Resolved, That the American Bar Association recommends that the following principles should guide the review of existing regulations by federal administrative agencies with rulemaking authority:

1. Whether or not Congress enacts regulatory reform legislation, agencies should commit to a periodic review of their regulations to determine whether they should be revised or revoked with the goals of improving existing regulations, eliminating duplicative, obsolete, and inconsistent regulations, and better coordinating related regulations.

2. Congress should require review programs and, in so doing, should: (a) ensure that agencies have adequate resources to conduct effective and meaningful reviews, and (b) avoid mandating detailed requirements for review programs that do not take into account differences in statutory mandates and regulatory techniques among agencies.

3. Agencies should choose from different approaches to review the methods that are best tailored for particular situations. The approaches may include multi-agency reviews, review by broad categories of rules, specific subjects, or the impact on specific groups (such as small businesses or state or local governments), and “clean-up” reviews which address problems such as outdated references, address changes, and obsolete requirements.

4. An effective and meaningful review program requires:
   a. the assignment of a senior level policy official to administer the review program to ensure the commitment of appropriate personnel and resources, the establishment of review priorities as necessary, and the enforcement of appropriate deadlines for considering and completing reviews;
   b. an internal process for assessing and revising rules that includes obtaining input from agency employees who routinely work with the applicable rules, such as inspectors, investigators, rule writers, policy analysts, and litigators;
   c. the establishment of methods to measure the success or failure of regulations and to obtain the information necessary to make such assessments, including information on costs, benefits, and changes in technology;
   d. evaluation of rules in light of legal requirements for review and such considerations as administration policy changes, cost and benefit data, technological and scientific changes, implementation and enforcement difficulties, litigation, conflict or duplication with other rules, obsolescence, and information from the public such as complaints, rulemaking petitions,
and requests for exemptions; and

e. the effective involvement of the public, as appropriate, by:

(1) reliance on general and specific requests for information, advance notices of
rulemaking, electronic bulletin boards, public meetings, advisory committees,
appointment of an ombudsman or other contact person to receive concerns or
complaints, and other methods of inviting public comment;

(2) publication of detailed procedures for the submission of rulemaking petitions,
publication of petitions for public comment, and encouraging petitioners to obtain
peer review of petitions or to use consensus petitions; and

(3) public education explaining how the rulemaking process works and how it can
be used to obtain the review of existing regulations.

5. Agencies should adopt regulations that are less likely to become obsolete or
require amendment, such as performance standards or other rules that give
regulated entities flexibility concerning methods of compliance, consensus
standards, and rules that provide standards for automatic adjustments to a
change in circumstance. Agencies should also establish formal programs for
issuing interpretations to lessen confusion concerning existing rules.
REPORT

In 1992, President Bush directed that federal agencies review all existing regulations during a 90 day moratorium on the issuance of new regulations. After the Rulemaking Committee sponsored a program on this action, the Section decided to send a questionnaire to federal departments and agencies concerning the process used to review existing regulations. A draft report, which summarized responses to this inquiry, was distributed to Federal departments and agencies and other interested persons in January, 1995.

This report summarizes the findings of the draft report and justifies the recommendations in light of these findings. Four issues are addressed. First, what events should trigger the review of existing rules? Second, what process should an agency use to review such rules? Third, what steps should agencies take to reduce the need to revise regulations and to speed up the amendment or repeal of rules if changes are necessary? Finally, what steps can the President and Congress take to make the review of existing rules more effective?

