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**Re: Comments in Response to Department of Energy's Direct Final Rule DOE-HQ-2025-0024**

The National Women's Law Center ("NWLC") submits this significant, adverse comment in response to the Department of Energy's ("DOE") Direct Final Rule ("DFR") published at 90 Fed. Reg. 20,777 (May 16, 2025). This DFR seeks to amend and rescind DOE regulations that enforce Title VI and other provisions that prevent discrimination in federally funded programs and activities. This DFR violates the Administrative Procedure Act ("APA") and removes lawfully required anti-discrimination protections. For this reason, we urge the DOE to withdraw this DFR.

NWLC is a nonprofit organization that has worked for over fifty years to combat sex discrimination and expand opportunities for women and girls in every facet of their lives, including workplaces and schools. NWLC uses the law in all its forms to change culture and drive solutions to the gender inequity that shapes society and to break down the barriers that harm everyone – especially those who face multiple forms of discrimination.

This DFR seeks to rescind longstanding civil rights regulations adopted more than 45 years ago. The DFR re-writes anti-discrimination law by removing regulations that protect against policies and practices that have the effect of racial discrimination. DOE's DFR "Rescinding Regulations Related to Nondiscrimination in Federally Assisted Programs or Activities (General Provisions)" would rescind 10 CFR §§ 1040.1, 1040.12, and 1040.14, which generally prohibit discrimination in employment in federally assisted programs or activities and specifically prohibits discrimination based on race, color, and national origin. These regulations include provisions prohibiting actions that would "have the effect of" discrimination—a reference to disparate impact theory—claiming that such language creates "constitutional difficulties and is not based on the best reading of Title VI." The DFR replaces this language with "intent," such that the resulting regulation would only prohibit recipients from taking any action "with the intent of

excluding individuals from, denying them the benefits of, or subjecting them to discrimination because of race, color, national origin, or sex."

DOE's recission of these regulations is based on an incorrect factual premise and disregards binding Supreme Court decisions construing an agency's authority to prohibit more than intentional discrimination. Further, these proposed changes are misaligned with statutory requirements and would remove important civil rights protections for individuals that participate in programs and activities receiving federal funding through DOE, resulting in significant harm, including the loss of economic opportunity, that would impact the economy as a whole.

## I. DOE's attempt to eliminate disparate impact claims through a DFR violates the APA.

The APA requires DOE, like all federal agencies, to engage in a multi-step process for issuing agency rules to implement and interpret statutes.[1] This process, called notice-and-comment rulemaking, promotes transparency and public participation, ensuring that interested parties have an opportunity to provide feedback and potentially influence the final versions of rules. The process is essential to helping agencies make better-informed decisions about regulations and building public trust in the regulatory process.

To formulate, amend, or repeal a rule, the APA requires agencies to (1) issue an NPRM to describe the proposed rule, the legal authority behind it, and opportunities for public participation; (2) provide opportunity for public comment, allowing interested parties to submit data, views, or arguments; (3) consider all relevant, timely-submitted comments and develop the final rule; and (4) publish the final rule with a preamble responding to all significant issues raised in the comments.[2]

There are statutory exemptions to the APA's notice-and-comment procedures, including for rules dealing with the military or foreign affairs functions,[3] rules relating to certain management or personnel,[4] or when there is "good cause" to forgo notice-and-comment because undergoing the full process would be "impracticable, unnecessary, or contrary to the public interest."[5] DFRs have historically been allowed under the "good cause" exemption for when the traditional rulemaking process is "unnecessary."[6] Though as scholars have observed, "the Achilles heel in

[1] 5 U.S.C. § 553.
[2] *Id.* at §§ 553(b)–(d).
[3] *Id.* at § 553(a)(1) (exempting rules involving "a military or foreign affairs function of the United States").
[4] *Id.* at § 553(a)(2) (exempting rules involving "a matter relating to agency management or personnel or to public property, loans, grants, benefits, or contracts").
[5] *Id.* at § 553(b)(3)(B).
[6] Administrative Conference of the United States, *Public Engagement in Agency Rulemaking Under the Good Cause Exemption* (Dec. 17, 2024), *available at* https://www.acus.gov/document/public-engagement-agency-rulemaking-under-good-cause-exemption.

