OF DEVELOPMENT
ST JOSEPHS HOSPITAL
170 MERRIMACK SUITE 210
LOWELL MA 01852

IDAHO HOSPITAL ASSOCIATION
ATTN JOHN D HUTCHISON DIR
BOX 7482
BOISE ID 83707

IOWA HOSPITAL ASSOCIATION INC
ATTN DONALD W DUNN EXEC VP
1906 INGERSOLL AVENUE
DES MOINES IA 50309

INDIANA HOSPITAL ASSOCIATION
ATTN ELTON TEKOLSTE PRES
38 EAST 39TH STREET
INDIANAPOLIS IN 46205

ILLINOIS HOSPITAL ASSOCIATION
ATTN ROBERT W O LEARY PRES
840 NORTH LAKE SHORE DRIVE
CHICAGO IL 60611

PAUL M IRELAND
EXECUTIVE DIRECTOR
AULTMAN HOSPITAL DEV FDN
2600 SIXTH ST S W
CANTON OH 44710

JAMES W ISAACS
ASSISTANT ADMINISTRATOR
SCIOTO MEMORIAL HOSPITAL
1805 27TH ST
PORTSMOUTH OH 45662

DONALD MC G JACOBS
DEVELOPMENT DIRECTOR
SANTA ROSA MEDICAL CNTR
BOX 7330 STA A
SAN ANTONIO TX 78285

REESE E JAMES
ADMINISTRATOR
WINCHESTER HOSPITAL
41 HIGHLAND AVE
WINCHESTER MA 01890

MRS BARBARA JANES
DIRECTOR OF DEVELOPMENT
ST JOSEPH MERCY HOSPITAL
326 N INGALLS
ANN ARBOR MI 48104

GERALD W JANOSEK
VICE PRES FOR DEVELOPMENT & PR
THE CHILDRENS MEMORIAL HOSP
2300 CHILDRENS PLAZA
CHICAGO IL 60614

ROBERT K JENKINS
DIR OF COMM RELATIONS
MONMOUTH MEDICAL CENTER
THIRD & PAVILION AVES
LONG BRANCH NJ 07740

WILLIS H JENKINS
V P ADMINISTRATOR
COOPER MEDICAL CENTER
CAMDEN NJ 08103

KENT J JEWELL
DEVELOPMENT OFFICER
MERCY MEDICAL CENTER
1512 12TH AVE RD
NAMPA ID 83651

ROBERT JOACHIM
DIR OF COMMUNITY RELATIONS
ST JOSEPHS HOSP & MED CNTR
703 MAIN ST
PATERSON NJ 07503

CHARLES A JOHNSON
DIR OF DEVELOPMENT
HENRY FORD HOSPITAL
2799 WEST GRAND BLVD
DETROIT MI 48202

MRS DONNA T JOHNSON
BAPTIST MEMORIAL HOSPITAL
6601 ROCKHILL ROAD
KANSAS CITY MO 64131

WARREN A JOHNSON
DEVELOPMENT CONSULTANT
ILLINOIS MASONIC MEDICAL CTR
836 WEST WELLINGTON ST
CHICAGO IL 60657

WINSTON R JOHNSON
DIRECTOR OF DEVELOPMENT
MC LEAN HOSPITAL
115 MILL ST
BELMONT MA 02178

MRS JEANNE JONES
DIRECTOR OF PUBLIC RELATIONS
FREEMAN HOSPITAL
JOPLIN MO 64801

PAUL F JONES
DIR OF FUND DEV
SAMARITAN HOSP
2215 BURDETT AVE
TROY NY 12180

JAMES M JOSOFF
DIRECTOR OF DEVELOPMENT
DANIEL FREEMAN HOSPITAL
333 N PRAIRIE AVE
INGLEWOOD CA 90301

JOURNALISM DEPARTMENT
ATTN JEAN LANGE
WASHBURN UNIVERSITY
TOPEKA KS 66621

DAVID KALOUPEK
ASSISTANT ADMINISTRATOR
THE COOPER HOSPITAL
CAMDEN NJ 08103

LYNN EDWARD KANDEL
DIR PUBLIC RELATIONS & DEVELOP
SOUTH MIAMI HOSPITAL
7400 S W 62ND AVE
SOUTH MIAMI FL 33143

KANSAS HOSPITAL ASSOCIATION
ATTN FRANK L GENTRY EXEC DIR
BOX 417
TOPEKA KS 66601

KERRY J KEANE
DIRECTOR OF DEVELOPMENT
SILVER HILL FDN
VALLEY ROAD
NEW CANAAN CT 06840

MICHAEL J KEARNEY
DIRECTOR OF DEVELOPMENT
ST JOSEPHS HOSPITAL MED CNTR
501 S BUENA VISTA ST
BURBANK CA 91505

WILLIAM T KEARNS
ASSOC V P FOR PUBLIC INTEREST
THE ROOSEVELT HOSPITAL
428 W 59TH ST
NEW YORK NY 10019

WILLIAM H KEENAN
DIRECTOR OF COMMUNITY RELATION
ST LOUIS CHILDRENS HOSPITAL
500 S KINGSHIGHWAY BLVD
ST LOUIS MO 63110

FRANK K KELEMAN
BOARD OF MANAGERS
THE COOPER HOSPITAL
CAMDEN NJ 08103

ROBERT F KELLEY
DIRECTOR OF COMMUNITY RELATION
THE CHARLOTTE HUNGERFORD HOSP
540 LITCHFIELD ST
TORRINGTON CT 06790

WM T KELLEY
DIRECTOR COMMUNITY RELATIONS
STORMONT VAIL HOSPITAL
TENTH & WASHBURN
TOPEKA KS 66606

CELESTE K KEMLER
ADMINISTRATOR
VALLEY VIEW HOSPITAL
ADA OK 74820

DAVID L KEMPTON
DIRECTOR OF DEVELOPMENT
SACRED HEART HOSPITAL
5151 N NINTH AVE
PENSACOLA FL 32504

F REGIS KENNA
DIRECTOR
UNIVERSITY OF CHICAGO
HOSPITALS & CLINICS
950 EAST 59TH ST
CHICAGO IL 60637

JOHN T KENNA
DIRECTOR OF PUBLIC RELATIONS
AUGUSTANA HOSPITAL
411 WEST DICKENS
CHICAGO IL 60614

EDWARD F KENNEY
ASSISTANT TO PRESIDENT
CHILDRENS MEMORIAL HOSP
44TH & DEWEY AVE
OMAHA NE 68105

KENTUCKY HOSPITAL ASSOCIATION
ATTN HASTY W RIDDLE EXEC VP
BOX 4162
LOUISVILLE KY 40204

DUDLEY C KENWORTHY
STANFORD UNIV MED CNTR
M1-21
STANFORD CA 94305

SALVINIJA KERNAGHAN
HOSPITALS JAHA
AMERICAN HOSPITAL ASSN
840 NORTH LAKE SHORE DR
CHICAGO IL 60611

RAYMOND C KILLEEN
VICE PRESIDENT
KENNEDY SINCLAIRE INC
524 HAMBURG TURNPIKE
WAYNE NJ 07470

GERALD KINDER
DIRECTOR OF DEVELOPMENT
VENICE HOSPITAL
540 THE RIALTO
VENICE FL 33595

ALFRED G KING
DIRECTOR INCOME TRUSTS
LUTHERAN HOSPITAL SOCIETY
1423 S GRAND AVE
LOS ANGELES CA 90015

DONALD R KLEINBERG
DIRECTOR OF DEVELOPMENT
YALE NEW HAVEN HOSPITAL
789 HOWARD AVE
NEW HAVEN CT 06504

ROLAND KNAPP
SR VICE PRESIDENT
ORTHOPAEDIC HOSPITAL
2400 S FLOWER ST
LOS ANGELES CA 90007

BUDD KNEISEL
DIR OF COMMUNITY RELATIONS
ST JOSEPH HOSPITAL
1401 SOUTH MAIN ST
FT WORTH TX 76104

VICK R KNIGHT
CHILDRENS HOSPITAL OF
ORANGE COUNTY
1109 W LA VETA
ORANGE CA 92668

LARRY S KOCH
ASSISTANT DEVELOPMENT OFFICER
UNIV OF OREGON MED SCHOOL
3181 S W SAM JACKSON PARK RD
PORTLAND OR 97201

THOMAS KOLDA
DIRECTOR OF DEVELOPMENT
ST MARYS HOSPITAL
2388 NORTH LAKE DRIVE
MILWAUKEE WI 53211

BERNARD M KORN
LUTHERAN GEN & DEACONESS
HOSPITALS
PARKRIDGE IL 60068

HERBERT K KRAYBILL
DIRECTOR OFFICE OF GIFTS
MILTON S HERSHEY MED CNTR
500 UNIVERSITY DRIVE
HERSHEY PA 17033

NEAL E KRESHECK
PRESIDENT
COMMUNITY HOSPITAL
2615 E HIGH ST
SPRINGFIELD OH 45501

E C KUBICEK
VICE PRESIDENT
CHICAGO COLLEGE OF OSTEOPATHIC
MEDICINE
5206 S UNIVERSITY AVE
CHICAGO IL 60615

JOSEPH L KUNEC
DIR OF PLANNING & DEVELOPMENT
HOSPITALS DEVELOPMENT FUND
951 SAN JACINTO BUILDING
HOUSTON TX 77002

DUNCAN M LAIDLAW
EXEC DIR FUND DEVELOPMENT
METHODIST HOSPITAL
6500 EXCELSIOR BLVD
ST LOUIS PARK MN 55426

ROBERT J LAMBERT
DIRECTOR OF DEVELOPMENT
THE MEMORIAL HOSPITAL
119 BELMONT ST
WORCESTER MA 01605

JAMES E LA MONT
DIRECTOR OF DEVELOPMENT
CHILTON MEMORIAL HOSPITAL
97 WEST PARKWAY
POMPTON PLAINS NJ 07444

MICHAEL S LANDES
ASSOC DIRECTOR OF DEVELOPMENT
PENNSYLVANIA HOSPITAL
8TH AND SPRUCE
PHILADELPHIA PA 19107

IRWIN M LANGER
DIRECTOR OF DEVELOPMENT
PENISULA HOSPITAL CENTER
FAR ROCKAWAY NY 11691

JAMES E LANSDOWNE II
DIR OF DEVELOPMENT
WESLEY MEDICAL CENTER
550 NORTH HILLSIDE
WICHITA KS 67214

BENAY LA ROCK
DIRECTOR OF DEVELOPMENT
JEWISH HOSPITAL OF ST LOUIS
BOX 14129
ST LOUIS MO 63178

GENE F LARSON
DIR OF DEVELOPMENT
SACRED HEART HOSPITAL
WEST 101 EIGHTH AVENUE
SPOKANE WA 99204

WILLIAM LAVERY
V P OF DEVELOPMENT
GRANT HOSPITAL OF CHICAGO
551 WEST GRANT PLACE
CHICAGO IL 60614

ALFRED B LAWSON JR
DIR OF DEVELOPMENT
CHILDRENS HOSPITAL OF THE D C
2125-13TH STREET N W
WASHINGTON D C 20009

J ROBERT LAWSON
DIRECTOR OF DEVELOPMENT
DECATUR MEMORIAL HOSPITAL
N EDWARD ST
DECATUR IL 62526

NORA F LAWSON
ASST ADMINISTRATOR
DELTA MEMORIAL HOSPITAL
3901 LONE TREE WAY
ANTIOCH CA 94509

MS ROBIN LEACH
DIRECTOR OF PUBLIC INFORMATION
MACNEAL MEMORIAL HOSPITAL
3249 S OAK PARK AVE
BERWYN IL 60402

DAVID G LEE
DIRECTOR OF DEVELOPMENT
LOVELACE-BATAAN MED CNTR
5400 GIBSON S E
ALBUQUERQUE NM 87108

TOD LEHMAN
DIRECTOR OF DEVELOPMENT &
PUBLIC RELATIONS
GOOD SAMARITAN HOSPITAL
LEXINGTON KY 40508

QUENTIN LEISHER
DIRECTOR OF DEVELOPMENT
PALOS COMMUNITY HOSPITAL
123RD & 80TH AVE
PALOS HEIGHTS IL 60463

SEYMOUR LEON
54 BARTHA AVE
EDISON NJ 08817

ED LEONARD
PRESIDENT
PACIFIC HOSPITAL FOUNDATION
BOX 1268
LONG BEACH CA 90801

RICHARD LEONARD
BOWE TIME SHARING INC
345 HUDSON ST
NEW YORK NY 10014

ROBERT S LERNER
ADMINISTRATOR
ROOSEVELT MEMORIAL HOSPITAL
426 W WISCONSIN
CHICAGO IL 60614

EDMUND J LESLIE
DIR PUB SVC & DEVELOPMENT
NEBRASKA METHODIST HOSPITAL
8303 DODGE ST
OMAHA NE 68114

DIANE D LE SUEUR
FUND DEVELOPMENT OFFICER
ST JUDE HOSPITAL
101 E VALENCIA MESA DR
FULLERTON CA 92634

JAMES K LE SUEUR
COUNSELOR/FUND DEVELOPMENT
ST JUDE HOSPITAL
101 EAST VALENCIA MESA DR
FULLERTON CA 92634

CHARLES K LEVINE
DIRECTOR OF DEVELOPMENT
BETH ISRAEL HOSPITAL
1601 LOWELL BLVD
DENVER CO 80204

CYRUS S LIBERMAN
VICE-PRES FOR DEVELOPMENT
ALBERT EINSTEIN MED CNTR
YORK & TABOR ROADS
PHILADELPHIA PA 19141

GEORGE LINGENFELTER
DIRECTOR OF DEVELOPMENT
ST VINCENT HOSPITAL
2213 CHERRY ST
TOLEDO OH 43608

WALLACE J LIGHTHALL
DIRECTOR OF DEVELOPMENT
WHITE MEMORIAL MEDICAL CENTER
1720 BROOKLYN AVE
LOS ANGELES CA 90033

HANS M LINK
ASST ADMIN-FINANCE
IMMANUEL MED CENTER
36TH & MEREDITH AVE
OMAHA NE 68111

HENRY V LIONE
DIRECTOR OF DEVELOPMENT
VALLEY HOSPITAL
LINWOOD & N VAN DIEN AVE
RIDGEWOOD NJ 07451

GEORGE F LIVINGSTON
ASSISTANT TO THE PRESIDENT
SCOTTSDALE MEMORIAL HOSPITAL
7400 E OSBORN RD
SCOTTSDALE AZ 85251

J NELSON LISKEY
ADMINISTRATOR
THE ROCKINGHAM MEM HOSP
738 S MASON ST
HARRISONBURG VA 22801

RALPH L LITTLE
DIRECTOR OF DEVELOPMENT
GENERAL ROSE MEMORIAL HOSP
1050 CLERMONT
DENVER CO 80220

RICHARD H LOGAN
OAKWOOD VILLAGE
6201 MINERAL POINT ROAD
MADISON WI 53705

ANTHONY M LOMBARDI JR
EXECUTIVE DIRECTOR
CHARLEROI-MONESSEN HOSPITAL
NORTH CHARLEROI PA 15022

JAMES L LORD
DIR OF DEVELOPMENT
DE PAUL HOSPITAL
2415 N KINGSHIGHWAY
ST LOUIS MO 63113

LOUISIANA HOSPITAL ASSOCIATION
ATTN LEE E BROWN EXEC DIR
2026 ST CHARLES AVENUE
NEW ORLEANS LA 70130

JAN A LOVELL
DIRECTOR OF P/R & DEVELOPMENT
PROVIDENCE HOSPITAL
2435 FOREST DRIVE
COLUMBIA SC 29204

WILLIAM LOWERY
DIRECTOR
TRI-HOSPITAL DEVELOPMENT
342 WESTMINSTER AVENUE
ELIZABETH NJ 07208

ANDREA A LOYOLA
DIRECTOR OF PR & DEVELOPMENT
MERCY HOSPITAL
301 N JEFFERSON DAVIS PKWY
NEW ORLEANS LA 70119

ELDON F LUNDQUIST
DIRECTOR OF DEVELOPMENT
ELKHART GENERAL HOSPITAL
600 EAST BLVD
ELKHART IN 46514

GEORGE LYNN
DIRECTOR OF DEVELOPMENT
WEST JERSEY HOSPITAL
MT EPHRAIM & ATLANTIC AVE
CAMDEN NJ 08104

ALVIN L LYONS
LYONS ASSOCIATES
4808
ASPEN CO 81611

MRS VERDA MACKAY
DEVELOPMENT DIRECTOR
PROVIDENCE HOSPITAL
3012 SUMMIT ST
OAKLAND CA 94609

MISS HELEN J MADDEX
TACOMA GEN HOSPITAL
BOX 5277
TACOMA WA 98405

KEITH A MAHER
EXECUTIVE DIRECTOR
NAT FUNDRAISING COUNCIL
LONDON ASSURANCE HOUSE
20 BRIDGE ST
SIDNEY NSW 2000 AUSTRALIA

MAINE HOSPITAL ASSOCIATION
ATTN FLETCHER H BINGHAM PHD
83 WESTERN AVENUE
AUGUSTA ME 04330

RICHMOND H MALLORY
EXEC V P MERCY HOSPITAL FOUND
BOX 19254
SACRAMENTO CA 95819

FRED C MALTZ
DIRECTOR FUND DEVELOPMENT
ST BENEDICTS HOSPITAL
NORTH LINCOLN
JEROME ID 83338

JOSEPH J MANSFIELD
EXEC DIRECTOR FOR DEVELOPMENT
NEW YORK INFIRMARY
STUYVESANT SQ EAST & 15TH ST
NEW YORK NY 10003

JAMES F MANTEUFEL
DIRECTOR COMMUNITY RESOURCES
ST LUKES HOSPITAL
2900 W OKLAHOMA AVE
MILWAUKEE WI 53215

RAY MARKHAM
DIRECTOR OF DEVELOPMENT
ST FRANCIS HOSPITAL
812 E 5TH ST
WASHINGTON MO 63090

JAMES G MARSHALL JR
EXECUTIVE DIRECTOR
METHODIST HOSPITAL FDN INC
309 W WASHINGTON ST
MADISON WI 53703

STEVE L MARTINEZ
DIRECTOR OF DEVELOPMENT
ST MARY CORWIN HOSPITAL
1008 MINNEQUA
PUEBLO CO 81004

W NEIL MARVIN
DIRECTOR OF DEVELOPMENT &
PUBLIC RELATIONS
GENEVA GENERAL HOSPITAL
196-98 NORTH STREET
GENEVA NY 14456

MARYLAND HOSPITAL ASSN
ATTN RICHARD J DAVIDSON VP
1301 YORK ROAD
LUTHERVILLE-TIMONIUM MD 21093

REV CHARLES E MASON
DIRECTOR OF DEVELOPMENT
ST LUKES MEDICAL CENTER
BOX 2000
SIOUX CITY IA 51104

MASSACHUSETTS HOSPITAL ASSN
ATTN PATRICK R CARROLL
100 FEDERAL STREET ROOM 3403
BOSTON MA 02110

MASSACHUSETTS HOSPITAL ASSN
ATTN DAVID M KINZER PRES
5 NEW ENGLAND EXECUTIVE PARK
BURLINGTON MA 01803

MAX F MASSFELLER
PROJECT COORDINATOR
HALIFAX DISTRICT HOSPITAL
BOX 1990
DAYTONA BEACH FL 32015

RUDOLPH A MATEKA
DIRECTOR OF DEVELOPMENT
RHODE ISLAND HOSPITAL
PROVIDENCE RI 02902

THOMAS J MATTSON
EXECUTIVE VICE PRESIDENT
MERCY HOSPITAL
4050 COON RAPIDS BLVD
COON RAPIDS MN 55433

WALTER E MAYS
DIRECTOR OF DEVELOPMENT
TEXAS SCOTTISH RITE HOSPITAL
2201 WELBORN ST
DALLAS TX 75219

JOSEPH L MC BRIDE
ST MARYS LONG BEACH HOSPITAL
509 E 10TH ST
LONG BEACH CA 90813

JOHN MC CARTHY
DIRECTOR OF DEVELOPMENT
HUNTINGTON MEMORIAL HOSPITAL
100 CONGRESS ST
PASADENA CA 91005

MRS BARBARA J MC CLINTOCK
DIRECTOR PUBLIC RELATIONS
NORTHEASTERN OHIO GEN HOSP
2401 HUBBARD RD
MADISON OH 44057

JAMES H MC CRACKEN
CHILDRENS HOSPITAL AT STANFORD
520 WILLOW
PALO ALTO CA 94304

JAMES L MC DIARMID
DIRECTOR OF DEVELOPMENT
THE ABBOTT-NORTHWESTERN
HOSPITAL CORP
810 EAST 27TH ST
MINNEAPOLIS MN 55407

MRS ELLEN MC DONALD
DIRECTOR OF DEVELOPMENT
