



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Office of Federal Operations
P.O. Box 77960
Washington, DC 20013

[REDACTED]
Britany C.,¹
Complainant,

v.

Louis DeJoy,
Postmaster General,
United States Postal Service,
Agency.

Appeal No. 2021001940

Hearing No. 520-2020-00336X

Agency No. 4B-100-0133-19

DECISION

On January 27, 2021, Complainant filed an appeal with the Equal Employment Opportunity Commission (EEOC), per 29 C.F.R. § 1614.403(a), from a December 21, 2020 final Agency decision (FAD) on her equal employment opportunity (EEO) complaint alleging employment discrimination in violation of Section 501 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended, 29 U.S.C. § 791 et seq. The Commission accepts the appeal in accordance with 29 C.F.R. § 1614.405.

BACKGROUND

During the period at issue, Complainant was employed by the Agency as a Mail Handler (Modified Assignment - Limited Duty), PS 4/P, at the Church Street Station in New York, New York.

On October 10, 2019, Complainant filed an EEO complaint alleging that the Agency discriminated against her based on her disability (bilateral leg, knee and ankle sprains;

¹ This case has been randomly assigned a pseudonym which will replace Complainant's name when the decision is published to non-parties and the Commission's website.

lumbosacral sprain) when, from July 5, 2019 through July 31, 2019,² it did not allow her to work.

The Agency accepted the complaint for investigation. The following pertinent information was found.

On June 15, 2019, the American Postal Workers Union, AFL-CIO, filed a Step 2 grievance against the Agency alleging that Complainant performing Clerk Craft duties in her Modified Assignment violated the collective bargaining agreement (CBA) between the union and the Agency because this crossed crafts (i.e. someone outside the Clerk Craft performing Clerk Craft duties). Report of Investigation (ROI), Exhs. 4 (Step 2 grievance), 7 (Union request for a list of Complainant's Modified Assignment duties), and Affidavit C, at 3, ¶ 15 (by the Manager of Customer Services, Complainant's second line supervisor "S2"), Bates Nos. 180, 207, 146. Complainant does not contest that she performed Clerk Craft duties.

On June 11, 2019, the Agency Health & Resource Management (HRM) informed Complainant that her most recent medical note on file was dated January 18, 2011, and it asked her to submit an updated note from her doctor with her medical restrictions. The request was repeated on June 21, 2019. ROI, at Affidavit A, at 16, Bates No. 21. S2 separately stated this request was made so the Agency could draft a new Offer of Modified Assignment for Complainant that was within her current medical restrictions and did not cross crafts. ROI, Affidavit C, at 3, ¶ 15, Bates No. 146. The Supervisor of Customer Services, Complainant's first line supervisor "S1" echoed this. Affidavit B, at 3, ¶ 15, Bates No. 138.

However, Complainant refused to submit a doctor's note with her current medical restrictions, believing it was unnecessary. At some point, S2 told Complainant not to return to work until she submitted an updated doctor's note describing her medical restrictions. Affidavit A, at 3, ¶ 15, at Bates No. 92 (Complainant's affidavit). Complainant expected that when she brought in the updated note, she would be allowed to work. On July 5, 2019, Complainant came to work with a July 2, 2019 doctor's letter which read:

... Above mentioned patient physical requirements are lifting, pushing/pulling reaching above shoulder not to exceed 20lbs [sic.], standing and walking average time 20 minutes....

According to S2, HRM found the updated doctor's letter to be inadequate because the limitations were unclear. S2 stated that he asked Complainant to submit another updated doctor's letter. Without reference to HRM, S1 attested that S2 told him the above.

Complainant submitted a revised doctor's note after July 31, 2019. ROI, Affidavit C, at four, ¶ 15 as continued from prior page, Bates No. 147. She returned to work on August 1, 2019.

² Complainant erroneously alleged this period started on July 4, 2019, which was a paid holiday for her.

The HRM Manager stated it was S2 who decided not allow Complainant to work. According to HRM Manager, he learned this after S2 made the decision and he was not aware why Complainant was not allowed to work in her limited duty assignment between July 5, 2019 and July 31, 2019.

