

***Welcome to KNOW YOUR  
RIGHTS:  
Medication-Assisted Treatment:  
Special Anti-Discrimination Issues***

**WEBINAR**

# **WELCOME to the Know Your Rights Webinar Series!**

**Presented by:**



**Today's presenters are:**

- Sally Friedman, Esq.
- Anita Marton, Esq.

# WELCOME to the Know Your Rights Webinar Series! (cont.)

Funded by:



**“Partners for Recovery”** is an initiative of the Federal government’s Center for Substance Abuse Treatment.

# **WELCOME to the Know Your Rights Webinar Series! (cont.)**

## **Who is the Legal Action Center?**

- National non-profit law firm
- Policy and legal work on anti-discrimination issues affecting people with
  - Alcohol or drug histories
  - Criminal records or
  - HIV/AIDS

# Today's Materials

- *Know Your Rights: Are You in Recovery from Alcohol or Drug Problems?* brochure
- This PowerPoint presentation
- *Helpful Resources to Address Discrimination Against People in Medication-Assisted Treatment*
- Download them on <http://www.pfr.samhsa.gov> or <http://www.lac.org>. On the LAC site, click on "Trainings and Technical Assistance," and then "Alcohol & Drugs/Criminal Record."

## Today's Materials (cont.)

- ***Stay tuned...*** brochure on ***Know Your Rights: Rights of Individuals on Medication-Assisted Treatment***
- *Will be posted on <http://www.pfr.samhsa.gov> and <http://www.lac.org> and when published.*

# WELCOME to the Know Your Rights Webinar Series! (cont.)



## Recording of this webinar

available at <http://www.lac.org>

# Save the Date!

## Upcoming Webinar:

- New Federal “Parity”  
Legislation for Insurance  
Coverage of Addiction  
Treatment

August 26

# Recorded Webinars

- Employment Discrimination Against People with Alcohol/Drug Histories
- Housing, Health Care & Other Forms of Discrimination
- Legal Rights of People with Criminal Records

# Who's today's audience?

## This training is for . . .

- People in Medication-Assisted Treatment
- Anyone supporting the rights of people in Medication-Assisted Treatment
- Employers, health care providers, government officials, and others who want to comply with anti-discrimination laws
- Anyone else interested in the topic.

# This training is about . . .

- Federal laws prohibiting discrimination against people with disabilities and
- How these laws protect people in Medication-Assisted Treatment.

# Today's training objectives

1. Understand rights under Federal anti-discrimination laws.
2. Understand how to exercise those rights.
3. Know how to help others understand and exercise those rights.



# Sounds familiar?

- Legal principals prohibiting discrimination against people in MAT also apply to discrimination against anyone with history of drug addiction or alcoholism.
- Today's focus – specific application of these principals to MAT.

## Part 1



# What Is Medication-Assisted Treatment?

# What is Medication-Assisted Treatment?

**Methadone or Buprenorphine** used to treat addiction to –

- Short-acting opioids, such as heroin, morphine and codeine, and
- Synthetic opioids, including oxycodone, OxyContin®, and hydrocodone.

# What is Medication-Assisted Treatment?

Also Naltrexone®, Acamprosate® or other drugs to treat other addictions

- **But today's focus – methadone & buprenorphine** to treat opioid addiction.
- Why? Greater stigma & ignorance.

# What is Medication-Assisted Treatment?

(cont.)

- Also discrimination against individuals taking Naltrexone®, Acamprosate® or other drugs to treat addictions.
- They *can* benefit from today's webinar too.

# What is Medication-Assisted Treatment?

(cont.)

## Where do people receive MAT with methadone or buprenorphine?

- Opioid Treatment Programs (OTPs) for methadone & buprenorphine
  - 42 C.F.R. Part 8
- Buprenorphine only – Office-Based Opioid Treatment by “DATA 2000 waived ” physicians
  - Drug Addiction Treatment Act of 2000

# What is Medication-Assisted Treatment?

(cont.)

## How does MAT work?

### Long acting opioids that:

- Occupy brain receptor sites affected by heroin & other opioids
- Normalize brain chemistry
- Block euphoric effects of short-acting opioids

More...

