

**COMMONWEALTH OF VIRGINIA**  
Department of Human Resource Management  
Office of Employment Dispute Resolution

**DECISION OF HEARING OFFICER**

In re: Department of Motor Vehicles

**Case Number: 11778**

Hearing Date: February 28, 2022

Decision Issued: March 18, 2022

**APPEARANCES**

Grievant with attorney

Agency legal counsel

Agency Representative

Four witnesses for the Agency

Five witnesses including Grievant testified for Grievant

**PROCEDURAL HISTORY**

**Grievant was an Assistant Manager of a DMV Customer Service Center (CSC) in Northern Virginia. Grievant's employment was terminated effective October 27, 2021, for (1) Improperly accessing and sharing with a third party, DMV confidential customer information with no legitimate business reason and (2) falsification of a state record. DMV processed each charge as a Group 111 with termination. At the time of termination, Grievant had 16 years of service with DMV and no prior disciplinary record.**

On or around November 24, 2021, Grievant timely filed a grievance. (Grievance Form A) Effective December 27, 2021, the Department of Human Resource Management (DHRM) Office of Employment Dispute Resolution (EDR) assigned the matter to the undersigned Hearing Officer. By agreement, the case was heard remotely through the Zoom video conferencing platform hosted by the agency's

counsel.<sup>1</sup> As relief, Grievant seeks reinstatement to her assistant manager position, backpay, rescission of the disciplinary action, restoration of benefits and seniority and attorney's fees.

### **ISSUES**

1. Whether Grievant engaged in the behavior described in the written notices?
2. Whether the behavior constituted misconduct?
3. Whether the Agency's discipline was consistent with law (e.g., free of unlawful discrimination) and policy?
4. Whether there were mitigating circumstances justifying a reduction or removal of the disciplinary action, and if so, aggravating circumstances existed that would overcome the mitigating circumstances?

### **EXHIBITS**

The Agency submitted a three-ring binder containing 20 exhibits numerically tabbed. Grievant submitted a three-ring binder containing 12 exhibits numerically tabbed. All exhibits were admitted without objection.

### **BURDEN OF PROOF**

The burden of proof is on the Agency to show by a preponderance of the evidence that its disciplinary action against the Grievant was warranted and appropriate under the circumstances. Grievance Procedure Manual ("GPM") § 5.8. A preponderance of the evidence is evidence which shows that what is sought to be proved is more probable than not. GPM § 9. Grievant has the burden of raising and establishing any affirmative defenses to the discipline and any evidence of mitigating circumstances related to the discipline. (GPM § 5.9)

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<sup>1</sup> By agreement, and at the request of the Hearing Officer, a zoom recording was made and provided to the Hearing Officer for the official recording of the hearing. The parties agreed that the link to the zoom recording would be deleted, and no recording would be retained by Agency counsel.

## FINDINGS OF FACT

After carefully reviewing the evidence presented and observing the demeanor of each witness, the Hearing Officer makes the following findings of fact.

Grievant's employment with the DMV was terminated effective October 27, 2021. As of that date, Grievant was an Assistant Manager at a Northern Virginia Customer Service Center (CSC). Grievant had 16 years of service with the DMV.<sup>2</sup>

The Assistant Manager position held by Grievant is an important and integral leadership position to effectively manage the CSC. As such, it was reasonable for upper DMV management to expect Grievant to lead by example and follow all relevant DMV policies and procedures.

The unequivocal policy of DMV regarding customer records is that they could not be accessed or shared with 3<sup>rd</sup> parties by DMV employees without a legitimate business purpose.

Most of the witnesses, including grievant's witnesses testified that every incursion or "peek" into a customer's records will result in a DMV record of an associated transaction that the customer requested while in the CSC or, a manager authorized the inquiry.

All witnesses, except the grievant's sister who is not a DMV employee acknowledged the existence of the policy.

