

cetera. Such questions as appear on this form we have examined and approved.

Another important area in which a question of invasion of privacy may be raised is that of research in the field of personality and mental health, best illustrated by the research projects of the Public Health Service. In this area questions of a personal or intimate nature often are involved, but participation is entirely voluntary, and it has been our view that the issue of invasion of privacy does not arise.

These studies, whether carried out directly by Government researchers or through contracts with non-Government research organizations, are evaluated on their merits. We satisfy ourselves that the proposed tests or questions are appropriate in relation to the objectives of the study. If the use of a well-established, standardized test is proposed, we do not attempt to amend it, but only to appraise the appropriateness of its use as a whole in terms of its known attributes and their relationship to the study in question. In making judgments of this sort, we consult experts both within and outside the Government.

In addition to employment application procedures and psychological research projects, there remains a miscellaneous variety of general statistical or administrative reports with respect to which the issue of privacy may arise—census forms, applications for privileges or benefits, surveys of participants in Federal programs, and the like. Here again, we evaluate each case on its merits.

We were also asked to be responsive to the question of what are some examples of how we have amended or disapproved questions which have involved the issue of privacy.

Let me repeat in this connection that such examples as I can cite illustrate not actions in terms of the simple issue of invasion of privacy, but judgments as to appropriateness and technical adequacy.

Item 1: We received a proposal to administer a well-known standardized personality test to 6- to 12-year-olds in connection with a health examination survey. We questioned the appropriateness of this particular test for children as young as 6 years. Consultation with psychologists confirmed the view that the test, however valid for other purposes, was not appropriate in this case, and it was disapproved.

Item 2: In a recent review of a group of naturalization and visa application forms we questioned the propriety of requiring a report of all cases of "offenses" against the law regardless of whether they had resulted in arrest or conviction. We were able to work out with the Immigration and Naturalization Service some modification of the original language, but the INS demonstrated that they were governed by the requirements of their statute and that little could be done amendment to existing law.

Item 3: About 15 years ago we worked with the Civil Service Commission in revising Standard Form 57 to make certain questions on personal conduct more realistic, less burdensome, and less likely to evoke false answers—as in the case of the question requiring a listing of all traffic violations regardless of seriousness.

Item 4: We have recently reviewed the application form for counselors to disadvantaged youth under the CAUSE II program of BES. This questionnaire was designed to obtain information on the socio-economic background of the applicant and his ability to understand