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COMMITTEE ON GOVERNMENT REFORM

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July 13, 2004

The Honorable Ann M. Veneman
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Madam Secretary:

Tomorrow, you will be testifying at a joint hearing of the House Committees on Government Reform and Agriculture on USDA's new surveillance program for bovine spongiform encephalopathy (BSE) or "mad cow disease." As you prepare for tomorrow's testimony, I want to advise you of several serious concerns that I have about how the Department has responded to the discovery of BSE in the United States.

My concerns fall into two specific areas. First, it appears that the Department's new surveillance plan for mad cow disease has major flaws. The Inspector General has conducted an audit of the program that finds numerous problems in the design and implementation of the surveillance plan. According to the draft audit report:

> The problems identified during our review, if not corrected, may negatively impact the effectiveness of USDA's overall BSE surveillance program, impair its ability to perform risk assessments and program evaluations, and reduce the credibility of any assertion regarding the prevalence of BSE in the United States.

The Inspector General will be asked to elaborate on these concerns when she testifies at tomorrow's hearing. As the draft audit report makes clear, however, the problems are systemic. The draft report finds:

- "Critical assumptions in the surveillance plan will result in questionable estimates of BSE prevalence";
- "Sampling is not truly random because participation in the program is voluntary";
- "As the plan is currently designed, [USDA] cannot obtain a statistically appropriate geographical representation of the U.S. cattle population";
- "Cattle condemned at slaughter plants for CNS symptoms were not always tested for BSE";

- "[A] process for obtaining samples from animals that 'died on the farm' has not been developed";
- "[S]ampling and data collection processes raise questions about the integrity of surveillance data"; and
- "Database accuracy was questionable."

Second, it appears that you and other senior Department officials provided erroneous assurances to the public about the status of the infected cow identified in Washington State in December 2003. You informed the public that the cow was a "downer" and therefore properly detected by USDA's testing program, which was supposed to test high-risk cattle and downers. But a second report from the Inspector General identifies three previously unreported eyewitnesses who saw the cow walk or stand on the day of slaughter. Internal agency documents also reveal that the cow was detected under an agreement that, in violation of USDA policy, permitted the testing of ambulatory cattle. These disclosures indicate that what you described as a success story for USDA policy could more accurately be depicted as a fortuitous event.

The public depends on the USDA to protect the safety of the food supply and to provide honest assessments of problems when they do arise. My concern is that the Department has not met either of these obligations. The new BSE surveillance plan appears to have major deficiencies. And the Department appears to have misled the public in how it responded to the discovery of the infected cow.

I ask that you respond to these concerns at tomorrow's hearing.

Problems with the New Surveillance Program

After the discovery of the infected cow, USDA developed a new surveillance program. Announced on March 15 and initiated on June 1, the plan expands testing to target over 200,000 "high-risk" cattle, including downers and cattle with central nervous system (CNS) symptoms, plus 20,000 normal-appearing cattle over 30 months of age.[1] On multiple occasions, USDA has promised the public that if its sampling goals are reached, "the enhanced program could detect BSE even if there were only five positive animals in the entire country."[2]

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[1] USDA Animal and Plant Health Inspection Service, *Bovine Spongiform Encephalopathy (BSE) Plan, March 15, 2004,* 1 (online at http://www.aphis.usda.gov/lpa/issues/ bse/BSE_Surveil_Plan03-15-04.pdf).

[2] USDA Animal and Plant Health Inspection Service, *Press Release: USDA Certifies Seven Laboratories for BSE Sample Analysis* (Mar. 29, 2004) (online at

You have called the new testing plan a "fully science-based system" that "will allow us to test at a higher level to determine more definitively what level of BSE is present in our system."[3] The American Meat Institute called the plan "extraordinary" and said it "should further bolster our trading partners' confidence in U.S. animal disease prevention efforts."[4]

I have learned, however, that USDA's Inspector General has audited the new surveillance program and found major deficiencies. These deficiencies are detailed in a draft report that was provided to the Committee, a copy of which is enclosed.[5] The Inspector General will testify about these problems at tomorrow's hearing.

