

“The Twilight Zone”

Congressionally Chartered Organizations

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Governments worldwide have established a variety of corporations, instrumentalities, quasi-official agencies, quangos, and other “hybrid” entities. This paper explores congressionally chartered organizations (CCOs) in the United States. First, it seeks to explain why CCOs exist and why Congress establishes them. Next, it reviews the cases of some specific organizations to illustrate the complexities of these anomalous entities. It concludes with a discussion of how CCO publications are treated in the Federal Depository Library Program (FDLP) and how laws that promote public access may not be applicable to CCOs.

Congressionally chartered organization is the umbrella term used to describe organizations or corporations that have been granted charters by Congress through the enactment of public laws. A congressional charter is the founding legislation that establishes a for-profit or nonprofit corporation. The Congressional Research Service (CRS) offered this definition: “A congressional or federal charter is a federal statute that establishes a corporation.”¹ Generally, charters are granted to organizations whose missions promote a public purpose that attracts private funding. As the Government Accountability Office (GAO) explained, “CCOs have been described as being perceived to be better suited than typical government agencies to handle certain issues and deliver services by partnering activities with non-federal entities to produce public value greater than what the federal government can accomplish alone.”² The United States chartered its first corporation in 1791 when Congress granted a charter to the Bank of the United States. In the early years of the republic, most congressional charters were granted in the District of Columbia, over which Congress has administrative power. Many of the early CCOs were banks or transportation companies that operated roads, bridges, or ferries, especially in the DC area. Subsequently, several interstate bridge companies and railroads were given charters.

A charter typically lists the organization’s name, purpose, duration of existence (if applicable), governance structure, operational powers, and federal oversight. Charters can be granted indefinitely or for a defined period. For instance, the charter of the Grand Army of the Republic (consisting of the Union veterans of the US Civil War) stated that it would terminate when the last member died. The Resolution Trust Corporation and the Pennsylvania Avenue Development Corporation were created by Congress for specific purposes and were phased out when their goals had been achieved. While Congress can also revoke an organization’s charter, as of this writing, it has never done so.³

According to CRS, “since 1989 the House Judiciary Committee’s subcommittee of jurisdiction has placed a moratorium on the chartering of additional nonprofit corporate organizations. This moratorium has been reaffirmed at the beginning of each new Congress.”⁴ However, Congress has since granted charters to a few organizations, such as the Military Officers Association of America. Efforts to designate new CCOs continue. For instance, the National Fab Lab Network Act of 2021 was introduced to establish a new nonprofit corporation that would create a national network of digital fabrication laboratories for workforce development.⁵ Also in 2021, Rep. Nicole Malliotakis, R-NY, introduced a bill to grant a federal charter to the National Lighthouse Museum.⁶ Many other bills have proposed new CCOs, but like these two bills, they have not advanced.

Researchers have identified several reasons for the continued existence of CCOs. Political scientist Harold Seidman viewed the proliferation of autonomous agencies, including government-sponsored enterprises, as a way for the government to exempt certain programs from the management controls imposed on traditional agencies and to exclude large sums of money from the federal budget. He observed that there was no

consistent pattern or logic in the creation of these programs, and if traditional tests of government enterprise were applied to them, many would be considered agencies subject to the same controls as the main cabinet-level agencies. Seidman also stated that CCOs exhibit an array of management structures, with some being completely independent from the government, while others have boards appointed by the president or consisting in part or in whole of federal administrators.⁷ Seidman and Rober S. Gilmour later characterized this ambiguity as the “twilight zone between the public and private sectors.”⁸

Law professor A. Michael Froomkin outlined four reasons why the government establishes government corporations:

1. Efficiency: the belief that a non-government entity can perform functions more efficiently than a government agency.
2. Political insulation: a government corporation needs to be shielded from interference by a cabinet-level agency.
3. Subsidy: a government corporation establishes a captive agency to provide subsidies to a constituency.
4. Subterfuge: activities are conducted “off-budget” and are therefore not subject to scrutiny in the budget process.⁹

The next section outlines the different types of CCOs and their purposes.

Types of CCOs

Both GAO and CRS have created different typologies of CCOs to help members of Congress understand the nature and characteristics of these organizations. These typologies are combined below to provide an overview of the incredible variety of CCOs and the ways in which they are related to the federal government.