THE COMMUNITY MED CNTR
95 MT KEMBLE AVE
MORRISTOWN NJ 07960

TOMMY R MC DOUGAL
DIRECTOR OF DEVELOPMENT
BAPTIST MEDICAL CENTERS
800 MONTCLAIR ROAD
BIRMINGHAM AL 35213

ERNEST R MC DOWELL
DIRECTOR OF DEVELOPMENT
HARRISBURG HOSPITAL
SOUTH FRONT STREET
HARRISBURG PA 17101

MS MILDRED S MC EVOY
ST JOSEPHS HOSPITAL
BOX 12069
TUCSON AZ 85732

LORETTA MC GEE
COMMUNITY RELATIONS ASST
THE ANNE ARUNDEL GEN HOSP
FRANKLIN & CATHEDRAL STS
ANNAPOLIS MD 21401

E J MC INTYRE
ASST DIRECTOR DEVELOPMENT
HERMANN HOSPITAL
1203 ROSS STERLING AVE
HOUSTON TX 77025

MISS G RUTH MC MILLEN
SPECIAL PROJECTS COORDINATOR
SACRED HEART HOSPITAL
900 CLAIRMONT
EAU CLAIRE WI 54701

PRESTON V MC MURRY JR
PR & DEVELOPMENT DIRECTOR
ST FRANCIS HOSPITAL
3237 SOUTH 16TH ST
MILWAUKEE WI 53215

STEPHEN H MC NEIL
DIRECTOR OF PLANNING
FLOYD HOSPITAL
BOX 233
ROME GA 30161

PAUL A MC WILLIAMS
PRESBYTERIAN UNIVERSITY HOSP
230 LOTHROP STREET
PITTSBURGH PA 15213

L*WRENCE V MEAGHER JR
DIRECTOR OF DEVELOPMENT
ST MARYS HOSPITAL
56 FRANKLIN ST
WATERBURY CT 06702

J MITCHELL MEDFORD
DIRECTOR OF DEV
BAPTIST MEDICAL CENTERS
3201 4TH AVE SOUTH
BIRMINGHAM AL 35222

MEDICAL COLLEGE OF OHIO
REFERENCE LIBRARIAN
BOX 6190
TOLEDO OH 43614

MEDICAL MEETINGS
750 THIRD AVE
NEW YORK NY 10017

CALVIN J MEIDER
PRES RES & EDUC DIV
HEALTH CENTRAL INC
4141 GOLDEN VALLEY RD
MINNEAPOLIS MN 55422

T CARTER MELTON JR
PRESIDENT
ROCKINGHAM MEM HOSP FDN
738 S MASON ST
HARRISONBURG VA 22801

A J MENLOVE
DEVELOPMENT DIRECTOR
WILLIAM BEAUMONT HOSPITAL
3601 W THIRTEEN MILE
ROYAL OAK MI 48072

PHILIP B MENNINGER
ADMINISTRATOR FOR DEVELOPMENT
BOX 829
TOPEKA KS 66601

MICHAEL L MERCIER
DIRECTOR OF DEVELOPMENT
BON SECOURS HOSPITAL
468 CADIEUX ROAD
GROSSE POINT MI 48230

JOSEPH R MERRY
DIRECTOR OF DEVELOPMENT
JERSEY SHORE MED CNTR
1945 CORLIES AVE
NEPTUNE NJ 07753

EDWARD MICHEL JR
DIRECTOR OF DEVELOPMENT
MORTON F PLANT HOSPITAL
BOX 210
CLEARWATER FL 33517

MICHIGAN HOSPITAL ASSOCIATION
ATTN H ALLAN BARTH PRES
2213 EAST GRAND RIVER AVENUE
LANSING MI 48912

BILL MILLER
DEVELOPMENT DIRECTOR
DONALD N SHARP MEMORIAL HOSP
7901 FROST ST
SAN DIEGO CA 92123

DON P MILLER
DIR OF COMMUNITY RELATIONS
ST ALEXIUS HOSPITAL
BOX 1658
BISMARK ND 58501

GENE MILLER
DIRECTOR OF DEVELOPMENT
INDEPENDENCE HOSPITAL
1509 W TRUMAN RD
INDEPENDENCE MO 64050

GEORGE F MILLER
DIRECTOR OF DEVELOPMENT
ST LUKES HOSPITAL MEDICAL CTR
525 NORTH 18TH STREET
PHOENIX AZ 85006

ROBERT J MILLER
DIRECTOR OF DEVELOPMENT
RIVERSIDE METHODIST HOSPITAL
3535 OLENTANGY RIVER ROAD
COLUMBUS OH 43214

MINNESOTA HOSPITAL ASSOCIATION
ATTN STEPHEN ROGNESS EXEC DIR
2333 UNIVERSITY AVENUE S E
MINNEAPOLIS MN 55414

DR RALPH T MIRSE
PRESIDENT
LAKELAND COLLEGE
SHEBOYGAN WI 53081

MISSISSIPPI HOSPITAL ASSN
ATTN CHARLES W FLYNN DIR
BOX 16444
JACKSON MS 39206

MISSOURI HOSPITAL ASSOCIATION
ATTN TED O LLOYD EXEC DIR
BOX 1044
JEFFERSON CITY MO 65101

A P MITKUS
DIRECTOR OF DEVELOPMENT
CARDINAL CUSHING GEN HOSPITAL
235 NORTH PEARL ST
BROCKTON MA 02401

I J MNOOKIN
DIR OF DEVELOPMENT
MENORAH MEDICAL CENTER
4949 ROCKHILL ROAD
KANSAS CITY MO 64110

WILLIAM P MOLONEY
ASSISTANT TO ADMINISTRATOR
ST JOSEPH HOSPITAL
400 WALTER N E
ALBUQUERQUE NM 87102

GEORGE J MONIODIS
PUBLIC RELATIONS DIRECTOR
ST AGNES HOSPITAL
900 CATON AVE
BALTIMORE MD 21229

GEORGE MONRO
ST JOHN HOSPITAL
22101 MOROSS RD
DETROIT MI 48236

MONTANA HOSPITAL ASSOCIATION
ATTN WILLIAM E LEARY EXEC DIR
BOX 543
HELENA MT 59601

L GUY MOON
DIR OF RESOURCES
ST LUKES HOSPITAL
2900 WEST OKLAHOMA AVENUE
MILWAUKEE WI 53215

MARGARET CURRENT MOORE
DEVELOPMENT VOLUNTEER SVCS DIR
MOLLY STARK HOSPITAL
BOX 9122
CANTON OH 44711

PAUL MOORE
DIRECTOR OF DEVELOPMENT
ALTON OCHSNER MED FDN
1514 JEFFERSON HWY
NEW ORLEANS LA 70121

RALPH E MORIARTY
PRESIDENT
THE LANKENAU HOSPITAL
LANCASTER AVE W OF CITY LINE
PHILADELPHIA PA 19151

BYON M MORRIS
DIR PROGRAMS & COMMUNICATIONS
BAPTIST MEMORIAL HOSPITAL
800 PRUDENTIAL DRIVE
JACKSONVILLE FL 32207

JOHN T MORRISSEY
DIR PERS & PUBLIC RELATIONS
MERCY HOSPITAL
BOX 1028
DURANGO CO 81301

CARL L MOSHER
EXECUTIVE VICE PRESIDENT
PRESBY UNIV PENNA MED CNTR
51 NORTH 39TH ST
PHILADELPHIA PA 19104

ROBERT MOSS
ADMINISTRATOR
HILLCREST
6780 MAYFIELD RD
MAYFIELD HEIGHTS OH 44124

MISS ELIZABETH MUDGE
NEWTEL ASSOCIATES
253 NORWOOD AVE
CRANSTON RI 02905

RALPH A MUELLER
DIRECTOR RESOURCE DEVELOPMENT
ST JOSEPH MERCY HOSPITAL
900 WOODWARD AVE
PONTIAC MI 48053

ROY E MUIR
MEDICAL DIR OF DEVELOPMENT
GEORGETOWN UNIV
37 & O STS N W
WASHINGTON D C 20007

JAMES F MULQUEEN
PUBLIC RELATIONS & DEV DIR
MERCY HOSPITAL
800 MERCY DR
COUNCIL BLUFFS IA 51501

CARL A MUNDING
ADMINISTRATOR
PROVIDENCE HOSPITAL
PACIFIC & NASSAU
EVERETT WA 98201

MS SHARON MURPHY
DIR MED NEWS SVC
WASHINGTON UNIV SCH MEDICINE
660 SOUTH EUCLID AVE
ST LOUIS MO 63110

JEFF G MURRAY
COMMUNITY RELATIONS DIRECTOR
ST PETERS GENERAL HOSPITAL
254 EASTON AVE
NEW BRUNSWICK NJ 08903

MILTON J MURRAY
DIRECTOR OF FUND EFFORTS
SEVENTH-DAY ADVENTIST HOSP
6840 EASTERN AVE N W
WASHINGTON D C 20012

MRS P A T MURRAY
DIRECTOR OF DEVELOPMENT
NEW ROCHELLE HOSPITAL
MEDICAL CENTER
NEW ROCHELLE NY 10802

DESAIX B MYERS
DIRECTOR OF DEVELOPMENT
SANTA BARBARA COTTAGE HOSP
BOX 689
SANTA BARBARA CA 93102

M A MYERS
DIRECTOR OF PUBLIC RELATIONS
THE WOMANS GENERAL HOSPITAL
1940 EAST 101ST STREET
CLEVELAND OH 44106

NORMAN L MYERS
ASSOCIATE DIRECTOR OF DEV
CHILDRENS HOSPITAL
561 S 17TH ST
COLUMBUS OH 43205

PHILIP F MYERS
COMMUNITY RELATIONS DIRE
MERCY HOSPITAL
566 N WASHINGTON ST
JANESVILLE WI 53545

KATHLEEN M NAGLE
DIRECTOR OF DEVELOPMENT
CHOATE MEMORIAL HOSPITAL
21 WARREN AVE
WOBURN MA 01801

SGD NAPARSTEK
CHIEF OFFICER MED CNTR REL
MT SINAI MEDICAL CNTR
948 N 12TH ST
MILWAUKEE WI 53233

R GRAHAM NASH
ST JOHNS HOSPITAL
1328 22ND ST
SANTA MONICA CA 90404

CHARLES W NASON
DIR OF COMM & DEVELOPMENT
APPLETON MEMORIAL HOSPITAL
1818 NORTH MEADE ST
APPLETON WI 54911

NATL SOCIETY OF FUND RAISERS
130 EAST 40TH ST
NEW YORK NY 10016

NEBRASKA HOSPITAL ASSOCIATION
ATTN STUART C MOUNT EXEC DIR
BOX 94833
LINCOLN NE 68509

68-308 O - 76 - 5

DAVID NELSON
DIRECTOR OF DEVELOPMENT
MARYS HELP HOSPITAL
1900 SULLIVAN AVE
DALY CITY CA 94015

NORMAN NELSON
LUTHERAN HOSPITAL SOCIETY OF
SOUTHERN CALIFORNIA
1401 SOUTH HOPE STREET
LOS ANGELES CA 90015

JOSEPH L NERO
DIRECTOR OF DEVELOPMENT
MARTIN LUTHER KING HOSPITAL
2525 EUCLID
KANSAS CITY MO 64127

NEW HAMPSHIRE HOSPITAL ASSN
ATTN LESLIE A SMITH EXEC DIR
12 LOUDON ROAD
CONCORD NH 03301

NEW JERSEY HOSPITAL ASSN
ATTN JACK W OWEN PRES
1101 STATE ROAD RESEARCH PARK
PRINCETON NJ 08540

NEVADA HOSPITAL ASSOCIATION
ATTN SHARON GREENE EXEC DIR
1450 EAST SECOND STREET
RENO NV 89502

NEW MEXICO HOSPITAL ASSN
ATTN JAMES L LACOMBE EXEC DIR
3010 MONTE VISTO N E SUITE 208
ALBUQUERQUE NM 87106

HOSPITAL ASSN OF NEW YORK
ATTN GEORGE B ALLEN PRES
15 COMPUTER DRIVE WEST
ALBANY NY 12205

RUTH A NICHOLSON
DIRECTOR DEVELOPMENT
GREENVILLE HOSPITAL SYSTEM
700 W FARIS ROAD
GREENVILLE SC 29605

O D NISWONGER
ASSISTANT ADMINISTRATOR
SOUTHWEST MISSOURI HOSPITAL
1701 LACY ST
CAPE GIRARDEAU MO 63701

NON PROFIT REPORT
205 MAIN ST
DANBURY CT 06810

DAVID R NORCROSS
DIRECTOR OF PR & DEVELOPMENT
LUTHERAN HOSPITAL OF MARYLAND
730 ASHBURTON ST
BALTIMORE MD 21216

RONALD NORDEEN
DIRECTOR OF DEVELOPMENT
THE CHILDRENS ORTHOPEDIC HOSP
4800 SAND POINT WAY N E
SEATTLE WA 98105

EDWARD H NORDIAN
PRESIDENT
PRESBYTERIAN UNIV HOSP
230 LOTHROP ST
PITTSBURGH PA 15213

NORTH CAROLINA HOSPITAL ASSN
ATTN MARION J FOSTER EXEC DIR
BOX 10937
RALEIGH NC 27605

NORTH DAKOTA HOSPITAL ASSN
ATTN HARVEY C HANSON EXEC DIR
312 RED RIVER NATIONAL BANK
GRAND FORKS ND 58201

MR ALEX NORTON
CHAIRMAN DEVELOPMENT COMMITTEE
NEW ROCHELLE HOSPITAL M C
16 GUION PLACE
NEW ROCHELLE NY 10801

MS JANICE O BRIEN
DIRECTOR OF DEVELOPMENT
BAPTIST MEMORIAL HOSP SYSTEM
111 DALLAS ST
SAN ANTONIO TX 78286

MARGARET C O DELL
PUBLIC INFO DIRECTOR
VALLEY MEMORIAL HOSP
1111 E STANLEY BLVD
LIVERMORE CA 94550

J P O DONNELL
DIRECTOR OF DEVELOPMENT
ST VINCENTS MEDICAL CENTER
BARRS ST & ST JOHNS AVE
JACKSONVILLE FL 32204

ROBERT E O HAIRE
DIRECTOR OF DEVELOPMENT
ST ANTHONY HOSPITAL SYSTEMS
4231 W 16TH AVE
DENVER CO 80204

OHIO HOSPITAL ASSOCIATION
ATTN DONALD R NEWKIRK PRES
88 EAST BROAD STREET
COLUMBUS OH 43215

OKLAHOMA HOSPITAL ASSOCIATION
ATTN CLEVELAND RODGERS DIR
1145 SOUTH UTICA AVENUE 115
TULSA OK 74104

WILLIAM A OLIFF
ASSOC ADM FOR DEVELOPMENT
CALVARY HOSPITAL
1600 MACOMBS RD
BRONX NY 10452

RONALD D OLMSTEAD
VICE PRESIDENT FOR DEVELOPMENT
NORTHWESTERN MEMORIAL HOSPITAL
250 E SUPERIOR ST
CHICAGO IL 60611

THOMAS M O MALLEY
ASSOCIATE EXECUTIVE DIRECTOR
ST MARYS HEALTH CENTER
6420 CLAYTON ROAD
ST LOUIS MO 63117

ORE ASSOCIATION OF HOSPITALS
ATTN P D FLEISSNER EXEC DIR
220 S W MORRISON STREET
PORTLAND OR 97204

ROBERT L O ROURKE
DIRECTOR OF PR & DEVELOPMENT
WEST ALLIS MEMORIAL HOSPITAL
8901 WEST LINCOLN AVE
WEST ALLIS WI 53227

JOHN C OSBORN
ASST DIRECTOR DEVELOPMENT
MORTON F PLANT HOSPITAL
BOX 210
CLEARWATER FL 33517

AL OSBORNE
SAMARITAN HOSP
2215 BURDETT AVE
TROY NY 12180

WILLIAM W OSBORNE
EXECUTIVE SECRETARY
WILSON MEMORIAL HOSPITAL FDN
JOHNSON CITY NY 13732

HENRY S OSINSKI
DIRECTOR OF DEVELOPMENT
ROCKFORD MEMORIAL HOSPITAL
2500 N ROCKTON
ROCKFORD IL 61103

EDWARD L OSOFSKY
DIRECTOR OF DEVELOPMENT
ST PAUL HOSPITAL
5909 HARRY HINES BLVD
DALLAS TX 75235

RONALD E OSSMANN
DIRECTOR OF DEVELOPMENT
PAUL KIMBALL HOSPITAL
600 RIVER AVENUE
LAKEWOOD NJ 08701

WILLIS A OSTREM
DIR OF DEVELOPMENT
SWEDISH-AMERICAN HOSPITAL
1316 CHARLES ST
ROCKFORD IL 61101

MISS JENNIFER O SULLIVAN
CONG RES SUC ED & PUB WELFARE
DECK 37
LIBRARY OF CONGRESS
2ND ST & INDEPENDENCE AVE N W
WASHINGTON D C 20540

DAVID W OUGHTON
DIRECTOR OF DEVELOPMENT
CHIT-CHAT FOUNDATION
BOX 277
WERNERSVILLE PA 19565

EVAN R OWEN
CHAIRMAN
BETHESDA HOSPITAL
OAK ST & READING RD
CINCINNATI OH 45206

JOHN M PALUMBO
DIRECTOR OF DEVELOPMENT
HOTEL DIEU HOSPITAL
1014 NORTH STANTON
EL PASO TX 79902

HOSPITAL ASSN OF PENNSYLVANIA
ATTN JAMES R NEELY PRES
BOX 608
CAMP HILL PA 17011

JOHN PARRISH
DIRECTOR OF DEVELOPMENT
PORTER MEMORIAL HOSPITAL
2525 SOUTH DOWNING ST
DENVER CO 80210

JAMES PATRICK
DIRECTOR OF DEVELOPMENT
TRINITY LUTHERAN HOSPITAL
31ST & WYANDOTTE AVE
KANSAS CITY MO 64108

MICHAEL A PEARSON
DIR OF DEVELOPMENT
MERCY HOSPITAL
3663 S MIAMI AVE
MIAMI FL 33133

SANDRA F PERLEY
DIRECTOR OF PR & DEVELOPMENT
THE MIRIAM HOSPITAL
164 SUMMIT AVE
PROVIDENCE RI 02906

ROGER A PERRY JR
ASST TO EXEC VICE PRES
NEW ENGLAND DEACONESS HOSP
110 FRANCIS ST
BOSTON MA 02215

PERSONNEL DIRECTOR
O BLENESS MEMORIAL HOSPITAL
HOSPITAL DRIVE
ATHENS OH 45701

JAMES W PETERSON
TACOMA GENERAL HOSPITAL
BOX 5277
TACOMA WA 98405

KENNETH L PETRICH
GRANTS ADMINISTRATOR
HEALTH & HOSP GOV COMM
COOK COUNTY HOSP
1900 WEST POLK ST
CHICAGO IL 60612

MRS V M PFARR
DIRECTOR OF DEVELOPMENT
FAIRVIEW GENERAL HOSPITAL
18101 LORAIN AVENUE
CLEVELAND OH 44111

JAMES PICHEL
RIVERSIDE COMMUNITY HOSP
4445 MAGNOLIA AVE
RIVERSIDE CA 92501

MS SANDY PINTO
COMMUNICATIONS DIRECTOR
HUNTSVILLE HOSPITAL
101 SIVLEY RD
HUNTSVILLE AL 35801

MISS KAREN W PORTER
MANAGING EDITOR
TRUSTEE
AMERICAN HOSPITAL ASSOCIATION
840 NORTH LAKE SHORE DRIVE
CHICAGO IL 60611

EDGAR D POWELL
PRESIDENT
AMERICAN CITY BUREAU/BEAVER
ASSOCIATES INC
9501 WEST DEVON ROOM 501
ROSEMONT IL 60018

EDWIN R POWERS
DIRECTOR OF DEVELOPMENT
FT SANDERS PRESBYTERIAN HOSP
1909 CLINCH AVE S W
KNOXVILLE TN 37916

W CLINTON POWERS
DIRECTOR OF DEVELOPMENT
CROZER CHESTER MEDICAL CENTER
UPLAND
CHESTER PA 19013

E K PRENTICE
TACOMA GENERAL HOSPITAL
BOX 5277
TACOMA WA 98405

PHILIP E PRICKETT
OFFICE OF DEVELOPMENT DIRECTOR
ARCHDIOCESE OF MILWAUKEE
345 NORTH NINETY FIFTH ST
MILWAUKEE WI 53226

BETTY B PRINE
DIR OF DEVELOPMENT &
COMMUNITY RELATIONS
ORMOND BEACH MEMORIAL HOSPITAL
875 STERTHAUS AVE
ORMOND BEACH FL 32074

