STATE OF FLORIDA
REEMPLOYMENT ASSISTANCE APPEALS COMMISSION

In the matter of:

Claimant/Appellee

R.A.A.C. Docket No. 20-00251

vs.

Referee Decision No. 0037161703-04U

Employer/Appellant

ORDER OF REEMPLOYMENT ASSISTANCE APPEALS COMMISSION

This case comes before the Commission for disposition of the employer's appeal pursuant to Section 443.151(4)(c), Florida Statutes, of a referee's decision holding the claimant not disqualified from receipt of benefits. Pursuant to the appeal filed in this case, the Commission has conducted a complete review of the evidentiary hearing record and decision of the appeals referee. *Id.* The Commission's review is generally limited to the evidence and issues before the referee and contained in the official record.

The referee held the claimant not disqualified on the ground the employer discharged her for reasons other than misconduct. §443.101(1)(a), Fla. Stat. After carefully reviewing the record, we vacate the referee's decision, and remand the case for a supplemental hearing.

I.

The referee made the following findings of fact:

> Claimant worked as a dog groomer from February 28, 2019 to December 28, 2019. On or around December 21, 2019, claimant and the employer agreed that claimant could leave work at 2:30 p.m. on December 28 to attend to personal issues. On December 28, 2019, claimant was scheduled to groom a dog at 1:00 p.m. Claimant's associate called the dog's owner the previous day to confirm the appointment and claimant called the owner a couple times during the day to make sure the dog owner would be on time for her appointment. Most clients who schedule their dogs

> to be groomed drop them off in the morning. The owner brought the dog to be groomed at 1:40 p.m. Claimant knew she would not have time to groom the dog before she had to leave and asked her associate if she could groom the dog. The associate was too busy to groom the dog. Claimant spoke to the customer and told her that she did not have enough time to groom the dog before she left and asked the customer to reschedule. Claimant understood that the customer realized she was late bringing the dog and agreed to reschedule. The general manager approached claimant and insisted that claimant groom the dog before she left. Claimant explained that she did not have enough time to groom the dog before she left. The general manager told claimant that if she was not going to groom the dog her services were no longer needed.

On these facts, the referee found the claimant's refusal to groom the dog was reasonable, and that the directive was unreasonable, given the limited amount of time the claimant had to complete the task. The referee concluded the claimant's behavior was therefore not disqualifying misconduct. *See* §443.036(29), Fla. Stat. (defining misconduct).

In holding the claimant not disqualified, the referee declined to consider the employer's evidence that the claimant also had issues with attendance and poor work performance. The referee found those matters were not causally relevant to the question of whether the claimant was discharged for misconduct:

> The general manager also testified that claimant had performance issues and instances of tardiness and absences that contributed to the employer's willingness to discharge claimant. Accumulated violations of the employer's interests over the course of employment can show misconduct even if the final incident leading to the discharge was not misconduct. *C. F. Industries, Inc. v. Long*, 364 So. 2d 864 (Fla. 2d DCA 1978); *Mason v. Load King Mfg. Co.*, 758 So. 2d 649 (Fla. 2000). However, in this case the general manager's testimony made it clear that had claimant agreed to groom the dog she would not have been discharged. Therefore, the employer's testimony about claimant's performance and attendance issues is irrelevant to the circumstances that led to claimant's separation.

We vacate the referee's decision and remand the case because the referee applied an erroneous causation analysis. That is, even though the grooming incident was clearly the event that triggered the discharge, the referee should have also addressed whether the claimant's attendance and performance issues directly and substantially contributed to the employer's decision to discharge the claimant; if so, the referee must consider whether those incidents amount to misconduct.

II.

Section 443.101(1)(a), Florida Statutes, disqualifies a claimant from receipt of benefits for being "discharged by the employing unit for misconduct connected with his or her work." Under the statute, the inquiry is thus whether a causal connection exists between the discharge and the claimant's misconduct. Under the statute's plain language, causation is *not* limited to the final incident only. Rather, as stated by the Florida Supreme Court, "the employee's *entire* course of conduct must be considered, *not* just the acts immediately precipitating the employee's discharge." *Mason v. Load King Mfg. Co.*, 758 So. 2d 649, 654 (Fla. 2000) (emphasis added).

Indeed, the principal issue resolved in *Mason* was whether the final triggering incident in a separation should be the sole matter examined, or whether prior actions should be considered. This is readily apparent in the *dissenting* opinion, where three justices believed that the issue of misconduct should be controlled by the actions that immediately precipitated the discharge. The Court majority rejected that view of the statute.