On July 22, 2019, the HRM Manager wrote Complainant that the Agency was reviewing her Modified Assignment (Limited Duty) to determine if a revision was necessary after an arbitration award on limited duty “non-APWU Clerk craft employees performing clerk craft duty assignments.” He informed Complainant that management would perform a search for adequate, available work and, if found, she would be offered a revised Modified Assignment (Limited Duty) within her July 2, 2019 medical restrictions.

Days later, in a letter dated July 25, 2019, the HRM Manager presented Complainant an Offer of Modified Assignment (Limited duty) effective August 1, 2019, to the position of Modified Handler (Modified Assignment – indefinite duration) at the James A. Farley Retail Local Operation Center. ROI, Bates Nos. 25 -26. The duties differed from her prior assignment, and the letter noted these duties were within the restrictions set forth in her “treating doctor [letter] dated July 2, 2019.” The list of Complainant’s restrictions in the Offer are identical to those listed in her July 2, 2019 doctor’s letter. ROI, Ex. 8, at 2, Bates No. 199.

Following the investigation, Complainant requested a hearing before an EEOC Administrative Judge (AJ). When Complainant later withdrew the request, the AJ ordered the Agency to issue a FAD. In its FAD the Agency found no discrimination.

In its decision, the Agency assumed, without finding, that Complainant was an individual with a disability. The Agency found she was not qualified because she was unable to perform the essential functions of her Mail Handler (unmodified) job with, or without, reasonable accommodation. But, even presuming she was otherwise qualified, the Agency reasoned that Complainant did not submit the medical documentation management requested in order to offer her a new modified assignment within her medical limitations. Additionally, the Agency concluded Complainant did not prove discrimination under the theory of disparate treatment. It found, for example, that Complainant did not identify any comparative employees who were treated differently. The instant appeal followed.

On appeal, Complainant argues that she was discriminated against.³ In reply, the Agency argues that the FAD should be affirmed.

³ Complainant raises allegations on appeal which are not part of her EEO complaint presently before us. Consequently, we shall not consider such claims in the instant decision.

ANALYSIS AND FINDINGS

As this is an appeal from a decision issued without a hearing, pursuant to 29 C.F.R. § 1614.110(b), the Agency's decision is subject to de novo review by the Commission. 29 C.F.R. § 1614.405(a). See Equal Employment Opportunity Management Directive for 29 C.F.R. Part 1614, at Chapter 9, § VI.A. (Aug. 5, 2015) (explaining that the de novo standard of review “requires that the Commission examine the record without regard to the factual and legal determinations of the previous decision maker,” and that EEOC “review the documents, statements, and testimony of record, including any timely and relevant submissions of the parties, and . . . issue its decision based on the Commission’s own assessment of the record and its interpretation of the law”).

Under the Rehabilitation Act and the Commission's regulations, an agency is required to make reasonable accommodation to the known physical and mental limitations of a qualified individual with a disability unless it can show that accommodation would cause an undue hardship. 29 C.F.R. §§ 1630.2(o), 1630.2(p). Once an individual with a disability requests a reasonable accommodation, the employer must make a reasonable effort to determine an appropriate accommodation. 29 C.F.R. Part 1630.9.

The definition of an “individual with a disability” under the ADA and Rehabilitation Act includes one who has a physical or mental impairment that substantially limits one or more major life activities. 29 C.F.R. § 1630.2(g)(1)(i). The Americans with Disabilities Act Amendments Act of 2008 (ADAAA) expanded the definition of disability under the Americans with Disabilities Act (ADA) and the Rehabilitation Act. The primary purpose of the ADAAA is to make it easier for people with disabilities to be covered under the ADA. The definition of disability is construed broadly in favor of expansive coverage to the maximum extent permitted by the terms of the ADA. Appendix to 29 C.F.R. Part 1630 – Interpretive Guidance on Title I of the Americans with Disabilities Act (located with 29 C.F.R. Part 1630 regulations), Section 1630.1(c), 1st ¶.

Since December 2010, until being told to go home on July 5, 2019, Complainant worked in the same Modified Assignment (Limited Duty). ROI, Affidavit A, at 18, Bates No. 107 (HRM Manager’s July 22, 2019 letter to Complainant). Her duties included spreading mail to carrier routes, casing mail, and nixie mail. The December 2010 Offer of Modified Assignment indicated its physical requirements were lifting, pushing/pulling not to exceed 20 pounds for 2 to 3 hours, reaching above the shoulder for 2 hours, and standing/walking for 3 to 4 hours. This indicates Complainant’s medical limitations were the above. The job was six hours daily. ROI, Ex. 6.