the legal case for direct final rulemaking has always been the fact that the APA does not explicitly authorize the procedure."[7]

Decades ago, when the Administrative Conference of the United States ("ACUS") initially recommended the use of DFRs, it explained that they should be used where "the rule is noncontroversial," meaning the rule is expected to "elicit no significant adverse comment."[8] ACUS's recommendation was based on law professor and administrative law expert Ronald M. Levin's 1995 report to the Conference, in which he also wrote that "[i]f even one person files an adverse comment or notice, the agency must withdraw the rule" to then undergo the normal notice-and-comment process.[9] Indeed, there is ample precedent for agencies withdrawing DFRs after receiving adverse comments on the proposed rule changes.[10]

Interpreting the APA's "good cause" exemption to traditional notice and comment rulemaking, ACUS explains that such rulemaking would be "unnecessary" when a rule is "a routine determination, insignificant in nature and impact, and inconsequential to the industry and to the public."[11] Here, the DFR cannot be justified under that exemption. First, for it to apply, the Federal Register notice must include a finding of good cause and a brief statement explaining why there is good cause to bypass the traditional notice-and-comment rulemaking process.[12] Here, the agency made no attempt to assert any basis for finding "good cause" to sidestep the notice-and-comment process.[13] This is unsurprising—since no good cause exists for rescinding

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[7] Ronald M. Levin, *The D.C. Circuit Undermines Direct Final Rulemaking*, YALE J. ON REG., *available at* https://www.yalejreg.com/nc/the-d-c-circuit-undermines-direct-final-rulemaking-by-ronald-m-levin/.
[8] 60 Fed. Reg. 43108, 43112 (Aug. 18, 1995).
[9] Ronald M. Levin, *supra* note 17 (article prepared as a report for the Administrative Conference of the United States (ACUS), which then adopted a recommendation regarding direct final rulemaking on June 15, 1995); *Procedures for Noncontroversial and Expedited Rulemaking*, ACUS Recommendation No. 95-4, 60 Fed. Reg. 43110 (1995).
[10] *See, e.g.*, Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments; Correction; Withdrawal of Direct Final Rule, 90 Fed. Reg. 13084 (2025) [hereinafter "Hazardous and Solid Waste Management System DFR"] (Environmental Protection Agency withdrawing a DFR that received 816 comments); Excess Emissions During Periods of Startup, Shutdown, and Malfunction; Partial Withdrawals of Findings of Failure To Submit State Implementation Plan (SIP), 90 Fed. Reg. 1903 (2025) [hereinafter "Excess Emissions DFR"] (Environmental Protection Agency withdrawing a DFR that received 6 comments); *Sierra Club v. Pruitt*, 293 F. Supp. 3d 1050, 1057 (N.D. Cal. 2018); *Sw. Pennsylvania Growth All. v. Browner*, 144 F.3d 984, 987 (6th Cir. 1998); *Sierra Club v. U.S. E.P.A.*, 99 F.3d 1551, 1554 n.4 (10th Cir. 1996).
[11] Administrative Conference of the United States, *supra* note 16.
[12] 5 U.S.C. § 553(b).
[13] "Low rates of lawsuits challenging good cause assertions" makes it difficult to clearly determine what constitutes proper invocation of the exemption. *See* Kyle Schneider, *Judicial Review of Good Cause Determinations Under the Administrative Procedure Act*, 73 STAN. L. REV. 237 (2021). However, at a minimum, agencies have historically provided at least *some* explanation supporting their finding of good cause for why the typical rulemaking procedures are "unnecessary," of which there is no such finding here. *See, e.g.*, *Jifry v. FAA*, 370 F.3d 1174, 1178-80 (D.C. Cir. 2004) (D.C. Circuit upholding a Federal Aviation Administration rule invoking the good cause exception in the wake of September 11, 2001 to automatically suspend certain noncitizen pilots' flying certificates upon notice by the Transportation Security Administration that those pilots posed a security threat, where the agency argued that it needed to act swiftly to avoid further terrorist acts).

longstanding civil rights protections, and through an expedited DFR process no less. Given the significance of these protections, rescinding them could not (and should not) be considered "routine" or "insignificant in nature and impact," and it is certainly not "inconsequential" to the public.