Although the referee cited *Mason* as authority for the conclusion that the prior incidents were not relevant, the referee misunderstood its application to these facts. The referee was undoubtedly correct that but for the final incident, the claimant would not have been discharged at that time. The final incident precipitating a termination will *always* be a "but-for" cause of a discharge—that is, but for the incident or event, the claimant would not have been discharged. However, it will not always be the *only* "but-for" cause. Applying but-for causation solely to the final incident would effectively disregard the majority's holding in *Mason* and instead adopt the dissent's rejected view.

While *Mason* dealt with a claimant who engaged in a pattern of similar behavior (attendance issues), we conclude the same principle applies in cases dealing with dissimilar behavior. *Accord C.F. Industries, Inc. v. Long,* 364 So. 2d 864 (Fla. 2d DCA 1978) (a case cited by *Mason* that disqualified a claimant for prior incidents,

including, among other things, absenteeism and poor performance, even though the final incident (falsification of records) was not proven). Borrowing from the precepts of tort law and employment law, we conclude that prior conduct must be considered *if* the prior conduct was a *direct* and *substantial* cause of the discharge. R.A.A.C. Docket No. 19-01158 (August 30, 2019).[1]

For prior conduct to be a *direct* cause, it must be part of one or more events that led to the ultimate decision to discharge. If it is established that but for a prior act(s) constituting misconduct, the claimant would not have been discharged, then the prior act(s) would normally be a direct cause. But the referee should also consider whether the prior act(s) is so remote in time and occurrence that the connection is too tenuous to support disqualification, as discussed by the Court in *Mason*. If it cannot be determined whether or not the prior act(s) is a but-for cause, such as when they are intertwined with non-disqualifiable incidents, then the referee should determine whether the combined incidents led directly to the termination. The prior events must also be a *substantial* cause. That is, they must have a degree of significance or materiality rendering them at least as important as other incidents bringing about the termination.

We adopt this test because we recognize that in some cases an employee's behavior in a single incident is so troublesome that the employer might discharge an otherwise satisfactory employee that the employer would have preferred to retain absent the event. In these cases, the final incident would be the only direct or but-for cause of the separation and will determine the outcome of the case. However, also common is the scenario where a poor or marginally satisfactory employee has a pattern of incidents which leads the employer to conclude, after a final incident, that retaining the claimant is no longer worthwhile. In some of our cases, for example, the final incident triggering the discharge is relatively minor, and the employee is discharged because he was on a "final warning" or at the end of a progressive discipline process. In these situations, the prior acts were clearly the primary motivators for the discharge and would be the direct and substantial causes. And then there is the third category of cases, like this one, where the issue of causation is less clear-cut and will require careful consideration by the referee.

Here, the claimant had previously had her hours reduced because of absenteeism. The employer also expressed concerns about her performance, although these were not developed by the referee. Applying the causation analysis discussed above, the referee must develop the record to resolve the following

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[1] In R.A.A.C. Docket No. 19-01158, we used the formulation "direct and major cause." While the formulation herein is essentially identical, we view the word "substantial" as clearer and easier to apply than "major."

questions: but for the claimant's prior absenteeism or poor performance, would the clamant have been discharged on December 28, 2019, following the grooming incident? Or alternatively, if both were collectively a but-for cause but only one could be deemed misconduct, was that one a direct cause of the separation? If either of these tests are met, the referee must consider whether the issue(s) of absenteeism and/or poor performance were a substantial factor in the employer's decision to discharge the claimant. Finally, the referee must develop the record as is necessary to determine whether the absenteeism and/or poor performance amounted to disqualifying misconduct. If so, the employer has satisfied the requisite causation between the claimant's conduct and the discharge as required under Section 443.101(1)(a), Florida Statutes.

We emphasize that, when addressing the causation test above, the referee should assess the *totality* of the evidence. For instance, in addition to asking the employer the common question: "were there any other instances that led to the employer's decision to discharge," the referee should develop the record and consider whether the claimant was warned or subjected to discipline for the prior conduct—which, if proven, can show substantiality. The referee should also develop the record and assess the duration of time between the prior conduct and the final incident.[2]

[2] Of course, the referee is not required to take any contention at face value. The record should provide facts that will allow the referee to determine the extent to which prior events were causally related to the discharge.