JEFFREY A PRUSSIN
9908 HILLRIDGE DR
KENSINGTON MD 20795

NORMAN J PUHEK
DIRECTOR OF DEVELOPMENT
KENOSHA MEMORIAL HOSPITAL
6308 EIGHTH AVE
KENOSHA WI 53140

RONALD L PURDUM
ADMINISTRATOR
ALBANY GENERAL HOSPITAL
1046 N 6TH AVE
ALBANY OR 97321

MRS JO QUACKENBUSH
DIRECTOR OF DEVELOPMENT
THE CHILDRENS HOSP OF AKRON
BUCHTEL AT BOWERY ST
AKRON OH 44308

H GERALD QUIGG
VICE PRESIDENT-UNIV RELATIONS
UNIVERSITY OF RICHMOND
RICHMOND VA 23173

ROBERT L RADCLIFFE
DIRECTOR OF DEVELOPMENT
OVERLOOK HOSPITAL
MORRIS AVE
SUMMIT NJ 07401

MRS KATHLEEN O RANK
DIRECTOR OF DEVELOPMENT
MIAMI HEART INSTITUTE
4701 NORTH MERIDAN AVE
MIAMI BEACH FL 33140

EDWARD H RAPP JR
DIRECTOR OF DEVELOPMENT
ATLANTIC CITY MEDICAL CENTER
1925 PACIFIC AVE
ATLANTIC CITY NJ 08401

MRS WARD RAPPAPORT
ASSISTANT TO THE PRESIDENT
ELWYN INSTITUTE
ELWYN PA 19063

SHERWOOD H RAYMOND
DIRECTOR OF DEVELOPMENT
NORWALK HOSPITAL ASSN
24 STEVENS ST
NORWALK CT 06856

FRANK L REGNANTE
DIR OF COMMUNITY RELATIONS
ST FRANCIS HOSPITAL
ROSLYN NY 11576

ALLEN C REHKOP
DIRECTOR OF COMM & PUBLIC REL
BERWICK HOSPITAL
701 E 16TH ST
BERWICK PA 18603

JAMES W REIBER
HILLCREST MEDICAL CENTER
UTICA ON THE PARK
TULSA OK 74104

GEORGE J REINERT
ASSISTANT ADMINISTRATOR
ST MARY DESERT VALLEY HOSPITAL
18300 HIGHWAY 18
APPLE VALLEY CA 92307

ROBERT P REINHARDT
DIRECTOR COMMUNITY RELATIONS
ARCHBISHOP BERGAN MERCY HOSP
7500 MERCY RD
OMAHA NE 68124

WILLIAM REITTER
212 N CENTER ST
ORANGE NJ 07050

REV RICHARD L REYNOLDS
DIRECTOR OF DEVELOPMENT
ROCHESTER METHODIST HOSPITAL
201 WEST CENTER
ROCHESTER MN 55901

HOSPITAL ASSN OF RHODE ISLAND
ATTN WADE C JOHNSON EXEC DIR
56 PINE STREET
PROVIDENCE RI 02903

JOHN H RHUDE
DIRECTOR OF DEVELOPMENT
JEWISH HOSPITAL
3220 BURNET AVE
CINCINNATI OH 45229

DAVID N RIANDA
DIRECTOR OF MEDICAL FUND
PROVIDENCE HOSPITAL
700 N E 47TH
PORTLAND OR 97213

CHARLES RICHARDS
DIR DEVELOPMENT & PR
WINTER PARK MEMORIAL HOSP
200 N LAKEMONT
WINTER PARK FL 32789

JAMES J RICHARDS
DIRECTOR COMMUNITY RELATIONS
ST BERNARDINE HOSPITAL
SAN BERNARDINO CA 92404

JAMES P RICHARDSON
PRESIDENT
PRESBYTERIAN HOSPITAL
BOX 10157
CHARLOTTE NC 28201

J B RICHMAN
DIRECTOR COMMUNITY RELATIONS
MISSOURI BAPTIST HOSPITAL
3015 N BALLAS RD
ST LOUIS MO 63131

LESTER E RICHWAGEN
31 LAKEWOOD PARKWAY
BURLINGTON VERMONT 05401

LOIS G RICKSON
DIRECTOR COMMUNITY RELATIONS
CRANSTON GENERAL HOSPITAL
1763 BROAD ST
CRANSTON RI 02905

GENE RIETFORS
DIR OF PR & DEVELOPMENT
BETHANY HOSPITAL
51 NORTH 12TH STREET
KANSAS CITY KS 66102

JACK K RIMALOVER
DIR OF RESOURCES DEVELOPMENT
LENNOX HILL HOSPITAL
100 EAST 77TH ST
NEW YORK NY 10021

JENNIFER RISEON
ADMINISTRATIVE ASSISTANT
PRESBYTERIAN UNIVERSITY HOSP
230 LOTHROP ST
PITTSBURGH PA 15213

PHILIP J RITTER
DIRECTOR OF DEVELOPMENT
PRESBYTERIAN MED CNTR
1719 E 19TH AVE
DENVER CO 80218

CURTIS ROBERTS
DEVELOPMENT DIRECTOR
ST MARYS HOSPITAL
HAYES & STANYAN STS
SAN FRANCISCO CA 94117

ROBERT ROBERTS SR
VP-DEVELOPMENT
MEDICAL COLLEGE OF OHIO
BOX 6190
TOLEDO OH 43614

STANLEY G ROBERTSON
DIRECTOR OF DEVELOPMENT
THE GRIFFIN HOSPITAL
130 DIVISION ST
DERBY CT 06418

CARTER ROCHELLE
PRESIDENT
CARTER ROCHELLE ASSOC
5400 MEMORIAL 813
HOUSTON TX 77007

GORDON F RODDA PRESIDENT
INTER-COMMUNITY HOSPITAL FDN
275 WEST COLLEGE ST
COVINA CA 91722

TED S ROE
ASSOCIATE HOSPITAL DIRECTOR
HERMANN HOSPITAL
1203 ROSS STERLING
HOUSTON TX 77025

JOHN O ROHDE
DIRECTOR
MUSKOGEE GENERAL HOSPITAL
300 ROCKEFELLER DR
MUSKOGEE OK 74401

HARRIET G RONAN
EXEC FUND RAISER
HIGHLAND PARK HOSPITAL FDN
718 GLENVIEW AVE
HIGHLAND PARK IL 60035

GEORGE A ROSE
DIRECTOR OF DEVELOPMENT
MEMORIAL HOSPITAL
4501 N PARK DR
BELLEVILLE IL 62223

THEODORE ROSENBAUM
DIRECTOR OF DEVELOPMENT
L I JEWISH-HILLSIDE MED CNTR
NEW HYDE PARK NY 11040

CHARLES F ROSS
DIRECTOR OF DEVELOPMENT
TRUMBULL MEMORIAL HOSPITAL
1350 E MARKET ST
WARREN OH 44482

DANIEL ROSS
DIRECTOR OF DEVELOPMENT
BOSTON UNIVERSITY MEDICAL CTR
720 HARRISON AVE
BOSTON MA 02118

EDWIN F ROSS
EXEC DIRECTOR
FAIRVIEW GENERAL HOSPITAL
18101 LORAIN AVE
CLEVELAND OH 44111

DAVID J ROSSER
ASSOC DIR OF DEVELOPMENT
THE WOODRUFF MEDICAL CENTE
EMORY UNIVERSITY
ATLANTA GA 30322

ALAN L ROSSMANN
ASSOCIATE DIRECTOR
UNIVERSITY OF IOWA FDN
IOWA MEMORIAL UNION
IOWA CITY IA 52242

WILLIAM S ROTH
DIRECTOR OF DEVELOPMENT
THE GEISINGER MED CNTR
DANVILLE PA 17821

B ALLEN ROWLAND
TRUSTEE DEVELOPMENT CHAIRMAN
LAWRENCE GENERAL HOSPITAL
ONE GARDEN ST
LAWRENCE MA 01842

VICTOR C ROWLEY
DIRECTOR OF DEVELOPMENT
PARK AVE HOSPITAL
789 PARK AVE
ROCHESTER NY 14607

LESTER H RUBIN
EXECUTIVE DIRECTOR
BROOKLYN WOMENS HOSP
1395 EASTERN PARKWAY
BROOKLYN NY 11233

SUZANNE RUCKER
MEMBERSHIP MANAGER
FAIRFAX HOSPITAL ASSN
3300 GALLOWS RD
FALLS CHURCH VA 22046

JOSEPH W RUKLICK
V P DEVELOPMENT
EVANGELICAL HOSP ASSN
MC DONALDS PLAZA
OAK BROOK IL 60521

FREDERICK C RUNDLET
SYSTEMS DIR OF RESOURCE
ST ANTHONY HOSPITAL SYSTEMS
4231 W 16TH AVE
DENVER CO 80204

ROBERT E RUSSELL JR
DIRECTOR OF DEVELOPMENT
REHABILITATION INST OF CHICAGO
345 EAST SUPERIOR
CHICAGO IL 60611

JAMES A RYBERG
DIR OF DEVELOPMENT
SPOHN HOSPITAL
1436 THIRD AVE
CORPUS CHRISTI TX 78404

JOHN M SACUTO
DIR COMM REC DEVELOPMENT
ALLEGHENY GENERAL HOSPITAL
320 E NORTH AVE
PITTSBURG PA 15212

TED SAFIAN
DIRECTOR OF DEVELOPMENT
MOUNT SINAI HOSPITAL
4300 ALTON ROAD
MIAMI BEACH FL 33140

ROBERT SAILSTAD
THE DUKE ENDOWMENT
SUITE 1500
200 SOUTH TRYON ST
CHARLOTTE NC 28202

WILLIAM A SANDBERG
DIRECTOR PR & DEVELOPMENT
ROSEVILLE COMMUNITY HOSPITAL
333 SUNRISE AVE
ROSEVILLE CA 95678

NORMAN W SAUNDERS
DIRECTOR OF DEVELOPMENT
NO KANSAS CITY MEMORIAL HOSP
2800 HOSPITAL DR
N KANSAS CITY MO 64116

ROBERT A SAUNDERS
DIRECTOR OF DEVELOPMENT
ST JOHNS HOSPITAL
1235 E CHEROKEE
SPRINGFIELD MO 65802

HUDSON B SCATTERGOOD
DIRECTOR OF DEVELOPMENT
THE LANKENAU HOSPITAL
LANCASTER & CITY LINE AVES
PHILADELPHIA PA 19151

VINCENT J SCHAFMEISTER JR
V-P COMMUNITY DEVELOPMENT
ST PETERS HOSPITAL
315 SOUTH MANNING BLVD
ALBANY NY 12208

LEON R SCHMUCKER
DIRECTOR OF DEVELOPMENT
MENNONITE HOSPITAL
807 N MAIN ST
BLOOMINGTON IL 61701

EDWARD C SCHOTT
ASSOCIATE ADMINISTRATOR
ST LUKES HOSPITAL
151 EAST BANNOCK
BOISE ID 83702

MARGARET M SCHROTH
DIRECTOR OF PUBLIC INFO
BILLINGS DEACONESS HOSPITAL
BOX 2547
BILLINGS MT 59103

GEORGE J SCHULTE
DIR PUB RELATIONS &
DEVELOPMENT
HOLY FAMILY HOSPITAL
100 NORTH RIVER RD
DES PLAINES IL 60016

FRED SCHULZKE
PRESIDENT
HANEY ASSOC INC MID WEST
7939 STATE LINE
KANSAS CITY MO 64114

HOWARD M SCHWARTZ
DIRECTOR OF DEVELOPMENT
PHILADELPHIA GERIATRIC CENTER
7015 BOYER ST
PHILADELPHIA PA 19119

K SUZANNE SCHWELLENBACH
ASST DIR OF DEVELOPMENT
HOAG MEMORIAL HOSPITAL
PRESBYTERIAN
301 NEWPORT BLVD
NEWPORT BEACH CA 92660

LT COL ALBERT SCOTT
EXECUTIVE DIRECTOR
BOOTH MEMORIAL MED CNTR
MAIN STREET
FLUSHING NY 11355

GEORGE W SCOTT PHD
ASST TO THE DEAN FOR DEVEL
UNIVERSITY OF WASHINGTON
SCHOOL OF MEDICINE
SEATTLE WA 98195

THOMAS V SCOTT III
DEVELOPMENT DIRECTOR
BAPTIST HOSPITAL OF MIAMI
8960 S W 87TH COURT
SUITE 26
MIAMI FL 33156

GERALD G SEARFOSS
DIRECTOR OF DEVELOPMENT
WHITE PLAINS HOSPITAL
41 EAST POST ROAD
WHITE PLAINS NY 10601

WILLIAM D SEELYE
DIRECTOR OF DEVELOPMENT
PACIFIC MEDICAL CNTR INC
BOX 7999
SAN FRANCISCO CA 94120

JOHN F SEIBOLD
FUND DEVELOPMENT OFFICER
BEVERLY HOSPITAL
309 WEST BEVERLY BLVD
MONTEBELLO CA 90640

MR MAURICE SEIPLE
DEVELOPMENT DIRECTOR
FLOWER HOSPITAL
3350 COLLINGWOOD BOULEVARD
TOLEDO OH 43610

JERRY L SELLENTIN
DIR OF PERSONNEL
BRYAN MEMORIAL HOSPITAL
4848 SUMNER ST
LINCOLN NE 68510

MARSHALL SEWELL JR
DIRECTOR OF DEVELOPMENT
MUHLENBERG HOSPITAL
PARK AVE-RANDOLPH ROAD
PLAINFIELD NJ 07060

MRS H J SEYMOUR
44 OLD SMITH RD
TENAFLY NJ 07670

GEORGE L SHANNON
ASSOCIATE ADMINISTRATOR
SCHUYLER HOSPITAL INC
MONTOUR FALLS NY 14865

EDWARD B SHAW
100 APPLEWOOD DR
MARLBOROUGH MA 01752

CLYDE SHIMADA
DIRECTOR OF DEVELOPMENT
KUAKINI HOSPITAL & HOME
347 N KUAKINI ST
HONOLULU HI 96817

JOHN C SHIMER
DIRECTOR OF DEVELOPMENT
ST JOSEPHS HOSPITAL
BOX 12069
TUCSON AZ 85711

RICHARD A SIGISMONTI
DIRECTOR OF DEVELOPMENT
ST JOSEPHS HOSPITAL
415 6TH ST
LEWISTOWN ID 83501

ROBERT P SIMMONS
EXECUTIVE DIRECTOR
ST LUKES HOSPITAL
P O BOX 3033
NEW BEDFORD MA 02741

MRS MARION E SIMON
SPECIAL ASST TO THE PRESIDENT
MICHAEL REESE MEDICAL CENTER
29TH STREET & ELLIS AVENUE
CHICAGO IL 60616

SISTER ANDREA
PRESIDENT BOARD OF TRUSTEES
ST VINCENT MEDICAL CENTER
2131 WEST 3RD ST
LOS ANGELES CA 90054

SISTER AURORA TATRO
DIRECTOR OF P R & DEVELOPMENT
FAMILY ALLEN HOSPITAL
101 COLLEGE PARKWAY
WINOOSKI VT 05404

SISTER ELLEN PATRICIA MEADE
ADMINISTRATOR
ST ELIZABETH HOSPITAL
225 WILLIAMSON ST
ELIZABETH NJ 07207

SISTER GEORGETTE JEAN SP
SAINT JOSEPH MEDICAL CENTER
BUENA VISTA & ALAMEDA
BURBANK CA 91505

SISTER M ANN FRANCES HOFF
ADMINISTRATOR
SAINT FRANCES HOSPITAL
EAST PIKES PEAK AVE & PROSPECT
COLORADO SPRINGS CO 80903

SISTER MARY EDITH ADMIN
ST JOHNS HOSPITAL
1923 S UTICA
TULSA OK 74104

SISTER VERENICE
DIRECTOR SUPPORT SERVICES
ST JOHN HOSPITAL
22101 MOROSS RD
DETROIT MI 48236

MERLIN R SIZELOVE
DIR OF COMMUNITY RESOURCES
WESLEY MEDICAL CENTER
550 N HILLSIDE
WICHITA KS 67214

MR WILLIAM S SLATTERY
DIRECTOR OF DEVELOPMENT &
COMMUNITY RELATIONS
RIVERVIEW HOSPITAL
35 UNION STREET
RED BANK NJ 07701

RICHARD GLEN SMILEY
ASST DIR MED CENTER DEV
DUKE UNIV MED CENTER
BOX 3081
DURHAM NC 27710

MRS DOROTHY B SMITH
DIRECTOR OF ANNUAL GIVING
MEMORIAL SLOAN KETTERING
CANCER CENTER
444 E 68TH ST
NEW YORK NY 10021

E J SMITH
ADMINISTRATOR
CITRUS MEMORIAL HOSPITAL
502 W HIGHLAND BLVD
INVERNESS FL 32650

ROBERT G SMITH
CONSULTANT
MT CARMEL MED CNTR
793 W STATE ST
COLUMBUS OH 43222

STUART R SMITH
DIR OF COMMUNITY RELATIONS &
DEVELOPMENT
UNITED HOSPITAL
406 BOSTON POST ROAD
PORT CHESTER NY 10573

THOMAS W SMITH
ASSISTANT DIRECTOR
JEWISH HOSPITAL
217 E CHESTNUT ST
LOUISVILLE KY 40202

ROBERT R SMYTHE
S W AREA DIR OF DEV
NATIONAL BENEVOLENT ASSN
4825 N EARLE ST
ROSEMEAD CA 91770

SOUTH CAROLINA HOSPITAL ASSN
ATTN WILLIAM L YATES EXEC DIR
BOX 1236
WEST COLUMBIA SC 29169

SOUTH DAKOTA HOSPITAL ASSN
ATTN WILLIAM T MURPHY DIR
222 EAST CAPITOL STREET
PIERRE SD 57501

RICHARD L SPALDING
SR V P FOR PLANNING & DEV
HENDRICK MEMORIAL HOSPITAL
19TH & HICKORY STS
ABILENE TX 79601

WILLIAM P SPECHT
PRESIDENT
HERBERT J THOMAS MEM HOSP
4605 MAC CORKLE AVE S W
SOUTH CHARLESTON WV 25309

EDWARD C SPOON
DIR OF PUBLIC REL & DEVEL
SAINT MARYS HOSPITAL
235 WEST 6TH STREET
RENO NV 89502

JAMES STACK
DIRECTOR OF DEVELOPMENT
ST JOSEPH HOSPITAL
2900 N LAKE SHORE DR
CHICAGO IL 60657

MR THOMAS K STADLINGER
DIRECTOR PUBLIC RELATIONS &
DEVELOPMENT
HOAG MEMORIAL HOSPITAL-
PRESBYTERIAN
301 NEWPORT BOULEVARD
NEWPORT BEACH CA 92660

REV JOHN F STANTON
ASSOC DIR OF DEVELOPMENT
CHRIST HOSPITAL
176 PALISADE AVE
JERSEY CITY NJ 07306

NORA A STARCHER
ASST TO DIR OF DEV
THE VALLEY HOSPITAL
LINWOOD & N VAN DIEN AVES
RIDGEWOOD NJ 07451

SEYMOUR STARK
COMMUNITY RELATIONS
JOHN T MATHER MEMORIAL HOSP
NORTH COUNTRY ROAD
PORT JEFFERSON NY 11777

MRS GARRETT STARMER
ASSISTANT ADMINISTRATOR
N T ENLOE MEMORIAL HOSP
W 5TH AVE & ESPLANADE
CHICO CA 95926

KENNETH R STEELE
BOX 81
BALTIMORE MD 21203

MISS TERESA E STEIN
DIR DEFERRED GIFTS
SOUTH MIAMI HOSPITAL
7400 S W 62ND AVENUE
SOUTH MIAMI FL 33143

M L STEINMETZ III
DIRECTOR OF DEVELOPMENT
KIRKSVILLE COLLEGE OF
OSTEOPATHY & SURGERY
800 W JEFFERSON
KIRKSVILLE MO 63501

MRS ETHEL STEPHENS
ASST DEVELOPMENT DIRECTOR
GREATER BALTIMORE MED CENTER
6701 N CHARLES ST
BALTIMORE MD 21204

LAWRENCE R STERN
ST MARYS HOSPITAL
BOX 50026
TUCSON AZ 85703

RANDALL S STEVENS
VICE PRES FOR DEVELOPMENT
MIDDLESEX MEMORIAL HOSPITAL
28 CRESCENT ST
MIDDLETOWN CT 06457

JOHN PAUL STEWART
DIRECTOR OF DEVELOPMENT
ST CATHERINE HOSPITAL
3556 7TH AVE
KENOSHA WI 53140

MISS ROSEMARY STINSON
DIR FOR DEVELOPMENT
BON SECOURS-LAWRENCE GEN JOINT
HOSPITAL BLDG FUND INC
P O BOX 312
LAWRENCE MA 02545

