

35. Federal Taxation

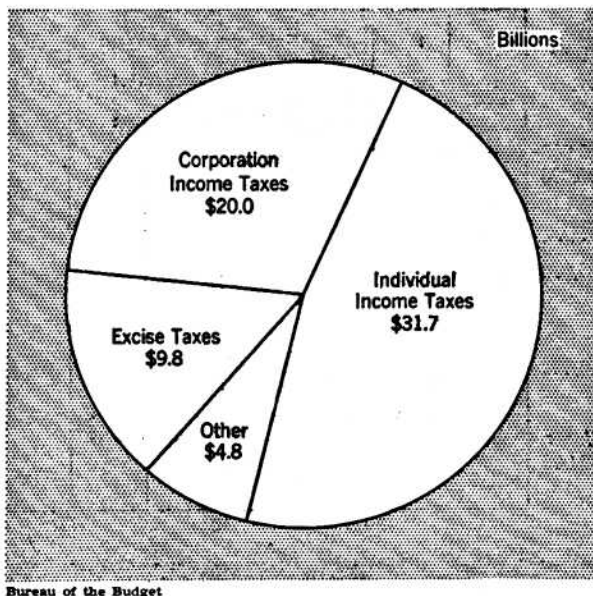


Photo by Abbie Rowe. Courtesy National Park Service

BY LEVYING taxes and by borrowing money the federal government obtains most of the funds necessary for the expenditures described in the preceding chapter. The federal government does have other sources of money, but in recent years these have dwindled to the point of being almost inconsequential. However, taxation and borrowing do not have the procuring of money as their sole function. Rather, both processes are cogs in the policy-framing machinery of the government; even where employed for the end of raising money, the form they take is shaped by considerations of a non-financial kind. This chapter is concerned with the different kinds of federal taxes; the relations between taxation and policy; the national debt; and the administration of federal moneys.

THE PATTERN OF FEDERAL TAXATION

In 1789 the federal government collected about four million dollars in taxes; in 1956 it collected almost seventy billions. Thus federal taxation



Bureau of the Budget

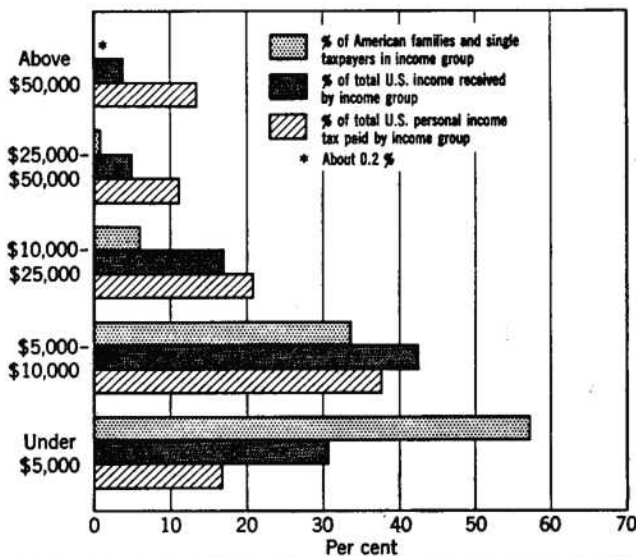
Figure 73. Major Sources of Federal Revenues (Fiscal 1957, Estimated).

today produces about seventeen thousand times as much money as it did in the first year of the American republic. This multiplication is not only a reflection of the vastly greater role of government in American life today; it is also a consequence of enormous changes in the pattern of taxation. Once-important sources of revenue have become almost trivial, whereas levies non-existent in 1789 have become the principal sources of revenue today. A comparison of the kinds and amount of revenues collected by the federal government is presented in Figure 73; the pattern has become fairly uniform in recent years. A discussion of each major type follows:

Income taxes

Income taxes are taxes that fall upon either the incomes of private individuals or upon the profits of business enterprise.

Individual Income Taxes: Individual income taxes today constitute the greatest source of revenue for the federal government; in 1956 they yielded over thirty-one billion dollars, or nearly half of the total. The income tax is what is known as a "progressive tax"; that is, it is levied at progressively, or proportionately, higher rates upon higher incomes. It is composed of a normal tax, which is a low percentage assessed on all taxable income, and a surtax, which incorporates the progressive feature of the tax. Normal tax and surtax combined rise from a minimum of twenty per cent on the first dollar of taxable income to a maximum of ninety-one per cent on taxable income over \$200,000. Certain portions of the total income are tax-exempt, according to the number of persons dependent upon the tax-



Based on "U.S. News & World Report," an independent weekly news magazine published at Washington. Copyright 1955, United States News Publishing Corporation, April 22, 1955, p. 20

Figure 74. Shares of American Income and of Personal Income Taxes of Different Income Groups, 1953.

