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FLORIDA
EMPLOYMENT LAW LETTER

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REASONABLE ACCOMMODATIONS

11th Circuit provides some guidance on leave as an accommodation

by Jeffrey D. Slanker
Sniffen and Spellman, P.A.

Employers have an obligation under the Americans with Disabilities Act (ADA) and the Florida Civil Rights Act to provide reasonable accommodations that allow employees to perform the essential functions of their jobs. As long as the employee doesn't pose a safety threat or the proposed accommodation wouldn't be an "undue hardship" on the employer, reasonable accommodations must be provided.

What is less clear is what exactly constitutes a "reasonable" accommodation. Guidance from the Equal Employment Opportunity Commission (EEOC) suggests that employers must allow employees with disabilities to take leave as a reasonable accommodation. It's not clear how much leave must be granted, however. A recent decision from the U.S. 11th Circuit Court of Appeals (whose rulings apply to all Florida employers) helps clear up that question.

EEOC guidance on leave as an accommodation

In 2016, the EEOC issued guidance in the form of a resource document addressing leave as a reasonable accommodation. According to the agency, when an employee with a disability has used all of her paid leave, the employer must consider providing unpaid leave as a reasonable accommodation. A request for unpaid leave must be treated as a reasonable accommodation request and granted if it doesn't create an undue hardship on the employer.

Courts have stated that such leave requests must be reasonable and have questioned whether long absences meet that standard. The EEOC guidance provides that "maximum leave" policies capping the amount of leave an employee may take are still appropriate. Nevertheless, the EEOC has opined that such policies may have to be modified to provide an accommodation to an employee with a disability. The 11th Circuit has now provided some guidance for employers confronted with whether and to what extent they have to provide leave as an accommodation.

11th Circuit's interpretation of the law

Roderick Billups was employed as a service technician by Emerald Coast Utilities Authority. After suffering an on-the-job injury, he took a significant amount of leave without providing a clear indication of when he would be able to return to work. Because of his inability to return to work and perform the essential functions of his job, Emerald Coast terminated his employment.

Billups later sued, alleging his former employer should have provided leave as a reasonable accommodation for his disability and failing to do so

AGENCY ACTION

EEOC launches respectful workplace training program. The Equal Employment Opportunity Commission (EEOC) announced in early October 2017 two new training programs for employers: Leading for Respect (for supervisors) and Respect in the Workplace (for all employees). The training programs focus on respect, acceptable workplace conduct, and the types of behavior that contribute to a respectful and inclusive workplace. The programs are customizable for different types of workplaces and include a section for reviewing employers' own harassment prevention policies and procedures. The training program is an outgrowth of the Report of the Co-Chairs of the EEOC's Select Task Force on the Study of Harassment in the Workplace. "We always said the report was just a first step," said EEOC member Victoria Lipnic, who is a coauthor of the report. "Implementation of the report's recommendations is key. These trainings incorporate the report's recommendations on compliance, workplace civility, and bystander intervention training."

Pension agency launches pilot mediation project. The federal Pension Benefit Guaranty Corporation (PBGC) has announced a new pilot program to offer mediation in certain Termination Liability Collection and Early Warning Program cases. The PBGC's pilot project will allow parties to resolve cases with the assistance of a neutral, independent dispute resolution professional. The project is part of the agency's ongoing efforts to make it easier for sponsors to maintain their pension plans. "We want our customers to know we're listening to them, and we want to improve their experience in working with us," PBGC Director Tom Reeder said of the project, which was announced on October 16. "By providing an alternative dispute resolution option for employers who sponsor ongoing and terminated plans, we expect to save time and money for both the government and our stakeholders."

Labor secretary announces apprenticeship task force. U.S. Secretary of Labor Alexander Acosta has announced members of the President's Task Force on Apprenticeship Expansion. The task force membership represents companies, trade and industry groups, educational institutions, and labor unions. President Donald Trump earlier issued the Executive Order Expanding Apprenticeships in America, which called for the task force. Apprenticeships provide paid, relevant workplace experiences and opportunities to develop skills that job creators demand. The mission of the task force is to identify strategies and proposals to promote apprenticeships, especially in sectors where apprenticeship programs are insufficient. Acosta is chair of the task force. Vice chairs are Betsy DeVos, secretary of the U.S. Department of Education, and Wilbur Ross, secretary of the U.S. Department of Commerce. ✤

violated the Americans with Disabilities Act (ADA). The trial court dismissed the case, finding that Billups didn't identify a reasonable accommodation that would allow him to perform his job. The 11th Circuit affirmed that decision on appeal.