While staying in the same Modified Assignment, her daily hours increased to eight on February 15, 2011. ROI, Affidavit A, at 10, Bates No. 109 (Complainant’s statement) and at 28, Bates No. 127 (letter dated December 12, 2012, documenting a grievance settlement). On July 2, 2019, Complainant’s restrictions were similar, except the length of time she could stand and walk substantially decreased.

An impairment includes any physiological disorder or condition, such as musculoskeletal. 29 C.F.R. § 1630.2(h)(1). Complainant's long term bilateral leg, knee and ankle sprains, and lumbosacral sprain are an impairment. Major life activities including walking, standing, lifting and reaching are all impacted by her impairment. 29 C.F.R. § 1630.2(h)(2)(i)(1)(i). "Substantially limits" is construed broadly in favor of expansive coverage, to the maximum extent permitted by the ADA, and is not meant to be a demanding standard. *Id.* (means same as above) at (h)(2)(i)(2)(i)(1)(i). We find that Complainant has met this standard and is an individual with a disability.

To be a "qualified" individual with a disability, the individual must satisfy the requisite skill, experience, education and other job-related requirements of their position or one they desire and, with or without reasonable accommodation, can perform the essential functions of the position. 29 C.F.R. § 1630.2(m). As noted above, the Agency found that Complainant was not qualified because with her medical limitations she was unable to perform the essential functions of her (non-modified) Mail Handler position.

Where an employee has performed a modified position for an extended amount of time, that is the position which is considered for purposes of deciding whether the employee is a qualified individual with a disability. Velva B. v. USPS, EEOC Request Nos. 0520180094 & 0520180095 (Mar. 9, 2018). Complainant performed her Modified Assignment over eight years before she was told to stop. Because the record is devoid of evidence that she was unable to perform the duties of this modified position, she is a "qualified" individual with a disability. See Huddleson v. USPS, EEOC Appeal No. 0720090005 (Apr. 4, 2011) (decision contains same language).

In September 2019, the Office of Workers' Compensation Programs (OWCP) accepted Complainant's recurrence of disability claim based on the Agency's withdrawal of her (December 2010) Modified Assignment. It awarded her wage loss compensation for total disability from July 5, 2019 through July 31, 2019. ROI, Affidavit A, at 21, Bates No. 120 (OWCP award letter).

When the need for an accommodation is not obvious, an employer, before making a reasonable accommodation, may require that the individual with a disability submit documentation on the need for accommodation. Appendix to 29 C.F.R. Part 1630 – Interpretive Guidance on Title I of the Americans with Disabilities Act, Section 1630.9, last ¶. This also applies to the type of accommodation. Since Complainant's most recent medical documentation on file was from January 2011, the Agency had a right to ask, in June 2019, that she submit an updated doctor's note on her current medical restrictions, and require this before offering her a new accommodation – which the Agency decided would be another Modified Assignment within her medical restrictions.

It is undisputed that S2 told Complainant that when she submitted her updated medical limitations, she could return to work. S2 explained he did not allow Complainant to work on July 5, 2019, because her restrictions in the updated medical documentation she submitted (that day) were unclear, and she submitted revised medical restrictions after July 31, 2019. Complainant

resumed working on August 1, 2019. This statement implies that as soon as Complainant submitted acceptable updated medical documentation, she would be assigned work. This is what Complainant believed.

On appeal, Complainant writes that after she submitted the July 2, 2019 documentation regarding her updated medical restrictions on July 5, 2019, she was not asked for additional documentation. She rhetorically asks the Agency to show her the revised doctor's note on which the new July 2019 Offer of Modified Assignment was based. See Complainant's handwritten comments on the FAD, pp. 17, 19. There is no evidence in the record that S2 asked Complainant to submit another doctor's note, nor is there one in the record dated after July 2, 2019. Language in the July 2019 Offer of Modified Assignment paperwork explicitly stated it was based on Complainant's July 2, 2019 medical documentation.