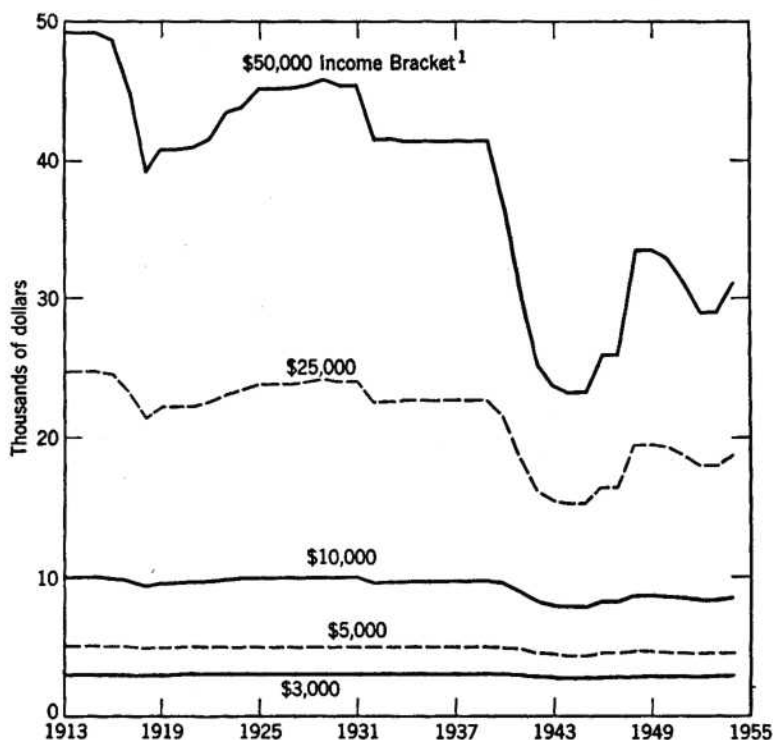
payer, the age of the taxpayer, the amount of the income that has been given to charity, the amount that has been consumed for medical care, and many other factors. Figure 74 compares entire classes of incomes of different levels and shows how numerous they are, how much of the total national income they furnish, and how much of the total tax collections they provide.

The progressive income tax enjoys excellent reputation among lower income groups in the population, since it is based upon the principle of the ability to pay; that is, it operates on the assumption that the higher the individual's income, the greater is his ability to pay taxes since it is taken for granted (although it is not a fact) that one person needs no more money than another to feed, clothe, and house himself. The income tax also has great fiscal practicality, since the amount of tax to be collected can be readily altered by simply changing the percentage of incidence. By such manipulation, for instance, collections were raised from less than one and a half billion dollars in 1941 to more than nineteen billions in 1945, a period during which total national income rose only about eighty per cent. The chart in Figure 75 shows how taxes on specific income levels have varied during the past forty years.

Individual income taxes must be paid annually, on or before April 15. The taxes are collected in two principal ways. People who receive regular salaries or incomes have a portion of their incomes deducted from their paychecks by their employers, to be turned over to the government. At the end of the year, then, such persons need pay only a small sum to make up the difference between what has been withheld from their checks and

what is owed the government; indeed, it often occurs that an excess has been withheld, so that the government must refund some money. The second type of collection applies to the persons who do not receive a regular salary or wage, but whose income is derived from some other source such as stock dividends. These persons must, sometime during the calendar year, file an estimate of their annual incomes and pay installments on their tax, as computed on their estimated incomes. Then, by the April deadline, they must submit a final statement of their incomes, paying if need be an additional tax on the difference between their estimated and their actual incomes. Again, they may receive a refund in the event they have over-estimated their incomes.