WALTER J STINSON
DIRECTOR OF DEVELOPMENT
HURON ROAD HOSPITAL
13951 TERRACE RD
CLEVELAND OH 44112

LARRY M STOUT
PUBLIC RELATIONS DIRECTOR
MERCY HOSPITAL
501 N W 12TH
OKLAHOMA CITY OK 73103

CHARLES W STROUD
FOUNDATION DIRECTOR
MERCY HOSPITAL FOUNDATION
6TH & UNIVERSITY
DES MOINES IA 50314

DR ROBERT WARREN STUCKRATH
DIRECTOR OF DEVELOPMENT
NORTH HILLS PASSAVANT HOSPITAL
9100 BABCOCK BOULEVARD
PITTSBURGH PA 15237

ROBERT H SUCKOW
DIR OF DEV & PR
METHODIST HOSP OF IN INC
INDIANAPOLIS IN 46202

PETER SUKALAC
DIRECTOR OF DEVELOPMENT
SALEM HOSPITAL
665 WINTER STREET
SALEM OR 97301

J BARD SULLENGER
DIRECTOR OF EDUCATIONAL
FUND RAISING
AMERICAN ALUMNI COUNCIL
SUITE 530
ONE DUPONT CIRCLE
WASHINGTON D C 20036

THOMAS J SULLIVAN
DIRECTOR OF DEVELOPMENT
MEDICAL CENTER OF VERMONT
GIVEN BUILDING
BURLINGTON VT 05401

WILLIAM B SUTHERLAND
DEVELOPMENT DIRECTOR
FAIRFAX HOSPITAL ASSN
3300 GALLOWS RD
FALLS CHURCH VA 22046

L B SUTTLEMYRE
DIRECTOR OF DEVELOPMENT
ST BENEDICTS HOSPITAL
3000 POLK ST
OGDEN UT 84403

HARRY T SWANSON
DIRECTOR OF DEVELOPMENT
CALIFORNIA HOSPITAL MED CNTR
1414 SOUTH HOPE ST
LOS ANGELES CA 90015

ROGER E SWENSON
VICE PRESIDENT FOR DEVELOPMENT
FAIRVIEW HOSPITAL
2312 SOUTH SIXTH STREET
MINNEAPOLIS MN 55406

WILLIAM R TALBOT JR
DIRECTOR OF DEVELOPMENT
PRESBY-UNIV PENNA MEDICAL CNTR
51 N 39TH ST
PHILADELPHIA PA 19104

THOMAS R TANIS
DIRECTOR DEVELOPMENT & PR
ST FRANCIS XAVIER HOSPITAL
135 RUTLEDGE AVE
CHARLESTON SC 29401

NORMAN TATMAN
EXECUTIVE SECRETARY
LUTHERAN HOSPITAL FOUNDATION
3024 FAIRFIELD AVE
FORT WAYNE IN 46807

CHARLES L TAYLOR
ADMINISTRATOR
ATLANTIC CITY HOSPITAL
1925 PACIFIC AVE
ATLANTIC CITY NJ 08401

HAROLD E TEAGLE
DIRECTOR OF DEVELOPMENT
PRESBYTERIAN HOSPITAL
300 N W 12TH ST
OKLAHOMA CITY OK 73103

JOHN S TEMPLE
DIRECTOR OF DEVELOPMENT
MEMORIAL HOSPITAL OF GLENDALE
1420 SOUTH CENTRAL AVENUE
GLENDALE CA 91204

TENNESSEE HOSPITAL ASSOCIATION
ATTN IRA M LANE JR PRES
214 REIDHURST AVENUE
NASHVILLE TN 37203

IRA BREWSTER TERRY
DIR OF DEVELOPMENT
THE WASHINGTON HOSPITAL CENTER
110 IRVING ST N W
WASHINGTON D C 20010

CYRIL E TETRICK
DIR OF FIN DEVELOPMENT
ST JOSEPH MEMORIAL HOSPITAL
1907 W SYCAMORE ST
KO KOMO IN 46901

TEXAS HOSPITAL ASSOCIATION
ATTN O RAY HURST PRES
BOX 4553
AUSTIN TX 78751

DE WITT THOMPSON
V P DEVELOPMENT
METHODIST HOSPITAL
BOX 1201
LUBBOCK TX 79408

ROBERT L THOMPSON
VICE PRESIDENT
KETCHUM INC
314 CHATHAM CENTER
PITTSBURGH PA 15219

SUSAN L THOMPSON
PUBLIC RELATIONS COORDINATOR
PENINSULA GENERAL HOSPITAL
SOUTH DIVISION & LOCUST ST
SALISBURY MD 21801

BRUCE D THORSEN
MERCY HOSPITAL FOUND
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R AVERY TILLINGHAST
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320 POMFRET ST
PUTNAM CT 06260

MS J KAY TIMMONS
DIRECTOR OF PUBLIC RELATIONS &
DEVELOPMENT
GOOD SAMARITAN HOSPITAL
1425 W FAIRVIEW AVE
DAYTON OH 45406

KENNETH E TIRMENSTEIN
EXECUTIVE DIRECTOR
ST VINCENT HOSPITAL FDN
2001 W 86TH ST
INDIANAPOLIS IN 46260

THOMAS M TITUS
DIR OF COMMUNITY RELATIONS
THE MEDICAL CENTER
710 CENTER STREET
COLUMBUS GA 31909

JOSEPH TOBIN
DIRECTOR OF DEVELOPMENT
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DIR OF PUBLIC RELATIONS
ST JOHN REGIONAL MED CNTR
HURON SD 57350

JAMES F TOMNEY
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BEVERLY HOSPITAL
HERRICK ST
BEVERLY MA 01915

REV RANDELL E TONN
DIR OF PUBLIC RELATIONS
LUTHERAN MEDICAL CENTER
2609 FRANKLIN BOULEVARD
CLEVELAND OH 44113

FRANK W TONNEMACHER
DIRECTOR OF DEVELOPMENT
ST JOSEPHS HOSPITAL & MED CNTR
BOX 2071
PHOENIX AZ 85001

BARBARA TRAEGER
DIRECTOR OF P R
EVANSTON HOSPITAL
2650 RIDGE AVE
EVANSTON IL 60201

WILLIAM E TREIBLE
DIRECTOR OF DEVELOPMENT
GENERAL HOSPITAL OF MONROE CTY
206 EAST BROWN STREET
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GREGG TRIPPETT
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621 N MADRONE
ROSEBURG OR 97470

W HOMER TURNER
EXECUTIVE VICE PRESIDENT
NATL COUNCIL ON PHILANTHROPY
680 FIFTH AVE
NEW YORK NY 10019

W WILSON TURNER
PRESIDENT
MEMORIAL HOSPITAL SYSTEM
1100 LOUISIANA
HOUSTON TX 77002

DONNA LEE UMANA
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170 GOVENORS AVE
MEDFORD MA 02155

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102 W 9TH ST
NELIGH NE 68756

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455 EAST FOURTH SOUTH STE 10
SALT LAKE CITY UT 84111

ROBERT L VALENTE
DIRECTOR DEPT FINANCIAL DEV
CABRINI HEALTH CARE CENTER
227 EAST 19TH STREET
NEW YORK NY 10003

MRS PATRICIA VAN FLEET
DIRECTOR OF DEVELOPMENT
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MEMORIAL HOSPITAL
60 PROSPECT AVENUE
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GEORGE VANGELLOW
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ROCHESTER NY 14620

W L VAN LOAN
DIRECTOR OF DEVELOPMENT
GOOD SAMARITAN HOSPITAL
27TH & HARRISON BLVD
CORVALLIS OR 97330

MISS VIRGINIA L VAUGHN
DIRECTOR OF FUND DEVELOPMENT
NEW ROCHELLE HOSP MED CNTR
16 GUION PLACE
NEW ROCHELLE NY 10802

NICHOLAS T VERRASTRO
ADMINISTRATOR
PASCACK VALLEY HOSPITAL
OLD HOOK ROAD
WESTWOOD NJ 07675

MRS CLEONE M VAZQUEZ
MANAGER DEVELOPMENT DEPT
MT ZION HOSPITAL
1600 DIVISADERO
SAN FRANCISCO CA 94115

VERMONT HOSPITAL ASSOCIATION
ATTN HENRY G COE EXEC VP
BOX 475
SHELBURNE VT 05482

JAMES P VIGNEAU
DIR OF DEVELOPMENT
ST JOSEPHS HOSPITAL
HIGH SERVICE AVENUE
O N PROVIDENCE RI 02904

VIRGINIA HOSPITAL ASSOCIATION
ATTN STUART D OGREN EXEC DIR
1904 BYRD AVENUE
RICHMOND VA 23230

JOHN R VITELLO
ST JOSEPH HOSPITAL FDN
BOX 1919
HOUSTON TX 77001

TOM W WALTERS
DIRECTOR OF DEVELOPMENT
THE ANTHONIAS
ST ANTHONAS HOSPITAL INC
ST PETERSBURG FL 33705

ALFRED G WARDLEY
DIRECTOR OF DEVELOPMENT
CHILDRENS HOSP MED CNTR FDN
5110 GROVE STREET
OAKLAND CA 94609

JOHN C WARREN
DIRECTOR OF DEVELOPMENT
SAINT MARYS HOSPITAL
ROCHESTER MN 55901

WILLIAM VAN N WASHBURN
DIRECTOR OF DEVELOPMENT
AFFILIATED HOSPITALS CENTER
641 HUNTINGTON AVE
BOSTON MA 02115

THE GEORGE WASHINGTON UNIV
CHAIRMAN DEPT OF HLTH CARE ADM
2018 EYE STREET N W
WASHINGTON D C 20006

WASHINGTON STATE HOSPITAL ASSN
ATTN JOHN BIGELOW EXEC VP
601 BROADWAY AVENUE
SEATTLE WA 98122

KEITH J WATERBROOK
DIR OF DEVEL & PUBLIC REL
BATTLE CREEK SANITARIUM HOSP
197 N WASHINGTON AVE
BATTLE CREEK MI 49016

MRS ROSEMARY M WATERMAN
DIRECTOR OF DEVELOPMENT
MYERS COMMUNITY HOSP
MIDDLE ROAD
SODUS NY 14551

R C WATERS
ASST TO V P FOR HEALTH
DUKE UNIV MED CNTR
BOX 3701
DURHAM NC 27710

JERRY L WATKINS
MARKETING DIRECTOR
ADMINISTRATIVE SYSTEMS INC
SUITE 326 NO. 2 PENN CTR PLAZA
PHILADELPHIA PA 19102

BRUCE C WATSON
DIRECTOR OF DEVELOPMENT
ST JOSEPH HOSPITAL
250 COLLEGE AVE
LANCASTER PA 17604

NORMAN F WEBB
VP PLANNING DEV PROF SVCS
SOUTH CHICAGO COMMUNITY HOSP
2320 E 93RD ST
CHICAGO IL 60617

FREDERICK T WEHR
DIR OF DEVELOPMENT & P R
CHURCH HOME & HOSPITAL
100 N BROADWAY
BALTIMORE MD 21231

PHILIP WEISS
DIRECTOR OF DEVELOPMENT
THE BROOKDALE HOSPITAL CENTER
LINDEN BLVD AT BROOKDALE PLAZA
BROOKLYN NY 11212

WEST VIRGINIA HOSPITAL ASSN
ATTN BRUCE J CARTER EXEC VP
1219 VIRGINIA STREET EAST
CHARLESTON WV 25301

EUGENE WHITE
DIRECTOR OF DEVELOPMENT
BAPTIST MEDICAL CENTER OF OKLA
5800 NORTHWEST GRAND BOULEVARD
OKLAHOMA CITY OK 73112

MISS SUSAN E WEISS
DIRECTOR PUBLIC RELATIONS
BON SECOURS HOSPITAL
468 CADIEUX
GROSSE POINTE MI 48230

MERRITT WELCH
DEVELOPMENT DIRECTOR
THE UNITED HOSPITAL
212 S 4TH ST
GRAND FORKS ND 58201

MRS DOROTHY S WHEELER
DIR OF PUBLIC RELATIONS
MORRIS CAFRITZ MEMORIAL HOSP
1310 SOUTHERN AVE SOUTHEAST
WASHINGTON D C 20032

GARY E WHEELOCK
ASSOC DIR OF DEVELOPMENT
UCLA-HARBOR GEN HOSP CAMPUS
1124 WEST CARSON ST
TORRANCE CA 90502

JOHN J WHITNEY
ATTORNEY DEACONESS HOSP
FORD HOWLAND WHITNEY & HAASE
1500 WILLIAMSON BLDG
CLEVELAND OH 44114

MRS RUTH J WICKEMEYER
DIRECTOR OF DEVELOPMENT
REID MEMORIAL HOSPITAL
1401 CHESTER BOULEVARD
RICHMOND IN 47374

JACK WICKS
THE HOSP ASSN OF PA
BOX 608
CAMP HILL PA 17011

AUGUST J WIESNER
ASST ADM DEVELOPMENT
ENGLEWOOD HOSPITAL
350 ENGLE ST
ENGLEWOOD NJ 07631

JERRY A WILBURN
DIR OF COMMUNITY RELATIONS
ST PATRICK HOSP OF
LAKE CHARLES
524 S RYAN
ST CHARLES LA 70601

HENRY T WILSON
PUBLIC RELATIONS
NEW ENGLAND MED CTR HOSPITAL
185 HARRISON AVENUE
BOSTON MA 02111

WILLIAM J WILDERN
DIRECTOR ANNUAL GIVING
HENRY FORD HOSPITAL
ROOM 251 NURSES RESIDENCE
2799 W GRAND BLVD
DETROIT MI 48202

ROGER H WILSON
JOHN F RICH CO
FIVE PENN CENTER PLAZA
PHILADELPHIA PA 19103

VINCENT C WILSON
DIRECTOR OF DEVELOPMENT
MEMORIAL HOSPITAL OF
DU PAGE COUNTY
AVON RD & SCHILLER ST
ELMHURST IL 60126

ELDON WINKLER
DIRECTOR OF DEVELOPMENT
ST LUKES HOSPITAL
11311 SHAKER BOULEVARD
CLEVELAND OH 44104

WISCONSIN HOSPITAL ASSOCIATION
ATTN WARREN R VON EHREN DIR
BOX 4387
MADISON WI 53719

PAUL R WISER
DIRECTOR OF DEVELOPMENT
UNIV OF OREGON MED CNTR
3181 S W SAM JACKSON PARK RD
PORTLAND OR 97201

P E WOLKODOFF
DIRECTOR OF DEVELOPMENT
UNITED HOSPITALS INC
125 COLLEGE AVE
ST PAUL MN 55102

BILL WOLFARD
COORDINATOR OF GOLDEN CROSS &
SCHOOL PROGRAMS
METHODIST HOSPITAL OF DALLAS
P O BOX 5999
DALLAS TX 75222

S E WOLKENHEIM
DIRECTOR OF DEVELOPMENT
ST MICHAEL HOSPITAL
2400 W VILLARD AVE
MILWAUKEE WI 53209

DE HAVEN WOODCOCK
EXECUTIVE DIRECTOR
RESOURSE DEVELOPMENT
SUITE 205
124 SOUTH 24TH ST
OMAHA NE 68102

C BRUCE WRIGHT
DIRECTOR OF DEVELOPMENT
ST MARYS GENERAL HOSPITAL
45 GOLDER ST
LEWISTON ME 04240

WYOMING HOSPITAL ASSOCIATION
ATTN ALBERT B MC DONALD DIR
BOX 3390
CHEYENNE WY 82001

TORBIN F YATES
DIRECTOR OF DEVELOPMENT
CAPE COD HOSPITAL
LOCK DRAWER 370

C ROBERT YOUNGQUIST
EXECUTIVE DIRECTOR
MAGEE-WOMENS HOSPITAL
FORBES AVE & HACKET ST
PITTSBURGH PA 15213

CARRYL R ZIETTLOW
DIR OF DEVELOPMENT
IOWA METHODIST HOSPITAL
1200 PLEASANT ST
DES MOINES IA 50308

ROBERT L ZUCKER
VP & DIRECTOR OF DEVELOPMENT
MASSILLON CITY HOSPITAL
ROOM 203
452 LAKE AVE N E
MASSILLON OH 44646

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Anniston
Anniston Academy
Birmingham
Birmingham University School
Helena
Indian Springs School
Huntsville
Randolph School
Mobile
The Julius T. Wright School
St. Paul's Episcopal Day School
University Military School
Montgomery
Montgomery Academy
Tuscaloosa
Tuscaloosa Academy

ARIZONA

Mayer
Orme School
Phoenix
Phoenix Country Day School
Rimrock
Southwestern Academy
Arizona Campus
Scottsdale
Judson School
Sedona
Verde Valley School
Tucson
Fenster School
Green Fields School
Treehaven School

CALIFORNIA

Avalon
Catalina Island School
Carlsbad
Army and Navy Academy
Carpinteria
Cate School
Claremont
Foothill Country Day School
Webb School of California
Corona del Mar
Harbor Day School
Corte Madera
Marin Country Day School
Danville
The Athenian School
Del Mar
San Diego Military Academy
Hillsborough
Crystal Springs School
Idyllwild
Desert Sun School
La Canada
Flintridge Preparatory School
La Jolla
The Bishop's Schools
La Jolla Country Day School
Long Beach
Progress School
Los Angeles
John Thomas Dye School
Marlborough School
The Mirman School
Westlake School
Los Olivos
Dunn School
Midland School
Menlo Park
Menlo School
Monterey
Santa Catalina School
The York School
North Hollywood
Harvard School
Oakwood School
Oakland
College Preparatory School
The Head-Royce Schools
Anna Head School
The Royce School
Ojai
Ojai Valley School
Thacher School
Pacific Palisades
St. Matthew's Parish School
Palm Springs
Palm Valley School
Palo Alto
Castilleja School

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Page 2

Palos Verdes Peninsula
Chadwick School
Pasadena
The Chandler Schools
Mayfield High School
Polytechnic School
Westridge School
Pebble Beach
Robert Louis Stevenson School
Ross
The Katharine Branson and
Mount Tamalpais Schools
Sacramento
Sacramento Country Day School
San Anselmo
San Domenico School for Girls
San Diego
Francis W. Parker School
San Francisco
Cathedral School for Boys
The Hamlin School
Katherine Delmar Burke School
Lick-Wilmerding High School
Schools of the Sacred Heart
Broadway Elementary School
Broadway High School
Stuart Hall School for Boys
Town School for Boys
San Marino
Southwestern Academy
Santa Barbara
Laguna Blanca School
Santa Monica
St. Augustine-by-the-Sea Episcopal
School

COLORADO

Canon City
The Abbey School
Carbondale
Colorado Rocky Mountain School
Colorado Springs
Colorado Springs School
Fountain Valley School
Denver
Graland Country Day School
Randell-Moore School of Denver
Englewood
Colorado Academy
Kent-Denver Country Day School
Steamboat Springs
Whiteman School

CONNECTICUT

Avon
Avon Old Farms School
Cheshire
Cheshire Academy
Cornwall
Marvelwood School
Danbury
Wooster School
East Haddam
Becket Academy
Fairfield
Fairfield Country Day School
Unquowa School
Farmington
Miss Porter's School
Greens Farms
Greens Farms Academy
Greenwich
Brunswick School
Convent of the Sacred Heart
Daycroft School
Greenwich Academy
Greenwich Country Day School
Whitby School
Hamden
Hamden Hall Country Day School
Hartford
Institute of Living School
Kingswood-Oxford School
Oxford Campus
Watkinson School
Kensington
Mooreland Hill School
Kent
Kent School
Lakeville
Hotchkiss School
Indian Mountain School
Litchfield
Forman School
Madison
The Country School
Middlebury
Westover School
Middlefield
Independent Day School

