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Womens
Fee

AGENCY POSITIONS ON EEA, DOLE AND CONABLE BILLS*

<u>PENSION AND INSURANCE ISSUES</u>		<u>EEA</u>	<u>Other</u>	<u>Comments/Costs</u>	<u>Agency Positions</u>
A. <u>Periods of Employee Service Taken Into Account</u>					
• Age which plans may require as a condition of participation.	Lowers from 25 to 21.	<u>Dole:</u> Same as EEA.		Questionable benefit for women (e.g., could cause longer vesting requirements); insufficient data to see if benefits justify administrative burden (especially on small employers). Treasury estimates \$100 million annual loss in revenues as a result of this and next provision.	<u>DOL:</u> Support as long as administrative burden is not large. <u>Treasury:</u> No position (insufficient data). <u>DOT:</u> Support (specific mention). <u>HHS:</u> General endorsement of <u>Dole</u> bill (S. 19). <u>OMB/UPD Staff:</u> Oppose (but not strongly) because of unknown consequences.
• Age below which plans may ignore service for vesting purposes.	Lowers from 22 to 21.	<u>Dole:</u> No such provision.		Minor consequences and little benefit to women. Revenue loss contained in above figure.	Generally ignored as a separate item in agency comments, but <u>Treasury</u> supports.

*EEA is S. 888 (Nondiscrimination in Insurance as a separate bill is S. 372 and H.R. 100.)
Dole is S. 19.
Conable is H.R. 1991.

PENSION AND INSURANCE ISSUES		EEA	Other	Comments/Costs	Agency Positions
B. <u>Cash Out Accrued Benefits</u>	<ul style="list-style-type: none">• Maternity or paternity leave.	Require employers to credit employees on approved leave up to 20 hours per week (up to certain limits) for participation, vesting and benefit accrual.	Dole: Require employers to credit employees up to 501 hours for such leave in a plan year to avoid a break in service. (Participation, vesting and benefit accrual are not affected.)	EEA provision would add as much as 4% to pension plan costs and could create disincentives for employers to establish liberal maternity and paternity leave policies. Treasury estimates less than \$50 million annual revenue loss as a result of this provision.	DOL: Oppose EEA; support Dole, modified to provide 501 hours in year of child's birth or following year. Treasury: Oppose EEA; support Dole. DOT: Support S. 19 (specific mention). HHS: General endorsement of S. 19. OMB/OPD Staff: Oppose EEA; support Dole.
	<ul style="list-style-type: none">• Amount of accrued benefit a plan may pay out as a lump sum rather than as an annuity for their administrative convenience.	No provision.	Dole: Raises involuntary cash-out limit from \$1,750 to \$3,500.	No value to women; Dole responding to industry request. Would diminish administrative costs to pension plans.	DOL: Position not known. Treasury: Support. DOT: Support (general endorsement of S.19). HHS: General endorsement of S.19. OMB/OPD Staff: Support but not necessarily in context of women's initiative.

PENSION AND INSURANCE ISSUES	EEA	Other	Comments/Costs	Agency Positions
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C. Joint and Survivor Requirements*

- Clarifies that J&S payable whenever life annuity payable, even when life annuity is not the normal form.

No provision.

Dole: Designed to reverse a Tax Court decision that overturned IRS regulations that required J&S whenever life annuity offered as an option.

DOL believes Dole bill's language does not accomplish its goal of reversing Tax Court decision. Reinstating the old IRS regulatory position in statute would make J&S more available in defined contribution plans.

DOL: Support concept but language needs to be redone.

Treasury: Support.

DOT: Support (general endorsement of S. 19).

HHS: General endorsement of S. 19.

OMB/OPD Staff: Support with any technical changes needed.

- Spousal consent to J&S waiver.

J&S would have to be waived by both participant and spouse in writing.

Dole: Same as EEA.

Treasury alternative: Require notification to all non-participants who are potentially affected by participants' choice of benefit form.

CCLP saw no legal problem. Treasury believes a new "property right" is created. Waiver consent may be easier to administer than Treasury's notice alternative.

DOL: Support in concept but has concerns about administrative questions that need to be clarified.

Treasury: Oppose on grounds that new Federal property right is created; prefers a notification requirement.

DOT: Support (specific mention).

HHS: General endorsement of S. 19.

OMB/OPD Staff: Same as UPL position.

*Treasury estimates that all EEA provisions concerning joint-and-survivor annuities would result in a less than \$50 million annual revenue loss.

PENSION AND INSURANCE ISSUES

	EEA	Other	Comments/Costs	Agency Positions
<ul style="list-style-type: none">Mandatory surviving spouse annuities.	Would require that in cases of 10 years of marriage a benefit has to be paid to the surviving spouse of a participant who dies before his annuity starting date, with the annuity generally beginning when the surviving spouse reaches that date.	Dole: No directly parallel provision, but bill contains require plans to add to the notices given to employees on separation and other occasions a statement about which of their benefits are forfeitable on their deaths.	EEA mandate creates unanticipated liabilities for pension plans. Congress in 1974 rejected this approach (including both EEA mandate and Treasury alternative) on grounds that employer-sponsored life insurance is designed to meet this need.	DOL: Notwithstanding costs, supports EEA provision on grounds of greater financial assistance to women; DOL is concerned about Dole's notice requirement in context of larger paperwork burden issue and notes that information already included in summary plan reports.
	Treasury alternative: Require plans to make pre-retirement benefits available upon affirmative election of the participant. Allow reduction in retirement benefits to offset costs.		According to DOL, EEA provision would have added 1.75% to overall plan costs in 1977 (about \$400 million in 1982 dollars).	Treasury: See alternative on EEA; supports Dole.
				DOT: Support (but DOT has misidentified this EEA provision as part of S. 19).
				HHS: General endorsement of S. 19.
				OMB/OPD Staff: Oppose both EEA provision and Treasury alternative on grounds life insurance meets the need; tentatively oppose Dole on basis of paperwork burden and likelihood not seen as a major plus by women.
<ul style="list-style-type: none">Mandatory payment to surviving divorced spouses if married on annuity starting date.	Includes provision.	Dole: Includes provision.	DOL believes any increase in benefit/administrative costs are small.	DOL: Support. Treasury: Oppose. DOT: Support (general endorsement of S.19). HHS: General endorsement of S. 19. OMB/OPD Staff: Tentatively support as consistent with joint consent on J&S