After Complainant was not permitted to work on July 5, 2019, she filed a grievance. Counselor's Report, at 5, Bates No. 63 (Grievance Summary – Step 1). The Grievance Summary, which is signed by S1 reflects the Step 1 meeting was on July 12, 2019, and the Step 1 answer was made on July 16, 2019. It recounts that management indicated Complainant's July 2, 2019 medical restriction letter was unacceptable because it did not say how long she could push/pull/lift/sit. In their EEO investigative affidavits, S1 and S2 did not explain why the July 2, 2019 medical restriction letter was inadequate.

We disagree with the Agency's finding that management did not offer Complainant a new Modified Assignment earlier because the July 2, 2019 medical restriction letter she submitted on July 5, 2019, was inadequate. The Agency's Offer of Modified Assignment dated July 17, 2019 and signed on July 25, 2019, was based on the above medical restriction letter, not a later one – of which there is none in the record.

Moreover, in Complainant's July 2019 grievance, the union argued that Complainant should have been permitted to work in her old Modified Assignment until things were sorted out, and the HRM Manager's letter to Complainant dated July 22, 2019, stated HRM was reviewing her old Modified Assignment to see if a revision was necessary after a recent arbitration award. The HRM Manager separately stated he did not know why Complainant was not allowed to work in her prior limited duty assignment from July 5, 2019 through July 31, 2019. We find, by a preponderance of the evidence, that management's reasons not allowing Complainant to work between July 5, 2019 and July 31, 2019, are not persuasive because it had the options to temporarily allow her to continue working within her old modified assignment and to offer her a new modified assignment earlier.

In Huddleson v. USPS, EEOC Appeal No. 0720090005 (Apr. 4, 2011), the Agency accommodated a complainant's disability with modified job offers for several years. In April 2005, the Agency abolished the complainant's bid position and he was given a new modified assignment outside his medical restrictions.

The complainant informed management of this. The EEOC found discrimination because the Agency did not show it would have been an undue hardship to continue to accommodate the complainant with work within his medical restrictions. We find Huddleson applies to Complainant's case.

Based on a thorough review of the record, we find that the Agency discriminated against Complainant when it did not reasonably accommodate her disabilities by allowing her to work from July 5, 2019 – July 31, 2019. In light of our finding of discrimination based on failure to reasonably accommodate, we need not address whether Complainant was also subjected to unlawful disparate treatment.

CONCLUSION

The Agency's decision finding no discrimination was improper and is hereby REVERSED. The case is REMANDED to the Agency in accordance with the Order below.

ORDER (D0617)

The Agency is ordered to take the following remedial actions:

1. The Agency shall determine the appropriate amount of back pay, with interest, and other benefits due Complainant, per 29 C.F.R. § 1614.501, no later than 60 days after the date this decision, and pay her the undisputed amount within 60 days of the date of its this determination. The back pay period is July 5, 2019 through July 31, 2019,⁴ for the position of Mail Handler, PS-04/P. Complainant shall cooperate with the Agency's efforts to compute the amount of back pay and benefits due, including providing statements, documents, input and other evidence, and responding to Agency requests for such information and completing Agency forms within 30 days of when the Agency makes a request. If there is a dispute on the exact amount of back pay and/or benefits, Complainant may petition for enforcement or clarification of the amount in dispute. The petition for clarification or enforcement must be filed with our Compliance Officer, via the EEOC Public Portal at <https://publicportal.eeoc.gov/Portal/Login.aspx>, by facsimile to 202-663-7022, by regular mail to the Director, Office of Federal Operations, Equal Employment Opportunity Commission, P.O. Box 77960, Washington, DC 20013, or by certified mail to 131 M Street, NE, Washington, DC 20507.⁵

⁴ The Agency may deduct wage loss compensation Complainant received from OWCP for the same period.

⁵ In this case, we exercise our discretion to not require the Agency to pay Complainant tax consequences resulting from receiving a lump sum of back pay in a tax year later than she normally would have earned that pay but for the discrimination.

