

Smoke and Excessive Heat Rulemaking

May 6, 2021

1pm

Agenda

DEQ presentation – Wildfire smoke trends in Oregon and air quality monitoring – (Tom Roick)

Discussion – draft smoke rule

Break

Discussion – draft heat rule

Adjourn – 4 PM

Renee Stapleton with Oregon OSHA started the meeting at 1:02pm. Reminder that this and future meetings are now in GoTo Webinar platform. You will need to register for future meetings on the new platform.

DEQ presentation – Wildfire smoke trends in Oregon and air quality monitoring (8 slides total) (Tom

Roick, Air Quality Monitoring manager with DEQ). This is preliminary information that includes 2020 data.

- Slide 1: Wildfire Smoke Trends and the Air Quality Index
- Slide 2: Acres burned in Oregon, Washington, and Northern California 2010-2020. Seems to be an upward trend in Oregon and other states.
- Slide 3: AQI days ≥ to USG caused by wildfire smoke (Oregon map)(USG: unhealthy for sensitive groups)
 - Q. Attendee: Is there an evaluation of why 2019 is a big delta between the trending from 2017 - 2020? (in terms of acres burned)
- Tom Roick: DEQ has not done that evaluation. We would look at ODF or similar forestry organizations to do that kind of evaluation. DEQ focuses on AQI.
- Slide 4: Bend Wildfire Smoke by AQI Category (number of days per year per category)
- Slide 5: Klamath Falls Wildfire Smoke by AQI Category. In 2020, we had a mild wildfire season for most of the summer, until Sept. 2020.
- Slide 6: Medford Wildfire Smoke by AQI Category
- Slide 7: Eugene Wildfire Smoke by AQI Category
- Slide 8: Portland Wildfire Smoke by AQI Category
- Questions?
 - Question in chat: Bend right now is AQI 33 for pm 2.5 - were sitting at 6.1 already 1/2 the proposed action level. I am unaware of any wild or controlled burns. Can you explain what is going on there? Shared <https://gispub.epa.gov/airnow/> as reference for levels at this time of year with no current wildfire activity.
 - A: Attendee: We do get prescribed burning this time of year. Level of 6.1 is fairly low. We normally see levels up to 12 this time of year. We are mostly in the good and moderate range throughout the year at all of these sites.
 - Renee Stapleton: per Curtis Cude (OHA), there is a prescribed burn going on in the Deschutes County / Bend area right now that may be accounting for part of that too.
 - Tom Roick: Elevated 2.5PM can be increased by use of wood stoves in the winter.
 - Q. Attendee: How do we calculate what is generated by a true wildfire event vs home fireplace burning?
 - Q. Attendee: Based upon this question regarding Bend, will the rules makes clear that any AQI trigger will be related to wildfire smoke as opposed to other environmental issues?
 - A. Tom Roick: It is seasonal, there may be prescribed burning in spring and fall. June – September is the typical time of the year that we measure it with wildfire smoke in mind, considered wildfire season.
 - A. Anthony Barnack: Similar health risks regardless of the source of the smoke if at really high levels (wildfires, winter use of fireplaces in homes in an area). There are allowed timeframes for prescribed burning. Shared link AQ annual report at <https://oragi.deq.state.or.us/home/map>
 - A. Tom Roick: This means there may be a way to define when wildfire season is.
 - Q. Attendee: For people being exposed to PM2.5, what other air pollutants might be carried by those molecules into people's respiratory systems (heavy metals, PAHs, etc.)?
 - A. Carol Trenga (OHA): Yes, there are co-pollutants of concern in terms of toxicity. Smoke is a complicated mixture of compounds. Smoke is of great concern given the toxins it contains. It varies on

what is being burned (houses, structures, plastics, vehicles which can be more toxic). Wildland Urban Interface is an area of active research. The composition of the smoke plume changes as the distance from the fire changes. Also, depending on conditions, ozone might form farther from the fire because of precursors present in the smoke. PM2.5 has the clearest guidelines for toxicity.