# What is Medication-Assisted Treatment?

(cont.)

## How does MAT work? (cont.)

- Relieve physiological cravings
- Prevent withdrawal
- Normalize bodily functions
- Dosing is an individualized *medical* decision

# What is Medication-Assisted Treatment?

(cont.)

## How does MAT work? (cont.)

- Does *not* impair functioning.
- No negative effect on intelligence, mental capability, physical functioning, or employability.

# What is Medication-Assisted Treatment?

(cont.)

## Want more information about MAT?

- Read *Helpful Resources to Address Discrimination in Medication-Assisted Treatment* – distributed for this webinar.
- See <http://www.lac.org>, click on “Free Publications” and then “Alcohol and Drug Publications.”

## Part 2



# Which Laws Prohibit Discrimination Against People in Medication-Assisted Treatment?

# Which Laws Apply?

## FEDERAL LAWS

- **Americans with Disabilities Act – “ADA.”** Applies to:
  - **Private employers** if 15+ employees (Title I)
  - **Local and State governments** (Title II)
  - Places of **Public Accommodation**” – private places open to the public, e.g. hospitals, doctors’ offices, day care, hotels. (“Title III”)

## WHICH LAWS APPLY? (cont.)

### Rehabilitation Act of 1973 (“Rehab Act”)

- Applies to Federal government,
- Federally funded State/local government activities, and
- Federally funded private programs or activities.



## WHICH LAWS APPLY? (cont.)

- **Fair Housing Act:** applies to most housing providers (landlords), and others who sell or rent housing (brokers)
- **Workforce Investment Act:** applies to federally funded workforce development programs

## WHICH LAWS APPLY? (cont.)

**States and cities also have laws prohibiting discrimination.**

How do you find out if your State/locality has applicable laws?



## WHICH LAWS APPLY? (cont.)

**One way:** Contact agency charged with enforcing State anti-discrimination laws. Some cities have them as well.

To find your State agency, do Google search – name of State and “human rights.”

## WHICH LAWS APPLY? (cont.)

### Another way (cont.):

- Legal Action Center has researched anti-discrimination laws in a number of States.
- Go to <http://www.lac.org>. Click on “Trainings and Technical Assistance,” “Training Materials” and then “Alcohol/Drugs & Criminal Record.”

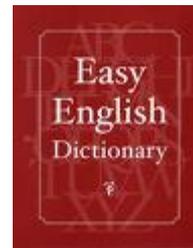
## Part 3

# WHO IS PROTECTED BY THESE LAWS?



## Who is Protected?

- Proving “disability” under anti-discrimination laws is **NOT** same as proving “disability” for government benefit programs, like SSI.



## Who is Protected? (cont.)

### What is a “disability”?

- “a physical or mental impairment that substantially limits one or more major life activities” (“**current**”)
- a **history** (“record of”) such an impairment *or*
- being “**regarded as**” having such an impairment

## Who is Protected? (cont.)

### What is a “disability”? (cont.)

- Court will make **an individualized determination**.  
No automatic disabilities.
- Must prove impairment that substantially limits – or once limited – one or more of *her or his* major life activities, such as caring for self, walking, talking, working, or major bodily functions.

## Who is Protected? (cont.)

### Drug abuse/addiction – Julie:

- 5 years in recovery (Oxycontin) and MAT
- 3 years on the job – day care center office
- Employer learns about former addiction & tells her to “get off” methadone or will be fired
- “Can’t have addicts nodding off around kids”

**Do YOU think Julie is protected by these Federal anti-discrimination laws?**

## Who is Protected? (cont.)

Likely **YES.**

- Has “**record of**” **addiction** (in past – to Oxycontin). People with a **past** drug addiction have a “disability” if –

it **substantially limited** that person’s major life activities.

## Who is Protected? (cont.)

### 2008 Amendments to the ADA

- It's now easier to prove "disability" as a result of the ADA Amendment Acts of 2008.
- This law – which took effect 1/1/09 – clarifies that Congress meant the term "disability" to be interpreted broadly.

