**WorkforceGPS**

**Transcript of Webinar**

**CRC Updates Section 188 WIOA Equal Opportunity Regulations
(29 CFR Part 38)**

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LAURA CASERTANO: Again, we want to welcome you to the "WIOA Wednesday: CRC Updates Section 188" webinar. And if you haven't already done so, please introduce yourself in that chat window. We'll leave the introductory chat up for a minute or two, so please type that information now.

And again, we'll have a similar chat up throughout today's webinar where you can type in your questions or comments at any time.

Now I'd like to turn things over today to Naomi Barry-Perez. She's the director of the U.S. Department of Labor's Civil Rights Center in Washington, D.C. Naomi?

NAOMI BARRY-PEREZ: Good afternoon, everyone. I hope it's warmer wherever you are if you're outside of the D.C. area. But I think there's a cold patch of weather coming through much of the country.

So welcome. We're really grateful to be here with you today, to share some information about Section 188 of the Workforce Innovation and Opportunity Act, the provisions that implement the nondiscrimination equal opportunity requirements of WIOA.

Grateful for all of you who have joined us today. I'm looking at the list and I see a good number of folks from the workforce system itself, including some of our state equal opportunity officers and some partners also from the advocacy community. So again, appreciate this opportunity. And thanks to everyone who is behind the scenes here, making sure that we have this opportunity to communicate. Let it be the first of many times, I hope.

So just again to start, my name is Naomi Barry-Perez. I'm the director of the U.S. Department of Labor's Civil Rights Center, located in Washington, D.C. And I appreciate all of you joining us today for this webinar to talk about our new regulations under Section 188 of the Workforce Innovation and Opportunity Act – WIOA.

The regulations were published on December 2nd, 2016, and will be effective on January 3rd, 2017, and they update the existing regulations at 29 CFR Part 38. Like the current regulations, the new regulations will be administered by my office, the Civil Rights Center.

Before and during this presentation, questions are encouraged and may be submitted through the webinar. We will answer questions after the presentation, as time allows. At any time, recipients may submit technical assistance requests to CRC at the following email address: civilrightscenter@dol.gov. More information, and answers to frequently asked questions, may be found online on the CRC website. Let me also mention that these frequently asked questions are not only available in English but also available in 10 other languages.

As many of you know, the mission of the Civil Rights Center is to promote justice and equal opportunity. We administer and enforce various civil rights laws that protect individuals who apply to, participate in, work for, or benefit from the programs and activities that receive federal financial assistance from the Department of Labor, including programs and activities that are operated by One-Stop partners as part of the One-Stop delivery system.

We carry out our mission by investigating and adjudicating discrimination complaints; conducting compliance reviews; providing compliance assistance, including technical assistance and training; and developing and publishing civil rights regulations, policies, and guidance.

We work closely with other Department of Labor agencies in affecting our mission, including the Employment and Training Administration and the Office of Disability Employment Policy. I am lucky today to be joined by colleagues from these agencies.

So before we get into the details of the new regulations, I'd like to introduce these colleagues from ETA and ODEP, Gerri Fiala and Jennifer Sheehy, who will talk briefly about the importance of this new rule. First, Gerri?

GERRI FIALA: Thanks, Naomi. And thank you for the opportunity to be part of this important conversation. My name is Gerri Fiala and I'm the deputy assistant secretary for the Employment and Training Administration at the U.S. Department of Labor.

The workforce development system is the backbone of job training and education in the United States. It provides millions of jobseekers and workers the opportunity to learn new skills and obtain new and better jobs. The system also serves a critical role in our nation's labor market, bringing together workers and businesses – a Match.com, if you will – to ensure that workers can find good jobs, and employers can find the skilled workers they need to keep business thriving.

The bipartisan Workforce Innovation and Opportunity Act – or WIOA – is the most significant reform of the workforce system since the late 1990s. It strengthens the alignment of the core programs of the workforce system by requiring, among other things, accessible One-Stop delivery systems and access to services and benefits so that people get the tools and skills they need not just to find good jobs, but to launch middle-class careers.

One-Stop Centers or American Job Centers – AJCs as they now are known – always have emphasized inclusion for individuals with barriers to employment. Under WIOA, that commitment is strengthened and memorialized both in statute and the WIOA Final Rule.

WIOA prioritizes serving vulnerable populations, individuals with multiple barriers to employment; for example, individuals with disabilities, youth disconnected from school and from work, older workers, or individuals with limited English proficiency who are English language learners.