PENSION AND INSURANCE ISSUES		EEA	Other	Comments/Costs	Agency Positions
D. <u>Assignment or Alienation of Benefits</u>	<ul style="list-style-type: none">In early retirement cases where employee chooses to continue to work, participant has to elect into J&S; in all other cases participant has to elect out of J&S. ERISA allows plans to ignore any election (or its revocation) related to J&S if participant dies of natural causes within two years of election or revocation.	Repeals this latitude now given plans.	<u>Dole</u> : No such provision.	Provision in ERISA exists because of adverse selection concerns.	<u>DOL</u> : Supports in belief that adverse selection would happen only in unusual circumstances.
	<ul style="list-style-type: none">Prohibition against assignment and alienation.	Would allow pension rights to be subject to court marital and support order; this clarifies what IRS already allows.	<u>Dole</u> : Same as EEA.	Non-controversial; defer to Treasury on specifics.	<u>Treasury</u> : Position not known (not in testimony). <u>DOT</u> : No position. <u>HHS</u> : General endorsement of <u>S. 19</u> . <u>OMB/OPD Staff</u> : Support if closer examination indicates plans can easily adjust; also recommend that consideration be given to making J&S the preferred benefit form in all early, as well as normal age, retirement functions.

Treasury: Support.

DOT: Support (specific mention).

HHS: General endorsement of S. 19.

OMB/OPD Staff: Support.

PENSION AND INSURANCE ISSUES		EEA	Other	Comments/Costs	Agency Positions
E. <u>Civil Service Retirement Provisions</u>	<ul style="list-style-type: none">Rules concerning qualified divorce distributions.	None.	Dole: Requires distributions pursuant to divorce decree to be consistent with plans' usual rules; clarifies tax treatment of such distributions.	Non-controversial; defer to Treasury on specifics.	DOL: Support but major technical problems need to be resolved. <u>Treasury</u> : Support. <u>DOT</u> : Support (general endorsement of S. 19). <u>HHS</u> : General endorsement of S. 19. <u>OMB/OPD Staff</u> : Support with any needed technical changes.
	<ul style="list-style-type: none">Spousal consent to J&S waiver.	J&S would have to be waived by both participant and spouse in writing.		CSR now has information requirement. This change is the same as that proposed for ERISA.	<u>OPM</u> : No mention. <u>Treasury, DOL, DOT</u> : No position taken. <u>OMB/OPD Staff</u> : Support if also done in ERISA.
	<ul style="list-style-type: none">Divorced spouse's benefit.	Would automatically allocate shares of annuities to divorced spouses of marriages lasting 10 years unless court decree provides otherwise.		Some part of the benefits paid for with reductions in normal annuities, but some new costs created; administratively difficult and costly and creates special rules for Federal employees.	<u>OPM</u> : Strongly opposes. <u>Treasury, DOL, UUT</u> : No position. <u>DOL</u> notes it would be consistent with their position on ERISA. <u>OMB/OPD Staff</u> : Oppose.

PENSION AND INSURANCE ISSUES	EEA	other	Comments/Costs	Agency Positions
<p>F. <u>Non-discrimination in Insurance Act</u></p> <ul style="list-style-type: none">Equality in pensions.Equality in insurance -- especially life and auto -- and privately purchased annuities.	<p>Mandates sex neutrality, both prospectively and retrospectively.</p>		<p>Manhart and Norris have settled some but not all employer-provided pension issues. Administration could submit legislation which would determine how court judgments are to be interpreted.</p>	<p><u>UOL</u>: Developing options on Norris follow-up.</p> <p><u>Treasury</u>: Not known.</p> <p>Justice: Need to review Norris; cautious about extending to non-Title VII plans.</p> <p><u>DOI</u>: Administration should submit bill which codifies and perhaps expands Norris.</p> <p><u>EEOC</u>: Implicitly supports with regard to employer-sponsored benefits.</p> <p><u>OMB/OPD Staff</u>: Need organized effort to review Norris.</p> <p><u>DOL</u>: Opposes on cost and efficiency grounds.</p> <p><u>Treasury</u>: Testimony does not contain position on non-pension issues.</p> <p><u>Justice</u>: Opposes.</p> <p><u>DOI</u>: No explicit position taken.</p> <p><u>CEA</u>: Oppose on economic efficiency grounds.</p> <p><u>OMB/OPD Staff</u>: Oppose.</p>
			<p>Very controversial, substantial reallocation of insurance costs between men and women.</p>	

TAX PROVISIONS	EEA	Other	Comments/Costs	Agency Positions
A. <u>IRA Liberalizations</u> <ul style="list-style-type: none">• Allow couple to pool and share income for IRA purposes (raises effective IRA limit in one-earner couple up to \$4,000).• Allow alimony to be used for IRA purposes without regard to current limits.	Contains provision.		\$.4-.5 billion annual loss; are distributional consequences open to "fairness" attack.	Issue now before the President. CCEA has recommended against.
				<u>DOL, Treasury, UMB/OPD staff: Oppose.</u>
B. <u>Dependent Care Tax Credit</u>	Raise percentage to 50 percent with longer phase-down to 20 percent; makes credit refundable.	<u>Conable:</u> Raises percentage per EEA; no refundability.	Costs \$.6 to .9 billion annually without refundability; another \$.3-.4 billion for refundability.	Issue now before the President. CCEA has recommended against.
				<u>DOL, Treasury, UMB/OPD staff: Oppose.</u>
C. <u>Include Custodial Day Care Organizations Within Tax Exempt Status</u>	Gives non-profit custodial care centers same status as educational facilities.	<u>Conable:</u> Same.	Costs less than \$50 million annually because affects only contributions to these already tax-exempt activities; raises philosophical issues.	DOT: Support EEA provision if decision made to support any new tax initiatives.
				CEA: Oppose on economic efficiency grounds.
D. <u>Increase Zero Bracket Amount for Head of Households</u>	Increase ZBA for heads of households to \$3,400 (same as joint filers).		ZBA for heads of households now set equal to single filers; no tax principle leads to either alternative; would increase the marriage penalty. Costs about \$1 billion annually.	<u>DOL, Treasury, UMB/OPD staff: Oppose.</u>
				<u>DOT:</u> No mention.

TAX PROVISIONS	EEA	Other	Comments/Costs	Agency Positions
E. <u>Include Displaced Home-makers in Targeted Jobs Credit</u>	Includes provision; makes such individuals' employers eligible for \$3,000/\$1,500 tax credit under certain conditions.		Extremely vague and could therefore be very costly and untargeted in terms of beneficiaries' income. No cost estimate can be done given the lack of precision.	<u>DOL, Treasury, OMB/OPU staff:</u> <u>Oppose.</u> <u>DOT:</u> No mention.