## Who is Protected? (cont.)

**Method of recovery is irrelevant** to proving “disability.” Irrelevant whether:

- successfully completed drug treatment
- currently in treatment
- achieved recovery without treatment

## Who is Protected? (cont.)

**Julie** (cont.).

**Second** – Julie’s participation in MAT constitutes a **“current” impairment.**

## Who is Protected? (cont.)

**Julie** (cont.).

**Third** – Boss “**regards**” Julie as addicted because of her form of treatment – MAT.

- Thinks methadone will make her “nod off” at work.

## Who is Protected? (cont.)

Julie



**But** what if Julie's employer found out that she was using cocaine while in MAT?

**Would she be protected by Federal anti-discrimination laws?**

## Who is Protected? (cont.)

Julie (cont.)

**NO.**

Federal laws do not protect individuals who are “**currently engaging in the illegal use of drugs.**”

## Who is Protected? (cont.)

### What does “illegal use” mean?

- Use of Illegal drugs (e.g., heroin, cocaine)
- Unlawful use of controlled substances for which there is a legitimate medical use:
  - no prescription
  - fraudulent prescription

## WHO IS PROTECTED (cont.)?

### What does “illegal use” mean?

- What if became addicted to Percocet while taking the medication in prescribed manner and prescribed amounts?
  - Not “illegal” use, so are protected.

## Who is Protected? (cont.)

### When is illegal use of drugs “current”?

- No black & white definition
- Question: is the use recent enough so that it is reasonable to assume that it is an ongoing problem?

More...

## Who is Protected? (cont.)

### When is illegal use of drugs “current”? (cont.)

- Many courts have found it reasonable to assume that illegal use of drugs was “current” *if*:
  - used within the last few months
  - risk of relapse/pattern of relapse may support conclusion that use is ongoing problem

## Who is Protected? (cont.)

### BUT...

- Exception for “current illegal drug users” does **not** apply to the receipt of health care.
- Health care providers may **not** discriminate against people on the basis of their current illegal use of drugs.

## Who is Protected? (cont.)

Julie



**But** what if Julie was a functioning alcoholic and had no history of illegal drug use?

**Would she be protected by Federal anti-discrimination laws?**

## Who is Protected? (cont.)

Likely **YES**. **Alcoholism/alcohol abuse** generally is a “disability” regardless of whether it is:

- *Past or Current*

# Part 4

## HOW Do These Laws Protect People in Medication-Assisted Treatment from Discrimination in –

# EMPLOYMENT?



# What rights do these laws give?

## EMPLOYMENT

### The basics:

1. May not deny job or fire qualified person because:
  - History (record) of opioid addiction
  - Participates in MAT (dependent upon the MAT medication)
  - Is regarded as having past or current addiction to opioids/opioid medication.
2. Must provide “reasonable accommodation.”
3. Must keep health information confidential.

## What rights do these laws give? **EMPLOYMENT** (cont.)

**No employer may discriminate against a  
“qualified individual with a disability.”**

# What rights do these laws give?

## EMPLOYMENT (cont.)

What does “**qualified**” mean – in employment context?

- Able to **perform essential job duties** with or without “**reasonable accommodation.**” (See next slide.)



## **What rights do these laws give?** **EMPLOYMENT** (cont.)

**What is a “reasonable  
accommodation”?**

## What rights do these laws give? EMPLOYMENT (cont.)

### Answer:

- Change(s) made to work setting, hours or workplace rules so that a person with a disability can perform essential job duties.
- **Must not** cause employer “undue hardship” – e.g., significant cost, need for fundamental change to way company operates.

# What rights do these laws give?

## **EMPLOYMENT** (cont.)

### **Example – Paul**

- Works 2 pm to 10 pm shift at hospital job.
- OTP open for medication pick-up from 7 am to 2 pm.
- Job changes his work shift to 7 am to 3 pm.

**Do YOU think Paul is entitled to “reasonable accommodation” of shift change?**

## What rights do these laws give? **EMPLOYMENT** (cont.)

### **ANSWER – Paul**

**YES**, unless allowing Paul to change to different shift would cause “undue burden” on employer.

# What rights do these laws give?

## **EMPLOYMENT** (cont.)

### What about employment-related inquiries & medical exams?

- Permitted under anti-discrimination laws?
- How does drug testing fit in?