Section 188 of WIOA helps ensure all people, including those with multiple barriers to employment, access the job training, education and employment services and benefits the workforce system provides, so that they acquire those tools and skills they need to access good jobs.

WIOA also offers opportunities to strengthen our partnerships across programs; makes sure our governance structures reflect all the voices that need to be at the table; make clear to all parties the significant provisions of nondiscrimination and equal opportunity; and focus on improved, integrated, high-quality and accountable service delivery to our jobseeker and our business customers.

WIOA offers many new opportunities to support youth and adults with disabilities in accessing training services through the workforce system. The Final Rule applies to recipients of financial assistance under Title I of WIOA, whether directly from the Department of Labor or through the governor or another recipient.

This includes programs and activities that are part of the American Job Center/One-Stop delivery system, making sure that the commitment that all people can access the programs, services and benefits that the public workforce system provides is kept, and that federal partnership programs and services will be fully-inclusive.

These principles of accessibility and service are reflected throughout WIOA and related laws, and they are discussed in detail in the WIOA Section 188 Final Rule. I urge you to read the Section 188 Final Rule and to contact the Department of Labor if you require additional technical assistance. We will provide both email and website contacts where you can direct your questions at the end of today's presentation.

And I'll turn back to Naomi.

MS. BARRY-PEREZ: Thank you for that introduction, Gerri. Next I'd like to introduce Jennifer Sheehy from the Office of Disability Employment Programs. Jennifer?

JENNIFER SHEEHY: Hello. Thanks, Naomi. And thank you all for joining us today. My name is Jennifer Sheehy and I'm the deputy assistant secretary for the Office of Disability Employment Policy in the U.S. Department of Labor.

An essential element of the workforce development system is its accessibility to everyone on an equal basis. The Department of Labor's Civil Rights Center is tasked with ensuring that all people can access the programs, services and benefits that the system provides, equally and free from unlawful discrimination. These principles are vital to a successful workforce development system.

WIOA offers many new opportunities to support youth and adults with disabilities in accessing employment and training services throughout the workforce development system. In general, WIOA's opportunities increase the responsibility of workforce development boards – formerly known as workforce investment boards – and American Job Centers to be fully accessible and offer the necessary accommodations to provide jobseekers with disabilities effective and meaningful access to skills training and career pathways for the modern workforce.

In particular, Section 188 represents one of these opportunities by ensuring nondiscrimination and equal opportunity in the workforce development system for individuals with disabilities. The Civil Rights Center's Final Rule supports this goal in a number of ways.

For example, by reiterating the requirements that facilities, programs, services, technology, and materials must be physically and programmatically accessible; and that auxiliary aids and services may be required to ensure that communications with individuals with disabilities are as effective as those communications with others.

We know that while most AJCs are physically accessible to individuals with disabilities, there is still some work that needs to be done to provide communication access and programmatic accessibility.

As state and local plans seek to delineate how they will meet nondiscrimination requirements regarding physical and programmatic accessibility, they should consider reviewing DOL's guide, "Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide." This reference guide is currently available and will be updated with the new regulatory citations and re-released in the coming weeks.

It contains a variety of great examples provided by AJCs across the nation to describe what might be done in each of the areas covered by Section 188. In that respect, it's a wonderful educational resource. Remember that states must develop criteria for certifying physical and programmatic accessibility of AJCs at least every three years.

I encourage you to read the Final Rule and please contact us if you need further technical assistance.

Naomi?

MS. BARRY-PEREZ: Thank you, Jennifer. Thank you both again, Gerri and Jennifer. We're very pleased that the statute itself integrated the nondiscrimination requirements, particularly with regard to individuals with disabilities. They're great opportunities for our offices to continue to work together. So I appreciate that highlight.

But now, as promised, I think I'll go back to some general information and discuss the new civil rights regulations under Section 188 of the Workforce Innovation and Opportunity Act again – or WIOA.

We have updated these regulations implementing the equal opportunity provisions of WIOA, which was signed into law in July 2014, to protect participants and other beneficiaries in the workforce development system.

The Final Rule provides important updates to our current regulations, which had not been substantively updated since 1999. The old rule did not reflect the many developments in civil rights law since that time; changes in the CRC's enforcement procedures and processes; or new practices of beneficiaries and recipients of WIOA Title I financial assistance, for example, the routine use of computer and Internet-based systems.