GCCA Corporations

Entities listed in 31 U.S.C. Chapter 91, which is commonly referred to as the Government Corporation Control Act (GCCA) of 1945, are defined as government corporations. They include fourteen wholly owned government corporations and five mixed-ownership government corporations. Examples include the Overseas Private Investment Corporation and the Tennessee Valley Authority. The boards of directors of these entities are appointed by the president or other executive branch officials. GCCA requires wholly owned government corporations to submit a budget to the president each year and these budgets are included in the proposed budget of the US government.¹⁰ They are considered agencies and are subject to all laws that govern agencies (this is not the case with most CCOs).¹¹

Non-GCCA Corporations

Four government corporations are subject to the GCCA provisions but are not listed in 31 U.S.C. Chapter 91: the African Development Foundation, the Inter-American Foundation, the Presidio Trust, and the Valles Caldera Trust. The African Development Foundation “invests directly in African grass-roots enterprises and social entrepreneurs.” Similarly, the Inter-American Fund “invests in community-led development across Latin America and the Caribbean.” The Valles Caldera Trust was created in 2000 to preserve and protect the 89,000-acre Baca Ranch inside a volcanic caldera in New Mexico’s Jemez Mountains.¹² The Presidio Trust Act (Public Law 104-333) established the Presidio Trust as a wholly owned government corporation. The trust manages leases and directs the renovation and environmental restoration of the former military properties at the Presidio in San Francisco. It can borrow funds from the US Treasury and may make loans to tenants who make capital improvements.¹³

Title 36 Corporations

Title 36 corporations are organizations that have been established and chartered by Congress to serve patriotic, charitable, historical, or educational purposes under Title 36 of the US Code. Generally, these organizations are established under state laws and then make a request to Congress to grant them a federal charter. The inaugural version of Title 36, issued in 1926, listed eight nonprofit chartered organizations. From the beginning, Title 36 did not list all organizations that had been granted charters, nor has it ever contained a comprehensive list of them.¹⁴ These so-called Title 36 corporations are now listed in Subtitle II, “Patriotic and National Organizations.” They can be roughly categorized as follows:

- Federal-government-affiliated organizations, such as the National Film Preservation Foundation
- Youth-oriented organizations, e.g., Big Brothers-Big Sisters of America
- National historical associations such as the United States Capitol Historical Society
- Charitable and benevolent societies, e.g., the Grand Lodge of the Independent Order of Odd Fellows of the District of Columbia
- Educational institutions, including George Washington University, Howard University, Southeastern University, and Gallaudet University
- Veterans and patriotic societies such as the National Society of US Daughters of 1812

- Professional associations such as the American Historical Association

According to CRS, organizations seek Title 36 status due to its perceived prestige and implied official imprimatur. CRS also noted,

In effect, the federal chartering process is honorific in character. This honorific character may be misleading to the public, however, when such organizations feature statements or display logos that they are “chartered by Congress,” thus implying a direct relationship to the federal government that does not, in fact, exist. In addition, there may be an implication that Congress approves of the organizations and is somehow overseeing [their] activities, which is not the case.¹⁵

Adjunct Organizations

Another category of CCO is adjunct organizations that are under the control of an executive branch agency. According to CRS,

Over the years, departments and agencies have found it useful and advantageous to ask Congress to create, or authorize a department to create, nonprofit organizations to perform functions that the department itself finds difficult to integrate into its regular policy and financial processes. This is true, for example, when a department or agency receives gifts of real property and monetary gifts.¹⁶

For example, the National Park Foundation accepts funds to support the National Park Service. Another example is the Securities Investor Protection Corporation of the Securities and Exchange Commission, which is explicitly not a government agency, yet its board of directors consists of government appointees.¹⁷

Another type of adjunct organization is agricultural marketing boards, also known as “check-off programs” because agricultural producers indicate through a check mark that they wish to participate. The earliest such board was established by the Agricultural Marketing Service in 1954 but most date to the 1980s and 1990s. There are currently seventeen agricultural marketing boards.¹⁸

Several adjunct organizations serve the armed services or veterans. These include the Henry M. Jackson Foundation for the Advancement of Military Medicine, established in

1983, which partners with other organizations to fund health-care research. The Department of Veterans Affairs (VA) has a network of “nonprofit research and education corporations” attached to its medical centers. In 2019, there were eighty-one such corporations.¹⁹

