

Commission on Human Rights and Opportunities



At a Glance

TANYA A. HUGHES, Executive Director

Cheryl A. Sharp, Deputy, Director

Established – 1943

Statutory Authority – CGS Chapter 814c

Central office – 450 Columbus Blvd, Suite 2, Hartford, CT 06103

Website – www.portalct.gov/chro

Toll free telephone - (800) 477-5737

TDD – (860) 541-3459

2020- 2021 Budget: \$7,238,416.71

(\$6,426,842 in Personal Services; \$289,98 in Other Expenses)

Number of positions filled - 77 full-time;

Authorized positions - 84 full-time.

***Organizational structure:* Nine-member commission establishes policy; Executive Director manages/oversees the administrative office, legal department and four regional offices; and, independent Human Rights Referees hear contested cases.**

Mission

The mission of the Connecticut Commission on Human Rights and Opportunities is to eliminate discrimination through civil and human rights law enforcement and to establish equal opportunity and justice for all within the state through advocacy and education.

Statutory Responsibility

The statutory responsibility of the Commission is to:

- Eliminate illegal discrimination in employment, housing, public accommodations and credit transactions through education and law enforcement.
- Monitor contract compliance laws and small contractor set-aside provisions by state agencies, contractors, and subcontractors.
- Review and monitor state agency affirmative action plans and compliance with laws requiring affirmative action and equal opportunity in state government.
- Establish equal opportunity and justice for all persons in Connecticut through education and outreach; and
- Provide sexual harassment prevention training for all residents.

Public Service

The Commission is headed by a policy-making body consisting of nine members. Five of the members are appointed by the Governor and four are appointed by the leadership of the General Assembly. All new appointments require legislative approval through the advice and consent of the House and Senate. The Commission conducts regular monthly meetings on the second Wednesday of the month. The Commission conducts special meetings as it deems necessary.

Eight Commissioners were serving at the end of the fiscal year. They were Chairperson Cherron Payne, Secretary Edward Mambruno, and Commissioners Andrew Norton, Edith Pestana, Joseph Suggs, Lisa Giliberto, Nicholas Kapoor, and Neeta Vatti. Currently, one vacancy remains unfilled.

An Executive Director appointed by the Commission oversees the operations of the agency. Executive Director Tanya Hughes was appointed Interim Executive Director on July 13, 2013 and appointed to a four-year term on November 17, 2013. She was re-appointed to a second four-year term in November 2017 and her third term in July 2021. The agency's administrative office, also located in Hartford, houses the Office of the Executive Director, Tanya Hughes, the Office of the Deputy Director, Cheryl Sharp, the Legal Division, Charles Krich, Principal Attorney, the Affirmative Action Unit, the Contract Compliance Unit, the Fair Housing Unit, and the Office of Public Hearings. There are also four regional offices located in Hartford, Bridgeport, Norwich, and Waterbury.

Martin Luther King, Jr Commission:

By statute, the Commission serves as the secretariat for the Martin Luther King, Jr. Holiday Commission (MLK). The State of CT Dr. Martin Luther King, Jr. Holiday Commission was established in 1986 to ensure that the commemoration of Dr. King's birthday is meaningful and reflective of the spirit with which he lived and the struggles for which he died. The purpose of the statewide Commission is to unify and educate communities within the State of Connecticut and encourage meaningful observations, ceremonies, and activities in commemoration of the federal holiday and state legal holiday honoring Dr. Martin Luther King, Jr. throughout the towns, cities, school districts, counties, and local government within Connecticut. The MLK Holiday Commission Roster is as follows:

Donna Campbell, Chairperson

Members: Dr. Stacey Brown; Guy Fortt; Seth Freeman; Dr. Steven Hoffler; Elder Ashley AJ Johnson; Bobby Ramos; Kristen Shorter; Mandy Wenis; Christopher Williams; Jami Williams; Sherry Woods.