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Page 3

Milford
Milford Academy

New Canaan
New Canaan Country School

New Haven
Foote School
Hopkins Grammar Day Prospect Hill School

New London
The Williams School

New Milford
Canterbury School

Pomfret
Pomfret School
Rectory School

Rowayton
The Thomas School

Salisbury
Salisbury School

Simsbury
Ethel Walker School
Westminster School

South Kent
South Kent School

Stamford
King School
Long Ridge School
Low-Heywood School

Stonington
Pine Point School

Suffield
Suffield Academy

Wallingford
Choate/Rosemary Hall

Washington
The Gunnery
Rumsey Hall School
Wykeham Rise School

Waterbury
Saint Margaret's-McTernan School

Watertown
Taft School

Westbrook
Oxford Academy

West Hartford
Kingswood-Oxford School
Kingswood Campus
Renbrook School

Windsor
Loomis-Chaffee School

DELAWARE

Hockessin
Sanford School

Middletown
Broadmeadow School
St. Andrew's School

Wilmington
Tatnall School
Tower Hill School
Wilmington Friends School

DISTRICT OF COLUMBIA

The Academy of the Washington Ballet
Beauvoir
Georgetown Day School
Georgetown Visitation Preparatory School
Maret School
National Cathedral School
St. Albans School
Sheridan School
Sidwell Friends School

FLORIDA

Boca Raton
Saint Andrew's School of Boca Raton

Clearwater
Saint Paul's School

Delray Beach
Gulf Stream School

Fort Lauderdale
The Mills School
Pine Crest School

Indian Rocks Beach
Cottingham School

Jacksonville
Bartram School
Bolles School
Jacksonville Episcopal High School
John Carroll Institute
Riverside Presbyterian Day School
Southside Country Day School

Miami
Carrollton School for Girls
Ransom-Everglades School

(continued)
Page 4

Orange Park
St. Johns Country Day School
Palm Beach
Palm Beach Academy
Palm Beach Day School
Tallahassee
Alfred B. Maclay, Jr., Day School
Tampa
Berkeley Preparatory School
Independent Day School
Vero Beach
St. Edward's School

GEORGIA

Athens
Athens Academy
Atlanta
The Arlington Schools
Holy Innocents' High School*
Lovett School
Marist School
Pace Academy
Trinity School
The Westminster Schools
Augusta
Augusta Preparatory School
College Park
Woodward Academy
Columbus
Brookstone School
Keysville
Boggs Academy
Mount Berry
Berry Academy
Rome
Darlington School
Savannah
Savannah Country Day School

GUAM

Agana
St. John's Episcopal Preparatory School

HAWAII

Honolulu, Oahu
Hanahauoli School
Hawaii School for Girls
Iolani School
The Kamehameha Schools
Punahou School
Kamuela, Hilo
Hawaii Preparatory Academy
Makawao, Maui
Seabury Hall

ILLINOIS

Chicago
Academy of the Sacred Heart
Anshe Emet Day School
Francis W. Parker School
Harris School
The Latin School of Chicago
Downers Grove
Avery Coonley School
Elgin
Elgin Academy
Evanston
Roycemore School
Lake Forest
Lake Forest-Ferry Hall Academy
Lake Forest Country Day School
Woodlands Academy of the Sacred Heart
Rockford
Keith Country Day School
Wilmette
Loyola Academy
Winnetka
North Shore Country Day School

INDIANA

Culver
The Culver Educational Foundation
Evansville
Evansville Day School
Howe
Howe Military School
Indianapolis
Park-Tudor School
La Porte
La Lumiere School
South Bend
The Stanley Clark School

IOWA

Bettendorf
St. Katharine's/St. Mark's School

(continued)
Page 5

KANSAS

Wichita
Wichita Collegiate School

KENTUCKY

Frankfort
Capital Day School
Goshen
St. Francis School
Lexington
Lexington School
Sayre School
Louisville
Kentucky Country Day School
Louisville Collegiate School
Versailles
Margaret Hall School

LOUISIANA

Baton Rouge
Episcopal High School*
Metairie
Metairie Park Country Day School
St. Martin's Protestant Episcopal School
New Orleans
Isidore Newman School
Louise S. McGehee School
Trinity Episcopal School
Shreveport
Southfield School

MAINE

Bath
Hyde School
Bethel
Gould Academy
Fryeburg
Fryeburg Academy
Hebron
Hebron Academy
Hinckley
Hinckley School
Kents Hill
Kents Hill School
Portland
Waynflete School
South Berwick
Berwick Academy
Vassalboro
Oak Grove-Coburn School
Yarmouth
North Yarmouth Academy

MARYLAND

Annapolis
The Key School
Arnold
Wroxeter-on-Severn School
Baltimore
Boys' Latin School
Bryn Mawr School
Calvert School
Friends School
Gilman School
Roland Park Country School
Samuel Ready School
Bethesda
Country Day School of the Sacred Heart
Holton-Arms School
Landon School
Brooklandville
Park School of Baltimore
Saint Paul's School
Saint Paul's School for Girls
Centreville
The Gunston School
Chestertown
Kent School
Colora
West Nottingham Academy
Easton
The Country School, Inc.
Garrison
Garrison Forest School
Gibson Island
Gibson Island Country School
Glencoe
Oldsfields School
Glenelg
Glenelg Country School
McDonogh
McDonogh School
North East
The Tome School
Olney
St. John's Parish School

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Page 6

Owings Mills
Valley School
Potomac
School of the Holy Child
Rockville
Georgetown Preparatory School
Green Acres School
St. James
Saint James School
Severna Park
Severn School
Silver Spring
Town and Country Day School
Stevenson
St. Timothy's School

MASSACHUSETTS

Andover
Phillips Academy
Pike School
Arlington Heights
Saint Anne's School
Ashburnham
Cushing Academy
Belmont
The Arlington School
Belmont Day School
Belmont Hill School
Beverly
Shore Country Day School
Boston
Commonwealth School
Newman Preparatory School
Thompson Academy
Winsor School
Boylston
Shepherd Knapp School
Braintree
Thayer Academy
Brookline
Dexter School
Park School
Byfield
Governor Dummer Academy
Cambridge
Buckingham Browne & Nichols School
Cambridge Friends School
Manter Hall School
Shady Hill School
Chestnut Hill
Beaver Country Day School
Brimmer & May School
Chestnut Hill School
Concord
Brooks School of Concord
Concord Academy
Fenn School
Middlesex School
Nashoba Country Day School
Dedham
Dedham Country Day School
Noble & Greenough School
Deerfield
Bement School
Deerfield Academy
Eaglebrook School
Dorchester
Boston College High School
Dover
Charles River School
Easthampton
Williston-Northampton School
East Northfield
Northfield Mount Hermon School
Fitchburg
Applewild School
Great Barrington
Simon's Rock
Greenfield
Stoneleigh-Burnham School
Groton
Groton School
The Lawrence Academy at Groton
Hingham
Derby Academy
Lenox
Berkshire Country Day School
Cranwell School
Foxhollow School
Lexington
Lexington Christian Academy
Lincoln
The Carroll School
Manchester
Brookwood School
Marblehead
Tower School
Marion
Tabor Academy

(continued)
Page 7

Marlborough
Hillside School
Migton
Milton Academy
Natick
Walnut Hill School
Newton
Country Day School of the Sacred Heart
St. Sebastian's Country Day School
Northampton
Smith College Campus School
North Andover
Brooks School
North Dartmouth
Friends Academy
Pittsfield
Miss Hall's School
Sheffield
Berkshire School
Southborough
Fay School
Saint Mark's School
South Hamilton
Pingree School
South Yarmouth
Trinity School of Cape Cod
Springfield
MacDuffie School for Girls
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Palfrey Street School
Wellesley
Dana Hall School
Tenacre Country Day School
Weston
Cambridge School of Weston
The Meadowbrook School of Weston
Rivers Country Day School
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Fessenden School
West Roxbury
Roxbury Latin School
West Stockbridge
Stockbridge School
Wilbraham
Wilbraham & Monson Academy
Williamstown
Pine Cobble School
Winchendon
Winchendon School
Worcester
Bancroft School
Worcester Academy

MICHIGAN

Birmingham
Detroit Country Day School
Bloomfield Hills
Academy of the Sacred Heart
Bloomfield Country Day School
The Cranbrook Schools
Brookside School
Cranbrook School
Kingswood School
Roeper City & Country School
Detroit
Friends School in Detroit
Glen Arbor
The Leelanau School
Grosse Pointe Woods
University-Liggett School
Interlochen
Interlochen Arts Academy
Oxford
Kingsbury School

MINNESOTA

Duluth
Duluth Cathedral High School*
Fairbault
The Bishop Whipple Schools
Saint James School
St. Mary's Hall
Shattuck School
Hopkins
Blake Schools
Lower School-Blake
Middle School
Minneapolis
Breck School
Blake Schools
Upper School
St. Paul
Saint Paul Academy & Summit School
St. Thomas Academy

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Wayzata
Blake Schools
Lower School-Highcroft

MISSISSIPPI

Vicksburg
All Saints' Episcopal School

MISSOURI

Kansas City
Barstow School
Pembroke-Country Day School
Sunset Hill School

Mexico
Missouri Military Academy

St. Louis
Community School
John Burroughs School
Mary Institute
The Principia School
Rohan Woods School
Rossman School
Saint Louis Country Day School
Thomas Jefferson School
Villa Duchesne
Whitfield School

NEBRASKA

Omaha
Brownell-Talbot School

NEW HAMPSHIRE

Andover
Proctor Academy

Canaan
Cardigan Mountain School

Concord
St. Paul's School

Dublin
Dublin School

Exeter
Phillips Exeter Academy

Littleton
The White Mountain School-St. Mary's

Manchester
Derryfield School

Meriden
Kimball Union Academy

New Hampton
New Hampton School

Plymouth
Holderness School

Tilton
Tilton School

Wilton
High Mowing School

Wolfeboro
Brewster Academy

NEW JERSEY

Atlantic City
Atlantic City Friends School

Bernardsville
Gill/St. Bernard's School

Blairstown
Blair Academy

Bridgeton
St. John's Day School

Burlington
St. Mary's Hall/Doane Academy

Chester
Garland School

Elizabeth
Pingry School
Vail-Deane School

Englewood
The Dwight & Englewood Schools
Elisabeth Morrow School

Far Hills
Far Hills Country Day School

Hightstown
Peddie School

Lawrenceville
Lawrenceville School

Livingston
Newark Academy

Mendham
St. John Baptist School

Montclair
Montclair-Kimberley Academy

Moorestown
Moorestown Friends School

Morristown
Delbarton School
Morristown-Beard School
Peck School

Mountain Lakes
The Wilson School

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Page 9

North Plainfield
Mount Saint Mary Academy
Pennington
Pennington School
Pine Beach
Admiral Farragut Academy
Plainfield
Hartridge School
Wardlaw Country Day School
Pottersville
The Purnell School
Princeton
Chapin School
Columbus Boychoir School
The Hun School of Princeton
Princeton Day School
Stuart Country Day School of the Sacred Heart
Rumson
Rumson Country Day School
Saddle River
Saddle River Country Day School
Short Hills
Far Brook School
Pingry School
Lower School
Somerset
Rutgers Preparatory School
Summit
Kent Place School
Oak Knoll School of the Holy Child
Tenafly
The Center for Open Education

NEW MEXICO

Albuquerque
Albuquerque Academy
Sandia School
Santa Fe
Santa Fe Preparatory School

NEW YORK

Albany
Albany Academy
Albany Academy for Girls
Saint Agnes School
Amenia
Barlow School
Bedford
Rippowam-Cisqua School
Upper School
Brewster
Green Chimneys School
Brooklyn
Adelphi Academy
Berkeley Institute
Brooklyn Friends School
Packer Collegiate Institute
Polytechnic Preparatory Country Day School
St. Ann's Episcopal School
Buffalo
Buffalo Seminary
Elmwood-Franklin School
Nichols School & Nottingham Academy
Congers
Rockland Country Day School
Cornwall-on-Hudson
New York Military Academy
Storm King School
DeWitt
Manlius Pebble Hill School
Dobbs Ferry
The Masters School
East Islip
Hewlett School
Forest Hills
Kew-Forest School
Garden City
Cathedral School of St. Mary
St. Paul's School
Waldorf School of Adelphi University
Garrison-on-Hudson
Malcolm Gordon School
Glen Head
Green Vale School
Hewlett
Lawrence Country Day School
Hoosick
Hoosac School
Jackson Heights
Garden School
Katonah
Harvey School
Lake Placid
North Country School
Northwood School

(continued)
Page 10

Locust Valley
Friends Academy
Portledge School
Loudonville
Saint Gregory's School
Lynbrook
Academy of Lynbrook
Millbrook
The Dutchess School
Millbrook School
Mt. Kisco
Rippowam-Cisqua School
Lower School
New Lebanon
Darrow School
New Rochelle
Thornton-Donovan School
New York City
Allen-Stevenson School
The Baldwin School of New York City
Barnard School for Girls
Birch Wathen School
Brearley School
Browning School
Buckley School
Calhoun School
Cathedral School
Chapin School
The Choir School of St. Thomas Church
Collegiate School
Columbia Grammar and Preparatory School
Convent of the Sacred Heart
Dalton School
The Day School
Ethical Culture Schools
Fordham Preparatory School
Friends Seminary
Grace Church School
Hewitt School
The Horace Mann-Barnard School
Lenox School
Little Red Schoolhouse, Inc.
Little Red Schoolhouse
Elisabeth Irwin High School
McBurney School
Marymount School
Nightingale-Bamford School
Professional Children's School
Rhodes School
The Riverdale Country School
Rudolf Steiner School
St. Bernard's School
Saint David's School
St. Hilda's & St. Hugh's School
St. Luke's School
Spence School
Town School
United Nations International School
Walden School
Old Westbury
School of the Holy Child
Oyster Bay
East Woods School
Pawling
Trinity-Pawling School
Peekskill
St. Mary's & St. John's School
Poughkeepsie
Oakwood School
Poughkeepsie Day School
Rochester
The Allendale and The Columbia Schools
Harley School
Roslyn
Buckley Country Day School
Rye
Rye Country Day School
St. James
Harbor Country Day School
Knox School
Scarborough-on-Hudson
Scarborough Day School
Snyder
Park School of Buffalo
South Wales
Gow School
Staatsburg
Anderson School
Staten Island
Staten Island Academy
Stony Brook
Stony Brook School
Tarrytown
Hackley School
Troy
Emma Willard School
Tuxedo Park
Tuxedo Park School

(continued)
Page 11

Wallkill
Mohonk Cragsmoor School
White Plains
Windward School
Woodmere
Woodmere Academy
Yonkers
Halstead School

NORTH CAROLINA

Arden
Christ School
Asheville
Asheville Country Day School
Asheville School
St. Genevieve/Gibbons Hall School
Charlotte
Charlotte Country Day School
Durham
Durham Academy
Goldsboro
Wayne Country Day School
Oak Ridge
Oak Ridge Academy
Raleigh
Ravenscroft School
Wilmington
Cape Fear Academy
Winston-Salem
Salem Academy
Summit School

OHIO

Bath
Old Trail School
Canton
Canton Country Day School
Cincinnati
Cincinnati Country Day School
The Seven Hills Schools
Doherty School
Lotspeich School
Seven Hills School
Cleveland
Hathaway Brown School
Laurel School
University School
Cleveland Heights
Beaumont School for Girls
Columbus
Columbus School for Girls
Dayton
Miami Valley School
Gahanna
Columbus Academy
Gates Mills
Gilmour Academy
Hawken School
Upper Campus
Hudson
Western Reserve Academy
Lyndhurst
Hawken School
Lower Campus
North Ridgeville
Lake Ridge Academy
Toledo
Maumee Valley Country Day School

OKLAHOMA

Oklahoma City
Casady School
New World School
Westminster Day School
Tulsa
Holland Hall School

OREGON

Portland
Catlin Gabel School
Oregon Episcopal Schools
St. Helen's Hall/Bishop Dagwell Hall

PENNSYLVANIA

Allentown
The Swain Country Day School
Bethlehem
Moravian Academy
Bryn Athyn
Academy of the New Church
Bryn Mawr
Baldwin School
Shipley School
Fort Washington
Germantown Academy
Harrisburg
Harrisburg Academy

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Haverford
Friends School
Haverford School
Jenkintown
Abington Friends School
Kennett Square
Upland Country Day School
Kingston
Wyoming Seminary & Day School
Lahaska
Buckingham Friends School
Lancaster
Lancaster Country Day School
Ligonier
Valley School of Ligonier
Lititz
Linden Hall School for Girls
Malvern
Phelps School
Meadowbrook
Meadowbrook School
Mercersburg
Mercersburg Academy
Merion
Episcopal Academy
Merion Mercy Academy
New Bloomfield
Carson Long Institute
New Hope
Solebury School
Newton Square
Charles E. Ellis School
Newtown, Bucks Co.
George School
Newtown Friends School
Paoli
Church Farm School
The Vanguard Schools
Pennsburg
Perkiomen School
Philadelphia
Academy of the Assumption-Ravenhill
Chestnut Hill Academy
Friends' Central School
Friends Select School
Germantown Friends School
Germantown-Stevens Academy*
Girard College
Lankenau School
Penn Center Academy
St. Joseph's Preparatory School
Springside School
William Penn Charter School
Pittsburgh
Ellis School
Fox Chapel Country Day School
St. Edmund's Academy
Shady Side Academy
Winchester-Thurston School
Pottstown
Hill School
Wyndcroft School
Rose
Ellis School
Fox Chapel Country Day School
St. Edmund's Academy
Shady Side Academy
Winchester-Thurston School
Pottstown
Hill School
Wyndcroft School
Rosemont
Agnes Irwin School
Booth School
Saltsburg
Kiskiminetas Springs School
Scranton
Scranton Preparatory School
Sewickley
Sewickley Academy
Wayne
Valley Forge Military Academy
Westtown
Westtown School
Wynnewood
Montgomery Country Day School
York
York Country Day School

PUERTO RICO

Fajardo
Fajardo Academy
Hato Rey
Caribbean Consolidated Schools
Santurce
Escuelas Las Nereidas
St. John's School

RHODE ISLAND

Barrington
St. Andrew's School
East Greenwich
Rocky Hill School

(continued)
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East Providence
Gordon School
Providence Country Day School
Newport
St. George's School
Portsmouth
Portsmouth Abbey School
Providence
Lincoln School
Mary C. Wheeler School
Moses Brown School

SOUTH CAROLINA

Aiken
Aiken Preparatory School
Charleston
Porter-Gaud School
Greenville
Christ Church Episcopal School
Spartanburg
Spartanburg Day School

TENNESSEE

Bell Buckle
Webb School
Chattanooga
Baylor School
Bright School
Girls' Preparatory School
McCallie School
Knoxville
Webb School of Knoxville
Memphis
The Hutchison School
Lausanne School
Memphis University School
Presbyterian Day School
Saint Agnes Academy
St. Mary's Episcopal School
Nashville
David Lipscomb Elementary & High Schools
Ensworth School
Harpeth Hall School
Montgomery Bell Academy
St. Andrews
St. Andrew's School
Sewanee
The Sewanee Academy

TEXAS

Austin
St. Stephen's Episcopal School
Bryan
The Allen School
Dallas
Greenhill School
Hockaday School
St. Mark's School of Texas
Denton
Selwyn School
Fort Worth
Fort Worth Country Day School
Trinity Valley School
Galveston
Trinity Episcopal School
Harlingen
Marine Military Academy
Houston
Kinkaid School
St. John's School
Midland
Trinity School of Midland
San Antonio
Saint Mary's Hall
Texas Military Institute
San Marcos
San Marcos Baptist Academy
Texarkana
St. James Day School

UTAH

Mount Pleasant
Wasatch Academy
Salt Lake City
Rowland Hall-St. Mark's School

VERMONT

Craftsbury Common
Sterling
Putney
Putney School
St. Johnsbury
St. Johnsbury Academy
Saxtons River
Vermont Academy
South Woodstock
Woodstock Country School

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VIRGINIA

Alexandria
Ascension Academy
Episcopal High School
St. Agnes School
Saint Stephen's School

Boyce
Powhatan School

Charlottesville
St. Anne's-Belfield School

Chatham
Chatham Hall
Hargrave Military

Christchurch
Christchurch School

Dyke
Blue Ridge School

Fork Union
Fork Union Military Academy

Fort Defiance
Augusta Military Academy

Front Royal
Randolph-Macon Academy

Greenway
Madeira School

Leesburg
Loudoun Country Day School

Lynchburg
Seven Hills School
Virginia Episcopal School

McLean
Potomac School

Middleburg
Foxcroft School
Hill School

Newport News
Hampton Roads Academy

Norfolk
Norfolk Academy
Norfolk Collegiate School

Orange
Grymes Memorial School

Petersburg
Bollingbrook School

Richmond
The Collegiate Schools
St. Catherine's School
St. Christopher's School

Roanoke
North Cross School

Staunton
Stuart Hall

Tappahannock
St. Margaret's School

Warrenton
Highland School

Waynesboro
Fairfax Hall

Woodberry Forest
Woodberry Forest School

VIRGIN ISLANDS

St. Croix
Good Hope School
St. Croix Country Day School
St. Dunstan's Episcopal School