The update ensures the entire workforce system is aware of current equal opportunity rights and responsibilities of beneficiaries and recipients of WIOA Title I financial assistance. The rule increases equality of opportunity for the millions of job applicants, training participants, program beneficiaries, and employees of recipients who interact with the workforce development system each year.

The rule's updates also enhance access to the system, in particular for people with disabilities; individuals with limited English proficiency; transgender individuals, who may face various forms of sex discrimination; and individuals who are pregnant, have had a child, or have related medical conditions. Our revised regulations implement the nondiscrimination and equal opportunity obligations under WIOA Section 188.

Section 188 prohibits discrimination against individuals in any WIOA Title I financially assisted program and activity, which includes job training for adults and youth, and programs or activities provided by recipients at American Job Centers or One-Stop Centers.

These programs or activities may not refuse to offer or refuse to provide services to individuals because of their race, color, religion, sex, national origin, age, disability, or political affiliation or belief. Discrimination on these bases is also prohibited against employees who are employed in the administration of or in connection with any WIOA Title I financially assisted program or activity.

Additionally, beneficiaries, applicants, and participants, as defined by the Final Rule, cannot be denied covered services because of their citizenship status, and cannot be denied their rights because of participation in a WIOA Title I financially assisted program or activity.

The rule applies to recipients of WIOA Title I financial assistance, and to programs and activities that are operated by American Job Center partners or One-Stop partners, as part of the American Job Center system or One-Stop delivery system, such as unemployment insurance, Temporary Assistance to Needy Families, adult education, Trade Adjustment Assistance, and others.

Now I'd like to highlight some of the changes in the Section 188 Final Rule, as compared to the 1999 rule under the Workforce Investment Act and the 2015 rule.

The Final Rule updates the nondiscrimination and equal opportunity provisions to align them with current law and legal principles. The rule captures developments since 1999 under the following laws, reflected in case law and in regulations issued by other federal agencies, including the Departments of Justice and Education, and the Equal Employment Opportunity Commission.

The laws that are reflected include Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, the Americans with Disabilities Act of 1990, and the ADA Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973.

The Final Rule ensures protection from discrimination based on pregnancy. The rule makes clear that sex discrimination includes discrimination based on pregnancy, childbirth, and related medical conditions, in accord with the Pregnancy Discrimination Act of 1978, which amended Title VII of the Civil Rights Act of 1964, and in accord with Title IX of the Education Amendments of 1972.

The Final Rule also safeguards meaningful access to the workforce system for persons with limited English proficiency – or persons who are LEP. The regulations clarify that discrimination based on national origin includes failing to provide language services to someone with limited English proficiency. Under the rule, recipients must take reasonable steps to ensure that individuals with LEP have meaningful access to aid, benefits, services, and training.

These steps may include oral interpretation and written translation of both hard-copy and electronic materials into non-English languages. This ensures that individuals with LEP are informed about or able to participate in covered programs and activities.

In addition, the rule clarifies which documents contain vital information and thus must be translated into languages spoken by a significant number or portion of the population eligible to be served or likely to be encountered.

Vital information means information – whether written, oral, or electronic – that is, one, necessary for an individual to understand how to obtain any aid, benefit, service, and/or training; two, necessary for an individual to obtain any aid, benefit, service, and/or training; or three, is required by law.

The rule requires recipients to record the limited English proficiency status and preferred language of applicants who seek to participate in the workforce development system, to help ensure they have the necessary information to serve individuals with LEP effectively.

Finally, an appendix to the LEP section of the rule describes promising practices to help recipients comply with their legal obligations, and includes the components of a plan to facilitate meaningful access for individuals with limited English proficiency.

The Final Rule, as we discussed before a bit, ensures equal access to the workforce system for people with disabilities by bringing the regulations in line with updated disability rights law. The rule brings the CRC regulations in accord with the Americans with Disabilities Act Amendments Act of 2008 and the implementing regulations and guidance issued by the Department of Justice, as well as the implementing regulations and guidance issued by the Equal Employment Opportunity Commission.

The rule's updated language ensures that the definition of "disability" will be interpreted broadly, which will enable more individuals with disabilities to be effectively served within the workforce development system. The rule also addresses accessibility requirements, such as for information and electronic technologies, as well as service animals.

