



Prevention Through Education

Exploring Asynchronous Training as a Service

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BACKGROUND

The Civil Rights Act of 1964, the nation's benchmark civil rights legislation, prohibits discrimination on the bases of race, color, religion, sex, or national origin. The Act also prohibits discrimination in public accommodations and federally funded programs. Title VII of the Act created the Equal Opportunity Commission (EEOC) to implement and enforce the law. It authorized the EEO to make rules to end discrimination, which it did. The EEOC also enforces the Age Discrimination in Employment Act of 1967, as amended, the Pregnancy Discrimination Act of 1978, and the Americans with Disabilities Act of 1990, as amended, among other statutes.

Three pivotal incidents occurred in South Carolina leading state leadership to realize that further legislation was needed: the 1968 Orangeburg Massacre - three black students were killed and 28 others wounded by law enforcement on the South Carolina State College campus while protesting a local bowling alley's refusal to desegregate; the 1969 Medical College Hospital Strike in Charleston – twelve workers were fired when attempting to raise grievances, leading to a strike by hundreds of black hospital workers, predominantly women, for more than one hundred days; and the 1970 Lamar Riot – angry white parents, armed with ax handles, bricks, and chains while protesting court-ordered desegregation, smashed bus windows and overturned two school buses that had delivered black students to Lamar elementary and high schools, leading to injuries of students.

These racial incidents led to the legislature mandating Section 1-13-40 which states, "There is hereby created in the executive department the South Carolina Human Affairs Commission, to encourage fair treatment for, and to eliminate and prevent discrimination against, any member

of a group protected by this chapter, and to foster mutual understanding and respect among all people in this State.”¹

The Mission of the South Carolina Human Affairs Commission is to eliminate and prevent unlawful discrimination in employment on the basis of race, color, national origin, religion, sex, age, and disability; housing on the basis of race, color, national origin, religion, sex, familial status, and disability; and public accommodations on the basis of race, color, national origin, and religion thereby promoting harmony and the betterment of human affairs for all people. The mission was based on the tenets of Title VII of the 1964 Civil Rights Act, the Age Discrimination in Employment Act, the Fair Housing Act, and the Americans with Disability Act. The South Carolina Human Affairs Law was amended in 2018 to include the South Carolina Pregnancy Accommodations Act. In 2020, Governor Henry McMaster signed the South Carolina Lactation Support Act into law, tasking SCHAC with enforcement of this Act.

TECHNICAL SERVICES AND TRAINING DIVISION

In support of SCHAC’s mission, the Technical Services and Training Division provides training to public sector and private sector employers to prevent and eliminate unlawful discrimination through education on federal and state discrimination laws and related best practices in the workplace. Training may also be requested as part of a conciliation agreement generated by the Enforcement Division. Training is available on a variety of topics and is frequently customized based on the customer’s needs and specified audience (*i.e.*, management or employees, or

¹ See S.C. Code Ann. §1-13-40

industry specific examples). Topics include: *Equal Employment Opportunity is the Law; Sexual Harassment Prevention; Affirmative Action Compliance; ADA: Disabilities and Protections in the Workplace; EEO Professional Certification; Diversity, Equity, and Inclusion; and, Reasonable Accommodations Under the SC Pregnancy Accommodations Act and SC Lactation Support Act.* Training time ranges from 30 minutes to the 2-day certification course.

In addition to training, Technical Services and Training staff also provide technical assistance to HR employees of over 90 State agencies on their agency's Affirmative Action Plans. Staff evaluate employment data provided by each State agency in the monitoring of their recruitment, hiring and promotion practices. Technical Services and Training staff compile and calculate data, generate reports, and publish the annual Report to the General Assembly on the Status of Equal Employment Opportunity in South Carolina State Government by February 1 each year, in accordance with Section 1-13-110 of the South Carolina Code of Laws of 1976, as amended.² The process to generate the Report to the General Assembly is cyclical and there are periods throughout the year where the workload hampers the team's ability to provide training.

Scheduling and providing employment law training to large groups of people remains a challenge when weighed against the statutory charge of compiling and publishing the annual Report to the General Assembly. This is exacerbated if there is staff turnover. Staff turnover results in shuffling of responsibilities until new staff are trained. Staff require two very distinct skillsets to work in Technical Services and Training. Data analysis and careful attention to detail is required in the monitoring of agencies' employment data and completing the Report to the General Assembly.

² See S.C. Code Ann. §1-13-110

It is a lengthy process requiring a great deal of customer service interaction throughout the year. Training staff must have knowledge of training fundamentals, the ability to engage the audience, but must also be subject matter experts on the laws they are covering. They must be able to address a variety of scenarios that come up during the question-and-answer sessions. Due to potentially strong viewpoints on the topics being covered, staff must be able to control the training environment with tact and respect.