I. Trigger

Agencies should periodically review all of their regulations to determine whether they need to be revised or revoked. This step is important for several policy reasons. First, actual costs or benefits of the rule may be different from predicted costs or benefits. For example, new scientific information may indicate that a dangerous conditions poses a greater or lesser risk than was previously understood. Similarly, the burden of a rule may be greater than anticipated because of an economic downturn or other economic developments. In some cases, a rule may no longer be necessary because it is obsolete or because it has been replaced by other regulations. Second, a rule may be outdated. For example, innovation may produce more effective and/or less expensive abatement technologies. Third, actual experience with a rule may indicate ways in which it could be improved. A rule that the agency thought was clear on its face, for example, may be confusing to regulated entities. Also, the agency's experience in granting exemptions or modifications may indicate ways in which a rule can be improved. Fourth, an agency may have overlapping and duplicative rules, or one agency's rules may conflict with another agency's rules. Finally, a review process would enable the agency to determine whether its rules were consistent with current administration policy. For example, a new president might prefer one regulatory approach, such as market-based regulatory incentives, over another approach, such as command
Agencies currently engage in both formal and informal review of existing rules. A formal review is one that is mandated. Formal reviews occur in response to various mandates including the Regulatory Flexibility Act, the Government Performances and Results Act, the petitions process of the Administrative Procedure Act (APA), Executive Orders, presidential memoranda, and internal agency rules. Informal reviews are a routine, daily occurrence in which, during the general operations of an agency, problems with existing rules are identified that may warrant further agency action. These review typically occur at the instigation of agency staff, the regulated industry or other stakeholders, or congressional or executive intervention.

Although agencies engage in the formal and informal reviews, the review process can be improved. Agencies assign different priorities to this activity, and the quality of the review process varies from agency to agency. Moreover, some regulations may fall between the cracks of formal and informal review programs. Review of some rules may not be mandated and these

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2 5 U.S.C. §§ 601 eqq. seq. The Act requires that agencies review every ten years existing regulations which have a significant economic impact on a substantial number of small entities. 5 U.S.C. § 610.

3 31 U.S.C. § 111 note. The Act requires that agencies develop strategic plans prior to fiscal year (FY) 1998, prepare annual plans setting performance goals beginning with FY 1999, and report annually on actual performance as compared to goals, with the first report due in March 2000. Although the Act is not directed at regulatory review, agencies may use this process to under such reviews.

4 The APA requires that agencies give interested parties the "right to petition for the issuance, amendment, or repeal of a rule." 5 U.S.C. § 553(e). To the extent that a petitioner seeks amendment or repeal of a rule, the petitioner, in fact, is requesting a regulatory review.

5 See, e.g., Exec. Order 12866, §5. For a description of this order, see infra note 11 & accompanying text.

6 After President Bush announced his moratorium on new regulations in his State of the Union Address, he sent a memorandum to all federal departments and agencies on "Reducing the Burden of Government Regulations." Agencies were ordered "to evaluate existing regulations and programs and to identify and accelerate action on initiatives that will eliminate any unnecessary regulatory burden or other promote economic growth."

7 Some departments and agencies have established review cycles and review criteria their operations manuals or orders.
rules are not picked up by informal approaches. Finally, agency review programs are also hindered by a lack of resources.  

The President should ensure that agencies have effective programs for the review of existing rules. Without presidential involvement, agencies may not regard the review of existing rules as sufficiently important to develop and undertake effective review programs. The President should recognize that review of rules must be balanced with other agency responsibilities, but the President should also ensure that agencies will review existing rules within an appropriate time frame. The President should also ensure that review programs are meaningful and that there is effective public participation. Part II of this report discusses these requirements.

Although presidential involvement is important, the President (and Congress) should avoid mandating standardized, detailed requirements for review programs. Although agencies could be forced to review all rules by a certain date, for example, this type mandate would likely be counterproductive for several reasons. First, excessive time and scarce resources devoted to a review program could result in insufficient attention to other regulatory needs or statutory mandates. Alternatively, the agency would meet these other needs and engage a review that is relatively perfunctory and meaningless. Although this tension could be eased if agencies had more resources, agency budgets are more likely to decrease in the future than to increase. Second, a standardized approach does not take into account that some agencies have thousands of existing regulations, while other agencies have far fewer rules. Third, the time necessary for a review may vary from agency to agency because different review methods are used. Fourth, the time necessary for an effective review may vary depending on the difficulty or ease of acquiring the necessary information, or on the degree of interest and involvement of stakeholders.