OTHER ITEMS		EEA	Other	Comments/Costs	Agency Positions
A. <u>Child Care Information and Referral Services</u>		New \$8 million a year HHS grant program to create community-based child care information and referral centers.	<u>Conable</u> : Same as EEA.	Small costs but raises Federal role questions.	<u>DOL</u> : Opposes as Women's Bureau is active in this area. <u>Treasury</u> : No position. <u>DUT</u> : Support. <u>OMB/OPD Staff</u> : Oppose.
B. <u>Child Support Enforcement</u>		<ul style="list-style-type: none">Expand Federal tax intercept to non-AFDC cases.Child support clearing-house.	Contains provision.	Administration bill does not.	Involves IRS in potentially difficult situations; could affect tax compliance.
		Mandates State clearinghouses.	Administration bill includes funding for information systems, including clearinghouses.	Mandates not necessary.	<u>DOT</u> : Support legislation which includes a policy statement that the program is intended to serve all families and children and which provides financial assistance for child support clearinghouses.

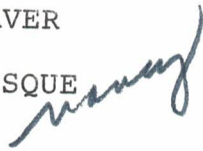
OTHER ITEMS	EEA	Other	Comments/Costs	Agency Positions
<ul style="list-style-type: none">• New State plan requirements.	<p>Mandates:</p> <ul style="list-style-type: none">• Medical support.• Liens.• Mandatory wage assignments for delinquencies.• State income tax intercepts.• Quasi-judicial hearings.• States would have to institute three out of five new requirements: voluntary wage assignment, scientific testing for paternity, security bonds in habitually delinquent cases, <u>ex parte</u> hearings, and <u>objective</u> standard setting for orders.	<ul style="list-style-type: none">• Administration doing by regulation.<ul style="list-style-type: none">• Rejected by Department as a possible mandate.• Administration bill same as EEA.• Administration bill same as EEA.• Administration bill same as EEA.<ul style="list-style-type: none">• Administration bill would encourage but not require such procedures.	<p>Mandates not necessary.</p>	
<ul style="list-style-type: none">• Mandatory pay deduction for Federal employees.	<p>Includes provision.</p>	<p>Administration bill does not include.</p>	<p>No reason to treat Federal employees differently. Administration bill includes wage withholding after delinquency.</p>	<p><u>OPM</u>: Opposes as not necessary.</p>
<ul style="list-style-type: none">• Discharge in bankruptcy.	<p>Includes provision.</p>	<p>Administration bill does not include.</p>	<p>Value not clear.</p>	
<p>C. <u>Regulation Reform and Gender Neutrality</u></p>	<p>Makes the on-going Administration exercise to eliminate gender distinctions wherever possible a statutory requirement.</p>		<p>Not necessary.</p>	<p><u>DOL, Treasury, OMB/OPU staff</u>: Oppose.</p>

THE WHITE HOUSE

WASHINGTON

September 15, 1984

MEMORANDUM FOR: MIKE DEEVER

FROM: NANCY RISQUE 

I held onto this in anticipation of our discussion this week. Given the mad schedules, however, I think we ought to go ahead and give it some circulation if you agree.

During a conversation we had in the midst of the Honegger debacle, I mentioned it vaguely to Jim Baker, who said he would like to see it, so I have delivered one to him also.

I think we ought to share it with Duberstein, Darman, Gergen, Fuller and Whittlesey. Do you have any other thoughts?

I will begin work on our next meeting with the Members early next week.

Guidance, please.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE ASSISTANT SECRETARY FOR LEGISLATION AND PUBLIC AFFAIRS

September 9, 1983

MEMORANDUM TO THE HONORABLE MICHAEL DEEVER

Nancy Risque requested that I forward the attached briefing book on gender issues to you. Since the initial copy was provided in July, the book has been modified to identify both Presidential and surrogate events, substantive actions, themes, and a background paper. It also includes suggestions for countering Barbara Honegger's critique. I believe the book is of greater value now than at the time of our last discussion.

VRG

Anne Graham
Assistant Secretary
Legislation and Public Affairs

Attachment: Briefing Book

September 9, 1983

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Background

Following the 1982 elections, the media concept of a "gender gap" facing GOP candidates became widespread. Based on exit polling which indicated that a historically high number of women voted Democratic in part to register disapproval of the President's policies, the gender gap quickly provided an opportunity for traditional feminist associations to position themselves as critical building blocks for candidates in 1984. At the same time, congressional Republicans took note that the gender gap could impact disproportionately on their reelection campaigns. These three forces -- the media, the feminists' constituency, and the Congress -- have combined into a potent force working to try to compel the Administration to accommodate feminist demands.

Buttressed by the President's opposition to the Equal Rights Amendment as a vehicle to secure equality of opportunity for women, potent anti-Reagan coalitions have formed around the gender gap issue. The astuteness of their use of the media platforms provided by the gender gap can be seen in the transformation of traditional feminist issues -- abortion rights, E.R.A., the number and types of women appointments -- into "women's issues." This opportunity to broaden the base of support for traditional feminist associations, and move feminist positions into a new terrain of women's issues capable of galvanizing large blocs of voters, comes precisely at a time when the feminist movement faced an identity crisis demonstrated by the growing numbers of women in non-traditional employment, increasing college enrollments for women, government-backed guarantees of equal access to educational and employment opportunities, and the transition from sex-role stereotypes and attitudinal changes in the public which effectively rendered the traditional feminist movement obsolete. After a period of several years in which the movement toyed with lifestyles, adoption rights for female couples, extremely radical concepts have provided new life and direction for the feminist movement. Analyses of recent writings by feminist leaders, such as Betty Friedan, reveal that the "turning point" nature of the current moment is well understood by the feminists themselves.

A Voting Gender Differential

A closer examination of the growing trend in preferences among women for Democratic candidates, however, reveals a subset of issues which collectively compose the gender differential in voting.

Women vote in higher proportion than men -- particularly in two age and marital categories where the Administration's electoral appeal is weaker across the board: with older women, and younger, single women. Another way of contrasting this differential is to note that the President's approval ratings tend to be lower for single men than for married women, and

higher for married women than for non-married older women. For married, non-working younger women, issues of primary concern tend to cluster around defense and the Administration's foreign policies. For older women, there is a tendency to believe that the Administration's economic policies are misguided.

Because older women vote in higher proportions than older men, and younger, single women vote in higher proportions than younger males (for very young males of voting age, turnout is negligible), differences which, in fact, stem from age and social strata are exaggerated into gender differences. The voting differentials between social and economic strata, and voting turnout between the sexes, may account in large part for the gender differences which emerged from exit polling -- and in effect created the perception of a gender gap.