- A. Tom Roick: Accuracy: most real-time PM2.5 monitors use light scattering technologies. We have nephelometers and our own low-cost sensors. We are looking at, how does our instrument read compared to the standard set by EPA called Federal Reference Method. Method weighs a filter; has been a standard for many years. We co-locate our real-time monitors and FRM equipment at locations around the state, in different seasons. Apply a correction factor to correlate our equipment to FRM.
- Slide 1: Low cost sensors for informational PM-2.5 monitoring in Oregon (5 slides total)
- Slide 2: Approximately \$30k for Teledyne T640 equipment. Nephelometer is \$8-10k, are being phased out. Oregon DEQ SensOR is about \$2-3K to put together. PurpleAir monitor is roughly \$300. Plantower sensor is very precise, but the accuracy can be challenging due to work of maintaining and setting up and applying a correction factor.
- Slide 3: Oregon DEQ data quality objectives. Data completeness \geq 75%. For regulatory data, our goal is to be within +/- 10% of standard FRM. For real-time monitors, we look to be within +/- 20% FRM Data. Low-cost sensors tend to be in +/-50% range in terms of accuracy relative to FRM. Takes extra work to correlate to FRM to gain levels of accuracy.
- Slide 4: Comparison of SensOR PM 2.5 to Neph PM 2.5
- Slide 5: Oregon DEQ Particulate Monitoring Network. We apply a different correction factor during wildfire season (June-September). Characteristics of smoke are different based on wildfire smoke vs wood stove smoke used in homes. PurpleAir's website lists four corrections. Without the correction, instrument could be reading twice the concentration of PM2.5 relative to the FRM. There is a time period involved in the measurements. Handheld device at PM2.5 measures at the moment in time. For AQI, click button that says PM2.5 measures PM2.5 at those locations, hourly average, refreshes top of the hour, each hour. Looking at AQI itself, rolling hourly average, called NowCast formula that looks at changes over time. DEQ gets a lot of questions about why a personal new device does not have the same reading as DEQ. Often related to the correction needed with FRM.
- In response to the draft rules, 5-3-1 visibility chart is a good tool to have as an option for measurement. Power outages can be an added challenge during wildfires for getting information out to people and people having access to that information.
- Q. Attendee: How does DEQ view the tradeoff between the highly accurate monitors at the AQM stations and the variation that employers might see at their actual work locations?
- Tom Roick: Recognize to establish the data quality needed for OSHA rulemaking to estimate potential worker exposure. We are looking at +/- 20%, which may not be appropriate for OSHA rulemaking (up to OSHA to decide). There are approximately 600 PurpleAir monitors across the state which effectively expands the network. Consider where the nearest DEQ monitors are located.
- Q. Attendee: What do the numbers mean in the Particulate monitoring network slide [5]?
- A. Tom Roick: These are the values for the AQI or is the actual value of PM2.5. There is a button you can click for PM2.5 and that concentration is what the number in the circle would represent. If you are on the Index, that is the number on the map. Anthony: AQI is also color coded based on levels. Dan: clicking on each dot brings up hourly trends. Shared Oraqi.deq.state.or.us/home/map
- Q. Attendee: Do the AQI results translate into an exposure equivalent for community health? For example, is it based on a person exposed for 24 hours a day. Whereas occupational exposure is more acute.
- A. Carol Trenga (OHA): the exposure estimates relate to the national ambient air quality standard which are set for 24 hour averages. The health recommendations based on activity level for example (looking at different populations) are based on a 24-hour average. Challenge of wildfire smoke on outdoor workers, much more difficult to control compared to indoors. EPA has a technical document with more information.
- Q. Carol Trenga: Are there any Ozone-only monitors in Oregon that might show up under "all" on the DEQ map? So an unfamiliar viewer might be looking at an Ozone AQI rather than PM2.5, for example. Are there any ozone-only AQI monitoring sites in Oregon?

- A. Tom Roick: Yes, and can be misleading if monitoring only for ozone levels and not smoke, and there is wildfire activity. AQI in those areas could look healthy because only ozone is being monitored. We have been working to show the needed information based on PM2.5 monitors at those locations.
- Q. Attendee: Can you use solar panels to run your monitors to avoid down time?
- Tom Roick: There is that for some larger stations but only lasts for short-term power outages (one or two hours). We are interested in this and looking to incorporate this, but we are not there yet.