The Final Rule ensures that recipients and beneficiaries are aware of the full scope of their responsibilities and rights. CRC revised the equal opportunity notice or poster that recipients are required to display and distribute, in order to ensure that they, and individuals participating in their programs and activities, are aware of the scope of the nondiscrimination and equal opportunity responsibilities and relevant developments in law.

As the Final Rule explains, CRC will make translations of this notice available to recipients in the 10 most frequently used languages in the U.S., other than English.

Changes in the language of the notice or poster reflect, for example, that "sex" as a prohibited basis for discrimination, includes pregnancy, childbirth, and related medical conditions; transgender status and gender identity; and sex stereotyping.

Similarly, the changes make clear that discrimination against persons with limited English proficiency is a form of national origin discrimination.

The Final Rule outlines protections against sex discrimination. The rule states that discrimination on the basis of transgender status, gender identity, and sex stereotyping are forms of sex discrimination, in accord with similar developments under other civil rights laws.

The rule specifically states that Section 188's prohibition of discrimination on the basis of sex includes, at a minimum, sex discrimination related to an individual's sexual orientation where the evidence establishes that the discrimination is based on gender stereotypes. CRC anticipates that the law regarding sex discrimination will continue to evolve, and CRC will monitor legal developments in this area.

So that was a quick overview of the Final Rule. As you can tell, we worked hard on producing a rule that protects individuals from discrimination in the nation's workforce system; balances the needs of both the people who have to follow the regulations and the people who are protected by them; and strives to communicate often times very complex obligations in a straightforward and clear way, so that it is easier for people to understand and follow.

If you represent or work with individuals who are interested in participating or already are participating in the workforce system, I want to encourage you to form relationships with the equal opportunity officers both locally and at the state level.

The rule emphasizes the need for recipients to reach out to community groups. But you can help as well by taking the first step. Equal opportunity officers can gain from your knowledge and experiences. By sharing problems and solutions, potential discrimination can be averted or avoided.

Lastly, I wanted to talk a bit about the complaint process. The rule provides that each recipient must have a complaint process and that they are required to publicize that process. Remember also that there is a required notice or poster, that includes information about how people can file a complaint, that must be given to every individual applying for or participating in the workforce system. Two points I'd like to make in this regard.

First, filing complaints locally should be your first preferred course. We find that complaints can be resolved faster when filed locally.

Second, individuals always have the ability to file a new complaint with CRC if they are not satisfied after filing locally. Let me say that again. If an individual is not satisfied after they file a complaint locally, they may still proceed to the CRC. Notice that I did not say "for an appeal." It is a new complaint. A complaint to the CRC is a fresh complaint. And if CRC accepts that complaint, CRC will begin the investigative process anew.

I encourage you to read our new WIOA Section 188 regulations, which can be found through the links on our website, which is www.dol.gov/crc. Our site will connect you to the Federal Register website, where you can read or print a copy of the new regulations. Our site also contains additional information, as I mentioned before, in alternative languages for individuals with limited English proficiency.

So that is the end of my formal presentation, if you will. Now I'm very eager to receive some of your questions and we'll try our best to answer all that we can in the time that we have.

So with that – (pause, audio break).

Hi, folks. This is Naomi Barry-Perez joining you again. I'm so sorry. We've had some technical difficulties. But thanks so much for sticking around.

Actually, this might have been beneficial because I now see some questions that have come in and so – although I kept talking for a long while before I figured I was off the air. And you missed really good information. I'm just kidding, of course.

There's a question that has come in about what constitutes languages spoken by a significant number or portion of LEP persons of a population eligible to be served or likely to be encountered, for purposes of translating vital information. Let me go ahead and start there. It was one of the first questions that has come in.

So this question is referring again, as I mentioned before, to the Final Rule's requirement that recipients translate vital information in written materials into these languages and make – when I say "these languages," into the languages spoken by a significant number or portion of LEP persons in the population eligible to be served or likely to be encountered. Translate information into these languages and make the translations readily available in hard-copy upon request, or electronically, such as on a website.

First let me say that clarification as to the CRC's reasoning for this requirement can be found in some detail in the preamble discussing Section 39.9(g)(1). Second, as to an understanding of what "significant number" means, CRC created the LEP tool to provide a roadmap for recipients to create an LEP plan tailored to their specific circumstances, including a determination of which languages are encountered with sufficient frequency, or are spoken by a significant number or proportion of the service population that is eligible or likely to be encountered to require advanced translation of vital information.

Let me read that again. That requires – these significant populations require advanced translation of vital information.