# What rights do these laws give?

## EMPLOYMENT (cont.)

*Jane:*



- Pre-employment drug test
- Applicants instructed: list medications taken
- Jane does *not* disclose participation in MAT
- Drug test is positive for methadone
- Jane is denied the job because she “failed drug test”

**Do you think the employer violated anti-discrimination laws?**

# What rights do these laws give?

## EMPLOYMENT (cont.)

### ANSWER – Jane

**No.**

- ADA limits pre-employment inquiries and medical exams, but drug testing not considered a “medical exam.”
- Drug testing does not violate Federal anti-discrimination laws (if done for all applicants, employees in job title)
- Job denial was not based on Jane’s history of addiction *or* participation in MAT

# What rights do these laws give?

## EMPLOYMENT (cont.)

### Jane (cont.)

**BUT** what if, after test results came in, Jane offered to bring letter from her treatment program showing she was taking methadone legally?

# What rights do these laws give? **EMPLOYMENT** (cont.)

## **ANSWER – Jane (cont.)**

**Too late.** Employer may legally deny Jane the job for non-compliance with its requirement to disclose medications before taking drug test.

**So what should Jane do differently next time?**

# What rights do these laws give?

## EMPLOYMENT (cont.)

### ANSWER – Jane (cont.)

- **Tell lab/entity doing drug test for employer that she's in MAT.**
- **Provide documentation** from treatment program **before** undergoing drug test.



# What rights do these laws give?

## EMPLOYMENT (cont.)

### Commercial Driver's Licenses



- Federal DOT regulations: Disqualify persons from **interstate** license if taking methadone.
- **Intrastate** license requirements set by State law.

## Part 5

**HOW Do These Laws Protect People in Medication-Assisted Treatment from Discrimination in –**

**HOUSING?**



# What rights do these laws give?

## HOUSING



### The 3 Relevant Laws:

- **Fair Housing Act**
- **Rehabilitation Act** – if Federally funded housing
- **ADA (Title II)** – when local/State government is providing or regulating/contracting for housing

## What rights do these laws give? **HOUSING** (cont.)



### Protections

Individuals with disabilities may not be –

- Excluded from or denied equal benefits of housing opportunities offered by private entities or local, State, or Federal government because of disability.

What rights do these laws give?  
**HOUSING** (cont.)



**Residences for people in recovery (e.g. recovery homes, sober houses, half-way houses)**

- **Illegal** to exclude individuals because they are in M-A-T
- Must make **reasonable accommodations**

## What rights do these laws give? **HOUSING** (cont.)



### Example – Tom

- In recovery from heroin addiction & in MAT
- Denied admission to Eastside Recovery Home because of policy: can't be in MAT

**Do YOU think Eastside violated anti-discrimination laws?**

## What rights do these laws give? **HOUSING** (cont.)



### ANSWER – Tom

**Yes.**

- Tom is “**individual with a disability**”
- **Fair Housing Act** applies to recovery homes (“dwelling”)

## What rights do these laws give? **HOUSING** (cont.)



### ANSWER – Tom

#### Recovery homes may *not*–

- **Categorically exclude** individuals because they are in MAT.
- **Require individuals to abstain** from MAT medication.

What rights do these laws give?  
**HOUSING** (cont.)



**Tom** (cont.)

What if **Eastside Recovery Homes** has a **policy** prohibiting residents from storing or taking methadone or buprenorphine on site?

**Does that policy violate anti-discrimination laws?**

**What rights do these laws give?**  
**HOUSING** (cont.)



**ANSWER – Tom**

**It may.**

- Unlawful discrimination also includes refusing or failing to make reasonable accommodations for people with disabilities, when needed.

## What rights do these laws give? **HOUSING** (cont.)



### **ANSWER – Tom (cont.)**

**Possible reasonable accommodations** (in lieu of policy excluding MAT patients from recovery home):

- Arranging for patient to take MAT medication at treatment program or elsewhere (not on site), depending on treatment plan
- Arranging for patient to store MAT medication in lock box in house, etc.