St. Thomas
All Saints Cathedral School
Antilles School

WASHINGTON

Seattle
The Bush School
Lakeside School

Spokane
St. George's School

Tacoma
Annie Wright School
Charles Wright Academy

WEST VIRGINIA

Wheeling
Linsly Military Institute
Wheeling Country Day School

WISCONSIN

Beaver Dam
Wayland Academy

Delafield
St. John's Military Academy

EXHIBIT "D"

STATE OF NEW YORK INSTITUTIONS

ALFRED UNIVERSITY
Alfred, N.Y. 14802

CANISIUS COLLEGE
Buffalo, N.Y. 14208

CLARKSON COLLEGE OF TECHNOLOGY
Potsdam, N.Y. 13676

COLGATE ROCHESTER DIVINITY
SCHOOL/Bexley Hall/Crozer
Rochester, N.Y. 14620

COLGATE UNIVERSITY
Hamilton, N.Y. 13346

COLLEGE OF NEW ROCHELLE
New Rochelle, N.Y. 10801

CORNELL UNIVERSITY
Ithaca, N.Y. 14850

DOWLING COLLEGE
Oakdale, L.I., N.Y. 11769

D'YOUVILLE COLLEGE
Buffalo, N.Y. 14201

EISENHOWER COLLEGE
Seneca Falls, N.Y. 13148

ELMIRA COLLEGE
Elmira, N.Y. 14901

COLLEGE OF WHITE PLAINS
White Plains, N.Y. 10603

HAMILTON COLLEGE
Clinton, N.Y. 13323

HARTWICK COLLEGE
Oneonta, N.Y. 13820

HOBART & WILLIAM SMITH COLLEGES
Geneva, N.Y. 14456

IONA COLLEGE
New Rochelle, N.Y. 10801

ITHACA COLLEGE
Ithaca, N.Y. 14850

KEUKA COLLEGE
Keuka Park, N.Y. 14478

KIRKLAND COLLEGE
Clinton, N.Y. 13323

LEMOYNE COLLEGE
Syracuse, N.Y. 13214

MANHATTAN COLLEGE
Bronx, N.Y. 10471

MANHATTANVILLE COLLEGE
Purchase, N.Y. 10577

MARIST COLLEGE
Poughkeepsie, N.Y. 12601

MILLS COLLEGE OF EDUCATION
66 Fifth Avenue
New York, N.Y. 10011

MOUNT ST. MARY COLLEGE
Newburgh, N.Y. 12550

NAZARETH COLLEGE OF ROCHESTER
Rochester, N.Y. 14610

NIAGARA UNIVERSITY
Niagara University, N.Y. 14109

PACE COLLEGE
New York, N.Y. 10038

PAUL SMITH'S COLLEGE
Paul Smith, N.Y. 12970

PRATT INSTITUTE
Brooklyn, N.Y. 11205

RENSSELAER POLYTECHNIC INSTITUTE
Troy, N.Y. 12181

ROCHESTER INSTITUTE OF TECHNOLOGY
Rochester, N.Y. 14623

ROSARY HILL COLLEGE
Buffalo, N.Y. 14226

RUSSELL SAGE COLLEGE
Troy, N.Y. 12180

ST. BERNARD'S SEMINARY
Rochester, N.Y. 14612

ST. BONAVENTURE UNIVERSITY
St. Bonaventure, N.Y. 14778

ST. JOHN FISHER COLLEGE
Rochester, N.Y. 14618

ST. LAWRENCE UNIVERSITY
Canton, N.Y. 13617

SARAH LAWRENCE COLLEGE
Bronxville, N.Y. 10708

SIENA COLLEGE
Loudonville, N.Y. 12211

SKIDMORE COLLEGE
Saratoga Springs, N.Y. 12866

SYRACUSE UNIVERSITY
Syracuse, N.Y. 13210

UNION COLLEGE & UNIVERSITY
Schenectady, N.Y. 12308

UNIVERSITY OF ROCHESTER
Rochester, N.Y. 14627

UTICA COLLEGE OF SYRACUSE UNIV.
Utica, N.Y. 13502

VASSAR COLLEGE
Poughkeepsie, N.Y. 12601

WAGNER COLLEGE
Staten Island, N.Y. 10301

WELLS COLLEGE
Aurora, N.Y. 13026

EXHIBIT "E"

THE CHRISTIAN AND MISSIONARY ALLIANCE

Graduate School: Alliance School of Theology and Missions
Nyack, New York

Colleges:

Nyack College, Nyack New York
St. Paul Bible College, Bible College, Minnesota
Simpson College, San Francisco, California
Toccoa Falls Bible College, Toccoa Falls, Georgia
(affiliated)

Retirement Centers:

Suppes Memorial Home, Glendale, California
Shell Point Village, Fort Myers, Florida
The Alliance Home, Carlisle, Pennsylvania
The Alliance Home of DeLand, DeLand, Florida

Convalescent and Nursing Homes:

Alliance Convalescent Hospital, Glendale, California
Alliance Nursing Center, DeLand, Florida
The Alliance Village, McAllen, Texas
Nursing Pavilion, Shell Point Village, Fort Myers,
Florida

Missionary Homes:

Headquarters Missionary Home, New York, New York
Nyack Missionary Cottages, Nyack, New York
Seymour Home, Vermilion, Ohio
Glendale Alliance Center, Glendale, California

EXHIBIT "F"

CHURCH OF THE NAZARENE -- RELATED COLLEGES

COLLEGES:

1. Bethany Nazarene College
   Bethany, Oklahoma

2. Eastern Nazarene College
   Wollaston, Massachusetts

3. Mid-America Nazarene College
   Olathe, Kansas

4. Mount Vernon Nazarene College
   Mount Vernon, Ohio

5. Northwest Nazarene College
   Nampa, Idaho

6. Olivet Nazarene College
   Kankakee, Illinois

7. Pasadena College
   Pasadena, California

8. Trevecca Nazarene College
   Nashville, Tennessee

Bible College

Nazarene Bible College
Colorado Springs, Colorado

Seminary

Nazarene Theological Seminary
Kansas City, Missouri

STATEMENT

of the

AMERICAN COUNCIL ON EDUCATION

COMMITTEE ON WAYS AND MEANS

March 19, 1976

The following associations join in this statement:

AMERICAN ASSOCIATION OF COMMUNITY AND JUNIOR COLLEGES

AMERICAN ASSOCIATION OF STATE COLLEGES AND UNIVERSITIES

ASSOCIATION OF AMERICAN COLLEGES

ASSOCIATION OF AMERICAN UNIVERSITIES

ASSOCIATION OF JESUIT COLLEGES AND UNIVERSITIES

COUNCIL FOR AMERICAN PRIVATE EDUCATION

COUNCIL FOR THE ADVANCEMENT AND SUPPORT OF EDUCATION

NATIONAL ASSOCIATION OF STATE UNIVERSITIES AND LAND-GRANT COLLEGES

NATIONAL CATHOLIC EDUCATIONAL ASSOCIATION

NATIONAL COUNCIL OF INDEPENDENT COLLEGES AND UNIVERSITIES

Mr. Chairman and Members of the Committee:

I am Professor Julian Levi of the University of Chicago, Chairman of the American Council on Education's Committee on Taxation.

We are very grateful for this opportunity to appear before you on behalf of America's colleges and universities and its privately supported elementary and secondary schools. We are authorized to speak for the associations, noted on the cover sheet of this testimony, whose memberships include virtually all of the accredited, public and private, nonprofit colleges and universities, as well as nonprofit elementary and secondary schools which enroll approximately ninety percent of the nation's private school children. While we are speaking for colleges and universities, public and private, for private schools and for associations of such institutions, what we are really talking about are some thirteen million students served by those institutions.

Over the course of the past several years, schools, colleges and universities have faced a critical financial plight that has resulted in a substantial curtailment of programs and limitation of activities. State institutions face increasing competition for funds. Private institutions, large and small, incur substantial operating deficits. One single factor -- the increase in energy costs -- shattered the expectations of many to balance their budgets. The anticipated increase in philanthropic support has not been realized. In fact, in the year 1973-74, for the first time in many years, there was no overall increase in contributions and bequests to institutions of higher education. In

the same period, the expenses of providing education have substantially increased. Moreover, schools, colleges and universities, public and private, fortunate enough to realize income from endowment sources, have seen that income sharply reduced in many instances. As an inevitable result, the crucial share of support which educational institutions receive from private gifts and bequests (and the income from those contributions which are funneled into endowment) has been reduced.

Other than the fact that overall contributions to educational institutions did not increase in the 1973-74 year, there are few material changes in the patterns of giving to schools, colleges and universities.

The American Council on Education has just completed a third in-depth analysis of voluntary support of American colleges and universities showing the patterns of giving to those institutions in the 1973-74 fiscal year. The study is attached. In summary, the report indicates that

a. Total documented voluntary support was found by the Council for Financial Aid to Education to be $1.746 billion, with an estimate of a probable $2.240 billion.

b. Twenty-two percent of voluntary support was received by public colleges and universities.

c. The 988 colleges and universities participating in the 1973-74 Survey reported $1.746 billion voluntary support. Of these institutions 961 reported $15.626 billion in expenditures for general education and student aid, and 863 of these institutions reported endowments with a market value of $10.827 billion. In 1973-74 estimated endowment

yield was 4.93 percent. Thus, voluntary support reported by the institutions participating in the 1973-74 Survey was 11 percent of educational expenditures reported. Such voluntary support, if derived from endowment income, would have required an additional endowment of more than $35 billion in contrast to reported endowment of $19.827 billion.

d. Some 47.5 percent of all voluntary support in 1973-74 consisted of gifts from individuals - alumni and nonalumni. Aggregate support from this category of donor was approximately $796 million, of which $564 million came in transactions of more than $5,000.

e. Higher education is dependent upon the large gift. Of all gift transactions by individuals (alumni and nonalumni) to higher education in 1973-74, 99.56 percent were for less than $5,000 and in the aggregate produce 29.16 percent of all voluntary support. The remaining 0.44 percent of all transactions (those over $5,000) produce 70.84 percent of all voluntary support by individuals.

f. Approximately 52 percent of gifts over $5,000 from individuals were received in the form of securities, real estate, or other property.

g. In 1973-74 voluntary support by bequest reached $267 million. Bequests of $5,000 or more amounted to approximately 98 percent of all bequest receipts, while bequests of securities, real estate, and other property represented 41 percent of all bequest receipts.

h. The total amount of annuities, life contracts, insurance policies, and other forms of deferred giving amounted to $56.9 million in 1973-74, a decrease of 29 percent from the amount reported in 1972-73. Deferred giving transactions of more than $5,000 represented 98.5 percent of all deferred giving receipts.

Thus, higher education in 1973-74, as in prior years, was dependent upon large gifts, approximately half of which come from individuals; and approximately 40 percent of these gifts from individuals, both over and under $5,000, were in the form of securities, real estate, or other property.

Private sources of support are essential to the continued existence of private institutions of elementary, secondary and higher education and crucial to the quality of education provided by many public institutions. For that reason, we urge this Committee, in considering modification of the tax laws at this critical time, to carefully weigh the potential effect of any modification on charitable and educational institutions, particularly those which like private schools, colleges and universities perform functions that would otherwise have to be financed for the most part by direct public budget outlays. In fact, we would hope that the Committee could find ways to encourage charitable contributions and bequests which are so essential to the continuation of the system of education. We feel certain that each member of this Committee is sensitive to the critical condition of schools, colleges and universities and supportive of the crucial role which they play in the life of this nation. On the other hand, we are genuinely fearful that, in making changes, which for other reasons may seem justified, Congress may, inadvertently, significantly damage the incentives to giving which are so important to the continued private support of all charities.

As a result of reforms enacted in 1969, a donor cannot incur financial benefit for himself or his family by means of a gift or

bequest. The personal satisfaction that may accrue to a donor as a result of his directing a contribution to a recognized charity is small in comparison to the benefits which the charity and, directly and indirectly, the public receive. With this in mind, we trust the Committee will give serious consideration to the potential detriment to private support that could result from particular changes, especially where the increases in tax revenues to the Federal government are minimal in comparison with the losses to educational institutions.

In this connection, we would like to call the Committee's attention to the Commission on Private Philanthropy and Public Needs' study of all aspects of philanthropy and philanthropic organizations in the United States. One of the Commission's most important acts was to sponsor the first comprehensive examination, based on econometric analyses, of the role which the Federal tax laws play in encouraging contributions and bequests. Studies conducted by Professor Martin Feldstein at Harvard and others confirm for the first time the significant role that the charitable contribution deduction plays in encouraging donations and, in the process, refute prior suggestions to the contrary. Studies conducted by Professor Michael J. Boskin of Stanford and the National Bureau of Economic Research, Professor Feldstein and others for the first time establish the even greater incentives to giving provided by the Federal estate tax deduction.

References are made to studies which will be included in a compendium to be published in the near future. Martin Feldstein and Charles Clotfelter, "Tax Incentives and Charitable Contributions in the United States: A Microeconometric Analysis"; Michael J. Boskin,

"Estate Taxation and Charitable Bequests"; Martin Feldstein, "Charitable Bequests, Estate Taxation and Intergenerational Wealth Transfers."

These studies show that the income and estate tax deductions for charitable gifts are indeed "efficient" in that for every dollar of tax revenue foregone by the Treasury, substantially more than a dollar is gained by the beneficiary charitable institutions. In the case of gifts of property and bequests, the benefits to charity resulting from the deduction are even more important.

Foundations are funding sources of great significance to colleges and universities, providing 23 percent to 26 percent of their gift income in recent years. For 1973-74 foundation contributions to higher education amounted to some $535 million. But it is not only the volume of dollars that is important. Functioning as independent funding sources, foundations materially add to the flexibility and capacity of colleges and universities in meeting such needs as broadened educational opportunities among women and minority groups, the development of new curricula and lines of inquiry, and qualitative improvement within both public and private higher education.

We would now like to make specific comments on those subjects that have a major impact on educational institutions.

Taxation of Gifts of Appreciated Property

The proposal which could have the most far-reaching effect on the private support of education is that of changing the present rules with respect to gifts of appreciated property. The rules were modified in 1969 with respect to gifts of appreciated property to private foundations. Donors to private foundations of long-term appreciated property must reduce the fair market value by one-half of the unrealized appreciation.

There are those who believe that it has virtually eliminated the support of private foundations through current gifts. We believe that the extension to public charities of a provision which would tax gifts of long-term appreciated property could result in eliminating the property gift which accounts for almost half of all individual donations and for more than one-quarter of the overall private support of higher education. The proposal that unrealized appreciation (and it is unrealized since the property, including the appreciation, passes to charity) be taxed at the time of gift to a public charity might well eliminate this form of giving, since it imposes a penalty on the donor who makes a contribution. This is a penalty that the donor can avoid by reducing the amount of his charitable contribution so that the real burden of the increased tax will be borne by the charitable institutions that are the donees.

We believe that the imposition of a tax at the time of gift would cause the donor to reduce or eliminate gifts of appreciated property. The Feldstein-Clotfelter studies indicate that for every dollar of revenue gained by taxation of the unrealized appreciation in property given to public charities, there will be a reduction in contributions to such public charities of nearly $1.60 and suggest that the burden of that reduction will be borne disproportionately by colleges and similar charities which perform a clearly public function which would otherwise have to be supported by Federal or state funds. The Filer Commission, after a careful examination into and spirited debate with respect to this issue, recommended that the "appreciated property allowance within the charitable deduction be basically retained but

amended to eliminate any possibility of personal financial gain through tax-deductible charitable giving." (Giving in America - Toward a Stronger Voluntary Sector, Report of the Commission on Private Philanthropy and Public Needs, page 147. see discussion pages 143-147).

In this regard, it is important to note that the charitable contribution, unlike any other deduction, is a voluntary act. The donor's choice is to give or not to give, and many factors play a role in the decision. The present tax laws are relatively benign towards the donor who wishes to give appreciated property for charitable purposes, and it encourages such gifts or bequests by allowing tax deductions. A change that would place on the donor a burden, which in some cases he might be in no position to assume, would, in our opinion, cause him to choose not to give. In such a case, we do not see how there could be resulting benefit or revenue to the Government. In short, we believe that the effect of the proposed changes with respect to gifts and bequests of property will not benefit the Treasury, but it will cause a substantial diminution of the support of public charities and in particular schools, colleges and in universities at a time of dire financial stress.

Taxation of Appreciated Property at Death

There are a number of proposals with respect to the treatment of unrealized appreciation at death. The suggestion that basis be carried through at death would not affect public charities. Other proposals, however, could substantially inhibit gifts of property. The imposition of a tax on unrealized appreciation at death without an exception for property passing to charitable purposes would clearly impose a burden

which the taxpayer would have to take into account in planning for charitable bequests. The extent of that burden may be suggested by the fact that over 40 percent of the value of estates bequeathed to colleges and universities is in the form of property. Since few people can anticipate the time of death, the problems associated with making judgments with respect to charitable gifts and bequests, if such a proposal were adopted, could be overwhelming. We believe that the effect would be distressing even if a simplified version of this tax were adopted, such as an additional estate tax. (See Feldstein, "Charitable Bequests, Estate Taxation and Intergenerational Wealth Transfers" for an indication of the magnitude of the penalty which may be imposed.) We strongly urge that, if a tax on unrealized appreciation at death is imposed, there be an exception (as supported by President Kennedy in his initial tax message to Congress) for property passing to charity.

Limitation on Charitable Deductions for Estate Tax Purposes

We find it difficult to understand the rationale of the proposal that there be a limitation on the estate tax deduction. In the case of a bequest, no individual benefits by reason of that deduction. All of the assets flow to a public or quasi-public entity. As indicated above, the Congress in 1969 ensured that those entities would either be public in nature, like schools, colleges and universities, or would operate strictly for the public benefit. Thus, it is incorrect to speak of the estate bearing its share of the tax burden. The burden will be borne by the charitable beneficiary or legatee. As indicated above, the Council for Financial Aid to Education survey indicates that private support of

public and private charities for the sample of reporting institutions reached the total of over $1.7 billion the 1973-74 fiscal year. Over 15 percent, or $267 million, was in the form of bequests. If nearly 40 percent of the dollar value of these bequests were part of or constituted the residue, as the 1973-74 survey indicates, then the effect of a limitation on this form of support could be serious indeed.

Special examinations suggest that many of the residue bequests consist of virtually the whole estate. Clearly, the large bequest provides virtually all of this form of support. If even 50 percent of the bequests represent substantially more than half the testator's estate, then the taxes which would have to be borne by the recipient educational institutions would certainly be many millions of dollars. Equally important, we feel that testators, when faced by the imposition of a tax on half of their estate passing to charity would react to this disincentive by limiting their charitable bequests to 50 percent. In such case, the loss to the colleges and universities alone could well exceed $100 million annually in vital support. The Boskin studies prepared for the Filer Commission indicate that the imposition of a 50 percent ceiling on charitable bequests would result in a maximum increase in revenue of $43 million in return for a loss in bequests to charitable institutions, particularly educational, scientific, health and social welfare organizations of between $189 and $338 million or that for a maximum gain in revenue of one dollar, charities can be expected to lose $4.40. This indicates that the charitable bequest is a significant incentive indeed. The same studies further indicate that, if the deduction were replaced with a 30 percent credit, for

every dollar gained in revenue, there would be a loss of $1.60 in bequests to charities, virtually all of which will be borne by the educational, scientific, health and social welfare organizations. (Boskin, supra, Table 13.)

As in the case of the charitable gift, the fact that Congress has established a procedure for recognizing and supervising worthy charities and permits unlimited deductions for charitable bequests to them is itself an incentive regardless of the actual effect on the taxpayer's estate. In this regard, we note that after due deliberation the American Law Institute concluded that

> "The 100 percent charitable deduction in the field of transfer taxation should be retained, under either a dual tax system or a unified tax." (Federal Estate and Gift Taxation Recommendations adopted by the American Law Institute at Washington, D. C., May 23-24, 1968, page 23).

We would also note that the Filer Commission, after due deliberation, recommended that "the charitable deduction be retained in its present form." (Giving in America, supra, page 151, see discussion pages 147-151.

Integration of Estate and Gift Taxes

The joinder of the proposal to limit the charitable deduction with the suggestion that the gift and estate tax be unified could be most unfortunate. We do not understand exactly how the limitation might be reflected insofar as the gift taxes are concerned. However, if any limitation is imposed on the gift tax deduction, then support of education at all levels, and we suspect of many other public charities, could well be destroyed. As indicated, 70 percent of the money raised comes in gifts of $5,000 or more. If one-half these gifts are subject to a

gift tax, then we suspect we simply would not receive them except in the most unusual circumstances. To impose a gift tax on a transfer to charity would be to discourage giving to charity, which seems directly contrary to the long-standing policy of Congress to encourage contributions through the income and estate tax deduction. Even if the change merely proposed that charitable contributions during lifetime be considered in determining the amount of charitable contributions deducted within the limitation discussed above, the effect would be most detrimental. Donors would be hard put at any time to know exactly what their charitable bequest deduction might be, and they would be even more likely to apply formula limitations on the charitable bequest.