The 11th Circuit rejected Billups' argument that he should have been offered a "limited period" of unpaid leave to recover from his job-related injury because he couldn't show that such an accommodation would allow him to perform the essential functions of his job "in the present or in the immediate future." An accommodation that doesn't permit the employee to perform his job is unreasonable under the ADA. The court held that although leave can be a reasonable accommodation, leave with an indefinite return date doesn't allow an employee to perform the essential functions of his job, making him unqualified for his position under the ADA. *Billups v. Emerald Coast Utilities Authority*, Case No. 17-10391.

Takeaway

The 11th Circuit's decision highlights some of the tension between the EEOC's guidance on leave as an accommodation and how employers evaluate reasonable accommodation requests. While the EEOC has indicated that requests for indefinite leave may not be permissible, it couched the issue as a burden for the employer to prove in establishing that the request creates an undue hardship. The 11th Circuit has reaffirmed that an employee must prove that a request for accommodation was reasonable in the first place.

The accommodation process is complex and involves the intersection of several different statutory obligations. Employers considering sticky disability accommodation issues would be well-advised to involve experienced employment law counsel.

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EEOC GUIDANCE

EEOC reminds employers of best practices for providing workplace accommodations

by Lisa Berg
Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A.

The Equal Employment Opportunity Commission (EEOC) held a training session in Fort Lauderdale on October 30, 2017. I had the pleasure of participating in a panel discussion titled "Providing Workplace Accommodations under the ADA," along with a representative of the Job Accommodation Network (JAN) and Michael Farrell, director of the EEOC's Miami District Office. Here are some takeaways from our discussion of accommodations under the Americans with Disabilities Act (ADA).

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ANDY'S IN-BOX

Rethinking the harassment complaint model

by Andy Rodman
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Over the last several weeks, allegations of sexual harassment and sex discrimination have hit the news almost daily, with fingers being pointed at Hollywood "stars," corporate executives, and politicians. And then there are countless unpublicized allegations raised by employees in workplaces across the country every year.

Many of the claims that have hit the media have been raised years or, in some cases, decades after the harassment allegedly occurred. Why have the victims, both men and women, waited so long to come forward? Many have explained that they were afraid that coming forward would end their career. By remaining silent, the victims internalized the harm, and in some cases, they continued to endure further harassment by the perpetrators. The silence also enabled the perpetrators to seek new victims.

How do we eliminate the fear of retaliation that deters victims of harassment and discrimination from coming forward immediately? For starters, perhaps we should examine common complaint mechanisms in standard antiharassment and antidiscrimination policies. Most complaint mechanisms are multitiered, meaning the victim is told to complain to her immediate supervisor, HR (especially if her supervisor is the perpetrator), or a management official. Many handbooks include "open-door" statements that essentially invite employees to stop by an executive's office at any time to talk about anything, including allegations of harassment or discrimination.

However, standard policies may not eliminate the fear of retaliation, even though most of them expressly prohibit retaliation. Perhaps we should think about incorporating an anonymous reporting option into complaint procedures. Of course, some employers already allow anonymous reporting, but it's far from universal.

Anonymous reporting certainly is not ideal. For one thing, without knowing the identity of the complaining party, it's much more difficult for HR to investigate a complaint. If HR can't complete a thorough investigation (which normally includes interviewing the complaining party), it may be hindered in its ability to reach a reasoned conclusion, take remedial action against the perpetrator (if necessary), and prevent future occurrences.

Despite the flaws inherent in anonymous reporting, many believe that an anonymous complaint is better than no complaint at all. That belief has given birth to a soon-to-be-launched website called AllVoices. Created by Claire Schmidt, a former technology executive at 20th Century Fox, AllVoices will provide an avenue for employees to bypass HR and anonymously report harassment and discrimination directly to CEOs and corporate boards of directors.

AllVoices will aggregate reports of harassment and discrimination by company, deliver the complaints to each company without providing personally identifiable information, and advise the complaining party when the company has received the report and whether the company has taken action. Schmidt describes AllVoices as "a safe place for people to report what they've experienced without having to come forward publicly, risk their jobs or reputations, or fear retaliation."