Government-Sponsored Enterprises

According to GAO, “Government-sponsored enterprises (GSEs) are federally chartered but established to be privately owned and operated financial institutions that are authorized to make loans or loan guarantees for limited purposes.”²⁰ There are five GSEs at present:

1. Federal National Mortgage Association (Fannie Mae)
2. Federal Home Loan Mortgage Corporation (Freddie Mac)
3. Federal Agricultural Mortgage Corporation (Farmer Mac)
4. Federal Home Loan Bank System (twelve banks)
5. Farm Credit System

GSEs were designed to serve an area of debt financing that would otherwise not be economically feasible. Although all have different charters and ownership structures, they share four characteristics: “(1) private sector ownership, (2) limited competition, (3) activities limited by congressional charter, and (4) chartered privileges that create an inferred federal guarantee of obligations.” GSEs have been characterized as quasi-governmental organizations and are considered instrumentalities of the government but are not agencies. Instrumentalities are private organizations not bound by the administrative regulations applicable to agencies, but they are subject to whatever limitations are stated in their charters.²¹ Critics have expressed concern about the financial condition of GSEs, leading Congress to consider additional regulations to increase oversight. In 2008, Fannie Mae and Freddie Mac were placed in government conservatorship and were subsequently infused with billions in government funds. This was not the first time that GSEs developed problems, either. Fannie Mae and Freddie Mac both were found to have accounting irregularities in the mid-2000s and the Farm Credit System had to be bailed out in 1988.²²

Quasi-Official Agencies

The 2021 edition of the *United States Government Manual* (USGM) lists five “quasi-official agencies”: the State Justice Institute, the Smithsonian Institution, the United States Holocaust Memorial Museum, the United States Institute of Peace, and the Legal Services Corporation (LSC). In previous editions, the Corporation for Public Broadcasting, the National

Trust for Historic Preservation in the United States, Amtrak, the National Consumer Cooperative Bank, and the National Academy of Sciences were listed in this category. In general, the quasi-official agencies are not executive agencies as defined by law but are required to publish information on their programs and activities in the *Federal Register*.²³

Commercial Corporations

Congress has occasionally established commercial corporations to handle matters in which the federal government has an interest. The first corporation that the United States acquired outright was the Panama Railroad Company, which the United States purchased from the French Panama Canal Company in 1903.²⁴ The World War I era saw growth in government corporations with the establishment of twelve federal land banks in 1916. Other corporations created because of the war included the War Finance Corporation and the United States Housing Corporation.²⁵ During the Great Depression, the Reconstruction Finance Corporation and the Tennessee Valley Authority were established.²⁶ The following are additional examples of commercial corporations.

Comsat

The intention of the law that created Comsat was to expand the US’s capacity to launch satellites by encouraging private industry to develop satellite communications. According to its website, “COMSAT was originally created by the Communications Satellite Act of 1962 and incorporated as a publicly traded company in 1963. Its initial purpose was to serve as a public, federally funded corporation intended to develop a commercial and international satellite communications system.” According to a RAND report, “Comsat . . . is unique among private, for-profit entities...in that it was expressly established by an act of Congress, and three of the fifteen members of its board of directors are appointed by the President.”²⁷

Venture Capital Funds

Congress has established at least three chartered venture capital funds, which are nonprofit corporations established with members of the venture capital community to foster innovation on behalf of affiliated agencies. They invest in small firms to develop technologies. OnPoint and In-Q-Tel were formed to develop technologies for the Department of Defense and the CIA, respectively. Red Planet Capital was a nonprofit organization created to establish a strategic venture capital fund for NASA to fund Mars exploration. Congress has also established venture capital funds that do not have congressional charters.²⁸

Alaska Native Corporations

Under the Alaska Native Claims Settlement Act, thirteen regional Alaska Native corporations and 182 Alaska Native villages were incorporated. Some American Indian tribes also have federal charters, as do some casino operations such as the Big Sandy Rancheria Enterprise in California.²⁹

Conrail

Conrail is an example of a “transition vehicle” created as an intermediate step toward privatization. Congress created Conrail in 1976 from seven bankrupt private railroads to facilitate the continuation of freight rail service in the Northeast. During a ten-year transition period, Conrail became profitable, and Norfolk Southern Corporation and CSX Corporation acquired it.³⁰

Governance of CCOs

Each CCO is unique and there is no standard governance structure for these entities. The following examples show the variability in how CCOs are organized.