The tax on individual incomes today rests upon the Sixteenth Amendment to the Constitution, adopted in 1913. This Amendment was necessitated by the constitutional provision that "No capitation, or other direct, tax shall be laid, unless in proportion to the census or enumeration herein before directed to be taken" (Art. I, sec. 9, cl. 4). A direct tax has been defined in various ways; it is generally held to be a tax whose payment cannot be transmitted to another person, such as a poll tax or a real estate



¹Statutory net income, i.e., income less allowable deductions but before personal exemptions

Adapted from National Industrial Conference Board, Inc., "Road Maps of Industry," no. 984

Figure 75. Impact of Income Taxes on Different Income Levels, 1913-1953. The chart shows how many dollars are left to the taxpayer in five different income brackets after he pays his income tax. (It is calculated for a married couple with two children.)

tax. An indirect tax, by contrast, is a levy such as a sales tax that can be passed on to some other person. According to one school of thought, there is no such thing as a direct tax; that is, all taxes can by one means or another be passed on. For instance, the income tax of a corporation president may finally be paid by the purchaser of the commodity manufactured by the corporation.

Employment Taxes: Employment taxes are also levied upon individual incomes. However, the government does not pretend to use these assessments for current operating expenses. Rather, these taxes are imposed to finance the programs of old age and survivors insurance and of unemployment insurance. These taxes are collected from both employers and employees, as percentages of total payrolls and of individual wages and salaries. In 1956 they yielded more than \$6.2 billions. These taxes will be discussed at length in the chapter on social welfare.

Corporation Income Taxes: Corporation income taxes today rank second only to personal income taxes as a source of revenue; in 1956 they yielded \$18.3 billions. The corporation income tax is also progressive, although its incline is not so steep as that of the personal income tax; it rises to a maximum of fifty-two per cent. The corporation income tax has the same flexibility as the personal income tax; that is, its yield can be easily raised or lowered by an adjustment of its rates. Too, like the personal income tax it is based upon the principle of the ability to pay.

Unlike the personal income tax, however, the corporation income tax has been ruled an indirect tax. It was first levied in 1909, as a tax upon the carrying on of business, to be proportioned to the profits of each business organization. Since this tax was quite similar to the personal income tax that had been ruled unconstitutional in 1895, it was soon challenged in a federal court. However, the Supreme Court upheld the constitutionality of this tax; hence the tax is not based upon the Sixteenth Amendment.

Estate and gift taxes

The federal government imposes taxes upon both large estates and large gifts. An estate tax must be distinguished from an inheritance or legacy tax such as many States levy. An inheritance tax falls upon an heir, and is computed according to his share of an estate. An estate tax falls upon the estate of any deceased person, and is paid out of the estate. The gift tax is paid by the donor. Estate and gift taxes, like individual and corporation income taxes, are progressive. Estates of less than \$60,000, and gifts of less than \$3,000, are tax-exempt. Other exemptions also apply to estates and gifts; for instance, any gift to a non-profit corporation such as a university is tax-free. Outside these exemptions, taxes begin at a low rate, then rise to a maximum of more than sixty per cent on estates and fifty-five per cent on gifts. These two taxes produce far less revenue than income taxes, usually under one billion dollars together, of which the gift tax is only a small part. Like the corporation income tax, the estate tax was enacted before the adoption of the Sixteenth Amendment, was challenged,

was declared to be an indirect tax, and today is not founded upon the Sixteenth Amendment.

Excise taxes

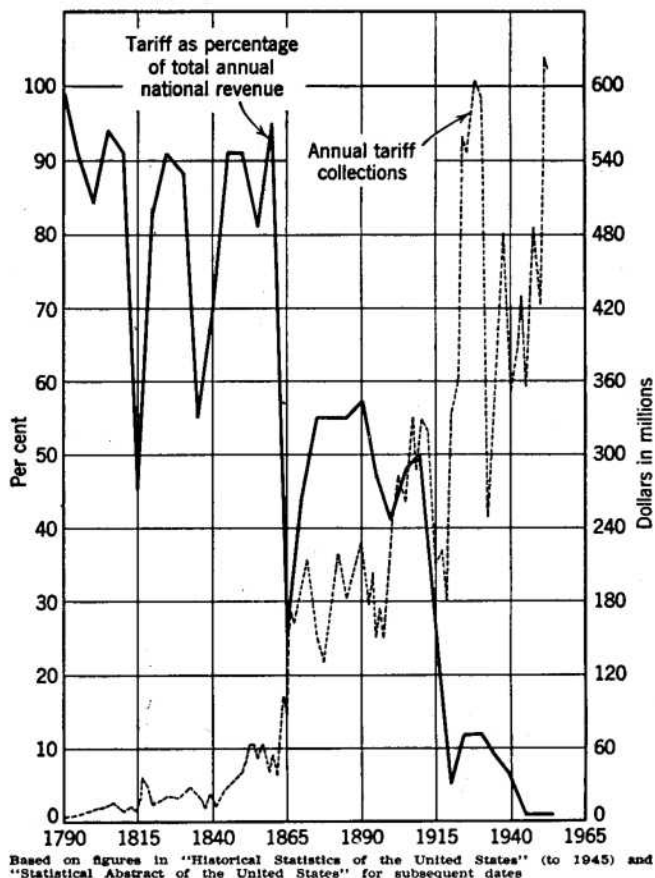
An excise tax is a tax upon a business transaction. Generally it is a sales tax that is levied upon specific items. However, the federal corporation income tax is an excise tax, levied upon the process of manufacturing. An excise tax is an indirect tax; it falls ultimately upon the consumer, for the tax is comprised in the purchase price of the item. It may be imposed either as a specific sum, in dollars and cents, or as a percentage of the retail or the manufacturer's price.