## What rights do these laws give? **HOUSING** (cont.)



**Tom** (cont.)

- **May Eastside impose non-discriminatory rules like:**
  - Attending NA or AA?
  - Abstaining from alcohol and illegal drug use?

What rights do these laws give?  
**HOUSING** (cont.)



**ANSWER – Tom**

**Yes.**

**May deny** admission to or evict residents who don't follow non-discriminatory rules.



## Part 6

**HOW Do These Laws Protect People in Medication-Assisted Treatment from Discrimination in –**

**GOVERNMENT ACTIVITIES & PROGRAMS?**

## What rights do these laws give?

### **GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

Government agencies (Federal, State and local) may not discriminate against persons with disabilities. This anti-discrimination rule applies to all government programs, services, and activities.



**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

## **Today's focus:**

- Criminal justice system
- Driving Under the Influence (DUI) and drivers licenses
- Zoning

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

# Criminal Justice System



## What rights do these laws give?

### GOVERNMENT ACTIVITIES & PROGRAMS (cont.)

#### Example – Albert

- 2 years in OTP for Oxycontin addiction
- No positive urine tests – 2 years
- Judge orders him to end participation in M-A-T as condition of probation

#### Discrimination?

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

**Answer – Albert**

**Yes.**

- Albert is “individual with disability”
- Court is bound by ADA, Title II
- May not single out individuals in MAT and require them to stop taking legal medications as part of course of addiction treatment

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

**Answer – Albert**

**So what can Albert do?**



**Stay tuned – Part 7**

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

# **Driving Under the Influence (DUI) *and* Drivers Licenses**



**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

**Example – Steven**

- Followed from OTP
- Pulled over & charged with DUI

**Legal?**

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

**Answer – Steven**

**Depends on his State law.**

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

## **Answer – Steven**

**Some laws: No DUI unless the drug –**

1. renders driver **“incapable” of driving safely**, or
2. **impairs driver’s ability** to operate safely or driver is under influence/affected by **“intoxicating” drug**

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

## **Answer – Steven**

**But other laws – “per se” DUI law**

- DUI just to have any drug(s) in one’s body while driving.
- *Irrelevant* that the treatment is legal & does not impair functioning.

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

**Answer – Steven**

**Doesn't this type of law violate the  
ADA?**

- Not yet been challenged, but it might.

**What rights do these laws give?**

**GOVERNMENT ACTIVITIES & PROGRAMS (cont.)**

## **Other types of discrimination by governments**

- Child welfare system
- Zoning
- Occupational licenses (nursing)
- Government-run health care programs
- Job training programs

## Part 7



**HOW Do These Laws Protect People in Medication-Assisted Treatment from Discrimination in –**

**PLACES OF PUBLIC ACCOMMODATION?**

# What rights do these laws give?

## PUBLIC ACCOMMODATIONS

- **“Places of public accommodation”** – privately owned/operated places open to the public, such as:
  - Schools and universities
  - Doctors’ offices & other health care providers and facilities
  - Social service facilities (e.g., day care center, homeless shelter)

# What rights do these laws give?

## **PUBLIC ACCOMMODATIONS** (cont.)

### Example – Jane

- **Jane** visits Downtown Medical Group – a primary care provider – for a stomach problem
- Discloses her participation in MAT
- Downtown Medical Group says will not treat “people on methadone” and refers her to City-run clinic

**Violates Federal anti-discrimination laws?**

# What rights do these laws give?

## **PUBLIC ACCOMMODATIONS** (cont.)

**YES.**

- Downtown Medical Group is “place of public accommodation.”
- ADA prohibits them from refusing to provide health services to people based on participation in MAT.

# What rights do these laws give?

## **PUBLIC ACCOMMODATIONS** (cont

### **Health care services & illegal drug use**

- What if Jane told Downtown she's addicted cocaine?
- Illegal to refuse to treat her for her stomach problem?

## What rights do these laws give? **PUBLIC ACCOMMODATIONS** (cont.)

**Answer: Yes.**

- Illegal to deny health services to people based on current illegal use of drugs.