- The GAO has characterized the United States Postal Service (USPS) as a “corporation-like organization” established by the government. USPS has itself claimed that it is not a government corporation and sees itself as operating like a private corporation, except that it is governed by a Board of Governors whose membership is mostly appointed by the president.³¹
- The Smithsonian Institution, established in 1846, is one of the oldest CCOs. It is governed by a Board of Regents consisting of the US vice president, the chief justice of the Supreme Court, three senators, three members of Congress appointed by the Speaker of the House, and nine citizens.³²
- The United States Institute of Peace (USIP) is listed as a “quasi-official agency” in the USGM. It is governed by a board of directors composed of twelve members from outside federal service who are appointed by the president and four ex-officio members: the Secretary of State, the Secretary of Defense, the president of the National Defense University (or their designees), and the president of USIP. The board is prohibited by law from having more than eight voting members of the same political party.³³

Standards and Regulations

President Truman established criteria for public corporations in his 1948 budget message, which defined a government

corporation as a program that is revenue-producing, potentially self-sustaining, and engaged in business-type transactions with the public.³⁴ In 1965, President Lyndon Johnson suggested that Congress establish criteria for the establishment of CCOs. In 1969, subcommittees of both the House and Senate Judiciary Committees jointly issued a statement of policy, “Standards for Granting of Federal Charters.” This statement set forth five minimum standards to be met by a private organization seeking a federal charter from Congress:

1. Operating under a charter granted by a state
2. Of such a unique character that it can only be incorporated by means of a federal charter
3. Organized and operated solely for charitable, literary, educational, scientific, patriotic, or civic improvement purposes
4. Organized as a nonprofit and nonpartisan organization
5. Organized for the primary purpose of conducting activities that are national in scope.³⁵

CRS noted, “Various proposals [have] been made over the years to adopt federal statutory procedures for chartering nonprofit organizations, but Congress has not enacted any of them.”³⁶

To some extent, regulations applying to the activities of CCOs are stated in the establishing legislation. CCOs subject to GCCA are considered federal agencies and are subject to the laws that apply to agencies. However, many CCOs are, or are treated like, private organizations and are therefore not required to submit budgets or conduct audits and are not subject to the Freedom of Information Act (FOIA) or other laws that govern federal agencies. This lack of transparency has long been a concern of members of Congress, presidents, and government watchdog organizations. Yet, there is apparently no political will to do away with CCOs or to attempt to standardize and regulate them uniformly.

Issues and Controversies

While some CCOs have operated without drawing undue attention, a CRS report noted that,

Congressionally chartered corporations have raised diverse issues for Congress, including (1) Title 36 corporations’ membership practices; (2) prohibitions on Title 36 corporations engaging in “political activities”; (3) confusion over which corporations are governmental and which are private; and (4) federal management of these corporations.³⁷

This section will present examples that illustrate these issues.

Boy Scouts of America

Members of Congress have occasionally moved to revoke the charters of organizations whose policies are objectionable. Boy Scouts of America (BSA) is one of the oldest CCOs, with a charter dating to 1916. BSA immediately benefited from this federal recognition, which enabled it to have access to military equipment. Even as recently as 2005, an unsuccessful bill was introduced to amend BSA’s charter to make Department of Defense facilities available to the Boy Scouts for official activities.³⁸ In the 106th Congress (2000), legislation was introduced to revoke BSA’s charter following a Supreme Court ruling that BSA was within its rights to refuse to appoint an assistant scout master who was openly gay. The House measure to revoke the charter was voted down, however.³⁹

American Gold Star Mothers, Inc.

Congress has been drawn into controversies over membership in CCOs, as in the case of American Gold Star Mothers, Inc. (AGSM). The organization was established in 1928, and it obtained a congressional charter in 1984. Its membership consists of women who have lost sons or daughters in military service. In 2005, ASGM denied membership to Ligaya Lagman, an immigrant from the Philippines whose son died in Afghanistan. The president of AGSM questioned why Ms. Lagman had not become a US citizen. AGSM’s refusal to admit Ms. Lagman drew a stern rebuke from Congressman Eliot Engel. AGSM subsequently changed its rules to allow admission of non-citizens.⁴⁰