III.

The referee's decision is vacated, and the case is remanded for supplemental proceedings consistent with this order.

It is so ordered.

REEMPLOYMENT ASSISTANCE APPEALS COMMISSION

Frank E. Brown, Chairman
Thomas D. Epsky, Member
Joseph D. Finnegan, Member

This is to certify that on
4/29/2020 ,
the above order was filed in the office of the Clerk of the Reemployment Assistance Appeals Commission, and a copy mailed to the last known address of each interested party.
By: Kady Ross
Deputy Clerk

DEPARTMENT OF ECONOMIC OPPORTUNITY
REEMPLOYMENT ASSISTANCE PROGRAM
PO BOX 5250
TALLAHASSEE, FL 32314 5250

*85187943 *

Docket No.0037 1617 03-04 Jurisdiction: §443.151(4)(a)&(b) Florida Statutes

CLAIMANT/Appellant ***EMPLOYER/Appellee***

APPEARANCES:

Employer

Claimant

DECISION OF APPEALS REFEREE

Important appeal rights are explained at the end of this decision.

Derechos de apelación importantes son explicados al final de esta decisión.

Yo eksplike kèk dwa dapèl enpòtan lan fen desizyon sa a.

Issues Involved: SEPARATION: Whether the claimant was discharged for misconduct connected with work or voluntarily left work without good cause as defined in the statute, pursuant to Sections 443.101(1), (9), (10), (11), (13); 443.036(29), Florida Statutes; Rule 73B-11.020, Florida Administrative Code.

Findings of Fact: Claimant worked as a dog groomer from February 28, 2019 to December 28, 2019. On or around December 21, 2019, claimant and the employer agreed that claimant could leave work at 2:30 p.m. on December 28 to attend to personal issues. On December 28, 2019, claimant was scheduled to groom a dog at 1:00 p.m. Claimant's associate called the dog's owner the previous day to confirm the appointment and claimant called the owner a couple times during the day to make sure the dog owner would be on time for her appointment. Most clients who schedule their dogs to be groomed drop them off in the morning. The owner brought the dog to be groomed at 1:40 p.m. Claimant knew she would not have time to groom the dog before she had to leave and asked her associate if she could groom the dog. The associate

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was too busy to groom the dog. Claimant spoke to the customer and told her that she did not have enough time to groom the dog before she left and asked the customer to reschedule. Claimant understood that the customer realized she was late bringing the dog and agreed to reschedule. The general manager approached claimant and insisted that claimant groom the dog before she left. Claimant explained that she did not have enough time to groom the dog before she left. The general manager told claimant that if she was not going to groom the dog her services were no longer needed.

Conclusions of Law: The record reflects that the claimant was discharged. The law provides that a claimant who is discharged for misconduct connected with work will be disqualified from receipt of benefits. Under Florida's Reemployment Assistance law, misconduct connected with work, irrespective of whether the misconduct occurs at the workplace or during working hours, includes, but is not limited to, the following, which may not be construed in pari materia with each other:

(a) Conduct demonstrating conscious disregard of an employer's interests and found to be a deliberate violation or disregard of the reasonable standards of behavior which the employer expects of his or her employee. Such conduct may include, but is not limited to, wilful damage to an employer's property that results in damage of more than $50; theft of employer property or property of a customer or invitee of the employer.

(b) Carelessness or negligence to a degree or recurrence that manifests culpability, or wrongful intent, or shows an intentional and substantial disregard of the employer's interest or of the employee's duties and obligations to his or her employer.

(c) Chronic absenteeism or tardiness in deliberate violation of a known policy of the employer or one or more unapproved absences following a written reprimand or warning relating to more than one unapproved absence.

(d) A willful and deliberate violation of a standard or regulation of this state by an employee of an employer licensed or certified by this state, which violation would cause the employer to be sanctioned or have its license or certification suspended by this state.

(e) 1. A violation of an employer's rule, unless the claimant can demonstrate that:

a. He or she did not know, and could not reasonably know, of the rule's requirements;

b. The rule is not lawful or not reasonably related to the job environment and performance; or

c. The rule is not fairly or consistently enforced.

2. Such conduct may include, but is not limited to, committing criminal assault or battery on another employee, or on a customer or invitee of the employer; or committing abuse or neglect of a patient, resident, disabled person, elderly person, or child in her or his professional care.