Implications for Administration Actions

Overcoming the gender gap is a multi-faceted exercise. The media attention focused on the gender gap and "women's issues" provide media platforms for a women's movement striving to regain a broad base of support after a half decade of radicalism. While largely symbolic issues, such as E.R.A., provide substance for this appeal, the dynamics of the media gender gap are best understood through the framework of a movement working to regain a constituency lost through social maturation. Effective action to bridge the gender gap must rely in part on a communications strategy designed to expose as a sham the broad-based attack on the President's commitment to equality for women.

Pollsters indicate that questions regarding overall approval for the President frequently evoke unusually harsh unsolicited comments which convey the impression that key groups believe the President is out of touch with their economic and social realities, doesn't care about equality for women, or represents a privileged social stratum and its special interests. The President's populist appeal, evident across income and social lines for married individuals, does not spill over into non-married women. Nor does the President's appeal as a leader who is principled, of integrity, appear to transcend the perception that he is out of touch. Both the leaders of the women's movement and others not aligned with our causes have made much of the different psychology of male and female voters.

The bottom line may rest in the success the Administration has had in restoring traditional family and American values to vogue. While this may temporarily have aggravated differences between married and single voters, the same ability to communicate policies and basic tenets which benefit all Americans will aid in overcoming the gap.

One decade ago, the church-going, traditional nuclear family may have felt itself an oddity when scanning daily newspapers, the evening news, or current television programming. Today, a

similarly-situated family is again respectable and no longer out-of-step with the times, due in part to the success of the President's appeal to traditional American values. Yet for single working women in particular, the success of bringing these values back into vogue presents dilemmas. While men are programmed to believe that it is natural -- in fact, appropriate -- for them to have careers as well as families, women who work either believe they must choose between careers and families or for those who are employed due to economic necessity, believe that their work comes at the expense of their families. For the growing numbers of women-headed families (a significant element in poverty-level wage earners), the dilemma is two-fold: They face both the economic pressures of low-paying jobs, the difficulty of entering higher-paying, non-traditional fields, and the realization that their families are atypical.

In cosmetics marketing, an anecdote serves to illustrate these sensitivities. The perfume Charlie was originally marketed through television spots depicting the target buyer, a single young woman, going from partner to partner in glamorous nightspots. As the marketers learned more about their audience, the ads changed to depict a young woman with a single mate talking about getting married. While it is true that young men and women reject sex stereotypes as passe (as in the recent Seven Colleges Survey), it is also the case that today's women, and particularly younger women, are the first to reconcile new opportunities with the lack of models for social or occupational roles. Put bluntly, many women -- like men -- would like to have both a marriage and a career. While men are programmed to take this for granted, women are not. It may very well be the case that the Administration's successful appeal to traditional family values has hampered our appeal with the "new women."

Thus viewed, the gender gap is a complex problem requiring a communications effort to overcome perception, and a vigorous effort to position the President, surrogates, and the Administration to appeal to the voting gender differential. The issues which are being displayed as "women's issues" and the causes of the gender gap may in fact be symptoms of broader, underlying problems. A corollary of this conclusion is that the Administration may be able to play to hidden strengths, transform the nature of the women's issues debate, and force the opposition to react to our initiatives on entirely new ground by 1984.

The approach to the gender gap can be similar to the education effort. Policy substantially was not changed; rather, policy was articulated; concern was demonstrated; the issue was diffused.

There are two points which must be remembered as any plan of action is formulated. First and foremost, the gender gap is a multiple issue. Success in demonstrating this Administration's concern for women cannot be achieved by addressing women exclusively, as a bloc. Second, there are millions of women,

including many in this Administration, who do not support the organized efforts of the eighties, but are extremely appreciative and supportive of what Gloria Steinem and company accomplished in the late sixties. Those goals of the sixties are perfectly acceptable in the eighties; and themes must be developed to show the President's support for those goals.

Witness Sally Ride. At 32, she is the prototype of the woman who was being educated as the barriers were being removed. Of her launch, Ride said,

"It's too bad our society isn't further along and this is such a big deal.... It's time people realize that women in this country can do any job they want to."

And said Ruth Osborn, an engineer at Rockwell and an inspector of the Challenger before the flight,

"I think of her just like the other astronauts. And that's what's so great. It isn't abnormal to have a woman astronaut anymore."

The President was most succinct. In his conversation with the crew upon landing, he told Ride she was on board ... "for one reason: you were there because you were the best person for the job." (This is precisely the correct approach to cement this Administration's commitment.)

Why did Dr. Ride's participation in STS-7 create such interest? Certainly, history will record her as the first American woman in space. However, for women -- particularly women in that age group -- she is proof that barriers can and are being broken, that given the opportunity women can meet the standards and successfully face the challenges. Her victory was a message to all women who achieve new frontiers. Again, this is the message this President has ("...you were the best person for the job.") articulated and must reinforce.

THEMES

Underlying much of the dissatisfaction with the Administration which manifests itself as a gender gap is the misperception that our policies violate a principle that has immense appeal to the American electorate: equality. Equality of treatment under the law, equality of opportunities, equality of access to basic services, equality of the burden in restraint on domestic spending -- all are elements in the appeal to the American sense of fairness.

Beneath the appeal of organized feminist associations and "women's issues" are fundamental issues which affect both genders. Women just as much as men value the American ideals of individualism and reward of merit. Unlike men, they have been historically excluded from full participation on the basis of gender rather than individual abilities. We need to play strongly to women's sense of individualism in bridging the gender gap, and to the President's commitment to equality and fairness and rewards based on merit.

There is no issue of broader appeal to the electorate than the concept of equality. Underlying voter dissatisfaction is the artificial image of an Administration which is unfair or disengaged: unfair in the impact of economic policies, not concerned with full equality for women, out of touch with the realities facing those from different income and social strata.

This misperception can be overcome through the President's ability to communicate basic American values. A theme campaign built on fairness, equality, and strong American values of individualism and reward of individual merit can bridge the gender gap if the settings where these themes are elaborated reinforce the image of a forward-looking, engaged, fair, and compassionate President.

Such a theme-oriented campaign requires careful selection of events. Although much progress can be made through saturation appearances of the type which were employed in the education events, the gender dimension of all issue-oriented Presidential events and statements should be taken into consideration as we work to reaffirm the basic themes of equality and fairness.