The Inspector General's report finds widespread problems in the new surveillance plan. The problems include false assumptions, barriers to random sampling, problems testing the highest-risk cattle, problems testing animals that die on the farm, and poor sample

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http://www.aphis.usda.gov/lpa/news/2004/03/bse_labs.html). This claim has been reiterated by USDA officials numerous times in the past several months. For example, Deputy Under Secretary for Marketing and Regulatory Programs Chuck Lambert said, "If we can test 200,000 basically we can find one case in 10 million with 95 percent confidence." *U.S. Cattle Prices Rebounding,* Knight Ridder Tribune Business News (May 14, 2004). USDA Under Secretary for Food Safety Elsa Murano said, "If there's a cow in 10 million, they'll find it with their testing protocol." *Fight Food-Borne Illness, Maintain Healthy Business; Serving Unsafe Food*, Nation's Restaurant News (May 24, 2004). Announcing the first inconclusive test result from the new surveillance program, APHIS Deputy Administrator Dr. John Clifford said, "our program could detect BSE even if there were only five positive animals in the target population in the entire country." USDA Animal and Plant Health Inspection Service, *Statement by Deputy Administrator Dr. John Clifford* (June 25, 2004) (online at http://www.usda.gov/Newsroom/ 0263.04.html).

[3] USDA, *Transcript of Remarks from Technical Briefing on BSE and Related Issues with Agriculture Secretary Ann M. Veneman and USDA Chief Veterinary Officer Dr. Ron DeHaven Washington D.C.* (Mar. 15, 2004) (online at http://www.usda.gov/Newsroom/0106.04.html).

[4] American Meat Institute President J. Patrick Boyle, *AMI Statement: On Increased Surveillance of Cattle for BSE* (Mar. 15, 2004) (online at http://www.meatami.com/Template.cfm?Section=Archived&template=PressReleaseDisplay.cfm&PressReleaseID=1912).

[5] USDA Office of Inspector General, Animal and Plant Health Inspection Service and Food Safety Inspection Service, *Bovine Spongiform Encephalopathy (BSE) Surveillance Program — Phase I* — DRAFT (2004) (hereinafter "USDA Audit Report").

collection and recordkeeping. Moreover, the public has apparently been misled about the purpose of testing 20,000 healthy cattle for signs of BSE infection.

False Assumptions

According to the draft report, "Critical assumptions in the surveillance plan will result in questionable estimates of BSE prevalence."[6] USDA claims that the new surveillance program will detect BSE if just five infected cattle are present in the United States.[7] But the Inspector General found that this claim was based on the incorrect assumption that "all BSE-detectable cattle are in [the] high-risk population."[8] According to the draft report:

> BSE has been detected in clinically normal, adult cattle but ... its prevalence in the population tends to be much less than that for high-risk cattle. However, the number of normal cattle in inventory greatly exceeds the number of high-risk cattle. Combining these relationships, any attempt to extrapolate the high-risk cattle results to the entire adult cattle population yields a significantly higher estimated prevalence rate than if USDA assumes all detectable BSE is limited to the high-risk population.[9]

For this reason, the Inspector General states: "the plan needs to be clarified to remove the misconception that BSE will appear in only high-risk animals."[10]

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[6] *Id.* at 6.

[7] USDA Animal and Plant Health Inspection Service, *supra* note 2.

[8] USDA Audit Report, *supra* note 5, at 6. Specifically, USDA's Surveillance Plan states: "Assuming all the BSE positive cattle are part of the high-risk population, if a total of 201,000 samples is collected, this level of sampling would allow us to detect BSE at the rate of 1 positive in 10 million adult cattle at a 95 percent confidence level. If a total of at least 268,500 samples is collected, this level of sampling would allow us to detect BSE at the same rate at a 99% confidence level." USDA Animal and Plant Health Inspection Service, *supra* note 1 (emphasis added).

[9] USDA Audit Report, *supra* note 5, at 9.