Analysts: Yvette Moore; Lori Stewart

The MLK Holiday Commission was able to host two events this year despite COVID-19, with assistance from the CHRO. Festivities included a Mental Health Forum on February 25, 2021 which focused on the need for mental health awareness and services in the African American community during this critical time of the world-wide COVID -19 pandemic. The event was a remote event broadcast and livestreamed virtual event via ZOOM, free and open to the public with attendance of individuals from across the state, as well as Governor Ned Lamont, Constitutional officers, and other state officials. The event featured a keynote from Dr. Rheeda Walker with a Q&A panel. Awards were presented to the following individuals:

Leadership Award — Dr. Anthony Bennett, Bridgeport

Legend Award — Ms. Blanche Sumpter, Stamford
Legend Award — Joseph Ward, Sr., New Britain
Legend Award — Mt. Aery Baptist Church, Bridgeport
Legend Award – Elizabeth Nkonoki-Ward, New Britain

On April 30, 2021, the MLK Holiday Commission sponsored From Loss to Light, an outdoor socially distanced program featuring a keynote from Deputy Director Cheryl Sharp. This event took place at the Dr. Martin Luther King, Jr. Social Justice Middle School in Hartford, CT.

The annual budget for this commission is \$5,977.

Improvements/Achievements 2020- 2021

THE COMMISSION ON HUMAN RIGHTS & OPPORTUNITIES AND THE COVID-19 PANDEMIC

The global pandemic dramatically affected the Commission on Human Rights and Opportunities and the way in which we provide services to the community. We were challenged with providing responsible leadership in a changing workplace. We found innovative ways to remain connected and provide education and outreach during a pandemic. The COVID-19 pandemic in the U.S. has proven to disproportionately affect people with low socio-economic status, as well as Black, Indigenous, and Latino people, all of whom have experienced higher rates of cases, hospitalizations, and deaths. We saw racial/ethnic disparities associated with income, employment, and housing as well. On March 13, 2020, CHRO issued comprehensive guidelines for employees regarding teleworking and expectations for responding to the public during the pandemic. We were able to maintain all operations without a break in service, converting virtual/electronic service via our website. www.portalct.gov/chro. These guidelines remained in place for the duration of the 2020-2021 fiscal year. CHRO was allotted a total of \$65,127 in CRF funds which afforded CHRO the ability to provide regular and frequent updates to its website, provide extensions to critical procedures and provide virtual assistance and trainings via webinars, Outlook TEAMS, telephonic and other forms of electronic services. Procedures were altered to provide steady, competent service while maintaining significant work productivity. We applied for numerous grants which afforded us the requisite PPE materials and computer equipment/software to avoid disruption in services to the public. We enhanced the information provided on the website, utilizing the statewide template to ensure that the state residents received information that was easy to access, organized in a simplistic format. We conducted webinars, agency wide trainings, EAP presentations, surveys, etc. to regularly check in with staff and respond to rapidly changing protocols as received from the governor's office and the CDC. The CHRO worked closely with OPM/ DAS/ DOL and the governor's office to ensure that all executive orders and legislative activities were reflective of the work and interests of the agency and its mission.

KEY CASES

Soule v. CT Association of Schools (US District Court) – As an intervening defendant, we joined in successfully moving to dismiss a case seeking to challenge the policy of the Connecticut Interscholastic Athletic Conference allowing athletes to compete in accordance with their gender identity. Case is currently on appeal to the Second Circuit.

Judicial Branch v. Gilbert (CT Supreme Court) – We are defending the Commission’s authority to prosecute and adjudicate violations of Conn. Gen. Stat. § 46a-58(a) based on deprivations of Title VII rights, and to award emotional distress damages and attorney’s fees where such violations are found. Oral argument occurred in January 2021; still awaiting decision.

CHRO v. Edge Fitness (CT Supreme Court) – We have argued that our state public accommodation statute does not contain an unwritten implied exception for “customer gender privacy”. We successfully solicited supportive amicus briefs from organizations including Lambda Legal, the CT TransAdvocacy Coalition, and the ACLU of CT. Oral argument occurred in May 2021; still awaiting decision.

State of Connecticut v. Jose A.B. (CT Supreme Court) – amicus brief.

Kovachich v. DMHAS (CT Appellate Court) – Through an amicus brief, we successfully ensured the confidentiality of documents and communications occurring during the Commission’s mediation process. The Court specifically relied on our amicus brief in reaching its decision.

CHRO v. Cantillon (CT Appellate Court) – We have argued that an award of \$15,000 in emotional distress to a Complainant who was subjected to repeated racial slurs and racially-motivated threats of violence by a neighbor over the course of years was erroneous as a matter of law, and the result of an incorrect application of the requisite legal framework for evaluating emotional distress damages. Oral argument occurred in March 2021; still awaiting decision.