Some agencies, including DOE, have used DFRs appropriately to expedite noncontroversial or routine rules where no adverse comments are anticipated. For example, DOE has previously used DFRs to make technical changes, such as updating its federal claims-collection standards to conform with other agencies.[14] When bypassing the typical notice-and-comment rulemaking process with a DFR, DOE has previously explained why its DFRs have been noncontroversial.[15] Indeed, in some of its prior DFRs, DOE has even provided an explicit path for switching to the typical notice-and-comment process in the Federal Register notice, should its expectation that there be no significant adverse comments prove incorrect.[16]

None of that has happened here, and eliminating crucial civil rights protections is deeply controversial. As of 11:59pm on June 15, DOE had already received 6,860 comments to this DFR alone. Past DFRs have been withdrawn after drawing far fewer comments, with as few as six comments serving as another agency's basis for withdrawing a rule.[29]

## II. DOE's repeal of disparate-impact regulations is contrary to law.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The DOE's DFR seeks to remove a well-established tool to effectuate this law by addressing policies that unjustifiably harm groups of people based upon their race, color or national origin, in education *and* employment. The regulations addressing disparate impact were established to ensure everyone has an equal opportunity to participate in DOE programs, and that DOE policies, regulations, and actions do not have a discriminatory impact on certain populations.[17] Federally funded DOE programs and activities must not be administered in a way that perpetuates the repercussions of past discrimination. The DFR would eliminate DOE's longstanding ability to address disparate impact discrimination, which will lead to increased inequality in colleges and universities, small businesses, state governments, and other entities and employers that accept DOE funding.[18]

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[14] *See* Collection of Claims Owed the United States, 68 Fed. Reg. 48575, 48576 (Aug. 14, 2003) [hereinafter "Collections of Claims DFR"].
[15] *See, e.g.*, Collections of Claims DFR at 48,576; Weatherization Assistance Program for Low-Income Persons, 71 Fed. Reg. 35775, 35775 (June 22, 2006); Defense Priorities and Allocations System, 73 Fed. Reg. 10980, 10981 (Feb. 29, 2008) [hereinafter "Defense Priorities DFR"].
[16] Defense Priorities DFR, 73 Fed. Reg. at 10981 (Feb. 29, 2008) (noting "in the event that significant adverse comments are filed, DOE has prepared a notice of proposed rulemaking proposing the same amendments," which it simultaneously published in the Federal Register).
[17] Office of Minority Impact, Sec. 614,Title IV Part 3, *available at* part3minorityeconomicimpactpdf
[18] Federal Register: Rescinding Regulations Related to Nondiscrimination in Federally Assisted Programs or Activities (General Provisions).

The public notice for this DFR, however, incorrectly alleges that 10 CFR §§ 1040.1, 1040.12, and 1040.14 are, "unnecessary regulatory provisions related to nondiscrimination in federally assisted programs or activities," and that they are, "outdated, raise serious constitutional difficulties, or are based on anything other than the best reading of the underlying statutory authority or prohibition "[19] This characterization is completely inaccurate assessment of the cited regulations. Not only were these regulations established in alignment with Title VI, other federal anti-discrimination statutes, and federal case law, they continue to reflect the current state of the law. The DFR, by rescinding these regulations, is therefore misaligned with the law.
The regulations the DOE seeks to rescind are a well-established, critical tool for the enforcement of Title VI and enable the DOE to effectively execute its responsibilities mandated by Congress. The DFR would undermine the very purpose of our anti-discrimination laws by narrowing protections against discrimination. Federal anti-discrimination laws are not limited to combatting discrimination based solely on intentionally biased conduct. These laws are also meant to protect against policies that cause a discriminatory effect, i.e., a "disparate impact," on protected groups or individuals. The DFR aims to remove these protections, making it even more difficult for the agency to ensure that everyone has access to the benefits of federally funded programs and activities.