Moreover, particularly in the case of a gift tax proposal, we cannot believe that any substantial revenue would be involved, simply because donors would be unlikely to continue their pattern of giving in the fact of substantial gift taxes. Since no individual benefits are involved, we seriously question whether the revenue resulting from all of these proposals would be substantial. Because, singly or together, they might destroy an important source of support for public charities, particularly colleges, universities, and schools, we would urge that any changes proposed provide suitable exceptions and reservations to preserve the present tax incentives to charitable bequests and not impose a burden, such as a gift tax, on donations.

Mr. Chairman, I respectfully suggest that any combination of the proposals we have discussed today, for the reasons inherent in the patterns of giving to educational institutions, may virtually destroy important sources of private support for public and private educational

institutions, all performing functions for which the state or federal government would otherwise have to assume financial responsibility.

We believe that there is little evidence that the changes would be accompanied by any significant increase of revenue to the federal government. We further believe that the changes proposed would not produce a more equitable tax system, for there are no cases where an individual, alive or dead, benefits financially by reason of his gift or bequest. Thus, it is difficult for us to believe that the public purposes would be served by curtailing the present tax incentives to charitable contributions and bequests. Certainly there is no warrant for imposing burdens and disincentives. If there is no indication of increased revenue and no proof of financial advantage, the only real effect would be to reduce substantially private support of public and private educational institutions with no corresponding benefit.

Statement by

Raymond C. Johnson, President
Council for Financial Aid to Education
680 Fifth Avenue New York, N.Y. 10019

Mr. Chairman and Members of the Committee:

I am Raymond C. Johnson, President of the Council for Financial Aid to Education and was, prior to my retirement, Vice Chairman of the New York Life Insurance Company.

I very greatly appreciate this opportunity to appear before you to discuss briefly some of the proposals for change in the Federal estate and gift tax laws. I am, in particular, deeply concerned over various proposals that have been made to impose a tax on unrealized appreciation of assets at death without an exception for property passing to charity, and with proposals to limit the estate tax deduction for charitable bequests. Proposals such as these would generate little revenue, yet they would, if enacted into law, seriously erode the private support that the institutions of higher education have come to rely on for their independence, their excellence, and their vitality.

The voluntary support of higher education is a critical factor in the financial structure of both public and private institutions, and American higher education owes much of its high standards and quality to the tradition of private support in the form of gifts and bequests. In the light of inflation, rising enrollments, and limited government funding, higher education has an urgent need for more voluntary support, not less.

I was pleased with the action of this Committee in connection with the Phase I tax bill. On July 30, 1975 when John T. Connor appeared before this Committee, he expressed concern that various proposals relating

to the minimum tax and the allocation of deductions would reduce, if not eliminate, the tax incentives for educational and charitable giving. The final bill, H.R. 10612, was passed by the House without altering the essential tax incentives of the present law. We appreciate your efforts on that measure, and applaud your considered conclusion not to alter those incentives.

In regard to the estate tax, I have a similar concern that any legislation imposing a limitation on the charitable deduction would cause direct and irreparable harm to educational institutions and other charitable recipients. The present unlimited deduction is not a tax shelter, it is not a tax avoidance "gimmick," nor is it a loophole through which the wealthy escape taxation; rather it is an incentive to all taxpayers to increase the share of their estates that they bequeath to the colleges of their choice and to other purposes that are in the national interest.

It is clear that taxpayers do respond to such incentives and that they are sensitive to the estate tax charitable deduction when they draw up their wills and arrange for the post-mortem distribution of their estates. Two of the technical studies that were undertaken for the Filer Commission demonstrate this fact. In one paper, Professor Michael J. Boskin of Stanford University found that charitable bequests are generally quite sensitive to the "price" reduction caused by their deductibility. In layman's language, this means that the present tax treatment of charitable bequests is efficient in the sense that charitable beneficiaries receive more than the Treasury loses. And it follows from

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this that any limitation on the deduction for charitable bequests will involve a loss to charity that is greater than the gain in the Treasury's tax revenue.

A corollary fact was demonstrated in a second paper by Professor Martin S. Feldstein of Harvard University. Professor Feldstein found that the current estate tax law provides an incentive to give assets to charitable organizations rather than to individual heirs. On the basis of this evidence, one must conclude that any limitation on the estate tax charitable deduction would cause some diversion of bequests from educational institutions and charitable recipients to individual heirs and other non-charitable recipients as well as to the Treasury.

This would be especially true of bequests to educational institutions. An authoritative source of information in this area is the Survey of Voluntary Support of Education which has been conducted by the Council for Financial Aid to Education since 1954-55. This annual survey is now co-sponsored by the Council for Advancement and Support of Education and the National Association of Independent Schools. The most recent survey, covering the academic year 1974-75, has just been completed, and the advance findings are submitted to this Committee at this time. Although the survey is based on information from only about a thousand colleges and universities, the institutions represented account for approximately 80% of the voluntary support received by all 2,800 colleges and universities in this country.

I call to the attention of this Committee the estimates of voluntary support by source that are shown in Table 8. The two categories of individual donors, alumni and non-alumni, reduced their educational support by more than $70 million in 1973-74 and by an additional $60 million in 1974-75. Each of these decreases amounted to almost 6%, and the two-year decline was nearly 12%. Some $52 million, or 39% of the total decrease of $134 million, is attributable to a reduction in the value of bequests. Table 5, which shows bequests for the participating colleges and universities, reveals that the decline in bequests amounted to 20% in 1974-75 alone. The slump in the stock market in this period is believed to have had much to do with the decrease in the value of educational bequests. Whatever the cause, it demonstrates clearly the sensitivity of this form of educational support to external influences. Historically, bequests have accounted for between 25% and 35% of all financial support from individuals, and since individual gifts and bequests account for about half of total support, this form of giving is a significant component of overall voluntary support of higher education.

These data also reveal how dependent our colleges and universities are to the continuing generosity of the American people in leaving substantial portions of their estates to higher education, and how vulnerable this flow of funds is to changes in donor's incentives and other influences.

Any limitation on the estate tax charitable deduction would, in effect, amount to a tax on the recipient, even though it is the estate rather than the recipient who actually makes the tax payment. A tax on charity, even in this indirect sense, is contrary to long-standing public policy. The same conclusion applies to the question of taxing capital gains at death without an exception for property passing to charity by bequest. Such a tax would obviously reduce the size of the estate, and there would be an equivalent reduction in all residuary bequests to charity as well as in all bequests of complete estates.

I respectfully urge this Committee, in considering various proposals for amending the estate and gift tax laws, to leave the charitable contributions deduction intact in its present form, so that existing incentives for voluntary philanthropy are preserved.

Voluntary Support of Education, 1974-75*

Tables to accompany statement by

Raymond C. Johnson, President
Council for Financial Aid to Education
680 Fifth Avenue New York, N.Y. 10019

to the

Committee on Ways and Means
U.S. House of Representatives

March 19, 1976

on the subject of Federal estate and gift taxation.

*Advance tabulation of data from the Survey of Voluntary Support of Education, 1974-75, co-sponsored by the Council for Financial Aid to Education, the Council for Advancement and Support of Education, and the National Association of Independent Schools.

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3.12.76

Table 1

Survey of Voluntary Support, 1974-75

Total Support, All Institutions Reporting
(000 omitted)

	1973-74*		1974-75		
	No.	Amount	No.	Amount	% Change
Major Private Universities	69	$ 703,106	69	$ 648,477	- 7.8
Private Men's Colleges	12	23,906	13	17,860	-25.3
Private Women's Colleges	77	67,761	80	64,460	- 4.9
Private Coeducational Colleges	465	458,916	453	426,579	- 7.1
Prof. and Spec. Schools	52	88,202	54	69,327	-21.4
Total Private 4-year	675	$1,341,891	669	$1,226,703	- 8.6
Public Institutions (4-year)	206	386,161	207	430,831	+11.6
Total 4-year	881	$1,728,052	876	$1,657,534	- 4.1
Junior Colleges	107	18,799	110	17,009	- 9.5
Grand Total	988	$1,746,851	986	$1,674,543	- 4.1
Average per institution		$1,768		$1,698	- 4.0

* Figures shown differ slightly from those published in the 1973-74 Survey Report; 5 institutions have been reclassified and the amount of support reported by them in 1973-74 has been allocated to the class in which they reported in 1974-75.

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Table 2

Survey of Voluntary Support, 1974-75

Total Support
827 Institutions in Two Surveys
(000 omitted)

	No.	1973-74	1974-75	% Change
Major Private Universities	68	$ 700,037	$ 645,069	- 7.9
Private Men's Colleges	11	22,106	17,390	-21.3
Private Women's Colleges	71	62,836	62,200	- 1.0
Private Coeducational Colleges	396	406,506	399,620	- 1.7
Prof. and Spec. Schools	45	79,130	65,144	-17.7
Total Private 4-year	591	$1,270,615	$1,189,423	- 6.4
Public Institutions (4-year)	160	334,856	366,357	+ 9.4
Total 4-year	751	$1,605,471	$1,555,780	- 3.1
Junior Colleges	76	14,986	13,708	- 8.5
Grand Total	827	$1,620,457	$1,569,488	- 3.1
Total support this group as % of all institutions reporting		92.8	93.7	

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Table 3

Survey of Voluntary Support, 1974-75

Total Support, by Source,
All Institutions Reporting
(000 omitted)

	1973-74		1974-75		% Change
Foundations	$ 416,924	(23.9)	$ 384,500	(23.0)	- 7.8
Non-Alumni Individuals	433,489	(24.8)	399,814	(23.9)	- 7.8
Alumni	396,866	(22.7)	377,376	(22.5)	- 4.9
Business Corporations	276,192	(15.8)	275,905	(16.5)	- 0.1
Religious Denominations	90,511	(5.2)	87,694	(5.2)	- 3.1
Other	132,870	(7.6)	149,254	(8.9)	+12.3
Total	$1,746,851	(100.0)	$1,674,543	(100.0)	- 4.1
Memo:					
All Individuals	$ 830,355	(47.5)	$ 777,190	(46.4)	- 6.4
		(100.0)		(100.0)	
Bequests	267,123	(32.2)	213,842	(27.5)	-20.0
Deferred Gifts	56,904	(6.9)	61,220	(7.9)	+ 7.6
Other Gifts by Living Donors	506,328	(60.9)	502,128	(64.6)	- 0.8

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Table 4

Survey of Voluntary Support, 1974-75

Total Support, by Source,
827 Institutions in Two Surveys
(000 omitted)

	1973-74		1974-75		% Change
Foundations	$ 392,715	(24.2)	$ 362,756	(23.1)	- 7.6
Non-Alumni Individuals	402,086	(24.8)	375,996	(24.0)	- 6.5
Alumni	380,872	(23.5)	362,189	(23.1)	- 4.9
Business Corporations	250,932	(15.5)	256,881	(16.4)	+ 2.4
Religious Denominations	75,504	(4.7)	79,374	(5.1)	+ 5.1
Other	118,348	(7.3)	132,293	(8.3)	+11.8
Total	$1,620,457	(100.0)	$1,569,488	(100.0)	- 3.1
Total support this group as % of all institutions reporting		92.8		93.7	
Memo:					
All Individuals	$ 782,958		$ 738,185		- 5.7

Table 5

Survey of Voluntary Support, 1974-75

Support Received from Individuals in the form of Bequests,
All Institutions Reporting
(000 omitted)

	1973-74	1974-75	% Change
Major Private Universities	$141,677	$111,779	-21.1
Private Men's Colleges	2,826	2,968	+ 5.0
Private Women's Colleges	13,958	10,385	-25.6
Private Coeducational Colleges	61,219	49,885	-18.5
Prof. and Spec. Schools	13,064	4,620	-64.6
Total Private 4-Year	$232,744	$179,637	-22.8
Public Institutions (4-Year)	33,026	32,123	- 2.7
Total 4-Year	$265,770	$211,760	-20.3
Junior Colleges	1,353	2,082	+53.9
Grand Total	$267,123	$213,842	-20.0
Bequests as a percentage of total voluntary support received by all institutions	15.3	12.8	

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Table 6

Survey of Voluntary Support, 1974-75

Total Support, by Purpose
All Institutions Reporting
(000 omitted)

	1973-74		1974-75		% Change
Unrestricted	$ 579,995	(33.2)	$ 540,218	(32.3)	- 6.9
Physical Plant	302,336	(17.3)	258,669	(15.4)	-14.4
Research	227,957	(13.0)	251,252	(15.0)	+10.2
Student Aid	227,832	(13.0)	222,675	(13.3)	- 2.3
Faculty Compensation	107,480	(6.2)	104,833	(6.3)	- 2.5
Other	301,251	(17.2)	296,896	(17.7)	- 1.5
Total	$1,746,851	(100.0)	$1,674,543	(100.0)	- 4.1
Current	$ 969,031	(55.5)	$1,019,741	(60.9)	+ 5.2
Capital	$ 777,820	(44.5)	$ 654,802	(39.1)	-15.8

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Table 7

Survey of Voluntary Support, 1974-75

Estimated Total Support
Relative to Enrollment and Purchasing Power

	All Higher Education						% Change 1969-70 to 1974-75
	1969-70	1970-71	1971-72	1972-73	1973-74	1974-75	
Total Estimated Support(millions)	$1,780	$1,860	$2,020	$2,240	$2,240	$2,160	+21.3
Enrollment (thousands)	8,005	8,581	8,949	9,215	9,602	10,224	+27.7
Support per student	$ 222	$ 217	$ 226	$ 243	$ 233	$ 211	- 5.0
Price index (1967=100)	113.1	118.8	123.3	129.2	140.4	154.5	+36.6
Support per student in 1967 dollars	$ 196	$ 183	$ 183	$ 188	$ 166	$ 137	-30.1
Total expenditures (billions)	$ 24.7	$ 27.1	$ 29.2	$ 31.4	$ 35.0	$ 40.2	+62.8
Total expenditures per student	$3,090	$3,160	$3,260	$3,400	$3,645	$3,930	+27.2
Total expenditures per student in 1967 dollars	$2,730	$2,660	$2,640	$2,630	$2,600	$2,540	- 7.0
Estimated support as percentage of expenditures	7.2	6.8	6.9	7.1	6.3	5.4	

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Table 8

Survey of Voluntary Support, 1974-75

Estimated Total Support by Source
(in millions)

	1972-73	1973-74	1974-75	% Change, 1974-75 v.1973-74	% Change, 1974-75 v.1972-73
Foundations	$ 524	$ 535	$ 497	- 7.1	- 5.2
Non-Alumni Individuals	600	556	516	- 7.2	-14.0
Alumni	536	509	486	- 4.5	- 9.3
Business Corporations	320	354	357	+ 0.8	+11.6
Religious Denominations	99	116	112	- 3.4	+13.1
Other	161	170	192	+12.9	+19.3
Total Voluntary Support	$2,240	$2,240	$2,160	- 3.6	- 3.6
Memo:					
All Individuals	$1,136	$1,065	$1,002	- 5.9	-11.8

TESTIMONY
OF
ROBERT F. GOHEEN, CHAIRMAN, COUNCIL ON FOUNDATIONS, INC.
HEARINGS BY THE COMMITTEE ON WAYS AND MEANS
HOUSE OF REPRESENTATIVES
MARCH 19, 1976

Introduction

Mr. Chairman, members of the Committee, my name is Robert F. Goheen and I represent the Council on Foundations, Inc., an association of more than 780 grant-making organizations. Among them are some 635 independent and company foundations, classified for the most part as private foundations, and also some 125 community foundations, organizations that almost without exception qualify or expect to qualify for public charity status.

I appreciate the opportunity to appear before the Committee on estate tax matters. A wide variety of proposed revisions to our estate and gift tax laws have been proposed to the Committee. My testimony will be limited primarily to proposals under which the deduction allowed for charitable bequests -- now unlimited in amount -- would be restricted to 50 percent or some other specified percentage of the testator's estate and to proposals that might impose such a percentage limitation only in cases where the donee is or would be classified as a private foundation under current law.

The Council strongly urges that current unlimited estate tax deductions for charitable contributions be preserved and, more particularly, that special limitations on the deductibility of gifts to private foundations as against other 501(c)(3) organizations are neither justified nor in the public interest. My testimony will emphasize the following points:

1. Foundations make important contributions to our society, contributions that should be fostered and encouraged.

2. The legislative framework within which private foundations must now operate ensures that money bequeathed to foundations is money committed to public, charitable purposes.

3. The post-1969 record of foundation compliance with these regulatory provisions is excellent; treating private foundations as "second class citizens" for estate tax purposes is unwarranted.

4. Deductions for bequests to private foundations are clearly the principal remaining tax law incentive for the creation of new foundations and the augmentation of existing ones, a process already hampered by existing disincentives in the income tax law.

5. Current charitable contribution deductions are "efficient" (and perhaps especially so in the estate tax area) in the sense that the deductions increase funds committed to charitable purposes more than they reduce taxes; correspondingly, we can expect that reducing or eliminating deductions will reduce gifts more than tax revenues will increase.

I. The significance of foundations

Thanks in some measure to continuing Congressional attention given to foundations and philanthropy, but also to the ongoing work of The Foundation Center, the American Association of Fund Raising Counsel, and the recent special efforts of The Commission on Private Philanthropy and Public Needs, the size and shape of the foundation community are now reasonably well documented. The basic data: there are an estimated 26,000 private grant-making foundations with current total resources in the range of $27 to $30 billion, contributing about $2,110,000,000 annually to the public charitable purposes enumerated in Code section 501(c)(3). By fields of interest, education and health are considerably the largest beneficiaries of foundation grants, the two fields together having drawn between 55 percent and 60 percent of foundation giving in recent years.

The significance of foundation resources, however, lies much less in their magnitude than in the capacities foundations can develop -- usually in concert with recipient agencies -- to direct limited assets toward beneficial results

and to accomplish things that otherwise might not be accomplished or accomplished as well. For more extended discussion of what it is that foundations do, how they do it, and what they accomplish, I would refer the Committee to the study by myself and the staff of the Council on Foundations for The Commission on Private Philanthropy and Public Needs (The Filer Commission). Chapter IV of that study is devoted to foundation endeavors and accomplishments and contains citations to other sources. I will only briefly summarize those observations here.

Past achievements where foundation support played a significant role include such examples as -

- developing municipally supported public libraries throughout the country.

- bringing to maturity and quality a system of medical education for the United States and Canada.

- creating the "Green Revolution" through development of high-yielding disease-resistant grains.

- developing important instruments for scientific research, including the ultracentrifuge, oscilloscope, mass spectrograph, electron microscope, and the laser.

- building the research base leading to our current knowledge of DNA, termed by some "the single most significant advance in biology of the twentieth century."

- supporting the American Law Institute, and funding its projects such as the writing of the Uniform Commercial Code, which for more than two decades has governed most commercial transactions in this nation.

Among notable recent grant programs are -

- the Robert Wood Johnson Foundation granted $75 million to community hospitals to develop group medical practices, making available around-the-clock medical care.

- the same foundation made a grant of $17.6 million to provide regional systems of pre-and post-natal care for mothers and children in situations of high risk pregnancies.

- separately, the foundation made a grant of $2 million to the Johns Hopkins University Medical School to evaluate the effectiveness of this regional program.

- the Carnegie Corporation made a major grant to an organization concerned with the administration of small colleges, to assist over a thousand small colleges throughout the country in administrative planning and management.

- the Fleischmann Foundation located in Reno has for a number of years maintained scholarship programs to enable needy high school graduates in Nevada and California to attend college. Fleischmann also has separate fellowship programs to enable qualified candidates to attend medical and dental schools. The foundation's total distributions for these and other charitable activities are in the range of several million dollars each year.

- the Danforth Foundation of St. Louis has also maintained a broad variety of scholarship and fellowship programs. For a recent year, its total charitable grants and expenditures were well over $13 million.

- the Kellogg Foundation made a substantial grant last year to Georgetown University for a program to develop the use of medical and nursing students as effective medical teams.

- the Kresge Foundation made a grant of about $250,000 to begin needed construction at Wayne County Community College in Detroit.

- another foundation made a grant of about $900,000 to the University of Washington Medical Center to support that Center's program of residencies in family medicine.

The key role of foundations in public television is documented in hearings on this topic held by the Subcommittee on Foundations of the Committee on Finance in September of 1974. In sum, that case history supports the view that the aid given by foundations, because of its timeliness and experimental character, was critical in the development of the medium both locally and nationally.