We built this tool to make it easier for recipients to fulfill their obligation to provide meaningful access to their programs and activities in a cost-effective manner. Indeed, the DOL LEP guidance issued in 2003 did not specifically define what constitutes a "significant number or proportion of the eligible service population" that would trigger the need to translate vital information into a particular language, in advance of encountering any specific LEP individual because – and we continue to agree – that that number should be measured on a case-by-case basis.

I see some more questions that have come in. There's a question here about can I review the definition of recipient and offer additional insight? Let me try to do that.

To best understand if an entity is covered by the rule, readers would be encouraged to review a couple of provisions in the rule, the first being applicability at Section 38.2; then the definition of financial assistance under Title I of WIOA at 38.4(x) and 38.4(y); as well as the definition of recipient at 38.4(zz).

Entities connected to the workforce development system may be recipients for purposes of Section 188 and the Final Rule even if they do not receive assistance in the form of money. For example, recipients subject to these regulations include entities with agreements, arrangements, contracts, subcontracts, or other instruments for the provision of assistance or benefits under WIOA Title I. Thus, entities that are selected and/or certified as eligible training providers are considered to receive financial assistance for the purpose of this regulation and Section 188.

Additionally, programs and activities operated by One-Stop partners, both required partners and additional partners, also receive financial assistance for purposes of this regulation to the extent that these programs or activities are being conducted as part of the One-Stop delivery system.

We note, however, that whether an entity is an additional One-Stop partner subject to Section 188 is based on whether that entity has signed a memorandum of understanding as an additional partner, per the requirements of Section 121 of WIOA, and not merely whether that entity is working with or contributing something to a WIOA Title I program.

There's a question that somewhat follows about nonprofits providing training and employment services. The question specifically was, "Are they to have updated regulatory posters mentioned, as well as the complaint process?" And the answer to that simply is yes. If these programs are receiving financial assistance under Title I of WIOA, or they are considered partners as just described, they are also required to display the poster that I mentioned before, and they also are required to have a complaint process as discussed before.

So I'm looking at the questions that have come in. (Pause.)

OK, folks. Sorry. We had a little blip here in technology again, but I think we're back on. If you have any concerns, let us know in that regard.

OK. So let me talk about – there seems to be a number of questions with regard to the LEP requirements. So let me start by addressing the question, "What's the difference between the old rule and the new rule with respect to protections for individuals with limited English proficiency?" CRC has not added new protections to this rule, but has added specific clarifying language to help recipients comply with their existing – indeed, long-standing – legal obligations.

The Final Rule makes clear that discrimination against those with limited English proficiency based on their LEP status is unlawful discrimination based on national origin. This is consistent with Title VI case law and Department of Justice guidance. The Final Rule also provides clarity with respect to recipients' obligations to take reasonable steps to provide meaningful access to programs and activities for individuals with LEP by providing written translation or oral interpretation when appropriate.

The previous regulations also provided protections for LEP individuals, but you can find the updated requirements at Section 38.9, and again as I mentioned in the appendix to Section 38.9, which CRC has provided to give recipients more detail and better guidance. The new appendix includes a description of the type of plan that may be implemented to promote meaningful access for persons with limited English proficiency and examples of how to apply the LEP provisions contained in Section 38.9.

To continue with the – with our discussion of LEP, there's also a question about what some folks know as the four-factor analysis that some LEP guidance documents, and indeed the 2003 DOL LEP guidance document referred to. So some of you may have noticed that the four-factor analysis is not included in this Final Rule, again, contrary to prior guidance.

So to begin with, I want to say again we provided what we think is significant explanation for our reasoning on the absence of the four factors from regulatory text in the preamble to Section 38.9(b). The four factors the question refers to were previously in guidance for assessing the effectiveness of a recipient's steps to ensure meaningful access.

Those factors are: one, the number or proportion of LEP persons served or encountered in the eligible service population; the frequency with which LEP individuals come in contact with the program; the nature and importance of the program, activity, or service provided by the recipient; and the resources available to the recipient and cost.

Essentially, we did not put the four factors in the regulatory text because those factors have never been in DOL's regulations. And more importantly, I think, we believe a formulaic analysis detracts from the application of a general rule, as well as from the primary weight to be placed on the nature and importance of the program or activity. Recipients should – and CRC will – review each situation based on the facts presented.