**a. The DFR is not aligned with current law.**

For decades, DOE regulations have prohibited recipients from taking any action "with the . . . effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination because of race, color, national origin, or sex," a form of discrimination known as "disparate impact." Disparate impact discrimination recognizes that policies and practices that appear neutral can still cause significant, disproportionate harm—and that such policies are unfair unless they are justified by a substantial, legitimate reason and there is no less discriminatory alternative available.[20] The Supreme Court said it clearly in *Griggs v. Duke Power Co.,* 401 U.S. 424 (1971): the law "proscribes not only overt discrimination but also practices that are fair in form, but discriminatory in operation."[21] To take one example, "no fault" attendance policies, which make employees eligible for discipline for absences or tardiness regardless of the reason, are more likely to harm women, who disproportionately hold family caregiving obligations,[22] workers with disabilities, or those who may need time off for religious obligations. To give an example under Title VI, policies that restrict language assistance to individuals with limited English proficiency. DOE's disparate impact regulations ensure that public funds—to which *all* taxpayers contribute—are not spent in any fashion to cause or entrench discrimination.

Even if DOE had discretion to amend the elements of 10 C.F.R. §§ 1040.1, 1040.12, and 1040.14 through a DFR—and it does not—the rationale it offers for doing so is contrary to law and its congressional mandate. Through the National Energy Policy Conservation Act, in 1978,

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[19] Federal Register: Rescinding Regulations Related to Nondiscrimination in Federally Assisted Programs or Activities (General Provisions)
[20] *See generally Griggs v. Duke Power Co.*, 401 U.S. 424 (1971)
[21] *Griggs v. Duke Power Co.*, 401 U.S. 424, 431 (1971)
[22] Protecting Caregivers from Workplace Discrimination, https://nwlc.org/resource/protecting-caregivers-from-workplace-discrimination/# (March 2023)

Congress directed DOE to establish the Office of Minority Impact to "advise the secretary on the effect of energy-related actions on minorities and minority business enterprises and on methods to insure that minorities have an opportunity to participate in the Federal energy programs of the Department."[23] DOE did so and adopted the regulations at issue here. When DOE initially adopted the regulations *after* notice and comment, it noted that many commenters were confused about the relationship between Title VI and Title VII.[24] DOE explained that "the employment practices of a recipient or subrecipient are only considered [under Title VI] when there is a direct relationship between these practices and the delivery of services to the public."

DOE now contends that this was incorrect and that "the express statutory language" of Section 604 of Title VI, 42 U.S.C. § 2000d-3, bars application of Title VI to any employment practices "*except* where the primary objective of the Federal financial assistance is to provide employment."[25] This belies appellate court decision that have addressed the question, which have found that an agency may address discriminatory employment practices through Title VI when those practices result in racial discrimination against the recipient's beneficiaries. The Fifth Circuit reached that conclusion almost 60 years ago, only two years after the enactment of Title VI, and did so based on the plain language of the statute—not on any deference to agency regulations.[26] By way of example, the Seventh Circuit did the same: "HEW took (and its successors take) the *correct view* that Title VI authorizes remedial action if employment practices tend to exclude from participation, deny benefits to, or otherwise subject the primary beneficiaries of a federal program to discrimination in violation of 42 U.S.C. § 2000d."[27]

Furthermore, DOE's contention that the rescinded regulations "raise serious constitutional difficulties" or "are based on anything other than the best reading of the underlying statutory authority or prohibition," is flatly wrong. The Supreme Court has repeatedly held that Title VI regulations validly prohibit practices having a discriminatory effect on protected groups, even if the actions or practices are not intentionally discriminatory.[28] Many agencies require that entities receiving federal financial assistance enter into standard agreements or provide assurances that the recipient will comply with the funding agency's implementing regulations under Title VI.[29]