1. The President supports equality for all Americans.

This cross-cutting theme can transcend many independent issues. A strong emphasis on the President's commitment to equality can make inroads against the Equal Rights Amendment through bolstering the Fifty States Project. Surrogate support from the Attorney General in legal equity, the Secretary of

H.H.S. in basic services, the Secretary of Agriculture in nutrition programs, and the Commission on Civil Rights in color and gender-blind policies can reinforce the Administration's emphasis on individualism and equality as opposed to special interest politics.

The essential difference between the Administration and opponents including Presidential candidates is the treatment of Americans as individuals possessing fundamental rights and rewards based on merit (with full acknowledgement of the need to provide special assistance to those who otherwise could not compete), whereas the opposition builds coalitions of special interests on the promises of favored treatment. There is a reservoir of resentment which can successfully be tapped through an indirect attack based on the ideals of equality and fairness for all.

Gender dimensions of equality should concentrate heavily on pension reform for older spouses, child care to ease the burden on working single women and working families, and a recognition of women's individual merits rather than treatment of all women as a single category of voters with identical needs.

2. This country needs the abilities of all Americans to face the challenges of the future.

The correction of injustices which originally fueled the women's liberation movement have, for modern women, largely become historical realities. Yet the appeal of the Equal Rights Amendment and other gender-oriented measures stems in large part from a desire to consolidate and guarantee the gains women have made.

Placing the President's emphasis on equality and individual merit in a future-oriented perspective plays on American optimism and defuses the myth of an older President looking back on the past as a guide to the future.

Without diminishing the fact that many women are employed out of economic necessity rather than choice, or alienating those who choose to become homemakers, the President should emphasize that the country needs the abilities of all Americans regardless of gender, handicap, or race to maintain its competitiveness. For every attempt by the opposition to splinter the electorate into individual interest groups, we should counterplay with the theme of unity and working together to meet a challenging future -- a future in which women will play an even larger role.

3. A growing economy helps all.

This theme should be emphasized in work settings where women are employed in non-traditional careers to underscore the fact that growth brings new opportunities.

After reforms in basic welfare and support services, a number of states have increased benefits to needy recipients.

The President can point out in these states that sound management coupled with non-inflationary growth yields increased benefits and maintains the fiscal integrity required to ensure services.

4. Elimination of waste and fraud in domestic programs.

Drawing benefits without entitlement cheats the needy and violates the principles of fairness and consideration of individual needs. Surrogate activity should highlight enforcement proceedings against welfare, food stamp, and AFDC abusers. Agencies and departments responsible for auditing and enforcing programs should be instructed to develop communications strategies to highlight prosecutions or civil actions to recover wasted funds or eliminate fraud.

The President's commitment to fight waste, fraud, and abuse should be recast as a social fairness measure rather than a budgetary policy. The emphasis should be on Administration action to guarantee that funds go to those truly in need.

5. Those who treat women as a monolithic bloc perpetuate sexism.

Just as it was unfair to pigeon-hole women into subservient, low-paying jobs or block them from the labor force entirely because of sex-role stereotyping in the past, it is discriminatory to attempt to obliterate the individualism of women today by treating them as a voting bloc.

Women's concerns are concerns of all Americans: the state of the economy, peace, and the support of fairness, equality, and opportunity by government and the courts.

Cynical attempts by male opposition candidates, working through feminist special interest organizations, to unite women as a voting bloc based on issues reserved to them by virtue of their gender brings sex-role stereotypes and sexism into the political arena just as it was being eliminated from the workplace and civic life.

Women surrogates should sound the theme that the President believes that women, like men, deserve to be treated as individuals and that their interests are not limited by virtue of their sex to pre-packaged issues. Therefore, he will not insult their integrity as individuals by appealing to women en masse -- he knows that they, like other voters, are more interested in the issues and his record.

6. The GOP is the champion of equality.

While other political contenders work to exploit schisms in American society for political advantage, the GOP is traditionally the party of equality. A substantive GOP program to recruit and train women candidates for state, local, and national campaigns will demonstrate the GOP's commitment to women. Because N.O.W. and the Women's Political Caucus state chapters have a record of refusing to support GOP women candidates, we can trap them into working against women by fielding women candidates in races against male incumbents. The underpinnings of this theme are elaborated in the section on substantive actions.

7. Offer a vision of America where "either/or" choices no longer dominate.

For past generations of women, the choice between a productive home life and a productive work life was often an "either/or" decision. Today, women can enter and leave the workforce, have more educational opportunities to train or retrain, and can combine both work and raising a family without the burdens falling entirely on women. Milestones such as maternity leave, insurance coverage, and "break in service" pension plan changes can be cited.

8. Women as entrepreneurs.

Much of the emphasis on economic equity for women assumes an employer-employee relationship in which women are the employees. The President can elevate economic equity issues to include an initiative to support women entrepreneurs. The emphasis should be on women's abilities to provide new directions in America's economy, create new jobs, and on how non-inflationary growth sustains creative entrepreneurship. Substantive actions concerning this theme are elaborated below.

9. Feminist organizations do not promote equality.

This is strictly a surrogate theme. RNC research should compile lists of positions, issues, or legislation advocated by feminist leaders and organizations which unfairly penalize some groups -- whether males, minorities, certain income groups, middle Americans, or business -- to further their own causes.

This opposition research material should be aggressively used in the surrogate media strategy outlined in substantive actions to convey the fact that the feminist groups have espoused a variety of radical causes fundamentally at odds with traditional American values and concepts of equality.

The goal is to force the feminist organizations to defend their recent transformation and record of the past, and remind large numbers of women that the new "women's issues" are a calculated attempt to buy political influence to further a radical agenda. We must drive the feminist organizations -- and their candidates -- out of the centrist position they currently claim by drawing attention to their record.

10. Merit pay for teachers is a women's issue.

In the background papers on the President's education grassroots campaign for educational renewal, it was noted that merit pay for teachers holds special appeal for women educators. Women are disproportionately represented in teaching. At a time when other professions were closed to women, many competent women made teaching a career. Yet higher-paying jobs in education traditionally were reserved for administrators, who were disproportionately men. Consequently, women tended to be excluded from high-paying jobs in education despite their ability and competence. Fair merit pay plans should reward competent teachers, and these teachers include a higher proportion of women. This gender gap dimension of merit pay proposals should be emphasized.

11. Women and creativity.

The lack of attention to women artists has been the focus of well-documented studies such as Germaine Greer's landmark book, The Obstacle Race. The First Lady can launch a campaign to identify historical works by American women artists that are currently unrecognized in museums or private collections. The best of these works can be selected for display in the White House, and private sector effort to mount a retrospective exhibit of the unknown works of American women artists can be encouraged.