2. The issue of Complainant's entitlement to compensatory damages is remanded to the Agency. Within 60 days of the date of this decision, the Agency shall determine the amount of pecuniary and non-compensatory damages to compensate Complainant for the harm caused to her by the discrimination found in this decision, and pay her the undisputed amount within 60 days of the date this determination. Complainant must prove these compensatory damages by submitting to the Agency statements, documents, input and other evidence, and cooperate with the Agency's efforts to calculate these compensatory damages by responding to Agency requests for information and completing Agency forms within 30 days of when the Agency makes a request. For guidance on what evidence is necessary to prove pecuniary and non-pecuniary damages, the parties are directed to EEOC Enforcement Guidance: Compensatory and Punitive Damages Available Under § 102 of the Civil Rights Act of 1991 (July 14, 1992) (available at [eeoc.gov](https://www.eeoc.gov).) Within 120 calendar days from the date of this decision, the Agency shall issue a FAD which addresses compensatory damages with appeal rights to the EEOC.
3. Within 90 days of the date of this decision, the Agency's EEO function shall give training to S1 and S2 on management's duty to provide reasonable accommodation under the Rehabilitation Act with content and form and manner it deems appropriate. The Agency may contact our Training and Outreach Division for Assistance in obtaining the necessary training via <https://www.eeoc.gov/federal-sector/federal-training-outreach>.
4. If the Agency still employs S2, within 60 days from the date of this decision it shall consider disciplining him. Training is not discipline. If the Agency disciplines S2, it shall identify the discipline. The Agency shall report its reason for disciplining or not disciplining S2 within 120 days from the date of this decision.

The Agency is further directed to submit a report of compliance in digital format as provided in the statement entitled "Implementation of the Commission's Decision." The report shall be submitted via the Federal Sector EEO Portal (FedSEP). 29 C.F.R. § 1614.403(g). The report must include supporting documentation of the Agency's calculation of back pay and other benefits due Complainant, including evidence that the corrective action has been implemented.

POSTING ORDER (G0617)

The Agency is ordered to post at its Church Street Station in New York, New York copies of the attached notice. Copies of the notice, after being signed by the Agency's duly authorized representative, shall be posted **both in hard copy and electronic format** by the Agency within 30 calendar days of the date this decision was issued, and shall remain posted for 60 consecutive days, in conspicuous places, including all places where notices to employees are customarily posted. The Agency shall take reasonable steps to ensure that said notices are not altered, defaced, or covered by any other material.

The original signed notice is to be submitted to the Compliance Officer as directed in the paragraph entitled "Implementation of the Commission's Decision," within 10 calendar days of the expiration of the posting period. The report must be in digital format, and must be submitted via the Federal Sector EEO Portal (FedSEP). See 29 C.F.R. § 1614.403(g).

ATTORNEY'S FEES (H1019)

If Complainant has been represented by an attorney (as defined by 29 C.F.R. § 1614.501(e)(1)(iii)), she/he is entitled to an award of reasonable attorney's fees incurred in the processing of the complaint. 29 C.F.R. § 1614.501(e). The award of attorney's fees shall be paid by the Agency. The attorney shall submit a verified statement of fees to the Agency -- **not** to the Equal Employment Opportunity Commission, Office of Federal Operations -- within thirty (30) calendar days of receipt of this decision. The Agency shall then process the claim for attorney's fees in accordance with 29 C.F.R. § 1614.501.

IMPLEMENTATION OF THE COMMISSION'S DECISION (K0719)

Under 29 C.F.R. § 1614.405(c) and §1614.502, compliance with the Commission's corrective action is mandatory. Within seven (7) calendar days of the completion of each ordered corrective action, the Agency shall submit via the Federal Sector EEO Portal (FedSEP) supporting documents in the digital format required by the Commission, referencing the compliance docket number under which compliance was being monitored. Once all compliance is complete, the Agency shall submit via FedSEP a final compliance report in the digital format required by the Commission. See 29 C.F.R. § 1614.403(g). The Agency's final report must contain supporting documentation when previously not uploaded, and the Agency must send a copy of all submissions to the Complainant and his/her representative.

If the Agency does not comply with the Commission's order, the Complainant may petition the Commission for enforcement of the order. 29 C.F.R. § 1614.503(a). The Complainant also has the right to file a civil action to enforce compliance with the Commission's order prior to or following an administrative petition for enforcement. See 29 C.F.R. §§ 1614.407, 1614.408, and 29 C.F.R. § 1614.503(g). Alternatively, the Complainant has the right to file a civil action on the underlying complaint in accordance with the paragraph below entitled "Right to File a Civil Action." 29 C.F.R. §§ 1614.407 and 1614.408. A civil action for enforcement or a civil action on the underlying complaint is subject to the deadline stated in 42 U.S.C. 2000e-16(c) (1994 & Supp. IV 1999). **If the Complainant files a civil action, the administrative processing of the complaint, including any petition for enforcement, will be terminated.** See 29 C.F.R. § 1614.409.