National Aviation Hall of Fame

There is no single government agency or office with oversight responsibility for CCOs. Congressional oversight is usually performed by the relevant congressional committee. In the case of the National Aviation Hall of Fame (NAHF), Representative Michael Turner seems to have single-handedly taken on oversight duties. In January 2017, Representative Turner issued a news release stating that he was leading an investigation into the finances of NAHF, located in Dayton, Ohio. He convened a blue-ribbon panel to conduct the investigation and determine the appropriate course of action to prevent the NAHF from disposing of its artifacts. Turner later threatened to draft legislation to remove the organization’s congressional charter when NAHF made plans to move away from Dayton.⁴¹

United States Investigation Services

United States Investigation Services (USIS) represents a very odd arrangement: it was a CCO created to employ laid off federal workers that then contracted with the government to

perform the work formerly done by the terminated employees. As part of a mid-1990s government reduction, the investigative branch of the Office of Personnel Management (OPM) was downsized. According to CRS, in 1996 the director of OPM created a private corporation, USIS, whose employees, 700 OPM investigators who had been laid off from OPM, would become its owners under an Employee Stock-Owned Plan. Critics claimed that USIS received special considerations that would not have been extended to other private corporations. In 2014, the US Department of Justice launched a fraud investigation into USIS. Subsequently, OPM did not renew the company’s contracts, and it eventually declared bankruptcy.⁴²

Civilian Marksmanship Program

The Civilian Marksmanship Program (CMP) is a national organization formed in 1903 as the National Board for the Promotion of Rifle Practice. It has an ambiguous arrangement with the federal government. Originally managed by the Army, its purpose was to promote marksmanship and prepare individuals for military service. In 1996, Congress moved it out of the Army’s control and established CMP as a CCO whose purpose was to educate US citizens about firearms safety. Since then, the Army, operating under a Memorandum of Understanding with CMP, has transferred more than 700,000 surplus firearms to it. CMP is authorized to loan these firearms to affiliated youth organizations and to sell surplus firearms to affiliated organizations such as gun clubs that offer firearms safety training. Most of its funding comes from the sale of these surplus firearms.⁴³

Another military-related CCO is the Civil Air Patrol, a non-profit organization that functions as an auxiliary to the US Air Force and receives appropriations from Congress. Given such ambiguous structures, it is not surprising that members of Congress and others have expressed confusion over whether some CCOs are government organizations or not.

National Education Association

Members of Congress have, at times, objected to the political activities of CCOs, and many CCOs have restrictions on political activities written into their charters. The National Education Association (NEA), chartered by Congress in 1906 in the District of Columbia, has no such restriction. Representative Scott Fitzgerald introduced H.R. 7510 in the 117th Congress to repeal the NEA’s charter due to its political activities, stating, “The NEA can no longer be considered a public service worthy of its Federal charter as it has drifted substantially from its core mission and become a massive political operation dedicated to electing Democrats and imposing a radical progressive agenda on America’s schools.”⁴⁴

CCOs and the FDLP

For the most part, the publications of CCOs are not included in the FDLP, though annual reports of some CCOs were formerly published in the US Congressional Serial Set. A few, such as the annual report of Howard University, have been published by the Department of the Interior. Monographic and serial publications of some CCOs have also been distributed through the FDLP, including those of the Smithsonian Institution, Civil Air Patrol, Tennessee Valley Authority, and USPS. However, in recent decades, Congress has specified that most reports are not to be printed at public expense. According to CRS, “corporate bodies are required to make annual reports of their activities to the Congress. Public access to the records and reports of Title 36 corporations varies. For example, the charter of the National Ski Patrol System (36 U.S.C 1527) requires that its annual report be submitted each year to Congress but prohibits the public printing of it.” In 1995, Congress enacted the Federal Reports Elimination and Sunset Act of 1995 (P.L. 104-66), which ended the requirement that federally chartered private corporations had to send financial audit reports and some proceedings to Congress.⁴⁵ The recently passed Access to Congressionally Mandated Reports Act (P.L. 117-263 (2022)) explicitly excludes federally chartered corporations from the requirement for GPO to place congressionally mandated reports in a repository.

Per GPO, publications produced using federal funds are considered to be within the scope of the FDLP, making most CCO publications out of scope. Most CCOs do not report their in-scope online publications to GPO, and consequently, they have not been included in GPO’s Cataloging and Indexing Program. GPO has prioritized CCOs for web harvesting in order to account for these unreported publications. For example, publications of the Legal Services Corporation can be found in the Catalog of Government Publications up to 2008, but online publications dating from 2014 to the present are available in the FDLP Web Archive.