The First Lady's contributions can be to provide lasting acknowledgement of the contribution of America's early women artists. This is an especially sensitive theme for intellectuals in the women's movement because Freudian and Jungian schools of psychology had long maintained that there were few female artists, the female urge to create being satisfied through birth -- thereby perpetuating sex-role stereotyping in psychological theory for decades. Greer's work refutes this, and the First Lady's involvement would indirectly refute stereotyping in the arts while recognizing America's neglected heritage from women artists.

SUBSTANTIVE ACTIONS

PRESIDENTIAL

1. Day Care

Launch an educational campaign on employers' benefits from day care. Employer-sponsored day care results in increased productivity, reduced absenteeism, and increased retention rates for female employees. The President and the Office of Private Sector Initiatives should emphasize existing programs and their benefits to business.

We should also evaluate expansion of tax reductions to pools of similar businesses for whom day care benefits are not cost-effective, but which would also benefit women working in small enterprises as well as their employers. (Continued emphasis by: Private Sector Initiatives, Health and Human Services, and Labor.)

2. Entrepreneurship

Establish a program for entrepreneurship through the Small Business Administration and Chamber of Commerce. Evaluate the Small Business Administration's capacity to sponsor a series of seminars in entrepreneurship training for women in conjunction with the national and local Chambers of Commerce. The program could concentrate on specific entrepreneurial training, or acquainting women with existing programs to benefit entrepreneurs. A teleconference format through BizNet would permit Presidential involvement.

The concerns of feminist organizations in economic equity center almost exclusively on employer-employee relationships. We can take the initiative to expand the focus of concern to include enterprises owned and managed by women.. (Continued emphasis by: Small Business Administration, Commerce.)

3. Equal Pay for Equal Work

Exemplary private sector efforts to reward employees in traditionally female occupations with forms of incentive pay or productivity/profit-sharing bonuses should be identified and advocated on the basis that competitiveness in an enterprise depends as much on clerical efficiency as on good management. (Continued emphasis by: Private Sector Initiatives and Labor.)

SURROGATE

1. Advertising

The Republican National Committee should sponsor a carefully tested series of television and radio spots to overcome the perception that the Administration and the Republican Party are not responsive to women. An offshoot of this program could include advertising to enlist aspiring women leaders to contact the RNC and join its candidate support programs for women seeking elected offices.

The White House should also encourage supportive associations, such as the Chamber, and outside entities such as Citizens for the Republic to sponsor their own public service or paid spots to promote the ways in which a growing, non-inflationary economy offers more opportunities to women.

In addition, key states should be targeted for statewide television and radio advertising during state sporting events geared toward male audiences to increase male voting turnout. Overcoming the gender gap consists every bit as much in encouraging additional male support as in outreach to women voters.

2. Candidates

Direct the RNC to recruit women candidates. The Republican Party should be charged with developing a high visibility outreach effort to recruit and train women candidates as quickly as possible. This effort should include campaign and candidate training seminars and institutional advertising to recruit women to run for state, local, and national offices.

If trends evident in 1982 persist, an increasing percentage of women will be elected to state and local office in 1984 even without this effort. However, a vigorous RNC program will provide a media platform to demonstrate that the Republican Party has not written off women and takes their leadership potential seriously.

If the National Organization for Women and other feminist organizations repeat their pattern of 1982, they will work against the election of Republican women. This program can provoke them into actions which can be used to demonstrate their partisan nature. By concentrating on fielding women in key states, the President can appear on behalf of these candidates as a women's supporter.

Utilizing the Republican Party for a major initiative to assist women leaders has the added benefit of providing credible Administration action without requiring Congressional sanction, thereby allowing the Administration to foster an effort which is clearly identified as its own.

3. Fifty-States Project (Change the name.)

Although the President has met previously with the governors' appointees for the Fifty-States Project, another meeting should be evaluated. It would emphasize the Administration's determination to see this project to a successful conclusion with any vestiges of legal or regulatory discrimination against women at the state level eradicated. In essence, the President would deliver a "get tough" message to the governors' representatives, reminding them that state rejection of the Equal Rights Amendment implies an obligation to see that women are treated equally under existing laws and regulations.

This action could be emphasized through Vice-Presidential events involving governors or state legislatures for those states which have an exemplary commitment to the project.
(The Vice President, Office of Public Liaison)

4. Legal Equity

There are two actions which can be taken to elevate the Administration's commitment to legal equity for women. To enhance the Fifty-States Project, the Attorney General could meet with state attorney generals to emphasize the results of the review of Federal regulations and legislation (now introduced by Senator Dole). The Attorney General would urge them to undertake similar reviews at the state level and modify laws and regulations that discriminate against women.

To add weight to the Administration's commitment at the Federal level -- and reinforce the Attorney General's advocacy with state attorney generals -- the review of Federal regulations and legislation should be elevated to the Office of the Vice President. The nominal reason for this can be the success of the Regulatory Relief Task Force and the experience the Vice President has in chairing working level groups of this type. Indirectly, the elevation of the review will convey the seriousness of the Administration's intent. Because the Vice President has advocated passage of the Equal Rights Amendment in the past, his leadership will be credible. Critics will interpret this as a new level of commitment in the Administration; supporters will see it as simply carrying through on our commitment. (Vice President, Justice)

5. Surrogate Support Program

In addition to Executive Branch senior officials, the Administration requires a special surrogate program with the primary purpose of conveying the Administration's record regarding equality for women and the benefits of the President's programs. A secondary purpose is to publicize the record of traditional feminist organizations and isolate them as partisan special interests.

Women appointees, women in business and in unions, leaders from women's groups, and supportive female celebrities and academic leaders would be provided with training and assistance in media communications. This speaker's bureau would provide insurance that opportunities to reach an audience would not be missed. Staff support for the surrogate operation would include RNC research efforts to enable them to make commanding appearances with the aid of up-to-date talking points, counterpoints, and opposition research into the anti-Reagan coalitions.

Special emphasis should be placed on bookings in media outlets used by women: daytime talk shows, radio interviews (the radio can be heard while a homemaker goes about the business of running the household or as a commuter travels), and publications such as "Ladies Home Journal," "Working Woman," "McCall's," "Redbook," and other sources of information for women.

Bookings can be arranged through White House Communications, agency public affairs operations, or public relations firms as appropriate. The surrogate program would require adequate staffing and, if it is to be fully effective, it should be viewed as a new initiative rather than a program which can be added to an office's existing responsibilities.