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[23] 42 U.S. Code Chapter 91, *available at* https://www.congress.gov/bill/95th-congress/house-bill/5037; https://www.energy.gov/management/articles/part3minorityeconomicimpactpdf
[24] 45 Fed. Reg. 40,514, 40,515/1 (June 13, 1980).
[25] (90 Fed. Reg. at 20,778/2)
[26] *See United States v. Jefferson County Board of Education*, 372 F.2d 836, 882-86 (5th Cir. 1966) (Wisdom, J.), *aff'd en banc*, 380 F.2d 385 (5th Cir.) (per curiam), *cert. denied*, 389 U.S. 840 (1967).
[27] *Ahern v. Bd. of Educ. of Chicago*, 133 F.3d 975, 977-78 (7th Cir. 1998) (emphasis added); *see also, e.g.*, *Caulfield v. Bd. of Educ. of N.Y.*, 583 F.2d 605, 611 (2d Cir. 1978); *Trageser v. Libbie Rehab. Ctr., Inc.*, 590 F.2d 87, 89 (4th Cir. 1978).
[28] *Guardians Ass'n v. Civil Serv. Comm'n*, 463 U.S. 582, 643 (1983) (Stevens, J., dissenting) (citing *Lau*, 414 U.S. at 568, 571 (Stewart, J., concurring) and *Fullilove v. Klutznick*, 448 U.S. 448, 479 (1980) (opinion of Burger, C.J.)); *Alexander v. Choate*, 469 U.S. 287, 293 (1985)).
[29] *See, e.g.*, 28 C.F.R. § 42.105 (DOJ) (requiring applications for federal financial assistance to be accompanied by an assurance of compliance with Title VI implementing regulations); *see also United States v. Marion Cty Sch. Dist.*, 625 F.2d 607, 609, 612–13 (5th Cir. 1980) (confirming legitimacy of assurance requirement); *Guardians*, 463 U.S. at 642 n.13 (Stevens, J., dissenting) (quoting from HUD assurance).

### b. The DFR removes a well-established tool to prevent discrimination in federal programs

Defining discrimination as only encompassing intentionally biased conduct and excluding conduct with a discriminatory effect is contrary to law and guts a key tool to root out policies that unjustifiably harm some groups more than others. Title VI prohibits discrimination on the basis of race, color, and national origin by recipients of federal financial assistance—including schools, police departments, public housing authorities, hospitals, public transportation agencies, social-service agencies, and private companies that receive grants or other funding from the federal government. Discrimination claims under Title VI may take two forms, looking at whether a person or group was subject to (1) different treatment or (2) disparate impact because of a protected characteristic. These two different tests recognize that discrimination shows up in many different forms. Sometimes discrimination is explicit, and a policy or decision-maker is clear that someone is being treated differently because of who they are. Sometimes a policy does not explicitly treat people in different groups differently, but its application causes a discriminatory effect—or "disparate impact." The purpose of our civil rights laws is to eliminate discrimination in all its forms and allow all people to thrive free from the burdens of discrimination.

The disparate-impact regulations seek to ensure that programs accepting federal money are not administered in a way that perpetuates the repercussions of past discrimination. As the Supreme Court has explained, even benignly motivated policies that appear neutral on their face may be traceable to the nation's long history of invidious race discrimination in employment, education, housing, and many other areas.[30] Accordingly, the disparate-impact regulations ensure "that public funds, to which all taxpayers of all races contribute, not be spent in any fashion which encourages, entrenches, subsidizes, or results in racial discrimination."[31] The Supreme Court explained that even "practices, procedures, or tests neutral on their face, and even neutral in terms of intent, cannot be maintained if they operate to 'freeze' the status quo of prior discriminatory employment practices."[32] DOE regulations require taking a close look at neutral policies that disparately exclude minorities from benefits or services, or inflict a disproportionate share of harm on them.

Research demonstrates that implicit bias against people of color remains a widespread problem.[33] Such bias can result in discrimination that federal agencies can prevent and address through

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[30] *See Griggs v. Duke Power Co.*, 401 U.S. 424, 430–31 (1971); *City of Rome v. United States*, 446 U.S. 156, 176–77 (1980); *Gaston Cty. v. United States*, 395 U.S. 285, 297 (1969).
[31] H.R. Misc. Doc. No. 124, 88th Cong., 1st Sess. 3, 12 (1963).
[32] *Griggs*, 401 U.S. at 430; *see also Texas Dep't of Hous. & Cmty. Affairs v. Inclusive Communities*, 135 S. Ct. 2507, 2521 (2015) (noting that "[r]ecognition of disparate impact claims is consistent with the [Fair Housing Act's] central purpose" as it "was enacted to eradicate discriminatory practices within a sector of our Nation's economy") (citations omitted).
[33] *See, e.g.*, Anthony G. Greenwald et al., Measuring Individual Differences in Implicit Cognition: The Implicit Association Test, 74 J. Personality & Soc. Psychol. 1464 (1998) (showing that majority of white experiment participants more frequently associate white faces rather than African American faces with "pleasant" factors); Anthony G. Greenwald & Linda Hamilton Krieger, Implicit Bias: Scientific Foundations, 94 Cal. L. Rev. 945, 954–59 (2006); *see also* Nilanjana Dasgupta, Implicit Ingroup

enforcement of their disparate-impact regulations. The Supreme Court too has recognized that disparate impact liability under various civil rights laws "permits plaintiffs to counteract unconscious prejudices and disguised animus that escape easy classification as disparate treatment."[34]