Failure by an agency to either file a compliance report or implement any of the orders set forth in this decision, without good cause shown, may result in the referral of this matter to the Office of Special Counsel pursuant to 29 C.F.R. § 1614.503(f) for enforcement by that agency.

STATEMENT OF RIGHTS - ON APPEAL
RECONSIDERATION (M0920)

The Commission may, in its discretion, reconsider this appellate decision if Complainant or the Agency submits a written request that contains arguments or evidence that tend to establish that:

1. The appellate decision involved a clearly erroneous interpretation of material fact or law; or
2. The appellate decision will have a substantial impact on the policies, practices, or operations of the agency.

Requests for reconsideration must be filed with EEOC's Office of Federal Operations (OFO) **within thirty (30) calendar days** of receipt of this decision. If the party requesting reconsideration elects to file a statement or brief in support of the request, **that statement or brief must be filed together with the request for reconsideration.** A party shall have **twenty (20) calendar days** from receipt of another party's request for reconsideration within which to submit a brief or statement in opposition. See 29 C.F.R. § 1614.405; Equal Employment Opportunity Management Directive for 29 C.F.R. Part 1614 (EEO MD-110), at Chap. 9 § VII.B (Aug. 5, 2015).

Complainant should submit his or her request for reconsideration, and any statement or brief in support of his or her request, via the EEOC Public Portal, which can be found at <https://publicportal.eeoc.gov/Portal/Login.aspx>

Alternatively, Complainant can submit his or her request and arguments to the Director, Office of Federal Operations, Equal Employment Opportunity Commission, via regular mail addressed to P.O. Box 77960, Washington, DC 20013, or by certified mail addressed to 131 M Street, NE, Washington, DC 20507. In the absence of a legible postmark, a complainant's request to reconsider shall be deemed timely filed if OFO receives it by mail within five days of the expiration of the applicable filing period. See 29 C.F.R. § 1614.604.

An agency's request for reconsideration must be submitted in digital format via the EEOC's Federal Sector EEO Portal (FedSEP). See 29 C.F.R. § 1614.403(g). Either party's request and/or statement or brief in opposition must also include proof of service on the other party, unless Complainant files his or her request via the EEOC Public Portal, in which case no proof of service is required.

Failure to file within the 30-day time period will result in dismissal of the party's request for reconsideration as untimely, unless extenuating circumstances prevented the timely filing of the request. **Any supporting documentation must be submitted together with the request for reconsideration.** The Commission will consider requests for reconsideration filed after the deadline only in very limited circumstances. See 29 C.F.R. § 1614.604(c).


COMPLAINANT'S RIGHT TO FILE A CIVIL ACTION (R0610)

This is a decision requiring the Agency to continue its administrative processing of your complaint. However, if you wish to file a civil action, you have the right to file such action in an appropriate United States District Court **within ninety (90) calendar days** from the date that you receive this decision. In the alternative, you may file a civil action **after one hundred and eighty (180) calendar days** of the date you filed your complaint with the Agency, or filed your appeal with the Commission. If you file a civil action, you must name as the defendant in the complaint the person who is the official Agency head or department head, identifying that person by his or her full name and official title. Failure to do so may result in the dismissal of your case in court. "Agency" or "department" means the national organization, and not the local office, facility or department in which you work. **Filing a civil action will terminate the administrative processing of your complaint.**

RIGHT TO REQUEST COUNSEL (Z0815)

If you want to file a civil action but cannot pay the fees, costs, or security to do so, you may request permission from the court to proceed with the civil action without paying these fees or costs. Similarly, if you cannot afford an attorney to represent you in the civil action, you may request the court to appoint an attorney for you. **You must submit the requests for waiver of court costs or a ppointment of an attorney directly to the court, not the Commission.** The court has the sole discretion to grant or deny these types of requests. Such requests do not alter the time limits for filing a civil action (please read the paragraph titled Complainant's Right to File a Civil Action for the specific time limits).

FOR THE COMMISSION:



Carlton M. Hadden, Director
Office of Federal Operations

August 30, 2022
Date