[10] *Id.* at 10. The Inspector General's concern about the assumption that only high-risk cattle have BSE echoes a critique of the plan from the Harvard Center for Risk Analysis. In a review of the new plan requested by current APHIS Administrator Ron DeHaven, Harvard researchers wrote:

> We note that USDA's derivation of a sensitivity level for their surveillance plan (one in 10 million animals with a 99% certainty) assumes that all the infected animals in the U.S. belong to the high risk population group; however, because there may be BSE-infected animals in the normal adult and normal juvenile populations, a more rigorous

Barriers to Random Sampling

USDA's projections assume that each animal in the target population has the same chance of being selected for testing. But the Inspector General found that "[s]ampling is not truly random because participation in the program is voluntary."[11] Without random sampling, "[t]here is reduced assurance that BSE will be detected, and any statistical projection regarding the high-risk group may be unreliable."[12]

Related to this problem, the Inspector General found that "[a]s the plan is currently designed, APHIS cannot obtain a statistically appropriate geographical representation of the U.S. cattle population."[13] The audit found that prior to June 1, 2004, sample collection was "concentrated in a few slaughter establishments and renderers in a few States" and that "APHIS has no contingency plans if geographical targets are not obtained."[14] As a result, "any references to the prevalence of BSE may need to be qualified."[15]

Problems Testing the Highest-Risk Cattle

Cattle exhibiting symptoms of CNS disease are at particularly high risk of BSE infection.[16] Such cattle may be condemned at slaughter by USDA inspectors or tested for rabies at state laboratories. However, the Inspector General found that because of "several

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set of assumptions must be developed to estimate a prevalence for the entire population.

Joshua Cohen and George Gray, Harvard Center for Risk Analysis, Comments to Ron DeHaven, Deputy Administrator, Veterinary Services, APHIS, USDA (Mar. 12, 2004) (online at http://www.aphis.usda.gov/lpa/issues/bse/BSE_Harvard03-12-04.pdf).

[11] USDA Audit Report, *supra* note 5, at i.

[12] *Id.* at 7.

[13] *Id.* at ii. APHIS is the USDA's Animal and Plant Health Inspection Service.

[14] *Id.* at 8–9.

[15] *Id.* at 9.

[16] A 1997 APHIS Veterinary Services Memorandum states that "it is essential that brain specimens be collected from adult cattle condemned for CNS signs as part of our national surveillance of BSE." USDA APHIS, *Veterinary Services Memorandum No. 580.16, Procedures for Investigation of Adult Cattle with Clinical Signs of Central Nervous System (CNS) Disease and Procedures for Surveillance of Downer Cows for Bovine Spongiform Encephalopathy (BSE)* (June 11, 1997).

operational weaknesses,"[17] "cattle condemned at slaughter for CNS symptoms were not always tested, and brain samples from cattle testing negative for rabies were not always submitted for BSE testing."[18] The Inspector General reports that the problems testing high-risk cattle "still exist under the expanded program" in effect after June 1.[19]

The failure of USDA to test a Texas cow condemned for CNS symptoms this spring garnered national headlines. At the time, a senior USDA official stated, "One failure of this policy is unacceptable to us."[20] Yet the Inspector General found that in fiscal year 2004, as many as 17 adult cattle were condemned for CNS symptoms but not tested. Of 129 total cattle condemned for CNS signs this fiscal year, only 62 — less than half — were tested. Between fiscal years 2002 and 2004, the Inspector General found that 680 cattle were condemned for CNS symptoms, including 357 adult cattle, but that only 162 were tested for BSE.

The Inspector General also found that "a high priority population, rabies negative samples, has not been adequately pursued for BSE testing."[21] According to the draft report:

> This target group is important to USDA's assertions regarding the prevalence of BSE in the United States because rabies cases exhibit clinical signs not inconsistent with BSE, and a negative rabies test means the cause of the signs has not been diagnosed. Public health and State veterinary diagnostic laboratories did not always submit rabies-negative samples for BSE testing because there was no formal mechanism in place to routinely submit samples for BSE testing. APHIS records showed only limited numbers of rabies negative cases have been submitted for BSE testing.[22]

The Inspector General surveyed five state laboratories to determine how frequently samples from rabies-negative cattle were submitted for BSE testing. According to the draft report, only 16% of the samples (94 of 586) were sent for BSE testing. This problem has yet

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[17] USDA Audit Report, *supra* note 5, at 12. These weaknesses include "insufficient monitoring of slaughter data," the "lack of effective coordination," and "a lack of formalized agreements with non-Federal laboratories engaged in rabies testing."

[18] USDA Audit Report, *supra* note 5, at 12.

[19] *Id.* at ii.

[20] *Failure to Test Cow Called a USDA Error*, Associated Press (May 10, 2004).