City of Waterbury v. CHRO (CT Superior Court) – Successfully moved to dismiss an appeal by the City of Waterbury, which sought to challenge the Commission’s declaratory ruling regarding insurance coverage for gender affirming care in state and municipal insurance plans.

Danner v. CHRO/CHRO v. Atos (CT Superior Court) – Successfully challenged public hearing decision that granted summary judgment in favor of the Respondent. Currently on appeal to the Appellate Court.

Waterbury Bd. of Ed. v. CHRO (CT Superior Court) – Successfully defended Commission public hearing decision in favor of the Complainant, which included awards of over \$100,000 in back pay with interest and \$35,000 in emotional distress. Currently on appeal to the Appellate Court.

CHRO v. Holly J. Digertt, LLC, et al. (OPH) – Reached first-of-its-kind settlement with entities alleged to have engaged in fraudulent MBE practices, requiring payment to Commission education and outreach fund and voluntary withdrawal of SBE/MBE status for period of 2 years.

REPORTS

CHRO, through its legal department drafted and released the *CHRO Zoning and Discrimination Report* which can be found on our website. The report analyzes the state's various zoning regulations and the resulting segregation throughout the state. It provides an overview of exclusionary zoning policies, the lack of affordable housing in the state, the intersectionality of housing segregation and its impact on education and health equity, and a summary of recent and relevant court cases. Annual reports required by statute including reports on the state of Affirmative Action in state agencies, the contract compliance program, agency case processing trends, and the awarding of attorney fees can also be found on our website. <http://www.portalct.gov/chro>

LEGISLATION

CHRO, through its legal department assisted in drafting proposed legislation and testimony in support and opposition to over 66 raised bills. While the session was long and labor intensive with all the bills released this session, the staff rose to the unusual virtual formats for hearings and committee meetings. Some important legislation we supported which passed that impacts our work includes:

Public Act 21-109 An Act Concerning the Duties and Responsibilities of the Commission on Human Rights and Opportunities - Effective October 1, 2021

This legislation was the CHRO's agency bill for the 2021 session. Among other things, the bill does the following:

- Adds language to the section that allows a state agency, department, board, or commission to not investigate a complaint if that complaint is going through the CHRO or EEOC. The new language specifies that if an agency, department, or board relies upon a commission investigation, such agency, department, board, or commission is not relieved of its duty to mitigate discriminatory conduct or of its responsibility to take immediate corrective action to prevent a like occurrence.
- Allows the chief referee to serve a copy of the complaint in accordance with section 46a-86a, which permits the Commission to inform the parties of any determination or proceeding by first class mail, facsimile machine, electronic mail, or file transfer protocol site.
- Allows for the portability of the sexual harassment prevention training provided by the CHRO. If an employee has received either the in-person training provided by the CHRO or has taken the free online training the CHRO was required to post on its website by the 2019 Time's Up Act in the past two years while working for a different employer, an employer may consider such training to satisfy the training requirements of the statute.
- Changes the filing deadline for discrimination complaints so that any complaint alleging discrimination that occurred on or after October 1, 2021 shall be filed within 300 days after the date of the alleged act of discrimination.

Public Act 21-2 An Act Creating a Respectful and Open World for Natural Hair (CROWN ACT)
In effect as of March 4, 2021 (upon Governor's signature)

This legislation amends the definition of “race” and “protective hairstyles” in the CHRO’s antidiscrimination statutes. Under this bill, “race” is amended to be “inclusive of ethnic traits historically associated with race, including, but not limited to, hair texture and protective hairstyles.” “Protective hairstyles” is defined as including but not being limited to “wigs, headwraps and hairstyles such as individual braids, cornrows, locs, twists, Bantu knots, afros and afro puffs.”

Public Act 21-128 An Act Concerning the Authority of the Office of the Attorney General
Effective July 1, 2021

Section 2 of this legislation allows the Attorney General to investigate, intervene in or bring a civil or administrative action in the name of the state whenever any person is or has engaged in a practice or pattern of conduct that:

1. Subjects, or causes to be subjected, other persons to the deprivation of any rights, privileges or immunities secured by the constitutions or laws of Connecticut or the United States.
2. Interferes or attempts to interfere, by threats, intimidation, or coercion, with the exercise or enjoyment by other persons of any rights, privileges or immunities secured by the constitutions or laws of Connecticut or the United States.