## Part 8

# Responding to Violations of Your Rights Under Anti-Discrimination Laws



# REMEDIES

*Julie*



Remember when *Julie's* boss said he'd fire her from her job at the day care center if she didn't end her participation in MAT?

**Is there anything Julie can do to exercise her rights without hiring a lawyer?**

## REMEDIES (cont.)

### Informal resolution

- Always worthwhile to try **informal** resolution.
- Attorney assistance is valuable, but you can do it on your own too.

## **REMEDIES** (cont.)

### **Julie can try to EDUCATE the employer**

- Violation of anti-discrimination laws is often due to ignorance.
- Educating an employer can sometimes result in the changes you want.

## REMEDIES (cont.)

### Resources Julie can use:

- *“Helpful Resources to Address Discrimination Against People in Medication-Assisted Treatment” – in hand-outs*
- *“Educating Courts, Other Government Agencies & Employers About Methadone” at <http://www.lac.org>, “free publications” and then “alcohol & drug publications.”*

## REMEDIES (cont.)

### FORMAL CHALLENGE

You can challenge the violation of your rights in other more **formal** ways:

1. **File discrimination complaint with Federal government agency** that enforces the anti-discrimination laws. You do not need a lawyer for this “administrative” complaint.

## REMEDIES (cont.)

**NOTE:** You may not file an employment discrimination lawsuit under the ADA, without first filing an administrative complaint with the U.S. Equal Opportunity Employment Commission (EEOC).

Visit <http://www.eeoc.gov/> to find the EEOC office nearest you.

## REMEDIES (cont.)

**Other types of discrimination – for example, by the criminal justice system:**

- See “*Educating Courts, Other Government Agencies & Employers About Methadone*”

<http://www.lac.org>, “free publications” and then “alcohol & drug publications.”

## REMEDIES (cont.)

### File a complaint with the Federal agency:

**Housing** – U.S. Department of Housing and Urban Development (HUD) <http://www.hud.gov>

**Public Accommodations and Local/State Government Services & Activities** – U.S. Department of Justice (DOJ) <http://www.usdoj.gov>

**Federally-funded programs/activities** – Contact the Federal agency that funds or regulates the program at issue.

## **REMEDIES** (cont.)

### **Formal challenge** (cont.)

- 2. In most cases, you also can file a discrimination lawsuit in Federal court.**

A lawyer is generally critical to success in a lawsuit.

## **REMEDIES** (cont.)

### **Formal challenge** (cont.)

#### **How to find a lawyer?**

- State or local bar association
- <http://www.lawhelp.org>

## REMEDIES (cont.)

**Do not sleep on your rights!**



- There are **deadlines** for filing complaints with government agencies and for lawsuits in court.
- **Check on the time limits.**



## REMEDIES (cont.)

**Do not sleep on your rights!** (cont.)

**Filing deadlines** from the date of the discrimination:

- Employment discrimination (EEOC) – 180 days
- Complaints against State/local governments (DOJ) – 180 days
- Housing complaints (HUD) – 1 year

## REMEDIES (cont.)



- There also are **deadlines** for filing lawsuits (“statute of limitations”).
- **Check these too!!**

## REMEDIES (cont.)

### Remember!



Your State and city may have additional discrimination laws and procedures to enforce them.

Check with your State/local agency to learn about any time limits.

# HAVE QUESTIONS?

**We can answer a few  
questions from today's  
audience.**



# HAVE QUESTIONS?

**IF you submit a chat** question during this webinar, and we do not have time to answer it...

Visit our website. We will post answers to questions submitted during today's webinar.

Go to <http://www.lac.org>. Click on "Trainings and Technical Assistance" and look for the "training materials" section.

# HAVE QUESTIONS?

**Now for your questions...**



# HAVE QUESTIONS?

## **Remember:**

Go to <http://www.lac.org>. Click on “Trainings and Technical Assistance” and look for the “training materials” section.

# WANT MORE INFORMATION?

Visit the websites of:

- *Partners for Recovery* (PFR)  
<http://www.pfr.samhsa.gov>
- Legal Action Center, <http://www.lac.org>

Both websites contain the Know your Rights materials developed under PFR and other useful information.

# Thank you!

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