The policy is a central feature of the Customer Service Center Operations Manual that expressly prohibits customer service representatives (CSRS) such as the grievant from:

- ***Accessing their own records, friend's records, or records of immediate family members (spouse, parents (including***

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<sup>2</sup> Grievant progressed through various levels of positions at DMV and was promoted to Assistant Manager in 2021 (Grievant's Ex. 11)

*stepparents), grandparents, children (adopted and step members) , grandchildren, siblings, in-laws etc.).*

- *Accessing customer's records without having proper authorization or legitimate business needs.*
- *CSRs must receive manager approval before accessing a customer's record when the customer (or authorized representative) is not present in the CSC.*
- *CSC personnel may not manipulate policies or use system loopholes or to assist customers in avoiding costs or achieving results to which the customer is not entitled.* (Agency Exhibit 5)

Grievant was intimately familiar with the policy. Throughout her career, she signed numerous documents acknowledging adherence to the policy. For example, she signed a confidentiality agreement in 2017 stating:

**" I acknowledge and understand that I may have access to confidential information regarding employees and the public. In addition, I acknowledge and understand that I may have access to proprietary or other confidential business information belonging to DMV. Therefore, except as required by law, I agree that I will not:**

- **Access data that is unrelated to my job at DMV:**
- **Disclose to any other person or allow any other person access to any information related to DMV that is proprietary or confidential and/or pertains to employees or the public. Disclosure of information included, but is not limited to verbal discussions, FAX transmissions, electronic mail messages, voice mail communication, written documentation, "loaning" computer access codes, and/or another transmission or sharing of data.**
- **I understand that DMV and its employees or public may suffer irreparable harm by disclosure of proprietary or confidential**

**information and that DMV may seek legal remedies available to it should such disclosure occur. Furthermore, I understand that violation of this agreement may result in disciplinary action, up to and including, my termination of employment. (Agency Exhibit 9)**

In 2014, DMV Commissioner [REDACTED] sent an email to all employees on the confidentiality of customer records and declaring a zero-tolerance policy for unauthorized access. The memo stated in pertinent part:

“Any misuse or unauthorized access of citizen information is considered under state policy to be an offense which normally results in job loss. To protect the Commonwealth’s citizens, DMV treats such activity as the very serious offense it is, and strictly enforces a zero-tolerance policy towards such abuses. This includes, but is not limited to, the alteration or unauthorized access of records, including your own.” (Agency Exhibit 8 at p. 5)

In 2016 Commissioner [REDACTED] sent another email to all employees advising them that unauthorized release of customer records could result in criminal conviction. The memo stated in part:

“Do not create, access, alter, delete, or release any records of the DMV except as necessary to perform assigned duties. This includes your personal records.” ... “I want to reiterate that DMV takes seriously the security and privacy of customer information. Unauthorized access or misuse of DMV records is a criminal act and is not tolerated.” (ID. at p. 6)

In 2017, Commissioner [REDACTED] sent yet another email to all personnel regarding unauthorized access of customer records. The memo stated in pertinent part:

“From this day forward, any employee who the agency determines has used his or her access to improperly and without authorization view a customer record will be terminated. This sanction will be applied consistently to all employees upon a first offense and will include an employee viewing his or her own record. While employees committing these acts were previously subject to discipline, I have determined this one-strike approach is necessary to stop the continued misuse of customer information.” (Id. at p. 11)

Grievant acknowledged in writing “I have read this email and will comply.” (Id. at p. 12)

Grievant was long aware of and intimately familiar with DMV policy regarding the unauthorized release of customer records. For example, in 2005 she acknowledged receiving DMV’s Information Security Policy that stated in part:

- “I will not create, access, alter, delete, or release any DMV records except as necessary to perform assigned duties.
- I will protect confidential and personal information, whether on paper, microfilm, or computer files, by following security procedures as established by my assigned work area.”

Grievant certified that “I have been informed and am aware of the fact that actions on my part involving falsification of any state document, theft of state property, embezzlement of monies, misappropriation of decals or improperly dispensing information obtained from the automated data system (privacy act) will be grounds for dismissal. (Id at 15 – 16)

In 2018, 2019 and 2020 Grievant certified in writing that she has received and read the “CSC Employee Operational Security Acknowledgement” that expressly prohibit CSC employees from:

- Processing transactions for friends (without prior management approval).

- Accessing customer’s records without having proper authorization or legitimate business needs
- CSR’s must receive manager approval before accessing the customer’s record when the customer (or authorized representative) is not present in the CSC. (Id at p.2-4)

In addition, Grievant’s officials in Grievant’s management chain reiterated the confidentiality of customer records several times. For example, in 2017, ■■■ a CSMA Deputy Director reiterated that “under no circumstances should DMV employees access their own, family, friends or co-workers record for any reason without authorization from Management. ” Grievant acknowledged receipt of the document. (Id. at p. 1). Grievant, nevertheless ignored the prohibitions and released customer records to friends and or acquaintances.