Excises fall into two broad classes: (1) retail excise taxes; and (2) manufacturers' excise taxes. Of the two, the manufacturers' tax is often regarded as unjust because of the mode of its collection; its critics hold that it works undue hardship on the consumer. The manufacturers' excise tax is a "hidden" tax. Levied at the factory, it is a tax that the manufacturer adds to his price.

Among federal excise taxes, which altogether raised \$9.1 billions in 1955, those upon alcoholic beverages and tobacco products are by far the most remunerative; for they bring in about half the total. In a sense these might be termed manufacturers' excises, since the producer must pay the tax originally. However, the tax appears in the form of a stamp bearing a specific monetary value, which must be affixed to the bottle or package. Consequently the consumer pays only the cost of the stamp, and is therefore only reimbursing the manufacturer for his tax charge. There are many taxes frankly termed manufacturers' excises, such as those upon automobile tires and tubes, phonograph records, firearms, electric light bulbs, mechanical refrigerators, and the like; they have lately returned over two billion dollars annually. There are a few so-called retailers' excises, imposed upon furs, jewelry, luggage, and toilet preparations, that yield about \$500 millions annually. Finally, there are a host of miscellaneous taxes, the most important of which are those on telephone and telegraph services, transportation, and entertainment; this group of taxes accounts for around \$2 billions each year.

The tariff

The tariff is a tax imposed upon goods imported into the United States from another country. The tariff is different from all other taxes hitherto described, for these other taxes fall into the category known as internal revenue. The tariff, by contrast, may be termed external revenue. The tariff is one of the oldest and most important taxes in history. For many years after 1789 it was the principal source of revenue for the American national government. The solid line in Figure 76 shows what percentage the tariff has been of total national revenue throughout American history. It can be seen that for most of the time until the Civil War the tariff yielded well over eighty per cent of all national government income; the



Based on figures in "Historical Statistics of the United States" (to 1945) and "Statistical Abstract of the United States" for subsequent dates

Figure 76. Annual Tariff Collections and Tariffs as a Percentage of Total National Revenues, 1790-1955.

decline in 1815 was occasioned by the War of 1812, and that about 1840 by the exceptional income from the sale of government lands. From the time of the Civil War until the First World War, the tariff still produced about half the entire national revenue; the extreme slump in 1865 was the consequence of the Civil War personal income tax.

With the First World War, and the realization of the potentialities of the personal and the corporation income tax, the tariff became a minor factor in the tax program. Yet today it provides more than \$600 millions, whereas in 1789 it returned only \$4 millions, as can be seen from the broken line in the same figure. The tariff is a very uncertain source of revenue. It is designed not only to gather funds for the government but also to regulate commerce. Like excises, it may be expressed either as a stipulated sum or as a percentage *ad valorem* (to the value of the thing taxed). In either case, if it is too low, it may displease those who seek its protection; if it is too high, it may yield no funds. The other functions of the tariff will be described in the following section of this chapter and in succeeding chapters.

TAXES AND GOVERNMENT POLICY

Taxes, as stated at the outset of this chapter, are closely associated with government policy. They not only provide the revenues for the conduct of government; they are also involved in the government regulation of money and in government management of society.

Taxes and the regulation of money

Taxes today play an important part in the governmental regulation of money. When, in 1789, all federal taxes totaled less than one per cent of the national income, federal taxation was not very influential upon money. Today, however, when the federal government collects one-fourth of the national income in taxes, these levies can have a profound effect upon money. The chief impact is upon the supply of money, or, in other terms, upon how much money is available to the public. During the Second World War, for example, many persons urged that taxes be kept high so that there would be less money in circulation, in order that inflation be restrained; some suggested that taxes be kept high in the postwar era for the same reason.