There is no comprehensive, up-to-date list of CCOs. Title 36 organizations are listed in the US Code. The Library of Congress has occasionally published lists such as *Corporations Chartered by Special Act of Congress*.⁴⁵ Various reports prepared by GAO and CRS list some CCOs but neither agency has developed a methodology to identify or list all CCOs in existence. While a few CCOs are listed in the General Services Administration’s A to Z directory of federal agencies, most are not.

Conclusion

CCOs are heterogeneous organizations that have been a source of confusion for Congress, GAO, CRS, and researchers. Public

access to CCO publications may be limited because of CCOs' unique governance structures and public/private statuses. Those publications that are within the scope of the FDLP may be captured by the various mechanisms used by GPO. However, Congress has excluded most CCO reports from being printed at public expense. Moreover, while federal agencies are bound by laws and regulations related to open government and record retention and control, organizations that are not deemed government agencies are not subject to these controls. CCOs represent a somewhat murky group of organizations that exist in a "twilight zone" of government entities. Ultimately, it is up to Congress to determine how to bring these organizations into the daylight.

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Notes

1. Kevin R. Kosar, *Congressional or Federal Charters: Overview and Enduring Issues* (Washington, DC: Congressional Research Service, 2013), 2, <https://www.everycrsreport.com/reports/RS22230.html>.
2. US Government Accountability Office, *Congressionally Chartered Organizations: Key Principles for Leveraging Nonfederal Resources* (Washington, DC: GAO, 2013), 1-2, <https://purl.fdlp.gov/GPO/gpo38395>.
3. Kevin R. Kosar, *Congressionally Chartered Nonprofit Organizations ("Title 36 Corporations"): What They Are and How Congress Treats Them* (Washington, DC: Congressional Research Service, 2011), 11, <https://www.everycrsreport.com/reports/RL30340.html>.
4. Kosar, *Congressionally Chartered Nonprofit Organizations*, 2.
5. National Fab Lab Network Act of 2021, H.R. 3274, 117th Cong. (2021), <https://www.congress.gov/117/bills/hr3274/BILLS-117hr3274ih.pdf>.
6. National Lighthouse Museum Act, H.R. 1839, 117th Cong. (2021), <https://www.congress.gov/bill/117th-congress/house-bill/1839>.
7. Harold Seidman, "Government-Sponsored Enterprise in the United States," in *The New Political Economy: The Public Use of the Private Sector*, ed. Bruce L. R. Smith (New York: MacMillan, 1975), 83-108.
8. Harold Seidman and Robert Gilmour, *Politics, Position, and Power: From the Positive to the Regulatory State*, 4th ed. (New York: Oxford University Press, 1986), 309.
9. A. Michael Froomkin, "Reinventing the Government Corporation," *University of Illinois Law Review* 1995, no. 3 (1995): 543-634.
10. US Government Accountability Office, *Federally Created Entities: An Overview of Key Attributes* (Washington, DC: GAO, 2009), 13-15, <https://purl.fdlp.gov/GPO/LPS120056>.
11. Kevin R. Kosar, *Federal Government Corporations: An Overview* (Washington, DC: Congressional Research Service, 2011), 4, <https://www.everycrsreport.com/reports/RL30365.html>.
12. GAO, *Federally Created Entities*.
13. US General Accounting Office. *National Parks: Significant Progress Made in Preserving the Presidio and Attaining Financial Self-sufficiency: Report to Congressional Requesters* (Washington, DC: GAO, 2001), <https://purl.fdlp.gov/GPO/LPS17908>.
14. Henry B. Hogue, *Title 36 Charters: The History and Evolution of Congressional Practices* (Washington, DC: Congressional Research Service, 2022), 5-6, <https://crsreports.congress.gov/product/pdf/R/R47236>.
15. Kosar, *Congressionally Chartered Nonprofit Organizations*, 4.
16. Kevin R. Kosar, *The Quasi Government: Hybrid Organizations with Both Government and Private Sector Legal Characteristics* (Washington, DC: Congressional Research Service, 2011), 14-15, <https://www.everycrsreport.com/reports/RL30533.html>.
17. Kosar, *The Quasi Government*, 15.
18. US General Accounting Office, *US Agricultural Marketing: Federally Authorized Commodity Research and Promotion Programs* (Washington, DC: General Accounting Office, 1994), <https://www.gao.gov/assets/rced-94-63.pdf>; US Agricultural Marketing Service, *Be a Voice for Your Industry* (2014), <https://www.ams.usda.gov/publications/content/be-voice-your-industry>.
19. Kosar, *The Quasi Government*, 16-17; Department of Veterans Affairs, Office of Inspector General, *Inadequate Financial Controls and Payments Related to VA-Affiliated Nonprofit Corporations* (Washington, DC: Department of Veterans Affairs, 2021), <https://www.va.gov/oig/pubs/VAOIG-20-03704-165.pdf>.
20. GAO, *Federally Created Entities*, 17.