Only time will tell whether AllVoices succeeds in achieving its goals. In the meantime, it would be prudent to review your antiharassment and antidiscrimination policies to ensure that employees are not deterred from bringing complaints forward immediately.

For more information on dealing with workplace harassment, see "Hollywood scandals generate new interest in workplace harassment" on pg. 7 of this issue.

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ADA's accommodation mandate

According to the ADA, the term "discriminate" includes "not making reasonable accommodations to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, unless such covered entity can demonstrate that the accommodation would impose an undue hardship on the operation of the business of such covered entity."

The ADA Amendments Act of 2008 (ADAAA) made it easier for people with disabilities to obtain protection under the ADA because it mandated that the definition of "disability" be construed broadly in favor of expansive coverage to the maximum extent permitted under the law.

What constitutes a request for a reasonable accommodation?

The EEOC's position is that when an employee informs his employer that he needs an adjustment or a change to his working conditions because of a "medical condition," that is enough to qualify as a request for reasonable accommodation. Federal courts have held that an employee must give sufficient notice that a workplace modification is needed *because of* a condition that could be a disability. A doctor's note with restrictions or a request for leave under the Family and Medical Leave Act (FMLA) for an employee's medical condition is enough to trigger the interactive process.

In making a request for accommodation, an employee doesn't need to use magic words like "accommodation." Examples of requests for accommodation include "I'm having trouble getting to work at my scheduled time because of the treatments I'm undergoing" and "I need six weeks off to have a procedure for a back problem."

A reasonable accommodation involves the removal of workplace barriers. Accommodations can involve:

- Changes to the job application process;
- Modifications to the work environment; or
- Changes so that an employee can enjoy equal privileges and benefits of employment.

What should you do after receiving an accommodation request?

When an employee requests an accommodation, you should respond, "How can I help you?" and initiate the interactive process. In other words, you should have a meaningful dialogue with the employee to determine whether a reasonable accommodation will allow her to perform the essential functions of her job. During the interactive process, you should:

- Identify the employee's precise limitations.
- Clearly and accurately characterize her essential job functions.
- Explore accommodation options with the employee.
- Involve third parties, including the employee's physician, HR, and the U.S. Department of Labor's (DOL) JAN.

You can generally ask an employee for information about the existence of a disability and whether she needs the accommodation *because of* the disability. You may ask for documentation to describe the impairment; its nature, severity, and duration; the activities it limits; and the extent to which it limits those activities. However, you cannot ask for complete medical records. You are entitled only to the limited information necessary to evaluate the request for accommodation. In some situations, it may be more beneficial to provide a "quick fix" and avoid obtaining the employee's medical information.

What is JAN?

Many employers are not aware of JAN, a confidential free service provided by the DOL's Office of Disability Employment Policy. JAN's website describes a wide range of disabilities and provides examples of how to accommodate those conditions in the workplace. JAN can assist employers with the ADA interactive process, provide targeted technical assistance and training, and work as your partner in the accommodation process. Employers may access the service by going to AskJan.org, e-mailing jan@askjan.org, or calling 800-526-7234 or 877-781-9403 (TTY). Consultants are also available at janconsultants via Skype.

Dealing with a disabled employee's coworkers

What happens when a disabled employee requests the accommodation of a transfer to an available position wanted by other employees? According to the EEOC, the disabled employee should get the position because reassignment without competing for the job is required with limited exceptions (e.g., seniority provisions in a collective bargaining agreement). However, the 11th Circuit has opined that the ADA merely requires an employer to allow a disabled employee to compete for a job with the rest of the world, and an accommodation does not have to violate a best-qualified hiring or transfer policy. Keep in mind that you never have to create a job as an accommodation.

What should you say when other employees ask about the accommodation you've provided to a coworker? The EEOC states that you may explain that you are acting for legitimate business reasons or in compliance with federal law, or you could respond, "Many of

the workplace issues encountered by employees are personal, and in these circumstances, it is our policy to respect employee privacy." A simpler response might be, "It is private information, and I cannot share it with you."