Taxes and the promotion of business

Apart from the expansion and contraction of the supply of money, numerous taxes and tax rates promote (or discourage) business enterprise. The tariff provides an important example of this feature of taxation. The operation of the tariff is simple: it promotes domestic industry that is selling its products to the domestic market by hampering foreign competition for that market. Also, the Constitution bans State tariffs (Art. I, sec. 10, cl. 2); States during the Confederation era had carried on trade wars through mutually prohibitive duties. This prohibition was designed to make the United States a free-trade area. The benefits of this principle are immediately visible to any observer; yet some States have found other devices for impeding interstate competition.

Taxes as compulsory mechanisms

Federal taxes may be imposed in order to compel persons or organizations to perform tasks demanded by federal policy. For instance, the federal government levies a tax upon payrolls, promising the employer a ninety per cent refund provided that the State in which the employer is situated enacts an unemployment insurance law satisfactory to federal authorities. Perhaps the outstanding case is the ten per cent tax that the federal government assesses on State bank notes, so as to bar their emission. This tax, incidentally, is a classic example of a tax which, if it returns any revenues, is a failure; it was created to drive these bank notes entirely out of existence.

Taxes as measures for social control

Today many taxes are instituted wholly or in part for the end of social control. For example, the personal income tax and the estate tax have been

employed to equalize incomes somewhat, both because they fall more heavily upon upper-income groups and because their proceeds have been frequently applied to increasing the wealth of lower income groups through such programs as subsidies to farmers. It is asserted in many circles that present income tax levels make it impossible for individuals to invest their money in numerous fields, with the result that the government will have to undertake these once-private functions. Certainly the revenues from personal income taxes do empower the government to extend many forms of assistance to lower-income groups.

Federal taxation may express social policy also through imposing restrictions upon purchases; in this respect it can mirror economic pressures. For many years the federal government assessed a ten-cent tax on a pound of colored oleomargarine, and a one-half cent tax upon a pound of the uncolored product. Senators and Representatives from butter-producing States such as New York and Wisconsin introduced this legislation and blocked its repeal. Eventually, however, congressmen from soybean producing States (soybean oil being a prime element of oleomargarine) joined with congressmen from the less prosperous urban districts to overthrow this law on the ground that it was unfair to consumers. Also, through restricting purchases on other things, taxes may be used as deterrents to crime. For instance, the federal government today levies a per capita tax upon every employee of a gambling establishment, and it has placed a heavy sales tax on the transfer of sawed-off shotguns. These two taxes, like the tax on State bank notes, may be viewed as comparative failures if they yield a large revenue. One could cite other taxes whose incidence or whose very nature is more closely related to policy than to revenue.

Intergovernmental tax conflicts

Important political conflicts arise from the fact that the federal government and the State and local governments may impose taxes upon the same object or function. To many people the most irritating phase of this conflict emerges from the fact that more than half of the State governments today levy personal income taxes; in fact, there are even some cities, such as St. Louis, that impose taxes upon personal incomes earned in the city. Since the State of Missouri also collects a personal income tax, the individual employed in St. Louis is liable to a triple tax upon his earnings. There are many items that are subject to at least double taxation; for instance, both the federal government and the State governments tax each gallon of gasoline sold to motorists. The consequence is that one government level may vie with another in collecting taxes from an object or an operation. Federal taxes, of course, take priority over any other taxes. In return, the federal government has extended certain exemptions to relieve the burden of double taxation. For instance, the federal government allows an individual to claim a deduction for any State income tax he has paid. However, it should be pointed out, this is not the same as permitting the individual to deduct his State income tax payment from his federal income tax payment.

A number of solutions have been proposed for these overlapping tax assessments. One of the most popular has been that the national government agree with the States that each level may tax only certain objects or operations. Following this notion, only the federal government might tax personal incomes, and only the State governments might tax gasoline. Another proposal, one that is repugnant to all adherents of State sovereignty, is that the national government collect all taxes, then apportion shares among the State governments. To a limited extent this practice is already being followed, in the form of federal grants-in-aid to State and local governments. Actually, since the national government feels pinched for revenues, and since the States yet claim that they are sovereign, the current pattern of overlapping taxation is likely to continue.