[21] USDA Audit Report, *supra* note 5, at 15

[22] *Id.*

to be resolved. According to the Inspector General, "APHIS has not provided us with any detailed plans on how samples for this targeted high-risk group will be obtained."[23]

Problems Testing Animals That Die on the Farm

The Inspector General expressed concern about USDA's ability to conduct BSE testing of animals that die on the farm. According to the draft report "[a] process for obtaining samples from animals that 'died on the farm' has not been developed."[24] This is a problem because:

> Identifying truly high-risk cattle that die on the farm may be complicated by the reluctance of producers to submit them and the motivation to mischaracterize low risk carcasses as "high risk" since only the latter may qualify for reimbursement. These inherent problems can lead to an understatement of the projected maximum BSE prevalence rates for truly high-risk cattle and a reduced chance of detecting BSE, if it exists.[25]

Poor Sample Collection and Recordkeeping

The Inspector General found that "APHIS' sampling and data collection processes raise questions about the integrity of surveillance data."[26] Citing numerous problems with the collection and submission of samples, the Inspector General wrote:

> The current processes do not ensure that all samples submitted are properly identified according to the animal's origin, that all animals whose tests are recorded are within the target or nontarget population, and that all samplers retain backup samples of brain tissue for purposes of verification should the sample test positive. APHIS processes led to inconsistent practices and improper data entries because of inadequate training, inadequate instructions, and unclear criteria.[27]

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[23] *Id.* at 16.

[24] *Id.*

[25] *Id.*

[26] *Id.* at 24.

[27] *Id.*

The Inspector General reports that these problems "can impact APHIS' ability to timely trace potentially diseased animals to the birth cohort and other risk animals, as well as any by-products that may need to be recalled."[28]

The Inspector General also found that "database accuracy was questionable."[29] According to the report, USDA keeps track of test results in two separate databases, but these databases contain conflicting entries. For example, the Inspector General found over 2,000 inconsistencies in the databases from 2002 through 2004.[30] Furthermore, USDA had not found a way to incorporate this old data into the new data system that it is developing.[31]

Misleading Representations about Testing Healthy Older Cattle

In promoting its new testing program, USDA has highlighted the fact that in addition to targeting over 250,000 high-risk cattle, the Department will aim to sample 20,000 healthy-appearing cows over 30 months of age.[32] According to officials, the purpose of targeting healthy-appearing older cattle is to learn about the prevalence of BSE. At a technical briefing for the press, APHIS Director Dr. Ron DeHaven stated:

> We also as part of this expanded surveillance program will be testing 20,000 normal but aged slaughter cattle for identifying these older animals because, one, we'd like to target our testing at animals that were born before the feed ban, which went into place in August of '97, but also because this is a disease with a very long incubation period. And so the older the animal you test, the more likely if they are infected that they would have gone through an incubation period and be more likely to test positive.[33]

The Inspector General found, however, that the primary purpose of the testing was not to understand the prevalence of BSE. Rather, APHIS officials wrote to the Inspector General

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[28] *Id.*

[29] *Id.* at 28.

[30] *Id.*

[31] *Id.* at 29.

[32] USDA Animal and Plant Health Inspection Service, *supra* note 1.

[33] USDA Animal and Plant Health Inspection Service, *Transcript of Technical Briefing with Bill Hawks, Under Secretary for Marketing and Regulatory Services, Dr.Elsa Murano, Under Secretary for Food Safety, Dr. Ron DeHaven, Administrator, Animal Plant Health Inspection Service, Dr. Barbara Masters, Acting Administrator, Food Safety Inspection Service* (May 21, 2004) (online at http://www.usda.gov/Newsroom/0204.04.html).

on June 24 to explain that the primary purpose was to "deter producers who might send potentially infected cattle into the normal slaughter process."[34]

According to the Inspector General, "this objective . . . conflicts with published goals, as well as press releases by APHIS stressing the importance of testing adult, aged animals."[35] The report also notes that "APHIS' plan to test 20,000 clinically normal cattle may give the incorrect impression that these few tests will suggest a level of assurance higher than warranted about the 45 million adult cattle in the United States."[36]

Other Problems

The Inspector General also found problems in contracts and agreements reached with key partners in the new surveillance program, including slaughterhouses, laboratories, and rendering facilities. For example, the Inspector General found that USDA "did not plan to use a formal written contract with non-Federal laboratories," relying instead on blanket purchase agreements without performance and quality control provisions.[37] The Inspector General also recommended a peer review of the National Veterinary Services Laboratory.[38]