Direct Cabinet officials to identify programs which impact on women. Highlight aspects of these programs that promote and protect women's rights. Cabinet officials should also be directed to make the primary themes outlined in this document the focus of comments in regularly-scheduled forums, events, and interviews. This direction in turn should be given to sub-Cabinet officials. (Office of Communications)

6. Women World Leaders

Whether in the Caribbean Island of St. Lucia or Great Britain, more women are serving as world leaders. During the coming year, every attempt should be made to secure state visits by elected women heads of government. While the summits may be used for the transaction of normal affairs of state, they also indirectly demonstrate that the President considers women to be his equals.

This approach can also be made by Cabinet and sub-Cabinet officials on a unilateral basis. Such exchanges might be sponsored by U.S.I.A., and allow the Cabinet to demonstrate the equality between leaders regardless of sex. (The Vice President, Ambassador to the United Nations)

7. Defusing Barbara Honegger's Critique

Although the proposals outlined in this strategy were written prior to Barbara Honegger's public criticism of the Administration's commitment to women, recent events have not invalidated them. In fact, Honegger's critique only sharpens the necessity for an in-depth attempt to overcome the many facets of the gender gap.

However, Honegger can and should be tackled directly as part of the surrogate effort. White House Communications should book radio and television talk show forums and prepare speeches for a cadre of select senior women appointees. These women should articulate the broad policy concerns and accomplishments of the Administration in a variety of issue areas. Surrogates should avail themselves of opportunities to confront Honegger by participating in media opportunities where Honegger is booked to appear. However, Administration representatives should avoid taking the initiative in setting up situations that would encourage any additional coverage for Honegger.

For maximum effectiveness, the select group should be given training in public speaking and the electronic media interviews before the project commences. The effort could also be preceded by in-depth briefings by White House Communications' and Office of Policy Development's staffs on a range of key Administration accomplishments beyond their areas of immediate expertise.

These carefully selected individuals should plan to commit time each week to these activities and to strategy sessions. The group should be small but able to represent and discuss major issue areas to include Administration policy as well as positive Administration programs for women. (Similar groups should be considered for other major concerns.)

CREATED EVENTS

PRESIDENTIAL

1. Olympics

Jay Moorehead should be asked to arrange fund-raising opportunities for the 1984 Olympics in which the President can be seen with women athletes in contention for 1984. Presidential remarks could emphasize the increasing contributions of women in all walks of life. (Continued emphasis by Private Sector Initiatives.)

2. Supermarket Shoppers

This update of the 1980 campaign event will emphasize the benefits from reduced inflation. In 1980, the event was used to demonstrate the impact of record inflation. This time, the event will highlight one of our key successes -- and emphasize how much it has helped family budgets. (Continued emphasis by Agriculture and Health and Human Services.)

3. Women Coal Miners

Select a Presidential visit to a company which boasts women coal miners and a high commitment to reclamation following exhaustion of commercial deposits. Again, the President could be seen with women in non-traditional roles, as he commends the company for its high level of commitment to environmental quality. (Note: This requires a thorough examination of the company's practices.)

The approach could be employed in other areas to emphasize the need for a balance among growth, jobs, and conservation -- with women miners and technicians wherever possible. (Continued emphasis by Labor, EPA.)

SURROGATE/CREATED EVENTS

1. Central America Trips

With the surrogate program underway, U.S.I.A. exchanges and other opportunities should be utilized to send women surrogates to meetings with Central American civic, business, and political leaders, on inspection tours of camps of refugees who have fled Nicaragua's Sandinista regime, and to U.S. military assistance centers and advisors.

Someone such as El Salvador's Colonel Lopez Nuila, head of the national guard and a progressive, Spanish-trained lawyer typifies the leaders with whom surrogates should meet. Following their return to the United States, the surrogates should be scheduled for heavy media coverage. The groups, on return could also give testimony to the President's Commission on Central America. This is the Bianca Jagger strategy in reverse. (The Vice President and/or Ambassador to the United Nations with PAS women delegation, and/or Ambassador Armstrong with PAS delegation)

2. Crime

Surrogates such as the Attorney General or the Deputy Press Secretary should stress the Administration's judicial reform measures for their relevance to women. Wherever possible, the need to modify the exclusionary rule should be framed in terms of failure to convict obviously guilty rapists or sex offenders. The Administration's reform efforts should not be cast simply as also aiding women, but with crime's impact on women foremost in every appropriate forum. (Attorney General, former Chair of Commission)

3. Day Care

For married women, two-thirds of those who work say they do so out of economic necessity. For those who want children, often the choice is not whether to continue working after childbirth -- but when and with what type of child care arrangements.

Two types of day care centers could be visited: a neighborhood cooperative and a business or corporate-sponsored day care program. Because adequate child care is a dominant concern of working mothers, the President's interest in child care easily translates into an interest in the problems facing working women. (Mrs. Bush, Health and Human Services)

4. GI's

Accompanied by senior-ranked women in the Armed Forces, the President could visit enlisted women as they go through drill instruction in boot camp. Involvement in rigorous physical training or firearms practice would demonstrate non-traditional activities, and the senior-ranked women officers can expand on why they chose the military as a career (i.e., as women dedicated to keeping the peace for their country).

Note that this requires pre-selection of the officers.

A similar approach can be used for women in Officer Training or in flight class following completion of OCS. It should be noted that college graduation requirements often result in a different ethnic/economic strata mixture in OCS school than in enlisted training. This event should complement the event outlined above. (Defense)

5. Nursing Home

Although this is basically a repeat of the 1982 campaign event, the President could now meet and talk with older women in the context of a solution to the Social Security crisis. This is also an opportunity to highlight the Administration's attempts to contain health care costs and concerns over the imbalance in Medicare funding. (The First Lady)

6. Rhodes and Marshall Scholars

In the past, Rhodes scholarships were available only to men attending Cambridge or Oxford University. For the past decade, however, the foundation's trustees have voluntarily opened to women this opportunity. Rhodes scholars, who are chosen on the basis of academic merit and leadership abilities, are required to arrive in Great Britain in mid-September. (Note: need to check number of women participants.)

This event could be used to tie quality education and gender gap issues together. (The Vice President)

7. Sports

For many suburban mothers -- and young adult women -- one of the primary manifestations of sexism was in separate sports leagues for boys and girls. In junior soccer these bounds have been broken.

The President could visit a team or game in which boys and girls play together, noting that the qualities of teamwork learned on the playing field serve later in life in the boardroom or office.