NON-TAX REVENUE SOURCES

The federal government has certain other sources of revenue that are not associated with taxation. Revenue, it may be noted here, is a source of money income for the government that does not add to the debt of the government; hence the money that the government obtains through loans does not constitute revenue. The non-tax revenue sources of the federal government are not nearly so important as those of the State and local governments; their nature shows that they are much more significant in the field of policy than in that of revenue. For instance, the federal government receives some money from the lease or sale of land that it owns—land which, if not privately exploited, might remain unused, but which, when exploited, adds to the national wealth and also returns tax dividends to the national government. Federal authorities also assess fees for licenses, such as the charters of incorporation granted to national banks, from copyrights, and from patents—all stimuli to business. Besides, the federal government receives court fines for the violation of federal laws. Too, it acquires whatever profits accrue to the various service organizations it maintains, such as the Post Office (which rarely shows a profit), the Tennessee Valley Authority, and comparable bodies. These non-tax sources and others furnish the government with well over \$1 billion annually.

THE NATIONAL DEBT

The national debt has arisen from the fact that the national government has had to borrow money. It has had to borrow money because it has not received sufficient revenues from taxes and non-tax sources to pay the obligations resulting from its expenditures. Taxes are among the oldest governmental phenomena on earth; so too are debts created by loans extended to rulers as individuals, in eras when state finance was identical with the king's money box. However, a national debt, incumbent upon an entire citizenry, is a comparatively modern concept. Whatever the function of the national debt is, whatever may be its role in political and economic affairs, its character in the public eye of the United States is tinged by

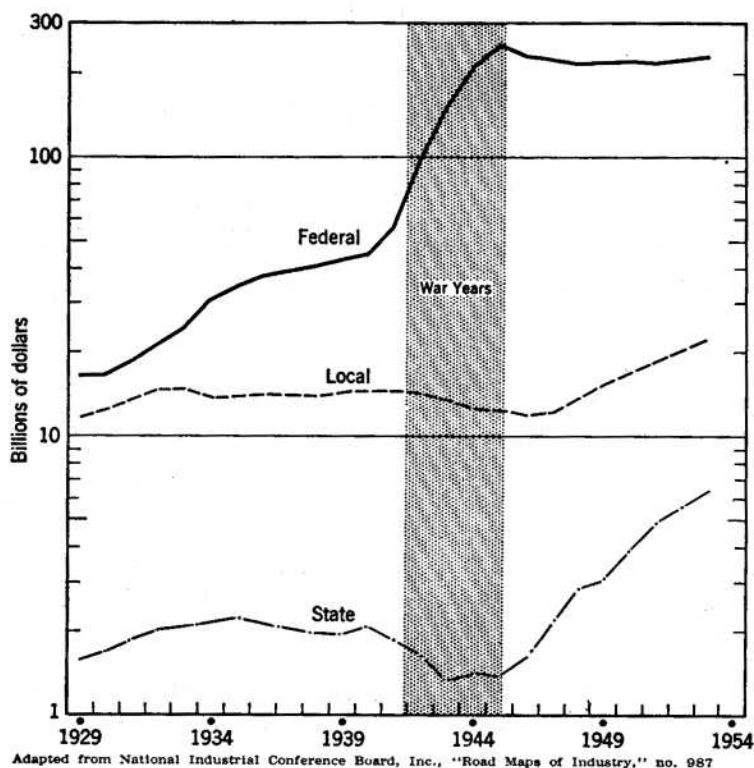


Figure 77. Trend of Federal, State, and Local Government Debt, 1929-1953.

centuries of conscious and unconscious rearing in a Puritan creed that rejects personal debt, and echoes Polonius' words: "Neither a borrower nor a lender be. . . ."

Evolution of the national debt

The national debt today amounts to about \$275 billions; see the chart in Figure 77, which also shows the increment of State and local debts. The national debt is almost entirely the consequence of wars. The new government in 1789 inherited a public debt of about \$75 millions from the Revolutionary War. This debt had been somewhat reduced when the nation entered the War of 1812. After that war, thanks to high tariff collections the debt was lowered to virtual nothingness by 1835. Thereafter, the depression of 1837, the sudden loss of revenues from the sale of the public lands that resulted from Andrew Jackson's hard credit policies, and the war with Mexico, created a new debt. Before the onset of the Civil War this debt had again been reduced to less than it had been in 1789; however, with the Civil War the debt vaulted to more than \$2 billions. Once more it was lowered, attaining a figure of less than \$1 billion by 1892, and being stabilized afterward at slightly more than this sum. With World War I it quickly rose to upwards of \$25 billions. By 1930 this debt

had been reduced to \$16.1 billions; and critics of the government in the 1920's contend that the debt could have been reduced even more had taxes been kept high.