As a result of these many deficiencies, the Inspector General found that "the problems disclosed during our review, if not corrected, may negatively impact the effectiveness of USDA's overall BSE surveillance program, impair its ability to perform risk assessments and program evaluations, and reduce the credibility of any assertion regarding the prevalence of BSE in the United States."[39]

False Assurances about the First BSE-Infected Cow

After a Holstein dairy cow in Washington State was discovered to have BSE in December 2003, you reassured the public that "this is a clear indication that our surveillance and detection program is working."[40] This assertion hinged on two key claims: (1) that the BSE-infected cow was a downer and (2) that as such, it was tested as part of a surveillance

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[34] USDA Audit Report, *supra* note 5, at 10.

[35] *Id.*

[36] *Id.* at ii.

[37] *Id.* at 30.

[38] *Id.*

[39] *Id.* at iv.

[40] USDA, *Transcript of News Conference with Agriculture Secretary Ann M. Veneman on BSE* (Dec. 23, 2003) (online at http://www.usda.gov/Newsroom/0433.03.html).

program that focused on "high-risk" cattle including downers.[41] On December 24, the day after the initial announcement, you told the *Today Show*'s Katie Couric:

> The cow had difficulty standing on its own, which is why it was a downer cow. My understanding from the early investigation is that this cow had given birth, and that it had not been able to get up since then.[42]

The claim that the cow was a downer became a linchpin of USDA's response to the discovery of mad cow disease in the United States. USDA moved quickly to ban downer cows from the food supply, announcing that the step would "bolster the U.S. protection systems against . . . BSE, and further protect public health."[43] As described above, the new surveillance program adopted by USDA was designed around the explicit assumption that only cattle prohibited from the human food supply, including downer animals, could be infected with mad cow disease.

On February 17, Chairman Tom Davis and I wrote to you with new evidence about the infected cow and USDA's surveillance program.[44] In that letter, we reported that plant owner Tom Ellestad and hauler Randy Hull each saw the cow stand or walk the day of the slaughter.[45] We also provided evidence that the facility where the cow was slaughtered had a special contract permitting the plant, contrary to USDA policy, to provide samples from cattle that were not downers. Our letter discussed the implications of this finding for the new surveillance system. We wrote:

> It is self-evident that if the only BSE-infected cow to be discovered in the United States was able to walk and had no symptoms of central nervous system disease,

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[41] Under an FSIS directive in effect at the time, "downer" refers to livestock that "cannot rise from a recumbent position." FSIS Directive 6900.1, Revision 1 (Apr. 29, 1992, Revised Nov. 2, 1998) (online at www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/6900.1Rev1.htm).

[42] NBC News, *Today Show* (Dec. 24, 2003).

[43] USDA, *USDA BSE Update* (Dec. 30, 2003) (online at http://www.usda.gov/Newsroom/0452.03.html).

[44] Letter from Reps. Tom Davis and Henry A. Waxman to Secretary of Agriculture Ann M. Veneman (Feb. 17, 2004) (online at http://www.house.gov/reform/min/pdfs_108_2/pdfs_inves/pdf_health_usda_mad_cow_feb_12_let.pdf).

[44] NBC News, *supra* note 42.

[45] Letter from Reps. Tom Davis and Henry A. Waxman, *supra* note 44.

> USDA should not assume that all infected cattle will be either downer cows or cows that exhibit symptoms of central nervous system disease.[46]

Despite this evidence, you and other senior USDA officials continued to insist that the cow was a downer and that the surveillance program worked. You wrote in a letter to me that your records showed that "our FSIS [Food Safety and Inspection Service] veterinarian's clinical assessment of the animal at the time of arrival at the plant classified it as a 'downer' animal."[47] Your spokeswoman, Alisa Harrison, told UPI, "We do believe the records we have show the animal was non-ambulatory, we tested the animal, the animal was positive and the rest is history."[48]

Mounting evidence, however, undercuts the Department's position. A new USDA Inspector General report cites three new eyewitnesses — the two owners of the dairy farm that sold the cow, along with a worker there — who saw the cow walk on the morning of slaughter.[49] These three eyewitnesses join the plant owner and the hauler to provide five credible accounts contradicting your statement that the cow had been a "downer" since giving birth.