Despite the four factors' absence from the rule, CRC will consider a number of relevant factors, including the four factors, based on the facts presented in each case. If you would like to see a list of some of the relevant factors CRC may consider, again, we ask you to turn to the preamble list provided in the discussion section of 38.9(z).

There's a question here about, "Is the requirement for the number of languages that babble (sp) notices must be in? Where can I find a sample babble notice?" So a babble notice is also defined in the regulation. I don't have a citation for you, but there is a specific definition for that. This is the language that generally says if you need assistance in a language other than English, here's how to obtain it, and provides sometimes a telephone number or a website.

We are going to provide sample babble notices in 10 languages, as I mentioned before; those will be on our website. And then the requirement for providing babble notices really again is made on a case-by-case basis, based on again the specific demographics in the relevant service area.

All right, folks. Looking at your questions that come in. Thank you so much for your active participation. (Pause.)

All right. Let me address – there's a question about recipients' obligations regarding harassment. The Final Rule doesn't contain a provision that gives recipients additional direction about an existing obligation to prevent harassment because of all bases protected by WIOA Section 188 and the Final Rule.

It defines acts that may be unlawful harassment, such as offensive remarks about a person's race, color, religion, sex, national origin, age, disability, political affiliation or belief, or citizenship or participation. And it describes the conditions under which such conduct is considered to be unlawful harassment, including when the conduct has the purpose or effect of unreasonably interfering with an individual's participation.

These are just examples. You can find the complete provision at Section 38.10.

Hopefully this information is helpful to you. The questions are beginning to slow down a little bit and we certainly don't have to utilize the full time here. But let me move on to some other questions that have come in here.

I see something on gender stereotyping, so let me address that. The rule makes clear that discrimination based on sex stereotypes is unlawful sex discrimination. Sex stereotyping is one of the most significant barriers to women's ability to access services, benefits, training, programs, and employment in and through the workforce development system. Sex stereotypes about the roles of women and men and their respective capabilities in the workplace can influence decisions about hiring, training, promotions, pay raises, and other terms and conditions of employment.

The Final Rule adopts the well-recognized principle that employment decisions made on the basis of stereotypes about how males and females are expected to look, speak, and act are forms of sex-based discrimination. And it applies the principle to the provision of any aid, benefit, service, or training through WIOA Title I programs and activities.

The Final Rule also clarifies, as I mentioned before, Section 188's prohibition of discrimination on the basis of sex includes, at a minimum, sex discrimination related to an individual's sexual orientation, where the evidence establishes the discrimination is based on gender stereotypes.

Let me add here while we're on the topic of sex discrimination that the Final Rule also provides protection for pregnancy under sex discrimination. The rule provides that discrimination based on pregnancy is a form of sex discrimination, as I mentioned. You can find the specific section of the rule focused on pregnancy discrimination as a form of sex discrimination at Section 38.8.

In addition, although pregnancy itself is not a disability, pregnancy-related medical impairments may be disabilities covered by the rule.

A couple of questions about how complaints can be filed. So under the new rule, a complaint may be filed with the EO officer – the equal opportunity officer – of the recipient, or the person the recipient has designated to receive complaints; or under the Civil Rights Center director, under Section 38.69(b). These options are also to appear in the equal opportunity notice or poster.

Also someone asked about whether a complaint can be filed via email. Section 38.35 does not prohibit complaints via email. A complaint may be filed electronically, so long as it meets the requirements outlined in Section 38.70(d), which includes a written or electronic signature of the complainant or that person's representative.

There's a question here about the projected date for the updated posters and babble notice – when they'll be available on the CRC website. They are done. We are just working with IT now to get them on the website. We hope that the posters will be on the website by next week.

Again, I mentioned 10 different languages. I'm rattling this off the top of my head now, but I think the languages are Spanish, Chinese, Portuguese, Korean, Vietnamese, Bosnian, Russian, Tagalog, French, and Arabic. The babble notice we hope will be available by February. So keep looking. And any additional information in addition to that – to those materials – but additional information we will populate on the website as soon as it is available.

So folks, I think we've reached the end of our questions and have perhaps reached the end of our time. We do want to encourage you, however, to continue to reach out to us with additional questions – questions for clarification, with requests for technical assistance and training. We will do our best to respond in a timely manner to all requests that come in.

And we're grateful for your participation here today and for your continued assistance as we attempt to train all of our stakeholders most effectively on this rule.

Appreciate your time. Take care and stay warm.

(END)