With the beginning of the depression in 1929, and the determination of the government to assist the needy, the debt began once more to rise, reaching \$40 billions in 1939. Commencing with this year the government began to arm itself preparatory to entering World War II; military costs soon surpassed the charges of domestic relief. After the United States declared war upon Japan, Germany, and Italy, the debt rose by leaps and bounds, reaching \$269 billions in 1946. Thereafter it was somewhat reduced, chiefly through the manipulation of government cash reserves. However, the decision of the government to arm itself against possible attack by the Soviet Union, and the outbreak of war in Korea, elevated the public debt to its present status.

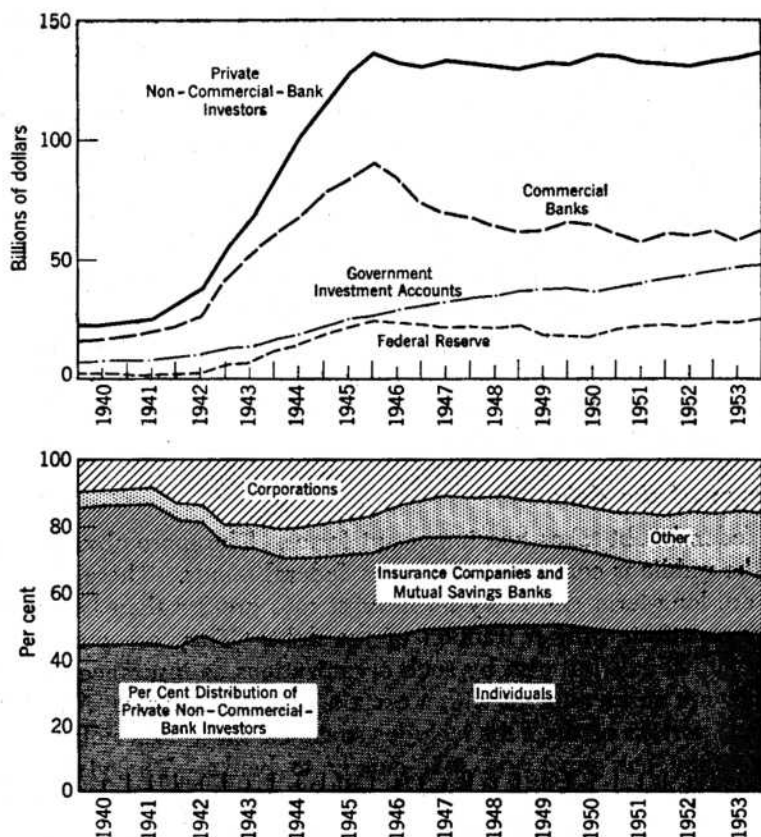
The form of the debt

The federal debt takes two important forms. The more obvious form so far as the public is concerned comprises federal bonds. These debentures, which are long-term and carry an interest rate greater than two per cent, actually constitute only a fraction of the debt. They are purchased not only by individuals but also by such organizations as insurance companies, since they are an investment with a certain, if small, income. Another very significant portion of the debt includes so-called short-term notes, valid for no more than one year, and sold chiefly to banks. The yield of these short-term notes is about two per cent. Most federal loans, whether as bonds or short-term paper, are sold through the Federal Reserve Banks. Savings bonds are a notable exception; they are sold by the United States Savings Bonds Division of the Treasury Department. The graph in Figure 78 shows who owns the federal debt.

The functions of the debt

The federal debt has several important functions. The most evident of these functions is to provide money for carrying on government operations, when this revenue is not available from taxes and other sources of income. This function of the debt is particularly important in modern wars, especially at their outset. Not only would it be almost impossible to finance a war entirely from taxes, but also a high tax rate at the beginning of a war might so discourage businessmen that they would not expand their industries sufficiently to cope with the added demands of the armed forces.

It might be argued that, as it stands, the federal debt affords a stabilizing or even depressing influence upon business development; however, businessmen today have more or less accepted the existence of this debt, and tend to disregard it in their calculations. The debt, particularly during wartime, may be used to soak up inflationary public buying power; that is, people may be urged, or even compelled, to buy bonds. It is noteworthy that with respect to inflation a bond sold to a private individual has an effect



Adapted from National Industrial Conference Board, Inc., "Road Maps of Industry," no. 962

Figure 78. Ownership of the National Debt, 1940-1953.

the reverse of a bond sold to a bank. A bond sold to an individual is deflationary, since it takes a specific sum away from the individual. A bond sold to a bank is inflationary, since the bank may use the bond as the foundation for credit that it may extend. It is for this reason that during a war the government is especially interested in selling bonds to private citizens.