By far the largest number of foundations concentrate their attention in local communities. In the Council's study for The Filer Commission and in other studies done for The Commission, there are examples and case histories describing

foundation work and how different elements in the community interrelate in working towards achieving local goals in communities like Atlanta, Boston, Cleveland, Des Moines, Hartford, San Francisco, and Spokane.

An example we gave of foundation activity in relation to government was foundation contributions to the start-up costs for the Institute of Medicine, a new unit of the National Academy of Sciences, serving as a source of information to help the government allocate public funds available for the delivery of health care. There are numerous other illustrations.

Foundation funds, then, help make possible many useful public services that would in most cases otherwise have to be provided by tax monies, if at all. They offer "the other door on which to knock," without which many volunteer (not-for-profit) activities would not be initiated and others could not be continued. They are there to respond both to new ideas and shifting social needs with a freedom and flexibility not readily achievable in the broad-scale approaches government agencies normally must pursue. They facilitate the testing of alternative solutions. As centers of independent thought and judgment, they help support freedom of thought, experimentation, and honest criticism directed at pressing issues of public policy. Foundations stand side by side with, and are directly related to, the broad range of agencies, institutions and systems, private and public alike, through which our society addresses its needs.

In sum, the affirmative contributions foundations have made -- and will continue to make -- are part of the public record and have been evidenced through research and investigations by Congressional Committees, The Filer Commission, and others. As this Committee knows, foundations have never and will never be immune from criticism; but overall their record is, I submit, a good one. If the committment of capital to charity through foundations is to be

still further discouraged and reduced through changes in the estate tax laws, the services provided to the public by the nation's many non-profit, charitable agencies will be handicapped materially.

II. Current law requires private foundations to operate in the public interest

Private foundations have been the subject of careful legislative scrutiny going back at least to the investigations of the late Wright Patman. They were thoroughly reviewed in the 1965 Treasury Report and in the course of the hearings that led to the enactment of the foundation provisions of the Tax Reform Act of 1969. As a result of these efforts, private foundations are now subject to a great number of restrictions and rules, carefully designed by Congress to do away with the problems that were the subject of Congressional attention. Apart from the 4 percent excise tax based on investment income that private foundations must pay, these rules:

- prevent the use of foundation assets for personal benefit by regulating dealings between a foundation and those who manage, control or make large gifts to it.
- compel substantial annual distributions in support of charitable activities.
- place limitations on and preclude prolonged retention of substantial business interests.
- regulate foundation investments.
- bar lobbying and partisan political activity.
- require foundations carefully to monitor and account for grants to individuals and to donees that are not public charities.
- require full annual reports by foundations to the IRS, to state authorities and to the public on foundation assets, earnings, grants, administrative costs and other matters.

No other form of charity is so thoroughly regulated to insure the commitment of resources to bona fide charitable purposes. These rules and regulations

assure that wealth placed in a foundation is wealth dedicated to charity and wealth that cannot be used for personal rather than public purposes.

III. The Commissioner of Internal Revenue and the Assistant Commissioner for Employee Plans and Exempt Organizations have both confirmed that foundation compliance with these rules is excellent

Immediately following enactment of the Tax Reform Act of 1969, private foundations became the subject of an extensive IRS audit program unprecedented in its scope. Under this program, every organization classified as a private foundation was audited at least once over a five year period; many were audited more frequently.

In a recent speech to the National Council on Philanthropy, Commissioner of Internal Revenue Donald Alexander said that the Service had found foundation compliance with the regulatory features of the 1969 legislation to be nearly complete. The Service accepted about 75 percent of the foundation returns it audited without change. Only about 12 1/2 percent of the returns that were examined involved changes related to the penalty taxes or the calculation of the 4 percent tax; the great bulk of these were caused by Service changes concerning the 4 percent tax. Non-compliance with the regulatory measures appears, then, to have been marginal at most. This conclusion is reinforced by the fact that of the more than $290,000,000 private foundations paid in taxes through June 1975, slightly better than 99.5 percent is attributable to the 4 percent tax; less than one-half of one percent is attributable to the penalty taxes.

Assistant Commissioner Alvin D. Lurie has also stated that private foundation compliance has been excellent. At a meeting of the Southeastern Council of

Foundations in November 1975, Mr. Lurie commented that the five year audit commitment was designed to place a microscope on the private foundation community. The assessment of the results by IRS was that compliance by private foundations was "superb." The available evidence then demonstrates that the rules and restrictions imposed by the 1969 Tax Reform Act are working and working very well. In these circumstances there is no reason to treat private foundations as "second-class philanthropic citizens" or to discourage testamentary gifts to them.

IV. Estate Tax Deductions are the principal remaining tax incentive for the creation of new foundations and the augmentation of existing ones -- a process already hampered by existing disincentives

The birth rate/death rate effects of the Tax Reform Act of 1969 on foundations have already been the subject of extensive Congressional testimony.1/ Perhaps the most significant data that have been gathered so far are contained in a sampling of data on the creation and dissolution of foundations for the years 1968 to 1972, discussed by Mr. Freeman, President of the Council, in his 1974 testimony before the Senate Subcommittee on Foundations. That study is part of the record for those hearings.

The samplings that were done included a numerical count of the creation and dissolution of foundations in twelve states for the period covered. Foundations in these states represent, we estimate, more than 50 percent of all of the assets in the field, and are therefore fairly representative of what has happened within the foundation community.

1/ See, particularly, the testimony of David F. Freeman and Marion Fremont-Smith, hearings before the Subcommittee on Foundations of the Committee on Finance, November 25 and 26, 1974, pages 197 through 218; testimony by John G. Simon, hearings before the Subcommittee on Foundations of the Committee on Finance, October 1 and 2, 1973, pages 165 through 179.

The figures showed very consistent patterns state by state. Overall, new foundation creations dropped sharply from 1968 to 1970; then levelled off at approximately one tenth of the 1968 rate. Terminations increased between 1969 and 1971 and then levelled off; but again, the rate of termination in 1972 was eight times higher than the rate of termination in pre-Tax Reform Act years. The evidence is, then, that the flow of new money to foundations has been deterred; the field is now more than ever dependent on bequests as a source of new funds. As Professor Simon emphasizes, a retarded foundation birth rate has an unhealthy impact because it will, over time, more severely limit the alternative funding sources available to institutions and agencies seeking substantial funding for new programs and approaches.

More recently, we have obtained substantial additional evidence of foundation reliance on bequests, in information drawn from the data bank of The Foundation Center based on foundation returns filed with IRS for 1973. An examination of the returns of the 36 private non-operating foundations (other than company foundations) reporting the largest amounts of gifts to them revealed that these gifts were all or substantially all testamentary in at least 30 cases. In dollar terms, better than 90 percent or more than $210 million of some $230 million in gifts to this group were testamentary in character.

These data bear out then, that foundations are today largely dependent on testamentary gifts for such new money as still flows to them. What can we expect will happen if disincentives to charitable giving are added to the estate tax law?

V. Current unlimited charitable contribution deductions for estates are efficient; these deductions should be retained

In its report, Giving In America, The Filer Commission states its conclusion as follows:

> "The Commission was not persuaded that any of the suggested changes in the charitable bequest deduction would make the system more equitable. Instead, the changes would reduce bequests to private organizations, particularly to private colleges and universities, without much being gained in equity or tax revenues. Therefore, the Commission recommends:
>
> That the charitable bequest deduction be retained in its present form."
>
> (Giving In America, p. 151)

This recommendation is based on careful research, and there are two studies cited in The Filer Report that I would call to the Committee's attention and briefly summarize here.

Michael J. Boskin, a Stanford economist, estimated the probable results of (a) substituting a 30 percent estate tax credit, or (b) a 50 percent limit, for the current unlimited deduction. His conclusions: under alternative (a) the Treasury would gain about $227 million in taxes, but charitable organizations would lose bequests totalling $360 million. Under alternative (b), charitable organizations would lose about $189 million in bequests, while estate tax revenues would increase by only $43 million; a loss of $4.40 to charity for each dollar gained by the Treasury.2/

2/ See Giving In America, pp. 150, 151; Boskin, Estate Taxation and Charitable Bequests, a paper prepared for the Commission on Private Philanthropy and Public Needs.

Correspondingly, Professor Martin Feldstein of Harvard concludes that -

"(1) the current deductibility feature of the estate tax law induces a substantial increase in charitable bequests.

(2) the charitable organizations receive more in additonal bequests than the Treasury for[e]goes in potential estate tax revenue."3/

The best evidence we have then, is that the unlimited estate tax deduction produces more in charitable gifts than it reduces tax revenues, and that limitations on that deduction will reduce charitable gifts more than estate tax revenues will increase. Moreover, as The Filer Commission puts it:

> "Transfers to charitable organizations are consistent with the purposes of the estate tax since they remove wealth from direct private control and commit it to what are deemed to be public purposes."4/

It is true, of course, that the federal estate tax directly affects only a small segment of our society. Current estimates are that only about 10 percent of decedent's estates are required to file returns, and perhaps a third of these are not taxable.5/ Within this small remaining segment, The Filer Commission data clearly show that the incentive to leave funds to charity is strong, and becomes increasingly strong as estates grow larger. According to the Commission's report, for estates exceeding $5 million, $125 went to charity for every $100 bequeathed to individuals. Moreover, decedents giving more than 50 percent of their estates to charity, although only 2 percent of those filing estate tax returns, contributed an estimated $338 million in 1969 dollars, or about one-sixth of all charitable bequests. The Commission's report warns that limiting

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3/ Feldstein, Charitable Bequests, Estate Taxation and Intergenerational Wealth Transfers, a paper prepared for the Commission on Private Philanthropy and Public Needs; see also Giving In America, pp. 149, 150.

4/ Giving In America, p. 149.

5/ Giving In America, pp. 147, 148.

the deduction to 50 percent would cause about half of the latter bequests not to be made.6/

Arguing persuasively that the estate tax should be viewed as a tax on the recipients of bequests rather than on their deceased benefactor, and that a percentage limitation would reduce charitable giving, Professor Boris Bittker of Yale Law School recently observed that such a limitation would be objectionable in two fundamental respects.

> "First, it would impose a burden that cannot be justified on 'ability to pay' principles.... Taxing charitable bequests (by imposing a limit on the deduction) will ... apply an estate tax rate schedule designed for ... wealthy taxpayers to charitable institutions and their ultimate beneficiaries whose economic status is utterly different.
>
> Second, if we take into account the role of the federal estate tax as a a device to moderate the concentration of family wealth - ... an unlimited exemption for charitable bequests is not only consistent with this role, but actually makes an affirmative contribution to its achievement. By encouraging testators to make charitable bequests, the deduction helps to disperse wealth among a larger group."7/

Thus the unlimited charitable deduction is efficient in two ways. First, it channels more funds to charitable institutions than are lost to the Treasury. Second, it diverts more funds from succeeding generations of family members than would be the case if the deduction were reduced or eliminated. These principles

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6/ Giving In America, pp. 148, 151.

7/ Bittker, Charitable Bequests and the Federal Estate Tax: Proposed Restrictions on Deductibility, The Seventh Mortimer H. Hess Memorial Lecture, Association of the Bar of the City of New York, December 1975; submitted by Professor Bittker for the record for these hearings.

apply whether the charitable donee provides services like a hospital or college, or is a foundation supporting these and other charitable services.

Conclusion

To sum up my testimony, I believe there is ample justification and substantial evidence that it is in the public interest to retain the current unlimited deduction for testamentary gifts to foundations as well as to charitable organizations generally. As to foundations in particular, the record is quite clear that the unlimited deduction for bequests is the principal remaining tax law incentive for their creation and augmentation. The 1969 statutory restrictions and the record of foundation performance under them provide assurance that foundation resources are and will be used for public purposes. In view of the evidence, and as one who shares the view that we need the new energy and new ideas that new foundations can help to generate or to foster, I urge the Committee to recognize first, that proposals to limit charitable deductions for estate tax purposes would essentially impose a tax on charitable institutions and their beneficiaries, and second, that the taxation of charitable bequests will return less in general revenue than would be lost in public benefit.

Thank you for the opportunity to express these views.

Testimony of
FATHER RICHARD T. McSORLEY, S.J.
Professor of Theology, Georgetown University, Washington, D.C.

before the

COMMITTEE ON WAYS AND MEANS
U.S. HOUSE OF REPRESENTATIVES

On Federal Estate and Gift Taxes
March 19, 1976

I am Richard T. McSorley, Professor of Theology at Georgetown Univeristy, speaking on behalf of the National Council for a World Peace Tax Fund, Pax Christi and the Catholic Peace Fellowship. I want to express our appreciation for the opportunity you have given us to discuss with you the provisions of H.R. 4897 as it would apply to the estate and gift taxes collected by the Federal Government from conscientious objectors to war. With me today are three representatives of the peace churches that have a long history of opposition to all forms of violence.

With your permission I would like to introduce three other members of the Council who have accompanied me: Dr. David R. Bassett, a Quaker physician from the University of Michigan Medical Center who founded the World Peace Tax Fund movement about five years ago; Ralph E. Smeltzer, Washington Representative of the Church of the Brethren; and Delton Franz, Washington Representative of the Peace Section of the Mennonite Central Committee.

The World Peace Tax Fund Act proposes to amend the Internal Revenue Code to permit taxpayers who are conscientiously opposed to all wars to have that part of their Federal income, estate and gift taxes which would otherwise be used for military purpcses to be allocated instead to a Federal trust fund - the World Peace Tax Fund - and spent for peace-related projects which would not otherwise receive this type of Federal aid. The Fund would be administered by a Board of Trustees, composed of members appointed by the President with the advice and consent of the Senate.

The law would extend to taxpayers the same First Amendment rights that have traditionally been granted to draftees through the conscientious objector provisions of the Military Selective Service Act. Conscientious objectors to past wars have numbered under 1% of the draft-age population according to Selective Service, and thus enactment of the bill would not impose a significant administrative burden.

The bill, H.R. 4897, has been introduced in three successive Congresses and now has 23 co-sponsors including two members of the Ways and Means Committee and Garner Shriver of Kansas who co-sponsored the bill in response to the concerns and pleas of various constituents, primarily among church members. Supporters of the bill include many members of the historic peace churches who have deep gratitude for the American respect for conscience. The respect for conscientious objection to war predates our own Constitution. A special clause making provision for conscientious objection was proposed by James Madison and considered for inclusion in the Constitution. Early state militia laws granted special exemptions to members of religious sects, and in some cases granted relief from war taxation too. Virginia, Kentucky, Massachusetts, New Hampshire, New York, Connecticut and Maine granted exemptions from all obligations under militia laws including war taxes to conscientious objectors. Argued one Quaker, "I do not derive the liberty of conscience from the government; I hold it from a tenure antecedent to the institutions of civil society. It was secured to me in the social compact, and it was never submitted to the legislature at all."

The Civil War draft legislation of February 24, 1864 provided specific alternatives to army service for all genuine members of pacifist denominations including provision for payment to a special fund to be applied to the benefit of the sick and wounded, and which was restricted from use in war.

THE MORAL BASE

A priority to what conscience dictates has always been a Christian teaching. It has certainly been the traditional teaching of the Roman Catholic Church that one must always follow one's conscience, and where governments enact laws that go contrary to conscience they lessen the support of their citizens. In the United States this is evidenced in the slavery laws, the Volstead Act, the liquor laws and the segregation laws following slavery. History clearly shows that these laws which went against the conscience of large sections of the American public were not observed and caused deep divisions within the country. In the current issue of paying taxes the government has the option of getting the taxes but not wounding the consciences of the people who object to seeing their taxes used for killing. It seems to me that it is only good

government to make that possible so that the allegiance of the citizenry is not lost. In this case neither is the tax benefit to the government lost.

CHRISTIAN BELIEF AND WAR

In all of Christian history there have been only two ways that Christians have related their faith to war. The first way is Christian pacifism which leads a Christian to refuse to kill or take part in any war because they believe this is contrary to the teaching of Christ. For the first three centuries all Christians followed this. In the fourth century with St. Augustine of Hippo Christians began to accept the just war theory which taught that under certain circumstances a war was not a violation of the Gospel but an act of mercy and love. These conditions included proportionality. That means the evil committed, the killing, must be proportioned to the good which might result from the war.

In the nuclear age in which we are living the massive destructive capacity of the weapons has led many Christians to the belief that the theory of Augustine, the just, unjust war theory, no longer applies. The principle of proportionality no longer seems to apply if these weapons are used. For this reason many Christians of the mainline churches like the Roman Catholic Church are left with no other alternative but Christian pacifism. If the just, unjust war theory does not apply then the Christian conscience requires that the Gospel of Peace be followed and Christian pacifism is the result. In brief many mainline Christians today are coming to believe that in an age of nuclear weapons a just war is no longer possible.

Christian conscience also opposes war today on the basis of the hunger in the world taken together with the expense for weaponry. There are now 460 million permanently hungry people(50 million starving each year) while the world's nations spend together $300 billion yearly on armaments. Many Christians find this incompatible with their conscience to pay for these armaments which take the food from the hungry and starving.

If I give a man money to buy a gun, and I know he is planning to murder you, then I am in part responsible for your murder. Likewise, if I give a government money to kill in my name, I am responsible for the killing that the government does. That is

the reason why many refuse to pay war taxes. It is a basic religious belief of many Americans that life is sacred, and that God has forbidden the taking of life. For these it is a part of their faithfulness to God, that they will not take part in the destruction of life. They will not do it, nor will they pay others to do it. These believe that the gospel and the teaching of Christ forbids us to make war and take human life. These are only a small percentage of all Christians.

But the main stream of Christian thought requires that any war be submitted to the judgment of the personal conscience, before it can be found in accord with God's law. On the face of it, war violates the command that we must love one another and that we should not kill one another.

MILITARY EXPENSES

The 1976 budget of the United States called for $152.5 billion to pay for past, present and future wars. This amounts to 67% of the total budget, after Social Security has been removed.

According to an analysis of Congressional appropriations in calendar year 1975, some 38.5% ($99.2 billion) was devoted to the cost of military expenditures. This may be a conservative estimate. The bill we support sets up a definite procedure by which this per cent is determined by the Comptroller General.

Thus for the conscientious objector roughly 40% of all their Federal income, estate and gift taxes are used for military purposes. This is a severe burden on the conscience of our citizens who are conscientiously opposed to supporting war. I might add this does not include the cost of past wars such as veterans' benefits and interest on the national debt. It is these conditions that have led many to become war tax resisters and to pay only a portion of their taxes.

It is important for you to realize that these people view the requirement of the payment of such taxes as an immoral act. They see their taxes going to a military program whose aim is to kill and destroy, and to promote research and development of nuclear weapons. Many also believe that because of the presence of nuclear weapons as a dominating part of our arsenal, every war is fought against the backdrop of possible thermonuclear destruction of the world. The current state of affairs forces many

troubled people to consider the path of war tax resistance.

We believe this bill would allow them to support their consciences and pay their taxes. We believe this provides a way out both for the conscientious objector and the government.

CHARITABLE TAX LAWS AND OTHER TAX LAW CONSIDERATIONS

The World Peace Tax Fund Act belongs in three general categories of special tax treatment where tax exemptions are regularly granted. 1. Constitutional exemptions, necessitated by the federal and state Constitutional limitations on tax legislation. 2. Economic exemptions, like those to encourage the settlement of development of new enterprise. 3. Exemptions to accomplish social ends.

Our present tax laws accept the premise that there are many activities to which an individual or a corporation's money may flow that are of sufficient public service either in the areas of rendering services and improvement to the society, or in stimulating economic activity, that special tax treatment is granted. The World Peace Tax Fund bill follows these premises and defines it for a special group, the conscientious objector.

There is a particular need for this extension of the religious exemption and special treatment tax laws at this time to cover the needs of the conscientious objector. In an era of nuclear weapons the military state is not a matter of men but of the technological weapon. The taxpayer has these weapons imposed on his back as an unwilling cross. Since IRS and various court decisions have given no relief to conscientious objectors despite the free exercise of religion clause of the First Amendment, the need for the Congress and this Committee to act is clear.

The Fund would create increased financing for many ongoing activities needed for the general social good. The bill authorizes the Board upon approval of Congress to use the money accumulated in the Fund for such purposes as peace research, disarmament, international exchanges, improvement of international health, education and welfare, and information about these activities. In the area of disarmament the accomplishments of the U.S. Arms Control and Disarmament Agency with a relatively small $10 million yearly have provided important assistance for several treaties that

have brought some decrease in international tensions.

By keeping the long tradition of respect for conscience by approving this bill this Committee can make a most important contribution to the better tomorrow we all seek, an era where the individual and government can cooperate to build a really permanent peace.

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National Council for a World Peace Tax Fund
2111 Florida Ave., N.W., Washington, DC 20008
(202) 483-3752
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