The legislation specifies that nothing in it shall limit the right of a person adversely affected by a violation of chapter 814c of the general statutes to file a complaint with the CHRO, that nothing in this section shall limit the jurisdiction of the CHRO, and that the Attorney General shall not bring an action under this section during the pendency of a matter involving the same parties and the same alleged facts and circumstances before the CHRO. It also specifies that the Attorney General’s office will post on its site how to properly file a complaint with the CHRO and that it may refer cases to the CHRO. CHRO has initiated meetings with the AG office to develop a comprehensive and collaborative Civil Rights agenda that will properly direct our citizens to the appropriate agency for expedient action.

Public Act 21-32 An Act...Prohibiting Discrimination Based on Erased Criminal History Record Information, etc.

The provisions of this legislation concerning the CHRO establish an individual’s “erased criminal history record information” as a protected class and classifies discrimination based on these erased records as a discriminatory practice in the areas of employment, public accommodations, the sale or rental of housing, the granting of credit, and in any other area covered by CHRO’s antidiscrimination statutes.

These provisions are generally effective as of January 1, 2023. To implement the provisions of this bill at the beginning of 2023, the CHRO will need to hire 2 Human Rights Attorney I’s and 2 HRO Trainees. The CHRO can expect an increase in its budget to hire this staff (\$127,254 in salary and \$52,556 in fringe benefits in FY 23, reflecting the partial year).

Special Act 21-8 / PA 12-2 of the June Special Session (Section 93)
Disparity and Equity Studies

The 2021 budget and implementer included \$4 million for the CHRO to conduct a disparity study and an equity study. The language of the disparity study legislation requires the CHRO to work with DAS and OPM to issue a request for proposals and ultimately contract with a firm to conduct a disparity study which will analyze the state’s set-aside program and the state’s contracting processes.

The equity study legislation similarly requires the CHRO to oversee a study after an RFP has been issued by DAS and the CHRO, DAS, and OPM have contracted with a firm to conduct the study. This study as overseen by the CHRO shall be an in-depth look at state government programs and actions, and to assess equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation, and disability.

SEXUAL HARASSMENT TRAINING

Like everything else in the world, Covid has had a big impact on the number of sexual harassment complaints filed since the start of the pandemic; this year has shown the continued need for action as we see a 20% increase in the number of sexual harassment complaints filed. We answered hundreds of questions about the sexual harassment training mandate. 360,000 people were issued certificates via our online training this fiscal year with hundreds of thousands who were provided this training directly by their employer reflecting a half million employees trained during this period.

<http://www.portalct.gov/chro>

INTERNAL TRAINING

CHRO, through its legal department has provided extensive two-week legal trainings for 12 new staff members remotely this year. Legal division staff conducted numerous IT training and development sessions with agency staff to enable them to work more effectively while being remote and the legal division organized and gave training available to the agency on a recent case the CHRO became involved with as well as on best practices for conducting intake. A full day, agency-wide training was conducted with internal and external presenters where the legal division staff provided various training sessions in December of 2020.

EXTERNAL TRAINING

CHRO, through its legal department provided outreach and education to the public virtually this year which included three fair housing trainings geared towards landlords, a series of webinars funded by HUD grants, an event in Simsbury on housing and education, a Human Rights Day talk with CT high schoolers, a Pride Month legal update for the Department of Social Services, speaking at a UConn Law event for students, an in person sexual harassment training, several cultural competency trainings, and a staff member served as the keynote speaker at a well-attended breastfeeding webinar sponsored by La Leche League of CT.

OUTREACH AND EDUCATION

COVID 19 challenged CHRO to use creative initiatives to continue our outreach and educational activities. We partnered with other agencies, stakeholders, and businesses under the direction of Deputy Director and Commission Attorney Cheryl Sharp. Her team of attorneys, managers, investigators, and professionals from throughout the state were able to maintain the Kid's Court Competition with a 100% virtual program of finalists who presented their speeches before a panel of esteemed judges. The event took place on June 8, 2021 and our judges were: CHRO

Commissioner Lisa Giliberto, CHRO Commissioner Nicholas Kapoor, AAG Vanessa Avery, Attorney Regina Hopkins, Judge Dawne Westbrook, and Judge Donna Wilkerson Brilliant.