Best practices

Some best practices for employers faced with reasonable accommodation requests include the following:

- Respond expeditiously to accommodation requests.
- Document the interactive process.
- Update your job descriptions, and ensure they accurately describe essential job functions.
- Password protect any medical information you receive as part of the interactive process.
- Keep supervisors out of the process of gathering medical information.
- Do not use one form for requesting medical documentation of an employee's disability. Instead, tailor the form to the specific situation.
- Train supervisors to spot requests for accommodations.

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HEALTH INSURANCE

More employers can claim contraception exemption under new rules

The Department of Health and Human Services (HHS) announced recently that it was expanding the circumstances in which an employer can offer a group health plan that doesn't cover contraception. The action was taken in response to an Executive Order from President Donald Trump asking the agency to amend the contraception coverage regulations to promote religious liberty. New exemptions allow a wider range of employers to opt out of providing coverage for some or all types of contraception if they can demonstrate a religious or moral objection to doing so.

Some background

Few aspects of the Affordable Care Act (ACA) have been challenged as much in court or gone through as many regulatory shifts as the contraception coverage mandate. Originally, regulations required all health plans—including those offered by employers—to provide coverage of contraceptives at no cost to employees. This requirement has been chipped away over the years. The first changes took the form of a regulatory exemption for churches and an accommodation under which other religious organizations could opt out of providing the benefits. The accommodation process—under which employees who lost contraception coverage under an employer plan could obtain

WORKPLACE TRENDS

Poll finds employers worried about reaction to pay disclosure rule. Half of companies polled about a new pay ratio disclosure rule say their biggest challenge is forecasting how employees will react, according to a poll by Willis Towers Watson. The rule requires companies to begin making CEO pay-to-worker ratio disclosures in early 2018. The poll also found nearly half of respondents haven't considered how—or if—they will communicate the pay ratio even though employees' reaction to the disclosure is their greatest concern. When asked whose reaction brings the most concern, half the companies cited employees. Twenty percent said they were most concerned about media reaction, followed by shareholders (16%). Few were concerned over the reaction of customers or CEOs.

Study finds employers acting to close retirement savings gap. A survey from Aon Hewitt, the talent, retirement, and health solutions business of Aon plc, shows that U.S. employers are taking steps to help workers save more and improve their long-term financial outlook. The survey of more than 360 employers, representing over 10 million employees, shows 401(k) plans are shifting in three key areas. (1) Company match: To encourage workers to save more, employers are boosting their match. (2) Automatic enrollment: Employers are defaulting employee contributions at a higher rate. (3) "Back-sweeping": Most employers automatically enroll only new hires, but many are taking action to ensure more workers participate in the plan. Currently, 16% of employers automatically enroll all eligible employees (also called back-sweeping) on an ongoing (annual) or one-time basis—double the percentage that did so in 2013.

Workers bored? Here's how they fill the time. A survey from Office Team finds that professionals admit they're bored in the office an average of 10.5 hours per week. Senior managers interviewed acknowledged boredom at work but estimated their staff is likely disinterested about six hours each week. Employees were asked what they do when they're bored. In addition to browsing the Internet, checking personal e-mail and social media, and chatting with coworkers, here are some other responses: having rubber band battles with coworkers, making grocery lists and cutting coupons, learning another language, doodling, making videos, watching TV or movies online, playing online games, writing a book, playing Ping-Pong, asking for more work, and looking for another job. Of all respondent groups, male workers and those ages 18 to 34 were found to be bored the most per week (12 hours and 14 hours, respectively). Men (46%) and employees ages 18 to 34 (52%) are most likely to leave their current position if bored. ✤

UNION ACTIVITY

Unions join NAACP in DACA defense. The United Food and Commercial Workers International Union announced in October 2017 that it had joined the American Federation of Teachers and the NAACP in a lawsuit against President Donald Trump, Attorney General Jeff Sessions, Homeland Security Secretary Elaine Duke, U.S. Citizenship and Immigration Services (USCIS), U.S. Immigration and Customs Enforcement (ICE), and the Department of Homeland Security (DHS) for the Trump administration's termination of the Deferred Action for Childhood Arrivals (DACA) program. The parties in the lawsuit contend that the decision to rescind DACA disregarded the due process rights of the DACA registrants and that the administration failed to engage in the required analysis or rulemaking procedures required by the Regulatory Flexibility Act and the Administrative Procedure Act.