Moreover, e-mail correspondence among USDA personnel, which was provided to the Committee, stated that "the term downer was used loosely in her case."[50] Another e-mail stated: "The cow arrived on a load with downer cattle on it so it was included in the sample collection. If she had arrived by herself it is very likely that she would not have been tested."[51]

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[46] *Id.*

[47] Letter from Secretary of Agriculture Ann M. Veneman to Rep. Henry A. Waxman (Feb. 19, 2004) (online at http://www.house.gov/reform/min/pdfs_108_2/pdfs_inves/pdf_health_usda_mad_cow_feb_19_let.pdf).

[48] *House Committee Questions Mad Cow Case*, UPI (Feb. 17, 2004).

[49] USDA Office of Inspector General, *Report of Investigation* (July 2, 2004). The report found no evidence of malfeasance by the lower-ranking USDA officials involved in investigation of the infected cow in Washington State. It did not examine the actions or statements of senior USDA officials in Washington, D.C. The report itself has not been released due to Privacy Act concerns.

[50] E-mail from Deborah J. Millis, USDA, to Beth E. Gaston, Assistant to APHIS Director Dr. Ron DeHaven (Feb. 11, 2004).

[51] E-mail from Gary T. Svetlik, USDA, to Kathleen J. Akin, USDA, et al. (Feb. 18, 2004) (emphasis added).

USDA's only evidence that the cow was a downer appears to be the set of antemortem inspection notes completed by Dr. Rodney Thompson, the agency's veterinarian. In an interview with Committee staff, however, Dr. Thompson said that Mr. Ellestad's account of the cow standing up after the antemortem exam was a "distinct possibility." Dr. Thompson further stated that there was nothing in the cow's appearance at the time of arrival or in the postmortem examination proving that the cow could not have stood.[52]

New evidence also contradicts your claim that the detection of the cow demonstrated that the surveillance plan was working as intended. The Inspector General has determined that at least three regional USDA officials knew that the slaughterhouse that killed the BSE-infected cow was routinely testing ambulatory cattle, a departure from stated USDA policy. These include Dr. Thompson and two APHIS veterinarians who worked with the plant.[53] A Washington State veterinarian who helped coordinate the sampling was also aware of the practice.[54] E-mail communications sent to the staff of a senior USDA official, provided to the Committee, discuss these same facts.[55]

Your claim that the infected cow was a downer reassured the public that USDA's testing program was working and that future food safety risks could be addressed by measures such as banning downer cattle from the food supply. But it now appears that these assurances lacked foundation. Even a cursory investigation would have found that the infected cow stood and walked on the day of slaughter.

Disclosure of the facts would undoubtedly have complicated USDA's efforts to respond to the discovery of mad cow disease and would have made it more difficult to provide reassurances. But that was no excuse for misleading the public.

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[52] Committee on Government Reform staff interview with Dr. Rodney Thompson, Veterinarian, FSIS (Mar. 15, 2004).

[53] USDA Office of Inspector General, *Report of Investigation* (July 1, 2004). The report found no evidence of malfeasance by the lower-ranking USDA officials involved in investigation of the infected cow in Washington State. It did not examine the actions or statements of senior USDA officials in Washington, D.C. The report itself has not been released due to Privacy Act concerns.

[54] *Id.*

[55] E-mail from Dr. Rory Meyer, Veterinian, APHIS, to Beth E. Gaston, Assistant to APHIS Director Dr. Ron DeHaven, et al. (Feb. 17, 2004).

Conclusion

The Inspector General's findings and the additional evidence obtained by the Committee have major implications. They call into question the credibility of the Department's public statements and the adequacy of the Department's past and ongoing response to mad cow disease.

The Department has done a number of things right in responding to BSE in the United States. But as the Inspector General has recommended, significant revision are needed to put the surveillance program back on track. A refusal to acknowledge limitations and mistakes is ultimately bound to undermine the safety of our food supply, the confidence of our trading partners, and the public's trust.

I ask that you come prepared to answer questions about these matters at tomorrow's hearing.

Sincerely,

Henry A. Waxman

Henry A. Waxman
Ranking Minority Member

Enclosure