Other outreach successes include but are not limited to:

- *Pride Month training* for DSS by CHRO Attorney Michael Roberts
- *Summer Internship program*-The Legal Division organized and successfully implemented the Commission's first remote internship program in the summer of 2020 and has done so again in 2021. This required a great deal of creativity, experimentation, and dedication to be completed successfully at a time when many other organizations opted not to have any intern program due to the difficulty of successfully managing and implementing a program that is beneficial to participants, the agency, and the public.
- *PSA* by Executive Interns on Allyship
- *CHRO Intern Summer Symposium 2020 on Educational Disparities* featuring Commissioner Miguel Cardona (currently the US Secretary of Education) on August 5, 2020.
- *CTPR3 Working Group* issued policy recommendations to the Governor and General Assembly for the adoption of a two-tiered traffic violation system to reduce racial profiling on the justification of administrative or equipment related stops.
- *Highschool Mascot Project* has been involved with multiple towns ending the use of American Indian Imagery in their athletics program and held a webinar that received national attention.
- *Police Training and Accountability Task Force* – Executive Director Tanya Hughes and Deputy Director Chery Sharp continue to actively participate on this committee which meets monthly.
- *Kids Court Academy* – This weekly program was developed, designed, and produced by Deputy Director Sharp featuring reviews of prominent court cases and their practical applications. The academy sessions start with a brief introduction by a guest speaker with breakout groups to guide the students through the exercise designed to foster discussion and interactivity.
- *WICC Radio* show with Melissa Scheckitoff – Monday morning radio slot featuring the Executive Director Tanya Hughes, Deputy Director Cheryl Sharp and several members of the legal/ management staff have been interviewed on WICC Radio about various civil rights topics including mascots, digital discrimination, sexual harassment, LGBTQ+ rights, zoning laws, recent legislation, breastfeeding discrimination and more.
- *Voters' Rights Project* Legal and investigative staff advised the public through the Commission's social media platforms on Facebook and Twitter regarding completing their decennial Census on time and about their numerous options to vote in the General and Primary elections in 2020. The newest option included voting early by mail because of the pandemic. Staff also assisted various municipalities on Election Day with conducting in-person voting, counting ballots submitted by mail, and answering legal questions.

DIVERSITY AND INCLUSION

Upon the retirement of Attorney Alix Simonetti, Attorney Jody Walker Smith was elected by her peers to chair the recently invigorated Diversity and Inclusion Committee. The Committee has spread its wings to include working on a considerable amount of educational content, created a Social Media Team for the agency, and significantly increased the agency's online reach. You can find nearly daily posts to update the public about issues of public interest and how to access our services for assistance. The legal department has started to engage in monthly thought-provoking and critically important conversations about equity and discrimination law, which we aim to use to inform our work as we move forward. The regional offices, Affirmative Action, Contract Compliance, and Fair Housing Units also contribute regularly to statewide efforts to increase diversity and inclusion through our work with schools, businesses, municipalities, stakeholders, and local chambers of commerce.

We can be followed at: [facebook.com/ctchro](https://www.facebook.com/ctchro); Instagram @ct_chro;
<http://www.portalct.gov/chro>

COMMENTS TO EEOC'S PROPOSED GUIDANCE (12/17/2020)

The Legal department drafted comments to the EEOC's Proposed Updated Compliance Manual on Religious Discrimination. The Proposed Manual broadly pronounced that the ministerial exception was both not waivable and that it precluded discrimination claims against qualifying religious entities. We clarified that the ministerial exception should operate as a waivable affirmative defense rather than a jurisdictional bar in discrimination cases against religious entities, and that the law was unsettled on whether the ministerial exception applied in all types of discrimination cases.

COMPLIANCE COMMITTEE

The mission of the Compliance Committee is to be proactive in preventing discrimination. The committee research housing and employment advertisements to identify potentially discriminatory language and contacts the employers/property owners to remedy the situation. In rare instances, the committee requests that the Commission initiate a complaint, as was the case with a recent housing advertisement that unlawfully restricted access to potential renters based on race, source of income, and criminal record (via disparate impact). In another instance, the Compliance Committee was successful in working with a business owner to add accessible parking to its lot.