Teamsters secure settlement of unfair labor practices. The International Brotherhood of Teamsters Local Union 118, based in Rochester, New York, claimed a victory for unionized labor in October with a settlement of more than $60,000 in damages following a long-running dispute with Palmer Food Company, Inc. The case involved unfair labor practice charges filed with the National Labor Relations Board (NLRB) in Buffalo that alleged an attempt to harm union activity at the company. In early 2017, warehouse workers at the company campaigned to organize with Local 118. The local filed charges against the company with the NLRB. Under the settlement, Palmer Food Company is to post a notice notifying workers that it will no longer engage in the practices it was charged with and what it will do to correct any improper conduct, including recognizing the Teamsters and entering into collective bargaining with the union.

Union urges FCC to investigate telecom industry sales practices. The Communications Workers of America (CWA) announced in October that it had called on the Federal Communications Commission (FCC) to more fully investigate the causes of unethical sales practices that result in "cramming and slamming" in the telecommunications industry. The union called on the FCC to investigate the relationship between sales quotas, incentives, performance management systems, and unauthorized and fraudulent charges on bills. The CWA said those sales practices force frontline employees to meet unrealistically high sales quotas and benchmarks or face the loss of compensation and their jobs. The CWA submitted comments in response to the FCC's proposed rulemaking on methods to protect consumers from unauthorized changes and charges, to empower consumers to take action, and to deter carriers from unethical sales practices. ✤

separate coverage free of charge through the carrier or a third-party administrator (TPA)—was later made available to some closely held corporations in response to a U.S. Supreme Court ruling.

But even with the exemptions, many religious organizations (and other employers) argued that the regulatory structure required them to be complicit in providing contraception to their employees in violation of their religious beliefs. Dozens of lawsuits were pending all across the country when the latest regulations were issued in early October 2017.

What's new

Under the new rules, an exemption from the contraception mandate can be claimed by:

- Any private employer (nonprofit or for-profit alike) that has a religious objection to contraception; and
- Nonprofit employers and non-publicly traded for-profit employers that have a moral objection to contraception.

Neither exemption is available to governmental employers (including public colleges and universities). However, both can be claimed by private colleges and universities with regard to student health coverage they offer.

It should be noted that both of the new exemptions completely relieve employers of the obligation to provide contraception coverage, which means their employees may not be able to obtain it elsewhere. Under the previous "accommodation" process, when a religious organization or closely held corporation opted out of contraception coverage, the carrier, TPA, and/or HHS would be notified. Employees who lost coverage through the employer could obtain it through the accommodation process independently of the employer plan. Under the new exemptions, employers that choose one of the new exemptions can ensure that employees don't obtain free contraception coverage elsewhere as a result (as they would through the accommodation process).

Employers that are currently claiming the accommodation can revoke it in favor of one of the new exemptions.

Uncertainties remain

One issue that remains uncertain is what it means to have "sincerely held moral convictions" or "sincerely held religious beliefs" and what an employer needs to do to demonstrate that it holds such beliefs. For some organizations, that may be relatively easy—such as a nonprofit run by a church with a well-established objection to contraception. For employers that have no clear religious affiliation, however, it's hard to tell what will suffice. The regulations merely say that the employer will need to have adopted and documented its moral convictions or religious beliefs "in accordance with state law."

In addition, unlike previous versions of the regulations, the interim regulations provide no specific process for an employer to claim the exemptions. For that reason, it may take some time

for carriers and TPAs to determine how they are going to handle employer requests to exclude contraceptive coverage under one of the new exemptions. While the regulations don't require any sort of form or filing, it is possible the carriers will develop their own requirements, and that could take some time.

Next steps

Theoretically, employers with an interest in claiming an exemption could do so immediately, but most will likely prefer to wait at least until the beginning of their next plan year. Because many state laws require contraception coverage, you need to determine to what extent any such laws apply to you before making any changes to your plan. You should also take care to properly document and disclose any changes you ultimately make, such as by issuing a new summary of benefits and coverage (SBC), revising your plan documents, and distributing a new summary plan description.