In light of these difficulties, agency-forcing review requirements should be used only in narrowly focused cases where they are likely to produce significant benefits. In other cases,

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8 Agencies responding to the ABA survey noted that although review of existing regulations was worthwhile, they did not have the flexibility to use their resources to conduct review because of statutory mandates.

9 The review ordered by President Bush may have met this fate. Because agencies were required to review all of their regulations in 90 days, some agencies had to review more than one part of the Code of Federal Regulations each day. One part can contain hundreds, or even thousands, of requirements. Some agencies receive large volumes of public comments in response to its review, which made the task particularly difficult.

10 See infra note 13 & accompanying text (description of methods of review).
agencies should develop review programs that are approved by OMB. Executive Order 12866, issued by President Clinton in September 1993, is a good model. It requires each agency to submit to the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget (OMB) a program under which it will "periodically review significant regulations." OMB should establish general requirements (i.e., performance standards), such as those recommended in Section II, that each agency would be required to meet concerning its review program.

II. Review Process

The review process used by agencies should be meaningful and should involve effective public participation. This section discusses these elements of review of existing rules.

A. Meaningful Review

The assignment of a senior level agency official to be in charge of the review of existing regulations is the first element of a meaningful program of review. This step is important for three reasons. The official would be responsible for ensuring that adequate personnel are assigned to the activity and that they are given appropriate deadlines. In addition, the official will be in a position to balance the importance of this activity with the agency's other responsibilities. Indeed, because there are likely to be competing priorities, this person can "battle" for the necessary resources. Finally, as discussed further in Section III, agencies can reduce the need for review of existing regulations by the way in which they design new regulations. This official can help ensure that agency employees responsible for new rules take these considerations into account.

In addition to designating a manager for the review process, a meaningful review program requires three additional elements. An review plan should specify how the agency will identify potential problems, conduct its reviews, and establish priorities for review if necessary.

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12 See supra note 5. The Executive Order directs the Administrator of OIRA to consult with the Regulatory Working Group, comprised of the Vice-President, policy advisors to the President, and the heads of agencies that have significant domestic regulatory responsibility, to pursue regulatory review. The order also encourages state, local, and tribal governments to assist in identifying regulations that impose "significant or unique burdens" on them and that "appear to have outlived their justification" or are "otherwise inconsistent with the public interest."

13 See infra note 19 & accompanying text (defining performance standards).
The agency should involve both the public and agency employees in the identification of problems with existing regulations. The public, particularly stakeholders, are likely to have useful information concerning the success or failure of regulations. The next section discusses ways in which agencies can involve the public in the review process. Likewise, agency employees who have supervisory or other duties concerning on-going regulations are also likely to have valuable information.

An agency should employ two approaches to obtaining employee information. First, agencies should have a clear process by which employees can report information about rules. If a litigator or an investigator finds problems with an existing rule, for example, there should be a method for the problem to be plugged into the review process. Similarly, if an agency sets standards for production facilities, which are enforced by inspectors who examine the regulated plants, the agency can set up a program for the inspectors to identify common implementation problems. Second, the official responsible for the review process should seek out employee information. The official can assign to specific persons the responsibility for identifying rules that need to be reviewed. Alternatively, the official (or his representative) can hold periodic meetings with the staff members responsible for implementing or enforcing rules to determine potential problems or the effectiveness of the rules. An agency might also turn to an Inspector General, if applicable, for an independent analysis of the need for changes in regulations.

Once potential problems are identified, the agency must determine whether a problem or problems justifies revision of a regulation. For this purpose, the agency should establish who will conduct the review and what methods will be used. Some agencies have the same office that wrote a rule review it because that office has the greatest expertise concerning the rule. Other agencies use different offices or special teams in order to gain additional objectivity. Either method is appropriate provided that evaluations are subject to review by the agency official responsible for the review program. The agency will also have to determine what method or methods of review are appropriate. An agency can review individual rules which have been identified as candidates for possible revision, but it can also employ broader review strategies.