Discussion – draft smoke rule (Ted Bunch with Oregon OSHA)

- Shared in chat 5-3-1 visibility chart: <https://oregonsmoke.blogspot.com/2014/08/5-3-1-visibility-chart-helps-determine.html>
- Protection from Wildfire Smoke document “Draft for Wildfire Smoke Rule 5-4-21”
- Ted pointed out addition to Section (4) Identification of harmful exposures: (d) is now added.
- Ted pointed out additions to Section (5) Employee information and training.
 - Q. Attendee: As an FYI- SB 762 would require public safety power shut offs during wildfire season if passed, so this is going to be a factor that we will need to deal with moving forward.
 - A. Tom Bozicevic: That is something that we have added to the exceptions of the rule that we are taking that into consideration when there is a need for power companies to do a power shutoff, that it may fall under an exception.
- Ted Bunch: read section (6) Employer two-way communication system.
 - Q. Attendee: I'm worried about the phrase "training must be provided once a year." What if an employee begins work after the yearly training was given?
 - A. Tom Bozicevic: Training is per individual once per year, not necessarily a group training. Every affected employee would need to be captured in the training.
- Ted Bunch: Read section (7) Control of harmful exposures to employees.
- Questions?
 - Q. Attendee: Will OSHA be putting out training materials?
 - Tom Bozicevic: This is something we are talking about internally (providing publications) but nothing is developed yet.
 - Q. Attendee: Who defines and what defines feasible? Time, cost, etc., similar questions for what's meant by practicable.
 - Q. Attendee: Is there a definition of "when feasible"? What about when practicable?
 - A. Renee Stapleton: It is tricky to define because it is a per case. In general, there is always a feasibility assessment. It is the employer's burden to determine if something is feasible or not. Traditionally that has been in regards to being possible, not financial.
 - Q. Comment. Attendee: I [am] assuming employers would have to conduct air monitoring to identify the results of the reduction in air pollution from the wildfire. The AQI would not be relevant if we are trying to reduce the indoor contamination.
 - Q. Comment. Attendee: Respiratory controls: Need to articulate this with the heat rule. Many air-purifying respirators, including N95, will create additional burden on employees under exertion.
 - Q. Attendee: Re: engineering and administrative controls- why does the draft use feasible sometimes and practicable other times?
 - Tom Bozicevic: We are using the framework from CAL-OSHA, after draft members recognized that is a direction we want to go. Ted Bunch: sounds like the comment is to be consistent between the use of those words.
 - Q. Attendee: For respirators, note 1 is a bit of a contradiction. The last sentence should be deleted. On one hand you are saying that you have to implement respiratory requirements like medical evaluations and fit testing, but on the other hand you are saying it is not required. I would suggest looking at that wording and making an alignment. From an employer perspective, we would be confused by that statement.
 - Q. Attendee: In regards to respiratory protective equipment, there are no exceptions for firefighting. How do you propose firefighters and other suppression personnel work in an environment with restricting respiratory devices?
 - A. Tom Bozicevic: We do have currently in the exceptions (2)(d) and (e) at this time. Still reviewing and requesting comments on that topic.

- Q. Attendee: Can we move to a 24-hour time frame. How can employers constantly monitor hour by hour and respond that quick? Following the ODF method for prescribed burning a 24-hour average is utilized.
- A. Tom Bozicevic: That is something we consider in the rule draft about taking current ambient temperature and 24-hour average. In the draft rule we talk about current ambient air quality. Confirmed with above Attendee, that the question is about employers using a 24-hour average rather than constantly checking throughout a day.
- Carol Trenga: AirNow is based on a 24-hour average. AQI is a rolling average. In terms of health protective aspects, we are concerned about those spikes. Understand the need to strike a balance in the proposed rule from employers' standpoint, in terms of frequency of monitoring and accommodating changing conditions.
- Q. Attendee: The annual training seems very minimal particularly since much of this is new to the employees and their supervisors.
- A. Tom Bozicevic: This training would be something we would expect employers to provide. The rule itself triggers at a 12.5, 2.5 and considering air quality conditions could worsen significantly after that. Once an employer is dealing with AQ of that or worse, then the requirement for providing that training would kick in.
- Q. Attendee: [audio quality was poor and could not be heard] This could give a practice run. Translation into workers' languages and how it would be presented would be concern that needs to be taken into consideration. When an emergency occurs, it is not a good time to open up the box and planning what to expect now.
- Tom Bozicevic: Referenced the Table for Protection from Wildfire Smoke in draft rule document.
- Q. Attendee: What is meant by "if available" regarding medical evaluation and fit testing on respirators?
- Tom Bozicevic: The hazard isn't one that develops in the workplace, it comes from somewhere else into the workplace. Doing medical evaluation and fit testing would be a challenge. This is something we need to consider in the rulemaking.
- Q. Attendee: This does not work well for farmworkers working outside to challenge the employers if this is feasible or not?
- Q. Attendee: Also, what is meant when the rule states that fit testing is required where available?
- A. Tom Bozicevic: Cal-OSHA has been doing their own fit testing, no data to show for that. Fit testing can have complications. Something we are looking at currently.
- Q. Attendee: Regarding sheltering in a car, would that include a private car that the employee drives to work? How would the car's filtration adequacy be determined?
- Tom Bozicevic: May be something that could be worked out with employer/employee.
- Q. Attendee: question on (7)(a) of draft document. What is the thought process of including this section?
- Tom Bozicevic: This assumes that there is a current ambient air concentration of PM2.5 that the employer would need to mitigate. Lists out how that would be accomplished. As we have listed in the exceptions, if an employer has employees who work in enclosed buildings/structures or vehicles so they would be an exception to the rule; however, this would be where there are workers who are exposed to those higher levels and they can basically take the concept of the exception in the scope and apply it as an engineering control.
- [response audio was unclear]
- Tom Bozicevic: we will capture unanswered smoke questions and answer those at the next meeting. You can send questions to Ted Bunch or Tom Bozicevic.
- Q. Attendee: section (7)(a) seems like it would apply to construction sites where we would have employees going in to temporary enclosed structures to do work, as written in the draft.
- Tom Bozicevic: We will review this section to make sure the thought process behind it is more clear for the reader.