The federal debt in the form of interest-paying bonds provides many persons and institutions with an investment; of course, the interest payments in a way amount to a transfer of funds from one pocket to another, since they can be paid only through collecting taxes. The greatest investor is the Social Security Administration, for federal law requires that all money taken for old age and survivors insurance be used to purchase federal bonds. Hence the SSA owns about \$20 billions worth of federal debentures. Finally, the public debt is a convenient weapon for those interests that seek to limit government activities favoring other interests; they can point to the debt, then invoke the horrid specter of national bankruptcy, to win a certain degree of backing from otherwise disinterested persons.

Servicing the national debt

Servicing the national debt refers simply to paying interest on the national debt. At one time the rate of interest was comparatively high, exceeding four per cent; today, however, the interest rate is little more than two per cent. At one time, the interest on the national debt concerned few persons other than those who owned federal bonds. Today, however, the federal government is the greatest debtor in the country and perhaps in the world. Hence the interest on the federal debt, and the way it is handled, have a profound influence upon the entire national economy. In effect, the rate of interest that the federal government pays determines, or at least modifies, the rate of interest paid by private concerns. By paying a low rate of interest, the government may promote low interest rates in banking circles, thus making money inexpensive to borrow and stimulating inflation. By raising its interest rates, the government may curtail, or at least strive to curtail, inflation. For many years government interest rates have been so low that the national economy has existed in a state of continuous inflation.

REVENUE AND DEBT ADMINISTRATION

Both national revenue and the national debt are administered by the Department of the Treasury, which on January 1, 1956 had 78,318 employees. This Department was one of the first created by Congress in 1789, and its Secretary ranks second only to the Secretary of State in terms of protocol. There is, however, one major finance officer in the Executive Office of the President: the Director of the Budget. The Secretary of the Treasury, then, has an important competitor for the ear of the President in drafting the budget. Whether the Director of the Budget or the Secretary of the Treasury will prevail in working upon the President is apt to be determined by the personalities of the individuals concerned.

There are two principal collection agencies for the Treasury Department: the Bureau of Internal Revenue and the Bureau of Customs. Of the two, the Bureau of Internal Revenue is by far the more important since, as seen above, it gathers many times as much money as the Bureau of Customs. There are sixty-four Bureau of Internal Revenue districts; none is greater than a single State, except that of Washington State, which includes Alaska; Florida, which includes the Canal Zone; Maryland, including the District of Columbia; and the Lower Manhattan (New York City) district, including Puerto Rico. The Bureau of Customs possesses forty-six offices situated chiefly on the Atlantic, Pacific, and Gulf coasts, and on the Canadian and Mexican land frontiers. There are, however, Bureau of Customs offices in such interior cities as Pittsburgh, Indianapolis, Denver, and Memphis, inasmuch as goods may be transported inland under seal to their final destination.

There are several other important services attached to the Department, which can trace their beginnings to the enforcement of tariff collections,

but which today have vastly wider roles. For example, the Coast Guard was designed initially to prevent smuggling; today, however, it comprises a sizable adjunct to the Navy. In fact, during the Second World War it was transferred to the jurisdiction of the Navy Department; however, after the war it was restored to Treasury. The Department also houses the Bureau of Printing and Engraving, which produces federal paper money. Too, it contains the Bureau of the Mint, which coins federal metallic money. The Savings Bonds Division was noted above. One other important division is the United States Secret Service, a force that was originally created for the suppression of counterfeiting, and that now also supplies the police guard around the President.

QUESTIONS AND PROBLEMS

1. List the six major sources of federal revenue and state the total of each in fiscal 1956.
2. Describe the history of the national personal income tax. Has the tax become more or less progressive since 1932; since 1949?
3. Distinguish between an estate and an inheritance or legacy tax. What are two taxes the revenues from which are not used for general expenditures?
4. Distinguish between a direct and an indirect tax; give an example of each.
5. Would you say that both *revenue* and *policy* have been motives behind the following taxes: the tariff; the tax on State bank notes; the gambling tax; the progressive income tax; the corporation income tax? Explain your answer.
6. How in general are taxes on individuals related to inflation?
7. In what ways do federal and State tax policies conflict?
8. What groups own government bonds? What is the total indebtedness of the national government today as compared with its indebtedness in 1940?
9. What are some of the major activities of the Department of the Treasury?