In this case, the general manager insists that claimant made the decision to leave her job when she refused to groom the dog as instructed by her supervisor. The courts have held a single incident of refusing to follow a reasonable work order is insubordination amounting to misconduct. See Givens v. Unemployment Appeals Commission, 888 So. 2d 169 (Fla. 3d DCA 2004); Citrus Central v. Detwiler, 368 So. 2d 81 (Fla. 4th DCA 1979). In Vilar v. Unemployment Appeals Commission, 889 So.2d 933 (Fla. 2d DCA 2004), the court held that although the employee was wrong to disobey her supervisor's instructions to return to her work area, this was an isolated instance of poor judgment and does not constitute misconduct. On the other had, only one week before the issuance of the Vilar decision, a panel of the Third DCA affirmed the disqualification of a claimant, noting that the claimant was discharged for misconduct "because he obdurately refused contrary to the direct orders of his supervisor, to operate a forklift." Givens v. Unemployment Appeals Commission, 888 So.2d 169 (Fla. 3d DCA 2004). Thus, there is clearly a narrow line between disqualifying insubordination and non-disqualifying "poor judgment."

Here, the general manager argues that claimant had plenty of time to groom the dog. The general manager testified that the owner brought the dog at 1:10 p.m. and not 1:40 p.m. She testified that after claimant left, she and another groomer were able to groom the dog in 35 minutes. The general manager also testified that claimant violated the employer's policy when she spoke directly to the customer about needing to reschedule rather than bringing the issue to management to deal with. The general manager also insists that claimant knew that because the employer allows owners to drop off their dogs at anytime during the day to be groomed, that she could rely on help from the general manager to get the dog groomed before she had to leave for the day. Claimant insists that the dog owner brought the dog in 40 minutes after her scheduled appointment, that she often spoke directly to customers about their dogs and was never warned she was violating any policy, and that the general manager never offered to help claimant groom the dog. The appeals referee finds the claimant's testimony to be more credible. Based on the facts, the appeals referee finds the employer's work order to be unreasonable and claimant was reasonable in refusing the work order. Therefore, the employer has not met its burden to show claimant violated any policy or was insubordinate when she refused to groom the dog because she did not have enough time to do so before the end of her shift. Thus, claimant is not disqualified from receiving benefits.

The general manager also testified that claimant had performance issues and instances of tardiness and absences that contributed to the employer's willingness to discharge claimant. Accumulated violations of the employer's interests over the course of employment can show misconduct even if the final incident leading to the discharge was not misconduct. C. F. Industries, Inc. v. Long, 364 So.2d 864 (Fla. 2d DCA 1978); Mason v. Load King Mfg. Co., 758 So.2d 649 (Fla. 2000). However, in this case the general manager's testimony made it clear that had claimant agreed to groom the dog she would not have been discharged. Therefore, the employer's testimony about claimant's performance and attendance issues is irrelevant to the circumstances that led to claimant's separation.

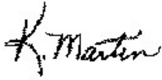
At the hearing, the referee was presented with conflicting testimony regarding material issues of fact. The referee alone is charged with resolving these conflicts. The appeals referee considered the factors set forth by the Unemployment Appeals Commission in Order No. 03-10946. Based on consideration of the following factors, (1) the witness' opportunity and capacity to observe the event or act in question; (2) any prior inconsistent statement by the witness; (3) a witness' bias or lack of bias; (4) the contradiction of the witness' version of events by other evidence or its consistency with other evidence; (5) the inherent improbability of the witness' version of events; and (6) the witness' demeanor, the referee accepts the testimony of the claimant to be more credible. Therefore, material conflicts in the evidence are resolved in favor of the claimant.

Decision: The determination dated January 24, 2020, disqualifying claimant is reversed. If otherwise eligible, claimant is entitled to receive benefits beginning December 22, 2019.

If this decision disqualifies and/or holds the claimant ineligible for benefits already received, the claimant will be required to repay those benefits. The specific amount of any overpayment will be calculated by the department and set forth in a separate overpayment determination, unless specified in this decision. However, the time to request review of this decision is as shown above and is not stopped, delayed or extended by any other determination, decision or order.

This is to certify that a copy of the above decision was distributed/mailed to the last known address of each interested party on February 13, 2020.