Discussion – draft heat rule (Gary Robertson)

- Table 1 has been changed from types of clothing and is now a workload table from NIOSH. Feedback is welcome on this table in terms of how table information is presented. Switch to Wet Bulb Global Temperature in (1)(b) above table.
- Definition of Heat Wave was changed.

- Access to shade section (a) and (b) may be moved around in that section. Change was to 80 degrees in that section.
- Section on *Exceptions to subsections* (6)(a) and (6)(b) has been revised to remove language on misters from draft rule. Ted Bunch: Question on misters out to California: they did not feel that mister machines were as effective as providing shade.
- (7)(e) added, “Remind employees throughout the work shift to drink plenty of water. An average adult should drink 32 oz. an hour.” The wording on amounts of water needed may be changed just to be consistent in document (example, saying ounces throughout rather than quart).
- Additional information added to (10) Acclimatization Plan. Comments on this section are welcome.
- (13) additions (J) and (K)
- Questions?
 - Q. Crystal Weston: Table 1 doesn't have the clothing adjustment factor and that is important to include because clothing has an important impact on heat on an individual. This should be in a table or appendix. California's heat wave criteria is a different temperature (80 degrees + 10), would like Oregon OSHA to consider harmonizing that number to reduce burden on employers to implement and be more protective.
 - Q. Attendee: Rules don't fit forestry sector activities. Seems like this rule fits non-mobile worksites rather mobile worksites engaged in logging. My suggestion is that logging and forestry should be removed from the general category and be specific to forest activity code. Should be taken to the forestry meeting that Tom Bozicevic is on. Point on shade is untenable.
 - A. Tom Bozicevic will add this to the discussion to the June RAC meeting.
 - Q. Attendee: Need to consider how this applies to workers who work alone. Also, it is not feasible for some employers to ensure employees have water or are drinking water throughout the day due to some employees' work locations through the day.
 - Q. Attendee: Oppose the idea of separating out the forestry workers planters, commercial thinners in regards to shade. They need shade too. Instead of thinking of exclusions/exceptions, think about how to provide protections for all workers. Also, I did not see additions to the draft language in regards to the comment on shade that I made in the last meeting.
 - Gary Robertson asked Attendee above to add the previous comment to the current meeting's chat so that he could review it.
 - Q. Attendee: The shade space does not have specifics as to what they are sitting on?
 - A. No, there is nothing specific at this time.
 - Q. Attendee: Just a comment around 6 feet (6)(c) of draft rule. One issue we have is abuse of break time. No real problem with someone needing to take a break because of heat or heat illness effects. But now we will need to have someone monitor them anytime the temperature is 80 degrees or higher. But there needs to be some parameters around breaktime, when there are no signs of heat illness, at what point does that become exploited and abusive. As written, it is unclear. We support someone needing to have a break based from a health standpoint.
 - Q. Comment. Attendee: I oppose that position. Focus on training and discipline instead of putting parameters on it.
 - Q. Comment. Attendee: We are concerned about the forest activities workers but even in many of the forest activities operations providing shade at the top of the hill for our workers would not be feasible. No one is going to want to run up to the top of the hill, sit in the shade, and then go back down a hill for work. We have to find a better solution to the issue. Join us at the forestry committee meeting and we can discuss it.
 - Q. Attendee: In looking at the CA heat standard and it appears that forestry is incorporated like everyone else is. Employers have policies and disciplinary measures of dealing with employees to try to resolve things in a meaningful way and I don't think we eliminate protection for workers who need it by worrying about the most extreme of situations for abusers. Many employees in Oregon can be laid off for any reason.
 - Q. Attendee: Since fire suppression (structural) falls under division 2, this rule will be challenging for us to meet. Any consideration for exemptions to fire suppression, both wild land and structural like there is in the smoke rule?
 - A. Tom Bozicevic: I would imagine that this exemption for wildland firefighting may include when those wildland firefighting efforts are engaged in structural firefighting. As we know wildland fires do destroy