Grievant’s circle of friends and or acquaintances include ■■■, ■■■ and ■■■.<sup>3</sup> None of these individuals are DMV employees. ■■■ was involved in a custody case with ■■■ and a separate criminal case with ■■■. Grievant testified in the custody case and at the time of this hearing, she was subpoenaed to testify in the criminal case.

In August 2021 DMV received a criminal complaint from ■■■ alleging that Grievant had accessed DMV customer records and provided the information to a third party. The complaint was investigated by Assistant Special Agent in Charge (ASPCA) ■■■, a 41-year veteran DMV law enforcement officer. (Hereinafter the investigator). (Agency Ex. 10, 13 & Testimony of ■■■)

On or around August 13, 2021, ■■■ provided an email to the investigator that included a screen shot of an email sent on November 10, 2018, from Grievant’s private email account to ■■■ disclosing private DMV records regarding ■■■ plates. The screen shot also stated that “on all other plates there is no

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<sup>3</sup> The initials of individuals are used throughout this decision to protect the privacy of the individuals and the confidentiality of DMV customer records.

information to be found. Not in system at all". (Agency Exhibit 11) (Grievant's Exhibit 4)

Grievant argues in the due process response and at instant hearing, that the screen shot is a fake and has offered a document purporting to be "a sample of emails from [REDACTED] email account" that was formatted differently from the email in the screen shot". She also argues that she has not received the original email depicted in the screen shot.

Based on the totality of the evidence presented and the demeanor and testimony of the witnesses to the screen shot, the Hearing Officer finds that the screen shot is an accurate copy of an email created and transmitted by Grievant disclosing confidential customer information to [REDACTED]. The email addresses of Grievant and [REDACTED] were accurate, [REDACTED] and [REDACTED] were involved in a criminal case. [REDACTED] and Grievant knew each other and were friends of [REDACTED]. Grievant testified in support of [REDACTED] in the custody case and is subpoenaed to testify for [REDACTED] in the criminal case. Other than her own assertion, and a "sample" of an email from her account, Grievant has offered no independent evidence that the screen shot is a fake. In addition, the evidence of disclosure was so clear and the consequences for Grievant so stark, it should have prompted an immediate response from Grievant during the investigation that it was a fake. Moreover, a veteran investigator (20+ years in law enforcement) found the screen shot to be credible to seek criminal charges against the grievant.<sup>4</sup>

The evidence the investigator discovered, and the agency confirmed demonstrate that Grievant improperly accessed the records of [REDACTED], [REDACTED] and [REDACTED] and shared [REDACTED]'s record with [REDACTED].

During the criminal investigation grievant was interviewed and the interview was recorded. (Agency Exhibit 13) . Grievant was informed that she had a right to be represented by an attorney and the right to stop answering questions at any time. Grievant was informed that the agency was investigating a

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<sup>4</sup> The Commonwealth Attorney declined to charge Grievant criminally for reasons other than the quality of the evidence. Thereafter, the Agency conducted an independent review of the evidence and brought its own charges against Grievant.



complaint of computer trespass. Grievant requested more detail of the charge against her. She was told that the charge was alleged computer trespass regarding Grievant entering customers' accounts without a business reason. She thereafter waived her rights in writing.

The Hearing Officer finds that Grievant legally waived her right to counsel. She failed to stop the interview and assert her right to counsel when she knew the charges were serious and could lead to her termination, and as she claimed after the fact that her memory was hazy.

Listening to the transcript of the interview the Hearing Officer is struck with Grievant's composure and forceful responses throughout the interview. At no time during the interview, Grievant sounded distressed or overwhelmed. Indeed, the Hearing Officer finds that the Grievant appeared evasive in some of her responses.

The interview proceeded . Grievant was shown various documents purporting to show that she entered the accounts of ■■■, ■■■, ■■■ and ■■■ without a legitimate business purpose.

To put Grievant's argument in context, the investigation occurred, without prior notice while Grievant was at work. The statements were unsworn. There is no evidence in the record that Grievant was warned that the responses to the investigator's questions could form the basis of an independent reason to terminate her employment. In her due process response, Grievant claims that the alleged disclosures occurred years before and her memory was hazy when she was interviewed. She argues that her memory cleared up when she had time to reflect on the charges.