21. Kevin R. Kosar, *Government-Sponsored Enterprises (GSEs): An Institutional Overview* (Washington, DC: Congressional Research Service, 2007), 2-3, <https://digital.library.unt.edu/ark:/67531/metadc812792/>
22. Kosar, *The Quasi Government*, 10.
23. Kosar, *The Quasi Government*, 6.
24. Kosar, *Federal Government Corporations*, 3.
25. Harold Archer Van Dorn, *Government Owned Corporations* (New York: Knopf, 1926).
26. Kosar, *Federal Government Corporations*, 3-4.
27. COMSAT, *About COMSAT*, <https://web.archive.org/web/20190729182849/https://www.comsat.com/about-comsat/>; Leland L. Johnson, *Issues in International Communications: Government Regulation of Comsat*, R-3497-MF (Santa Monica: The RAND Corporation, 1987), iii.
28. Kosar, *Congressional or Federal Charters*, 21-22.
29. GAO, *Federally Created Entities*.
30. Kosar, *Federal Government Corporations*, 11-12.
31. US General Accounting Office, *U.S. Postal Service: Issues Related to Governance of the Postal Service* (Washington, DC: GAO, 1997), <https://www.gao.gov/products/ggd-97-141>.
32. Smithsonian Institution, “The Board of Regents,” <https://www.si.edu/regents>.
33. United States Institute of Peace, “Board of Directors,” <https://www.usip.org/about/leadership/board-directors>.
34. Seidman, “Government-Sponsored Enterprise,” 85.
35. US Senate Committee on the Judiciary, *Standards for the Granting of Federal Charters to Nonprofit Corporations*, S. Prt. 98-62 (Washington, DC: GPO, 1983), <https://catalog.hathitrust.org/api/volumes/oclc/9872566.html>.
36. Kosar, *Congressionally Chartered Nonprofit Organizations*, 7.
37. Kosar, *Congressional or Federal Charters*, 2.
38. A Bill to Amend the Federal Charter of the Boy Scouts of America in Title 36, H.R. 1301 109th Cong. (2005), <https://www.congress.gov/109/bills/hr1301/BILLS-109hr1301ih.pdf>.
39. Kosar, *Congressionally Chartered Nonprofit Organizations*, 9-10.
40. Kosar, *Congressional or Federal Charters*, 4.
41. Michael Turner, “TURNER to NAHF: Preserve NAHF Artifacts,” Jan. 13, 2017, <https://turner.house.gov/press-releases?ID=A1B9B7DD-66FE-4752-BEB7-C0E18FDCFD07>; Michael Turner, “TURNER to NAHF: No Congressional Oversight, No Congressional Charter,” Feb. 15, 2017, <https://turner.house.gov/press-releases?ID=1AAFB211-FB59-4CF8-9F6B-FC7228A8058A>
42. Kosar, *The Quasi Government*, 28-29.
43. US Government Accountability Office, *Civilian Marksmanship Program: Information on the Sale of Surplus Army Firearms* (Washington, DC: GAO, 2019), 4-5, <https://www.gao.gov/products/gao-19-287>.
44. An Act to Incorporate the National Education Association of the United States, P.L. 59-398; National Education Association Charter Repeal Act, H.R. 7510, 117th Cong. (2022), <https://www.congress.gov/bill/117th-congress/house-bill/7510>.
45. Kosar, *Congressionally Chartered Nonprofit Organizations*, 9; 14-15.
46. Margaret Fennell, *Corporations Chartered by Special Act of Congress* (Washington, DC: Legislative Reference Service, 1945), <https://hdl.handle.net/2027/uc1.31822024186637>.