TECHNOLOGY COMMITTEE

The committee is responsible for ensuring efficient and effective troubleshooting of IT related issues within the agency or, if necessary, through unit-specific elevation to DAS. The committee is also responsible for training staff on the use of technology, adoption of best practices, intra-agency IT security protocol development, and recommendation of technology purchasing. Each unit has at least one representative on this unit to ensure consistent and accurate application of all agency practices and procedures.

FEDERAL REVENUE:

The CHRO has workshare agreements with both the Equal Opportunity Commission (EEOC) and the US Department of Housing and Urban Development (HUD). For every complaint dual-filed with both the CHRO and either EEOC or HUD, the federal government remits payment to the CHRO to process and investigate the complaint on their behalf. To ensure fair and impartial processing, this money is not contingent on the outcome of the complaint. As a result of this arrangement, approximately 25% of the commission's budget is covered by federal vouchers for case processing. This revenue is directly deposited into the General Fund. In FY 2020-2021, the CHRO vouchered for \$1,497,2240 from the EEOC for case processing and \$494,328 from HUD for case processing. An additional \$39,265 grant was received from HUD plus another \$7,795 from HUD for training and travel. CHRO was again able to improve its performance in completing the Housing investigations within the prescribed 100-day timeframe.

HUD GRANTS

CHRO, through its Executive Office and legal department administered 3 HUD Cares grants, CARES, Health Equity and COVID 19 totaling \$65,127 awarded to CHRO. The project furthered HUD's national priorities by educating the public, advocates and lay people about their state and federal fair housing rights which included organizing webinars, publishing blog posts, creating public service announcement and issuing a blue paper on Health Disparities and Health Equities which can be found here: [Blue-Paper---Health-Disparities-and-Health-Equity.pdf \(ct.gov\)](#). The CHRO put on four webinars focusing on community outreach, housing and equality related to Covid-19. We published four blog posts associated with those webinars. Additionally, we put on a three-part webinar focused on where you live and access to healthcare. We procured equipment associated to the grant work. We set up a call center and question box which we are still maintaining. We developed brochures related to the subject matter which are available on our website. The health equity webinars were on 9/30/2020, 11/12/202 and, and 2/22/21. The housing and equality webinars were on 9/15/20, 10/28/20, 1/26/21 and 4/20/21. 365 people registered for the webinars. Additionally, more than 1,300 people have viewed these webinars since they were posted on our website. We have received hundreds of views on the PSAs we created. We had numerous inquiries on our Covid hotline and mailbox. All the webinars and related materials will continue to be posted on our website so the public can continue to view those. The hotline and email address will continue to stay open.

PUBLIC HEARINGS

The Office of Public Hearings (OPH) conducts contested case proceedings in discrimination cases brought by the Commission and in whistleblower retaliation cases filed with the Chief Human Rights Referee pursuant to CONN. GEN. STAT. § 4-61dd. The average number of cases pending litigation at OPH continued to show increase in FY 2020 – 2021 with case hearing halted. This remains largely due to an extended vacancy in referee appointments. This division operates autonomously and is slated to consist of three appointed referees. It is significant to note that one of the positions has remained vacant since June of 2014. The chief referee position was recently vacated in April 2021 by Chief Referee Michelle Mount. Alissa Wright is currently the only remaining referee appointed. Unless these critical vacancies are filled, cases will continue to languish at public hearing and become severely aged.

FREEDOM OF INFORMATION

The Commission takes seriously its responsibility to comply with the provisions of the state's Freedom of Information Act. The Legal Division is responsible for responding to all freedom of information (FOI) requests, except those received directly in a regional office requesting a file being processed by that office. The Legal Division also responds to subpoenas for documents and testimony related to agency procedures and documents. Support staff handles most requests; complex requests and hearings are referred to the Executive Director. During Fiscal Year 2020-2021 we responded to 162 FOI requests and we received 46 Complaints filed against or involving State Agencies. The Executive Director ensures that all regular and special Commission meetings are properly noticed and filed with the Office of the Secretary of State in accordance with the requirements of the Freedom of Information Act.

Additional Information: Individuals seeking more information about the Commission, the laws it enforces, or its services and programs are encouraged to contact the Commission's website (<http://www.portalct.gov/chro>) or call our toll-free number (800) 477-5737.