In a "clean-up" review, the agency identifies regulations that are obsolete, redundant, or suitable for non-regulatory guidance statements and issues a rulemaking document to rescind them. In a categorical review, the agency reviews all rules that pertain to a specific subject. For example, the Occupational Safety and Health Administration (OSHA) could review all of the regulations that address electrical safety. In a review based on affected groups, the agency reviews all rules that apply to specific group, such as one industry. OSHA, for example, could review all of the rules that apply to the chemical industry. Similarly, agencies could review all rules that affect small businesses. Finally, when two or more agencies regulate the same subjects or industries, they can engage in a multi-agency review process. For example, a number of agencies regulate the handling and transportation of infectious substances.
Agencies should choose the review method that will be the most effective in light of the agency's resource limitations.

When an agency evaluates the effectiveness of a rule, it should measure its success against the objective or goal of the rule, such as decreasing pollution or reducing the number of accidents. This evaluation may require the agency to obtain additional information. For example, an agency should have a method to obtain information about technological changes to the extent that it relies on a particular technology in a rule. The simplest method may be to invite regulated industries to keep the agency up to date concerning such changes. A more difficult task is to gather the information necessary to evaluate whether the costs and benefits are higher or lower than intended. An agency may be able to turn to existing sources, such as agency records or other government records, or it may need to ask (or require) the regulated industry to report information for this purpose. The Nuclear Regulatory Agency uses "regulatory impact surveys" for this purpose. Under this approach, agency staff visit licensees and obtain comments on generic areas of regulation, such as reporting requirements or inspections.

Agency resources are unlikely to permit an agency to review more than a portion of its rules in a thorough manner in any given year. When resources are limited and all rules cannot be reviewed, agencies should choose rules to be reviewed on the basis of the potential benefits to the public compared to the cost to the agency in terms of time and resources. As part of this process, agencies should take into account how long it has been since a rule was reviewed. Ideally, an agency would integrate its priority process for promulgating new regulations with its process for choosing priorities for the review of existing regulations.

B. Public Participation

As noted earlier, public participation in the review process can be especially valuable because the public is likely to be able to identify problems with existing rules. Members of the public can call problems to the attention of an agency in several ways. An agency may learn of problems because of the volume and nature of complaints, requests for interpretations, waivers, and exemptions, and petitions to amend a rule. An effective program of public participation,

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14 The Paperwork Reduction Act, however, may constrain the extent to which agencies can rely on surveys or require information to be submitted. 44 U.S.C. § 3501.

15 Several agencies have developed criteria to choose regulations for review which consider the age of the rule, its clarity, and its economic impact.
however, will also require agencies to seek out public participation.

Agencies have several methods by which they can encourage public participation. When a final rule is published in the Federal Register, the agency should provide the name and telephone number of an individual to contact if members of the public have difficulty with the implementation of the rule. If appropriate, an agency could designate an ombudsman to receive such complaints. Agencies can also periodically invite public comment concerning which of their existing rules should be reviewed, such as in conjunction with publication of the Regulatory Agenda in the Federal Register, or by electronic bulletin boards which solicit such input.

Routine requests, however, may not elicit useful information. An agency may need to ask specific questions of the public concerning the impact of regulations, focus public attention on such requests through press releases and other educational efforts, hold public meetings, or engage in other types of informal fact-finding. Agencies can also ask advisory committees to make periodic recommendations on rules that need to be reviewed.

Agencies can also increase the effectiveness of public participation by improving their petition process. To encourage greater public participation, agencies can clarify their petition procedures, provide training courses or develop other educational material for the public explaining how the petition and rulemaking processes work, and publish petitions, or summaries of them, in the Federal Register to stimulate additional public interest and comment. Finally, agencies could encourage stakeholders to adopt consensus petitions in which interested parties recommended mutually acceptable rule changes.

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16 The Federal Advisory Committee Act, 5 U.S.C. App., may constrain the extent to which agencies can utilize advisory committees for this purpose. Moreover, Executive Order 12838 limits new advisory committees to situations where "compelling circumstances necessitate creation." Exec. Order. 12838 (1993).