S. Morales
Appeals Referee

By: 

KIMBERLY MARTIN, Deputy Clerk

IMPORTANT - APPEAL RIGHTS: This decision will become final unless a written request for review or reopening is filed within 20 calendar days after the distribution/mailed date shown. If the 20th day is a Saturday, Sunday or holiday defined in F.A.C. 73B-21.003(4), filing may be made on the next day that is not a Saturday, Sunday or holiday. If this decision disqualifies and/or holds the claimant ineligible for benefits already received, the claimant will be required to repay those benefits. The specific amount of any overpayment will be calculated by the Department and set forth in a separate overpayment determination. However, the time to request review of this decision is as shown above and is not stopped, delayed or extended by any other determination, decision or order.

A party who did not attend the hearing for good cause may request reopening, including the reason for not attending, at connect.myflorida.com or by writing to the address at the top of this decision. The date of the confirmation page will be the filing date of a request for reopening on the Department's Web Site.

A party who attended the hearing and received an adverse decision may file a request for review to the Reemployment Assistance Appeals Commission, 1211 Governors Square Boulevard, Suite 300, Tallahassee, FL 32301-2975; (Fax: 850-488-2123); **https://raaciap.floridajobs.org.** If mailed, the postmark date will be the filing date. If faxed, hand-delivered, delivered by courier service other than the United States Postal Service, or submitted via the Internet, the date of receipt will be the filing date. To avoid delay, include the docket number and the last five digits of the claimant's social security number. A party requesting review should specify any and all allegations of error with respect to the referee's decision, and provide factual and/or legal support for these challenges. Allegations of error not specifically set forth in the request for review may be considered waived.

There is no cost to have a case reviewed by the Commission, nor is a party required to be represented by an attorney or other representative to have a case reviewed. The Reemployment Assistance Appeals Commission has not been fully integrated into the Department's CONNECT system. While correspondence can be mailed or faxed to the Commission, no correspondence can be submitted to the Commission via the CONNECT system. All parties to an appeal before the Commission must maintain a current mailing address with the Commission. A party who changes his/her mailing address in the CONNECT system must also provide the updated address to the Commission, in writing. All correspondence sent by the Commission, including its final order, will be mailed to the parties at their mailing address on record with the Commission.

IMPORTANTE - DERECHOS DE APELACIÓN: Esta decisión pasará a ser final a menos que una solicitud por escrito para revisión o reapertura se registre dentro de 20 días de calendario después de la distribución/fecha de envìo marcada en que la decisión fue remitida por correo. Si el vigésimo (20) día es un sábado, un domingo o un feriado definidos en F.A.C. 73B-21.003(4), el registro de la solicitud se puede realizar en el día siguiente que no sea un sábado, un domingo o un feriado. Si esta decisión descalifica y/o declara al reclamante como inelegible para recibir beneficios que ya fueron recibidos por el reclamante, se le requerirá al reclamante rembolsar esos beneficios. La cantidad específica de cualquier sobrepago [pago excesivo de beneficios] será calculada por la Agencia y establecida en una determinación de pago excesivo de beneficios que será emitida por separado. Sin embargo, el límite de tiempo para solicitar la revisión de esta decisión es como se establece anteriormente y dicho límite no es detenido, demorado o extendido por ninguna otra determinación, decisión u orden.

Una parte que no asistió a la audiencia por una buena causa puede solicitar una reapertura, incluyendo la razón por no haber comparecido en la audiencia, en connect.myflorida.com o escribiendo a la dirección en la parte superior de esta decisión. La fecha de la página de confirmación será la fecha de presentación de una solicitud de reapertura en la página de Internet del Departamento.

Una parte que asistió a la audiencia y recibió una decisión adversa puede registrar una solicitud de revisión con la Comisión de Apelaciones de Servicios de Reempleo; Reemployment Assistance Appeals Commission, 1211 Governors Square Boulevard, Suite 300, Tallahassee, FL 32301-2975; (Fax: 850-488-2123); **https://raaciap.floridajobs.org.** Si la solicitud es enviada por correo, la fecha del sello de la oficina de correos será la fecha de registro de la solicitud. Si es enviada por telefax, entregada a mano, entregada por servicio de mensajería, con la excepción del Servicio Postal de Estados Unidos, o realizada vía el Internet, la fecha en la que se recibe la solicitud será la fecha de registro. Para evitar demora, incluya el número de expediente [*docket number*] y los últimos cinco dígitos del número de seguro social del reclamante. Una parte que solicita una revisión debe especificar cualquiera y todos los alegatos de error con respecto a la decisión del árbitro, y proporcionar fundamentos reales y/o legales para substanciar éstos desafíos. Los alegatos de error que no se establezcan con especificidad en la solicitud de revisión pueden considerarse como renunciados.