This approach can be used in other sports -- rodeo, hockey, intercollegiate sports -- as the year progresses. See cautionary note above regarding emphasis on women's sports. (The Vice President)

8. Volunteerism

The Office of Private Sector Initiatives should be instructed to identify volunteer programs in social services which are heavily reliant on retired and older Americans for staff resources. In bridging generational and income lines, Presidential visits to volunteer programs which use older Americans can also become forums to discuss the Administration's resolution of the Social Security crisis and America's need to draw on the talents and resources of its elderly.

These events will also identify the President with the conditions of older Americans on fixed incomes in a positive environment, and enable him to offer a vision of a compassionate and self-reliant America dedicated not only to preserving benefits for the elderly but also making their communities -- and lives -- better by drawing on their resources and talents. (The First Lady, Private Sector Initiatives)

FIXED FORUMS

PRESIDENTIAL

Because efforts to identify appropriate conventions for Presidential addresses are already underway, there is no attempt to duplicate the list of potential events. However, if the RNC effort to recruit women candidates is undertaken, the seminars should be used as fixed forums for Presidential involvement. In addition, Presidential addresses should be carefully utilized. The following observations apply:

1. Candidate Seminars

The Republican National Committee's effort to recruit and train women candidates will provide opportunities for Presidential and surrogate involvement in seminars, forum meetings to acquaint the candidates with Administration accomplishments, and in the campaigns themselves.

The announcement of this effort could be preceded by a meeting between the President and Senator Laxalt, with Laxalt announcing that the President directed this effort.

Announcing the effort shortly following the reelection announcement should be evaluated. (RNC)

2. Major Addresses

A series of fixed forums should be identified where women are the audience or at least prominent in attendance for Presidential speeches. Interspersed between other Presidential events and addresses, these forums should be used for continued emphasis on the President's commitment to equality for women and the ways in which his agenda benefits all Americans -- and women in particular. It is critical that these speeches address substantive issues.

Consideration should also be given to a major speech in a state which has enacted community property rights.

SUMMARY OF PROVISIONS IN ECONOMIC EQUITY ACT
(HR 2090 and S888)

Title I - Tax and Retirement Matters

Sec. 101

Extend to married couples a maximum IRA tax deduction equal to twice the maximum deduction allowed individual earners.

Comment: 1981 ERTA permitted non-working spouse to set up own IRA. Because of revenue loss, do not favor expansion of the amount at this time.

Sec. 102

Alimony treated as compensation in determining income tax deduction for IRAs.

Comment: IRAs in principle based on earned income. Currently, taxable alimony is eligible for IRA savings account if the account has been extant for 5 years.

Sec. 103

Prohibit waiver of survivor benefits in ERISA plans unless spouse agrees.

Comment: Agree in principle.

Require ERISA plans to pay survivor benefits if participant dies after 10 years service.

Comment: Rejected by CCLP Working Group: (a) complicated to administer; (b) could be very costly, but hard to estimate; (c) could have adverse impact on women -- e.g., reduction of death benefits and incentive for defined contribution plan, employers to shift from annuities to lump sum.

Sections 104 and 105

Provide that pensions can be assigned by divorce courts.

Comment: Agree. Essentially a statutory codification of current practice.

Sec. 106

Lower required participation age for ERISA plans from age 25 to age 21.

Comment: Agree in principle. There are significant administrative problems the way the bill is written. But we are amenable to meeting the policy concern which underlies these sections.

Sec. 107

Counting years of service after age 21 for vesting under retirement plans.

Comment: Same as Sec. 106.

Sec. 108

Continuation of benefit accruals under retirement plans while the employee is on approved maternity or paternity leave.

Comment: Agree in principle, but as with Sections 106-107, believe the interest can be accommodated in a slightly different way.

Sec. 109

Entitle former civil service spouses who were married for at least 10 years the right to pro rata share of pension benefits.

Comment: Courts can now order civil service retirement benefits to be paid to ex-spouse; but court can't control disposition of survivor annuity. OPM opposes Sec. 109: heavy administrative cost; average monthly survivor's annuity is small in any event -- will there really be much benefit where two wives divide the pie?

Sec. 110

Displaced homemakers established as a targeted group for purposes of computing the Targeted Jobs Tax Credit.

Comment: They are eligible under Title III of the Jobs Training Partnership Act. Probably more effective than TJTC, but no opposition.

Sec. 111

Zero bracket amount for heads of households in determining income tax increased to amount to joint returns.

Comment: Revenue loss = \$1 billion+ by FY 84. Treasury opposes at this time.

Title II - Dependent Care Program

Sec. 201

Increase in the tax credit for expenses for household and dependent care services necessary for gainful employment.

Comment: 1981 ERTA increased with our support. Further increase not favored at this time -- (a) revenue loss; (b) at some point, you end up taxing at-home mothers to subsidize working mothers.

Sec. 202

Certain organizations providing dependent care included within the definition of tax-exempt organizations.

Comment: Treasury opposes enlarging tax exempt status criteria. Employers' payments to employees used for day care are deductible and exempt.

Sec. 203

Tax credit for household and dependent care services necessary for gainful employment made refundable.

Comment: CCEA approved.

Sec. 204

Establish \$8 million dollar grant-in-aid program for child care information and referral services.

Comment: We don't favor new categorical grant programs. Where services are needed, can now be funded under Social Services block grant.

Title III - Nondiscrimination in Insurance

Sections 301-311

Prohibit any sexual classifications in all forms of insurance.

Comment: Complicated issue. The understanding is not helped by calling it a "civil rights" issue. FACT: All but a small % of working women are already covered by non-discriminatory plans. FACT: Women generally benefit from gender classifications in insurance, especially auto and life. In short, the analogy to race is not appropriate. Issue is under review, but we do not want to injure women in the name of eliminating "discrimination".

Title IV - Regulatory Reform and Gender Neutrality

Sections 401 and 402

Review of federal statutes and regulations to eliminate all gender distinctions.

Comment: Already underway; being done on routine basis. Dole bill is the embodiment of our efforts.

Title V - Child Support Enforcement

Sections 501-502

Expands to non-AFDC cases the use of federal income tax refunds to collect past-due child support obligations.

Sec. 503

Requires each state to have a child support clearinghouse with records of past-due payments.

Sec. 504

Requires states to adopt various enforcement mechanisms and procedures.

Sec. 511

Mandates automatic wage withholding for child support obligations in the case of federal employees, subject to certain limitations.

Comment: The tack to take on Child Support Enforcement generally is simple: (1) Note that Ronald Reagan as Governor was the leader in getting the first really effective CSE program up and running. (2) We agree in principle that enhanced CSE measures are both cost-effective and socially beneficial. (3) We will therefore have our own legislative and administrative package.