In short, we don't recommend getting in too big of a hurry to adopt the new exemptions (especially those of you who have a new plan year coming up on January 1). It's better to take a little time for the process to crystalize, see how the carriers are going to handle the exemptions, and consult with your attorney for assistance and advice. ✤

SEXUAL HARASSMENT

Hollywood scandals generate new interest in workplace harassment

The past couple of months have been a little crazy. It seems like every day, we hear a new salacious story about inappropriate sexual behavior committed by various movers and shakers in La La Land and beyond.

For those of us who work in the HR and employment law fields, it can be hard to believe this type of behavior still goes on in the 21st century American workplace. Some of us have been writing and educating employers about preventing and responding to workplace harassment since the days of Anita Hill and Clarence Thomas (look it up, kids).

Yet in spite of our cumulative efforts, workplace harassment (whether sexual or based on some other protected characteristic such as race or religion) continues. What can the HR profession do to turn the tide? While there is no surefire answer, consider the following steps.

Update harassment, discrimination policies

Many employers resist adopting written policies out of misguided concerns that they will:

(1) Be bound to a specific disciplinary or investigative process or response; or

(2) Create legal obligations where none were intended.

While both of those things *could* happen, an attorney can help you craft an employee handbook that is well thought out, well written, and designed specifically for your workplace. Some HR resources even offer "handbook builder" tools that can get you started (although you should still customize it to your workplace and have it reviewed by an attorney).

Train your supervisors

Supervisor training is key to any successful harassment prevention program for a number of reasons. First, harassment committed by a supervisor is the most dangerous form of harassment legally because it creates *strict liability* under federal employment laws such as Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and the Age Discrimination in Employment Act (ADEA). "Strict liability" means that if an employee can prove illegal harassment by a supervisor, there is no defense for the employer.

But beyond that, educating your supervisors is critical because they are key players in recognizing and responding to the types of conduct that could give rise to a harassment or discrimination complaint.

Educate your employees

Nonsupervisory employees also should receive harassment training, but it should look substantially different from the training provided to supervisors. Beyond providing a basic understanding of the types of behavior that are prohibited by your policies and the law, employee training should focus on your internal complaint process for harassment, discrimination, and other similar issues. If an employee doesn't follow your complaint process, you can assert his failure to do so as a defense to many harassment claims (those that don't involve supervisor harassment).

Respond promptly to complaints

Any time an employee complains about workplace harassment, you need to be prepared to respond appropriately. Ideally, you should have a process in place before a complaint arises so that you can respond without delay. If you don't yet have such a process, develop one with the following questions in mind:

- Who will interact with the employee regarding the complaint?
- Who will conduct an investigation into the complaint (if necessary)? Will you use someone internal to your organization or bring in an outside investigator? Do some research ahead of time to find

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1-25 Form I-9 Recordkeeping: How to Complete, Re-Verify, Store, and Destroy Paper and Electronic Files in Compliance with Federal Law

attorneys or HR consultants who perform such investigations so you will know whom to call when the time comes.

- Will the investigation vary depending on the nature and severity of the complaint? If so, try to establish some rough parameters for the differences.
- What measures can you take to protect employees from retaliation and/or safeguard confidentiality?

Get buy-in from company leaders

It's an unfortunate fact of life that no matter how much work you put into the previous steps, it may not mean much unless the leadership in your organization is on board. Too many company owners and executives still view HR's cautionary stance on harassment prevention and response as trivial, unimportant, or downright unnecessary. That can put HR in the difficult position of knowing that something needs to be done but not having the authority or resources to do it.

If you don't have this problem, count yourself lucky. But if you do, look for ways to educate the powers that be about the dangers of ignoring the need for harassment policies, prevention, and response. Keep an eye out for articles in CEO-friendly publications such as *Inc.*, *Forbes*, or the *Wall Street Journal*. When you read about a particularly large verdict or settlement, share it with them. You can even do a quick summary of the articles in this newsletter that might be of interest to your leadership team.

Final words

Harassment law is a huge topic, and it's not one that can be fully addressed in a single article. We strongly recommend that you (and others in your organization if necessary) seek out additional training and resources to attain competency in this complex field.

Learn how to address and prevent explosive #MeToo sexual harassment allegations at your workplace by listening to the webinar "#MeToo Sexual Harassment: How to Recognize and Prevent Devastating Claims and Workplace Culture Problems," presented by attorney Mark Schickman. For more information, visit http://store.HRhero.com/events/audio-conferences-webinars/me-too-sexual-harassment-112017. ✤

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