17 See Administrative Conference of the United States, Recommendation 86-6, Petitions for Rulemaking.
III. More Effective Rules and Rulemaking

The process of reviewing existing regulations can be complicated and time consuming. An agency would therefore benefit if it adopted regulations that are less likely to become obsolete or require amendment. An agency would also benefit if it were easier to adopt new regulations, or repeal old ones, if necessary. This section discusses what steps agencies should take to reduce the need to revise regulations and to speed up rulemaking.

A. More Effective Rules

Agencies should consider whether a rule can be written in a manner that makes it less likely that it will need to be revised or revoked at a later date. The following options reduce the likelihood that a rule will have to be revised.

First, agencies can adopt rules that permit regulated entities more flexibility concerning the methods of compliance. Use of performance standards in appropriate circumstances is one way to accomplish this goal. Adopting a rule that permits equivalent compliance is another option. Where appropriate, agencies could authorize an administrator to accept an equivalent method of compliance in lieu of the method of compliance specified in the regulation.

Second agencies can use consensus standards in appropriate circumstances. This approach would make initial rulemaking easier which has the advantage of freeing up resources.

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18 For example, the Federal Aviation Administration (FAA) received almost 2000 public suggestions for changes to its aircraft certification regulations. After public hearings and other steps which narrowed the number of changes, the FAA issued eight Notices of Proposed Rulemaking of approximately 200 pages each which proposed nearly 600 changes. About 900 of these changes were adopted in nine final rules which averaged about 200 pages each. The whole process took eight years to complete. The aircraft certification regulations constitute only 11 of 73 parts in the C.F.R. of the FAA regulations.

19 Because performance standards prescribe the results, but not the means, of regulatory compliance, regulated entities are free to choose or invent the easiest or least expensive methods to meet some regulatory target. This flexibility makes performance standards less vulnerable to technological changes. If a new and less expensive method of abatement is invented, the regulated entity is free to use it without prior agency approval.

20 A consensus standard is developed by private standard-setting organizations with the participation and agreement of the members of the organization.
for reviews of existing rules. It may also make it easier for an agency to change the rule. The agency could follow the lead of the private standard-setting organization concerning whether revision of the rule is appropriate.

Third, agencies can adopt two types of rules that adjust automatically to a change in conditions. Agencies can adopt rules that change or terminate if a certain condition occurred. For example, an agency can stipulate that a rule will remain in effect until some number of states pass laws requiring some specified action. Second, a rule can contain a mechanism for automatic adjustments. For example, an agency can require that dollars amounts will change based on the rate of inflation which avoids the need for another rule to make this adjustment.

Fourth, an agency can issue an interim final rule (IFR) when it is concerned about potential implementation problems, or when it simply wants assurance that the rule works well. If the IFR is combined with a request for public comments concerning any implementation problems, the agency may make it easier to gather information concerning the performance of the rule. This step would therefore make it easier to revise the rule if necessary.

Finally, agencies can reduce the need for additional rulemaking by good housekeeping practices. When agencies write new rules that make existing rules obsolete, they should delete the old rules. Agencies should also formally withdraw notices of proposed rulemaking that

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21 After an agency decides to adopt a consensus standard, it can adopt the standard through the "direct final" rulemaking process, which would save additional resources. See infra note 28 & accompany text (discussion of direct final rulemaking).

22 Alternatively, the agency could decide that a rule will change or terminate after the publication of a notice to that effect in the Federal Register.

23 If necessary, the agency could publish a notice in the Federal Register advising the public of the new amount.

24 Although the agency could achieve the same result by issuing a final rule and then asking for comments, an IFR is more likely to generate useful information. As compared to a final rule, the IFR sends a stronger message that the agency intends further review based on public information. Moreover, if appropriate, the agency could place a "sunset" date in the rule to force an evaluate of the performance of the rule.

