

**United States Senate**  
WASHINGTON, DC 20510-2204

April 10, 2002

The Honorable Alan Greenspan  
Chairman  
Board of Governors of the Federal Reserve System  
Constitution Avenue and 20th Street  
Washington, D.C. 20551

Dear Chairman Greenspan:

I have enclosed a letter from the Newaygo County Office of the State of Michigan Family Independence Agency (FIA). This agency is responsible for various programs, including Adult Protective Services. In that context, the agency is charged with preventing the abuse and exploitation of adults, which notably includes protecting such adults from the abuse and exploitation of their financial resources.

As indicated in the enclosed letter, the FIA is questioning the information sharing restrictions that may exist between financial institutions and social service agencies due in part to the Gramm-Leach-Bliley Act and its implementing regulations. While it is clear that 15 USC 6802 provides some exceptions to disclosure restrictions on nonpublic personal information obtained by financial institutions, the legal opinion attached to the FIA correspondence (and enclosed here) provides an interpretation that financial institutions disclosing such information or entering into formal agreements to share such information with agencies such as the FIA would be subject to liabilities under Section 502 of the Act.

I would appreciate your thorough review of the issues raised in the enclosed materials and any guidance that could be provided. I have sent this request to each of the agencies having policy and regulatory jurisdiction over this section of the Gramm-Leach-Bliley Act. Thank you for your assistance in this matter and I look forward to your reply.\_

Sincerely

A handwritten signature in black ink, appearing to read "Debbie Stabenow". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Debbie Stabenow

United States Senator