The Agency claims that Grievant admitted to the investigator that she accessed customer records without a legitimate business need. Grievant adamantly denies that she did so. The interview transcript provides the following relevant information:

- Investigator: Why would you send this (referring to the screen shot email to ■■■ on your personal email to this person (■■■))

- Grievant: Ok I understand what you are saying. I don't remember, but if you say I sent it to him on my personal email, I must have sent it through my personal email. (Exhibit 13 at 12:52)
- Investigator: My investigation focuses on what you have done. This is just the tip of the iceberg. There could be more.
- Grievant: This I will go ahead and take the hit for but this I am not willing to take the hit for because I don't know these people. (Id. at 24:23 to 27)

There was no follow up by the investigator to nail down what Grievant was taking the hit for. Grievant's explanation in the due process response is:

"I was thinking out loud I say: I'm not worried about this"; placing my hand over ■ and ■'s name "because I knew I didn't go into a record unless someone was present and inquired." But the email; placing my hand on it, stated If I am going to take a hit this is black and white. This is what I would be taking a hit for "meaning this concerns me very much; because I knew I did not send it but I'm looking at documentation that appears as if I did." (Grievant's Exhibit 6)

The evidence proves that on 11/9/2018 Grievant accessed the record of ■ and the very next day forwarded the information to ■. (Agency Ex. 12, 13, 15) (Testimony of the investigator, ■ & ■, Deputy Director of Operations.) DMV records also reveal that between 11/9/2018 and 5/6/2019, Grievant accessed the records of ■ and ■ multiple times for a "vehicle inquiry" with no evidence of a transaction. (Agency Ex. 17 p.2-3)(Testimony of ■, ■) Indeed, the evidence is that ■ visited the Manassas CSC several times during this period and a transaction is recorded for each visit (Ex. 17 at p. 1). The evidence shows that Grievant accessed ■'s records on 9/20/2018, 9/27/2018, 12/28/2018 and 5/6/2019 and no transaction was recorded. Significantly, ■ conducted his DMV business at the Lorton and Woodbridge CSC's (Agency Ex. 18 at p. 1). There is no evidence that he visited the Manassas CSC for any transaction. Therefore, there is no discernible legitimate reason for Grievant to access his account.

Grievant's unauthorized access to the customer records described above, significantly embarrassed the agency and exposed it to potential liability. As required by Virginia law, the affected customers were notified of the unlawful access. (Agency Ex. 19). Two customers contacted the agency to express their concern, one was in a witness protection program and feared disclosure to ■ would jeopardize the witness' safety and the other feared that his security clearance could be impacted.

### **ANALYSIS AND OPINION**

The General Assembly enacted the Virginia Personnel Act, Va. Code § 2.2-2900 et seq., establishing the procedures and policies applicable to employment within the Commonwealth. This comprehensive legislation includes procedures for hiring, promoting, compensating, discharging, and training state employees. It also provides for a grievance procedure. The Act balances the need for the orderly administration of state employees and personnel practices with the preservation of the employee's ability to protect his rights and to pursue legitimate grievances. These dual goals reflect a valid governmental interest in and responsibility to its employees and workplace. *Murray v. Stokes*, 237 Va. 653, 656 (1989)

Code § 2.2-3000 (A) sets forth the Commonwealth's grievance procedure and provides in pertinent part:

*It shall be the policy of the Commonwealth, as an employer, to encourage the resolution of employee problems and complaints.... To the extent that such concerns cannot be resolved informally, the grievance procedure shall afford an immediate and fair method for the resolution of employment disputes which may arise between state agencies and those employees who have access to the procedure under § 2.2-3001.*

“In disciplinary actions, the agency must present its evidence first and show by a **preponderance of evidence** that the disciplinary action was warranted and appropriate under the circumstances. Grievance Procedure Manual. **The employee has the burden of raising and establishing any affirmative defenses to**