25 Although this is a simple step, agencies sometimes forget to repeal the prior rule because of looming time deadlines or other similar reasons.
have become obsolete because of the passage of time without further agency action. Because this step will reduce confusion about the agency’s future intentions, it clears the decks for the agency to focus on current viable projects and review of existing rules.

B. More Effective Rulemaking

An agency can write the initial rule to make it less likely that it will have to be revised or revoked at a later date. An agency can also take steps to make it easier to adopt any revisions or revocations that are necessary. The subject of how to make rulemaking more effective has received considerable attention. For the purposes of this report, only two reforms are briefly mentioned. One possibility is to streamline the internal agency decision-making process. Even well-run agencies are finding that time can be saved by management reforms. In addition, agencies should consider the use of direct final rules. This process involves the issuance of a final rule without a prior opportunity for public comment in cases where the agency determines that it is unlikely to receive any comments.

V. Presidential and Congressional Actions

The President and Congress can assist agencies in developing and maintaining effective programs for the review of existing regulations. As discussed earlier, the White House and Congress should generally avoid mandating detailed requirements for review programs. Instead, OMB should be assigned the responsibility of ensuring that review programs meet the type of general principles proposed in this report. This approach recognizes that review programs in agencies should vary to take account of differences among agencies.

The President and Congress should also be aware that an agency’s capacity to review rules will be affected by the extent that other impact assessments are mandated. The American Bar Association (ABA) recommends that “the President and Congress . . . exercise restraint in the overall number of requirement rulemaking impact analyses [and] assess the usefulness of existing

25 Similarly, if the agency issues an IFR, the agency should ensure that a final rule is adopted.


27 The final rule preamble indicates that the rule will go into effect within a specified time period (generally sixty days) if the agency receives no adverse comment or a notice of an intent to file an adverse comment with a specified time period (generally thirty days). See Report of the National Performance Review, Creating A Government That Works Better & Costs Less, Appendix C, REG 05 (1993).
and planned analyses. . . . The President and Congress should also be aware of the impact of budget reductions on an agency's capacity to review existing regulations and maintain other regulatory responsibilities. An agency can assist the oversight process by periodically briefing OMB and legislative staff on areas that it is considering reviewing, the potential benefits that might be obtained, and the impact of resource limitations on its intentions.

Finally, the President and Congress should consider reforms that would make existing agency resources go further. For example, agencies might be better able to review existing regulations if it were easier to promulgate new regulations. For one reform, Congress could authorize an agency to adopt automatically a notice of proposed rulemaking as a final rule if there were no public comments on a proposal. In addition, training programs for presidential appointees and agency staff could be focused on the function of review of existing rules, and recognition and rewards can be given to agency officials and employees who excel in this area.

Respectfully submitted,

Janet Belkin
Chair, Section of Administrative Law & Regulatory Practice

August, 1995

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30 See supra note 28 & accompany text (describing direct final rules).

The resolution recommends that federal regulatory agencies should commit to a periodic review of their regulations to determine whether the rules should be revised or revoked, the President and Congress should encourage review programs, and that agencies should choose the review methods that are best tailored for particular situations, design review programs to include public participation and other procedures necessary for effective and meaningful review, and should adopt regulations that are less likely to become obsolete or require amendment.

Approved at a regularly scheduled meeting of the Section Council on Feb. 12, 1995.

No. Although there was a flurry of rulemaking resolutions passed in the early 1980's, these all addressed the promulgation of new rules. This recommendation addresses a review of existing rules.

See Above.

Action is desirable at this meeting to allow consideration of the recommendation by regulatory agencies as they undertake review of existing regulations.

7. **Cost to the Association.** (Both direct and indirect costs.)

None.

8. **Disclosure of Interest.** (If applicable.)

None.

9. **Referrals.**

A copy of the Report with Recommendation was circulated to all Section and Division Chairs in June, 1995.

10. **Contact Person.** (Prior to the meeting.)

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12. **Contact Person Regarding Amendments to This Recommendation.** (Are there any known proposed amendments at this time? If so, please provide the name, address, telephone, fax and ABA/net number of the person to contact below.)

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