- homes and there is always an effort to protect those homes, so I can see the possibility of including that exemption. That is something that we will have to discuss.
- Q. Attendee: Any thoughts about limiting to outdoor work places as CalOSHA does? Heat Illness Prevention resources for Employers and Workers (a) Title, Scope, and Application. (1) This section shall be known and may be cited as the Maria Isabel Vasquez Jimenez heat illness standard, and shall apply to all outdoor places of employment.
 - A. Gary Robertson: We don't have anything in writing and your question will give us more to think about it. We want to make sure we are doing our own rule for Oregon.
 - Q. Comment. Crystal Weston: Looks like online has CA's indoor heat draft rule.
 - Q. Attendee: Is there data that supports CA's claim that misters aren't as good as shade?
 - A. Ted Bunch: I did ask CA that question and they are supposed to be providing me with some information.
 - Q. Attendee: Heat Alert Program (under High Heat Procedures): Consider making language the same as definition of "Heat wave." It says previous days but doesn't specify previous five days.
 - A. Gary Robertson: [Looking at the draft rule language], that is something an employer could write it into a program. Not sure yet about being that prescriptive in the rule.
 - Q. Attendee: Is OR OSHA aware of Sturgill V. OSHA regarding a heat stroke fatality?
 - A. Gary Robertson: I am not familiar with that case.
 - Q. Comment. Attendee: Sturgill V. OSHA case had to do with a heat stroke fatality and questions about the data that OSHA used for issuing the citation. I can forward the link.
 - A. Renee Stapleton: In relation to that case, there is a bill in Congress considering heat stress. It is not in OSHA's lap yet and is still in progress. Conversation happening on federal level for quite awhile. Been petitioned by various groups for heat related illness rule.
 - Q. Attendee: Acclimatization needs to consider workers who many times come into Oregon from climates warmer or the same temperature. Why not add lesser acclimatization requirements for workers who have come from the same or warmer climate?
 - Q. Comment. Attendee: Your answer for prescribed burning not being considered a wildfire unless it travels outside of the designated area is inaccurate. A prescribed fire can be considered a wildfire for several different reasons... deteriorating burning fire weather conditions where the threat of it escaping is high, unwanted fire behavior ... considering something a wildfire gains access to a wider range of fire suppression resources, like air tankers, hand crews, helicopters, dozers, etc. Thus, it does not only mean that it has escaped and out of control.
 - A. Tom Bozicevic: Restated previous answer. My understanding of a prescribed fire is a planned event within a designated area and if it gets to a point that it is out of control or the moment that it leaves the area, or it could a situation of spot fires outside of the area, does make it a wildland fire. There is a possibility that a prescribed fire could turn into a wildland fire if it is beyond the fire management's control.
 - Q. Attendee: In (7) (f) is the 32oz/hour intended to be a regulatory requirement? The second sentence seems like it should be a Note to the requirement.
 - A. Gary Robertson: It says "remind employees" not "must" or "shall". Made note to address the language in that section for clarity.
 - Q. Attendee: Why not match L&I vs CA? Be nice to get some consistency between at least Oregon and Washington. We have employees working in all three states and it gets confusing.
 - Q. Comment. Attendee: CA standard defines "heat wave" as any day in which the predicted high temperature for the day will be at least 80 degrees Fahrenheit and at least ten degrees Fahrenheit higher than the average high daily temperature in the preceding five days.
 - A. Previously asked/answered.
 - Q. Attendee: The shade space does not have specifics as to what they are sitting on? Also, oppose the idea of separating out the forestry workers planters, commercial thinners. They need shade too.
 - Q. Attendee: How do the rules account for employees who are hired and already acclimated to a warmer climate?
 - A. Previously asked/answered.
 - Q. Comment. Attendee: The way NIOSH and ACGIH take into account a clothing adjustment factor, they add degrees, based on the clothing type, to the measured WBGT level. 0 for work clothes, 3 double layer clothes and 11 for vapor-barrier coveralls for example.