**discipline and any evidence of mitigating circumstances related to discipline**  
(GPM) § 5.8.

The Department of Human Resource Management (DHRM) has issued its Policies and Procedures Manual setting forth Standards of Conduct for State employees. Policy 1.60. *“The purpose of the policy is to set forth the Commonwealth’s Standards of Conduct and the disciplinary process that agencies must utilize to address unacceptable behavior, conduct, and related employment problems in the workplace, or outside the workplace when conduct impacts an employee’s ability to do his/her job and/or influences the agency’s overall effectiveness.”* A legitimate goal of the policy is to *“enable agencies to fairly and effectively discipline and/or terminate employees.... where the misconduct and/or unacceptable performance is of such a serious nature that a first offense warrants termination.”* Id. (Agency Ex. 3)

The policy requires that employees *“[c]omply with the letter and spirit of all state and agencies policies and procedure, the Conflict-of-Interest Act, and Commonwealth laws and regulations”* and *[c]onduct themselves at all times in a manner that supports the mission of their agency and the performance of their duties”*.

The severity of an infraction determines which of three levels of disciplinary actions an agency chooses to administer. Group III offenses *“include acts of misconduct of such a severe nature that a first occurrence normally should warrant termination. This level is appropriate for offenses that, for example, ... constitute illegal or unethical conduct; ... or other serious violations of policies, procedures, or laws.”*

DMV has implemented a Code of Conduct for DMV employees based on core values of:

**Trustworthiness – Inspiring the confidence of others through our reliability, dependability, and honesty**

**Respect – recognizing and appreciating the value and importance of other individuals and the agency**

**Accountability – taking ownership for our actions and decisions**

**Integrity - always doing the right thing, and**

**Teamwork – working together to achieve common goals (Agency Ex. 4)**

DMV employees are expected to, among other things, “uphold the laws, regulations, executive orders, and directives of the United States and the Commonwealth of Virginia; adhere to all policies and procedures of the Department of Motor Vehicles and other state agencies as appropriate and guard against conflict of interest or the appearance of impropriety...” and Protect privileged information and the privacy of individuals by not sharing or accessing driver, vehicle or tax records or any other record that contains personal or confidential information unless necessary to perform your job duties.”(Id)

### **APPLICABLE POLICIES**

The Department of Motor Vehicles took the disciplinary action in this case pursuant to the Standards of Conduct, Policy 1.60. Agency Ex. 3). Under the policy, corrective action may range from counseling to a Group 1, 11 or 11 written Notice based on the severity of the offense. “Misuse or unauthorized use of state records, willfully or recklessly” is a Group 111 offense. (Policy at p. 22). And a first offense could result in termination of employment.

**Grievant Engaged in the conduct described in the Written Notice with respect to Offense 1.**

The Findings of Fact that are carefully articulated in the Findings of Fact above demonstrate that Grievant engaged in the conduct described in the written notice with respect to **“Offense 1: Improper Accessing and Sharing of DMV Information”**<sup>5</sup> The evidence demonstrates that Grievant accessed the records of three customers without the need to accomplish a legitimate transaction , and in one instance, shared the customer’s plate information with a friend. By so doing, Grievant not only violated DMV policy but ignored all the many reminders of the policy throughout Grievant’s DMV career.

**Grievant did not engage in the conduct described in the Written Notice with respect to Offense 2.**

**“Offense 2: Falsification of a State Record (Group 111).** During the interview the investigator questioned Grievant about accessing the accounts of ■■■, ■■■, ■■■ and ■■■. According to the Group Notice the Grievant “clearly admitted to accessing the information of the owner of Virginia plate (that appeared on the screen shot) and sending it to ■■■. However, in response to the due process letter, you recanted your admission and claimed you never confessed to accessing and transferring of information.” Under the agency’s logic, the written due process response was false. The agency’s conclusion is based on its interpretation of Grievant’s responses to the investigator culminating in the statement “This I will go ahead and take the hit for but this I am not willing to take the hit for because I don’t know these people. (Supra at p. 9)(Id. at 24:23 to 27).

After listening to the interview recording several times, the Hearing Officer is unable to determine exactly what customer account Grievant was taking the hit for. It is noteworthy that the investigator failed to nail down exactly what Grievant’s statement meant. Therefore, the statement was open to

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<sup>5</sup> As previously explained, the Agency has failed to prove by preponderant evidence that the Grievant falsified a state record.

interpretation by both the Grievant and the agency. A determination that the statement was true or false depends largely on the viewpoint of the Grievant. Statements that are relative in nature and depend largely upon the speaker's viewpoint are expressions of opinion. *Cf Raytheon Technical Services Co. v. Hyland, 641 S.E. 2d84, 273 Va. 292 (2007)*. Furthermore, when viewed in the context, her explanation for the statement in the due process response is improbable, given the fact that there was no underlying customer transaction, but not impossible. And Grievant's explanation that the opportunity to reflect clarified the meaning of the response is potentially valid.