## III. Robust protections against discrimination in employment are important for DOE's programs and grants

DOE provides over $25 billion annually through grants alone.[35] DOE provides several billion dollars per year in discretionary and mandatory funding to support nuclear security, clean energy, environmental cleanup, and science and innovation.[36] Ensuring robust protections against the effects discrimination in these fields is particularly important, where the reality is that we have not yet "overcome the effects of conditions that resulted in limited participation" of women and girls in certain education programs and gender gaps in certain areas remain significant.[63] For example, in STEM, there continues to be a large disparity between the percentage of men and women working in the field: in 2023, women made up only 28% of the STEM workforce.[64] Without proactive efforts to recruit more people who have been underrepresented in STEM, some fields will face potentially devastating shortfalls in degree holders.[65] Addressing women and girls' equal participation in STEM could not only bolster innovation and growth in those spheres, but it is also an economic necessity that contributes to increasing the GDP ("Gross Domestic Product").[66] The Bureau of Labor Statistics ("BLS") anticipates continued growth in employment in STEM occupations, increasing 10.4% over the next ten years—significantly outpacing non-STEM occupations growing 3.6%.[67] Currently, the U.S. is unable to meet this rapidly growing demand,[68] making investment in increasing women and girls' participation in STEM fields all the more essential.

Women remain significantly underrepresented among those receiving STEM bachelor's degrees required for many of the highest-paying occupations, which is a major contributor to the persistence of the gender wage gap.[69] And, in graduate degrees, women make up only 38% of the master's degrees and 36% of doctorate degrees in five STEM categories.[70] In engineering and engineering technologies graduate degrees, women made up 29% of master's degrees and 27% of doctorate degrees.[71] The U.S. National Science Foundation's latest Science & Engineering Indicator report revealed that in 2021, while 24% of the overall U.S. workforce held a STEM occupation, only 18% of women did—meaning that women's representation was three-fifths that of male workers.[72]

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Favoritism, Outgroup Favoritism, and Their Behavioral Manifestations, 17 Soc. Just. Res. 143 (2004); Gary Blasi, Advocacy Against the Stereotype: Lessons from Cognitive Social Psychology, 49 UCLA L. Rev. 1241 (2002); Jerry Kang, Trojan Horses of Race, 118 Harv. L. Rev. 1489 (2005); Christine Jolls & Cass R. Sunstein, The Law of Implicit Bias, 94 Cal. L. Rev. 969 (2006); Samuel R. Bagenstos, The Structural Turn and the Limits of Antidiscrimination Law, 94 Cal. L. Rev. 1, 5–9 (2006).

[34] *Texas Dep't of Hous. & Cmty. Affairs v. Inclusive Communities*, 135 S. Ct. 2507, 2522 (2015)

[35] Department of Energy, US Spending, available at, https://www.usaspending.gov/agency/department-of-energy?fy=2025 (last visited June 16, 2025).

[36] American Diversified Energy, https://www.americandiversified.energy/doe-grants#:~:text=Grants%20%26%20Loan%20Guarantees&text=DOE%20provides%20several%20billion%20dollars,cleanup%2C%20and%20science%20and%20innovation (last visited June 16, 2025).

## IV. Conclusion

DOE cannot take the controversial step of rescinding decades-old civil rights protections without good cause or affording the public a robust opportunity for notice and comment before the rule is finalized. The agency also fails to provide a sufficient, reasoned explanation for its change in policy. Disparate impact regulations help give life to our civil rights laws' promise of simple justice by addressing unfair barriers in federal-funded programs and activities. We strongly urge DOE to withdraw the DFR and restore the prior rules.

Should you have any questions, please contact Lauren Khouri, Senior Director of Workplace Equality, at lkhouri@nwlc.org, or Bayliss Fiddiman, Senior Director of Educational Equity, at bfiddiman@nwlc.org.

Sincerely,

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