- Q. Attendee: For some of these rules where there is required monitoring or reminders to drink water, how will agricultural labor contractors be considered? Will the contractor be the responsible party in this scenario? Some crews may move from farm to farm and the timeframe for drinking water may cover multiple operations in a day.
- A. Gary Robertson: It might come down to supervisory and control of those employees, labor contractor vs operator. Renee Stapleton: It is also possible that it would be a multi-employer worksite scenario that we would need to evaluate in line with our program directive if there is some additional direction and control or supervisory responsibility that the host employer shares. Difficult to assess abstractly but often when we are out there, it becomes more clear.
- Q. Attendee: California's indoor and outdoor heat rules were promulgated years apart. Would OSHA consider approaching inside and outside separately?
- A. Renee Stapleton: Oregon has an existing rule related to employers with hot processes. We are not approaching this rulemaking to connect anything that the heat temperature is because of the process. However, we aren't looking at it as indoor vs outdoor; it is looking at workers exposed to heat related to the climate. We are early on in the process.
- Q. Attendee: One question to consider going back to the earlier provision on 1(c) who decides the "normal" walking rate. Workers are continuously "encouraged" to work faster and if they are working on piece rate - to the workers it might feel like a faster rate than an employer. The question is who decides the rate and vigor of work. [please discuss]. (10) who decides that a worker is physically fit?
- A. Gary Robertson: Made note to look at the wording "physically fit" under (10)(d) Acclimatization Plan.
- Q. Attendee: (8) Shade- exception seems too broad- If an employer says not enough space -then what happens?
- A. Gary Robertson: Discussing that will be on our radar.
- Q. Attendee: If acclimatization takes 4 to 14 for most people should we assume less fit would take twice as long per 10d [in draft rule]?
- A. Gary Robertson: It is a tough question to answer, similar to determining someone's physical fitness. We will look into that particular component.
- Q. Attendee: Does Oregon intend to use and promote the Washington Heat Illness Toolkit for agriculture as part of the rule, at least by reference?
- A. Gary Robertson: Have to take a look at that toolkit. Renee Stapleton: challenging to reference it in a rule if the toolkit ceases to exist. There would be a requirement in the rule that has nothing to point to.
- Q. Attendee: How is the Heat Illness Prevention Plan (as is under CA rule) being considered in Oregon? (12)(a) of draft rule. IIPP is required to be created in CA.
- A. Gary Robertson: We had a note when this draft language first came out and is still a highlighted note since we are early on in the process. Still looking at if it will be a permanent part of this rule. To be discussed in next meeting. Confirmed that the reference is currently to a piece that does not exist under Oregon draft rule.
- Q. Attendee: Solo workers are not referenced. Do they need specific training in emergency response procedures when they can't be monitored for symptoms, etc.?
- A. Gary Robertson: I have notes that this will be addressed in discussion.

Tom Bozicevic reminded attendees that additional questions and comments on Excessive Heat rulemaking can be emailed directly to Gary Robertson at Gary.L.Robertson@oregon.gov and Smoke to Ted Bunch at Theodore.BUNCH@oregon.gov. Renee Stapleton reminded attendees that meetings have switched from GoTo Meeting to GoTo Webinar. Please visit the Oregon OSHA website to register for each future meeting.

Listening sessions are scheduled for May 20 and May 25 (will be recorded). These are on the GoTo Meeting platform so registration is not necessary. Click to Join the meeting. Both English and Spanish-speaking attendees are available. Offline conversations are always an option, including in other languages if needed.

Meeting adjourned at 4:03pm.