For these reasons, the Hearing Officer finds that the preponderant evidence does not support the agency's charge that Grievant falsified the written due process response. The Agency's Group 111 charge of falsification is therefore denied.<sup>6</sup>

**The Agency's discipline was consistent with law and policy.**

DMV is a heavily regulated agency. All employees are required to follow all DMV regulations and policies. DMV management, all the way up to the Commissioner, has repeatedly reminded CSC employees that unauthorized access of customer records is a serious offense for which the penalty is termination for the first offense. Management officials testified that the agency has terminated the employment of anyone who violates the policy. Grievant was intimately familiar with the policy and the termination consequence and yet ignored the many warnings and accessed customer information without an underlying customer transaction.

**There were no mitigating circumstances justifying a reduction or removal of the disciplinary action.**

In hearings contesting formal discipline, if the hearing officer finds that (1) the employee engaged in the behavior described in the Written Notice, (11) the behavior constituted misconduct, and (11) the agency's discipline was consistent

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<sup>6</sup> The Hearing Officer acknowledges that the evidence made this a close call. . Grievant's explanation as to what she meant is not persuasive. However, it is the agency's burden to prove the charge by a preponderance of the evidence. It is not the Grievant's burden to disprove the charge by a preponderance of the evidence

with law and policy, the agency's discipline must be upheld and may not be mitigated unless under the record evidence, the agency's discipline exceeds the limits of reasonableness."(GPM at § 5.9).

The Standards of Conduct Policy provides for the reduction of discipline if there are mitigating circumstances such as (1) conditions that compel a reduction to promote the interests of fairness and objectivity or based on an employee's otherwise satisfactory work performance; or (2) an employee's long service or otherwise satisfactory work performance.

Grievant had 16 years of service to DMV when her employment was terminated. This is a significant length of employment and should not be treated lightly. Grievant was a contributing performer. The agency has invested considerable resources to train Grievant. Thus, termination is a considerable loss to the agency. In this case however, Grievant not only entered customer records without a business need, in one instance she transmitted the information to a friend. Grievant's unauthorized actions exposed the agency to embarrassment and potential liability. Grievant's failure to protect customer records is significant and the agency was justified in terminating Grievant's employment.

### **DECISION**

The Group 111 disciplinary action of the Agency with respect to Improper Accessing and Sharing of DMV Information is affirmed. The Group 111 disciplinary action of the Agency with respect to Falsification of a State Record is denied.

### **APPEAL RIGHTS**

You may request an administrative review by EEDR within **15 calendar** days from the date the decision was issued. Your request must be in writing and must be **received** by EEDR within 15 calendar days of the date the decision was issued.

Please address your request to:

Office of Employment Dispute Resolution (EDR)  
Department of Human Resource Management



101 North 14<sup>th</sup> St., 12<sup>th</sup> Floor  
Richmond, VA 23219

or, send by e-mail to [EDR@dhrm.virginia.gov](mailto:EDR@dhrm.virginia.gov), or by fax to (804) 786-1606.

You must also provide a copy of your appeal to the other party and the hearing officer. The hearing officer's **decision becomes final** when the 15-calendar day period has expired, or when requests for administrative review have been decided.

A challenge that the hearing decision is inconsistent with state or agency policy must refer to a particular mandate in state or agency policy with which the hearing decision is not in compliance. A challenge that the hearing decision is not in compliance with the grievance procedure, or a request to present newly discovered evidence, must refer to a specific requirement of the grievance procedure with which the hearing decision is not in compliance.

You may request a judicial review if you believe the decision is contradictory to law. You must file a notice of appeal with the clerk of the circuit court in the jurisdiction in which the grievance arose within **30 days** of the date when the decision becomes final.<sup>7</sup>

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<sup>7</sup> See Sections 7.1 through 7.3 of the Grievance Procedure Manual for a more detailed explanation or call EEDR's toll-free Advice Line at 888-232-3842 to learn more about appeal rights from an EEDR Consultant.



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Neil A.G. McPhie  
Hearing Officer  
March 18, 2022