No hay ningún costo para tener un caso revisado por la Comisión, ni es requerido que una parte sea representado por un abogado u otro representante para poder tener un caso revisado. La Comisión de Apelación de Asistencia de Reempleo no ha sido plenamente integrado en el sistema CONNECT del Departamento. Mientras que la correspondencia puede ser enviada por correo o por fax a la Comisión, ninguna correspondencia puede ser sometida a la Comisión a través del sistema CONNECT. Todas las partes en una apelación ante la Comisión deben mantener una dirección de correo actual con la Comisión. La parte que cambie su dirección de correo en el sistema CONNECT también debe proporcionar la dirección actualizada a la Comisión, por escrito. Toda la correspondencia enviada por la Comisión, incluida su orden final, será enviada a las partes en su dirección de correo en el registro con la Comisión.

ENPÒTAN - DWA DAPÈL: Desizyon sa a ap definitif sòf si ou depoze yon apèl nan yon delè 20 jou apre dat distribisyon/postaj. Si 20yèm jou a se yon samdi, yon dimanch oswa yon jou konje, jan sa defini lan F.A.C. 73B-21.003(4), depo an kapab fèt jou aprè a, si se pa yon samdi, yon dimanch oswa yon jou konje. Si desizyon an diskalifye epi/oswa deklare moun k ap fè demann lan pa kalifye pou alokasyon li resevwa deja, moun k ap fè demann lan ap gen pou li remèt lajan li te resevwa a. Se Ajans lan k ap kalkile montan nenpòt ki peman anplis epi y ap detèmine sa lan yon desizyon separe. Sepandan, delè pou mande revizyon desizyon sa a se delè yo bay anwo a; Okenn lòt detèminasyon, desizyon oswa lòd pa ka rete, retade oubyen pwolonje dat sa a.

Yon pati ki te gen yon rezon valab pou li pat asiste seyans lan gen dwa mande pou yo ouvri ka a ankò; fòk yo bay rezon yo pat ka vini an epi fè demann nan sou sitwèb sa a, connect.myflorida.com oswa alekri nan adrès ki mansyone okomansman desizyon sa a. Dat cofimasyon page sa pral jou ou ranpli deman pou reouvewti dan web sit depatman.

Yon pati ki te asiste odyans la epi li resevwa yon desizyon negatif kapab soumèt yon demann pou revizyon retounen travay Asistans Komisyon Apèl la, Reemployment Assistance Appeals Commission, 1211 Governors Square Boulevard, Suite 300, Tallahassee, FL 32301-2975; (Faks: 850-488-2123); https://raaciap.floridajobs.org. Si poste a, dat tenm ap dat li ranpli aplikasyon. Si fakse, men yo-a delivre, lage pa sèvis mesaje lòt pase Etazini Sèvis nan Etazini Nimewo, oswa soumèt sou Entènèt la, dat yo te resevwa ap dat li ranpli aplikasyon. Pou evite reta, mete nimewo rejis la ak senk dènye chif nimewo sekirite sosyal demandè a sosyal demandè a sekirite. Yon pati pou mande revizyon ta dwe presize nenpòt ak tout akizasyon nan erè ki gen rapò ak desizyon abit la, yo epi bay sipò reyèl ak / oswa legal pou defi sa yo. Alegasyon sou erè pa espesyalman tabli nan demann nan pou revizyon yo kapab konsidere yo egzante.

Pa gen okenn kou pou Komisyon an revize yon ka, ni ke yon pati dwe reprezante pa yon avoka oubyen lòt reprezantan pou ke la li a revize. Komisyon Apèl Asistans Reyanbochaj pa te entegre antyèman nan sistèm CONNECT Depatman an. Byenke korespondans kapab fakse oubyen pòste bay Komisyon an, okenn korespondans pa kapab soumèt bay Komisyon an atravè sistèm CONNECT. Tout pati ki nan yon apèl devan Komisyon an dwe mentni yon adrès postal ki ajou avèk Komisyon an. Yon pati ki chanje adrès postal li nan sistèm CONNECT la dwe bay Komisyon an adrès ki mete ajou a tou. Tout korespondans ke Komisyon an voye, sa enkli manda final li, pral pòste voye bay pati yo nan adrès postal yo genyen nan achiv Komisyon an.

An equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.