COVID-19 PANDEMIC AND CIVIL UNREST

When the COVID-19 pandemic dramatically changed the terrain of the workplace, Technical Services and Training immediately sought creative ways to achieve the mission of the Human Affairs Commission. Early on, when the workforce was limited by work-from-home requirements and social distancing constraints, the team developed an advertising campaign to educate South Carolina employers and employees on the rights afforded by the SC Pregnancy Accommodations Act. The statewide media campaign used email blasts, social media, cable television and network television advertisements to reach an audience that was listening for updates on the pandemic. The training team quickly adapted to the provision of training in a virtual setting using Webex, a license acquired prior to the pandemic, to achieve additional training opportunities without travel. Training numbers were hampered as employers evaluated next steps required by the pandemic, but the virtual training platform worked for several State agencies and employers at the time and we quickly tried to meet our training goals.

During the summer of 2020, following the police killings of George Floyd and Breonna Taylor and civil unrest across the nation, many entities reached out to the SC Human Affairs Commission

and Technical Services and Training to collaborate on or provide trainings. Executive Order 13950; Combating Race and Sex Stereotyping was issued by President Donald J. Trump on September 22, 2020, and questions arose as to what training could be provided to federal funding recipients. Employers proceeded with our provision of half-day *EEO is the Law* training. At the time, our training was monitored by federal funding oversight staff to ensure compliance with the executive order. We received positive feedback from both state and federal entities on our coverage of the protected bases, examples we provided, and consequences for non-compliance with appropriate federal and state laws. Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government was issued by President Joseph Biden on January 20, 2021, revoking EO 13950 (Trump). Virtual training continued to be carefully reviewed for compliance with the law.

Virtual training was not an ideal training arrangement for all employees of various employers. Some local government employers delayed training until in-person training could resume. Some employers had us train some staff virtually and offered in-person training to others once it was deemed safe in 2021. Since the pandemic began in March of 2020, Technical Services and Training has been operating with only three staff out of the four slots allocated, including a brief window with only two employees.

PROBLEM STATEMENT

SCHAC measures the annual number of external training attendees provided training in the Agency Accountability Report. The Technical Services and Training Division provided in-person training to 1,145 individuals in SFY19-20. During SFY20-21, Technical Services and Training

provided 51 training sessions to seven State agencies and eight county government or private sector employers, impacting 1,765 total external employees. Our training target is 3,992 external employees. To meet the agencies mission to prevent and eliminate unlawful discrimination we need to identify new ways of providing training to a diverse workforce.

DATA COLLECTION

Interviewing HR representatives that requested training from SCHAC was the method of data collection. Employers were asked what methods of training could effectively reach their employees. While some employers preferred in-person training when possible, we received an increase in requests for standalone training modules from a variety of employers from the public and private sector citing flexibility. While in-person interactive training remains the preferred choice for both the trainers and the HR staff scheduling the training, the benefits of ensuring that employees receive consistent and timely employment training cannot be ignored.

Four employers/businesses requested an annual baseline training module (PowerPoint with voiceover) that met certain criteria that could be supplemented with in-person training as circumstances allowed, permitting them to remain in compliance with their internal policy of annual anti-harassment training. Each representative requested training modules that were under an hour. One request, from an independent contractor, requested a *Preventing Sexual Harassment* module required for an Entertainment Industry permit. This individual required a quick turnaround time, and as we did not have the requested training readily available, we were able to successfully identify and refer the individual to an appropriate external solution. One employer of approximately 1200 employees requested an abbreviated version of *EEO is the Law*

training we had previously conducted in person. This employer was behind on the training required by their policy and needed a basic overview as an annual refresher. Since then, two employers requested *Diversity, Equity, and Inclusion* (DEI) overview training as an asynchronous module. Trainings were requested to last approximately thirty minutes but no more than hour. DEI requests wished to have employer-specific examples incorporated into the module. The State agency was attempting to replace outdated training materials. The other, a large municipality, wished to use an abbreviated version of our DEI materials during employee on-boarding. Podcasts and videos were also discussed, with some interest in podcast development.

With significant turnover among State agency HR staff, numerous representatives requested training as soon as possible on steps to completing components of the Report to the General Assembly, in addition to anti-harassment training options.

Ann Bryson-Eldridge, Performance and Accountability Manager with the Executive Budget Office of the Department of Administration, was interviewed on October 19, 2021, via Webex, to discuss providing training via an Online Portal and dashboard functionality that new Computerized Affirmative Action Management System (CAAMS) v5 SaaS platform would have, according to our CAAMS liaison. Ann had recently created training for the State Agency's Accountability Reports in Online Portal. The discussion covered providing group trainings on job aids, different types of training for different learners, provision of multiple reminders on due dates and training resource, logical organization of the materials, and lessons learned from the process.

Unfortunately, in early November it was determined that the dashboard and training portals offered within CAAMS v5 would be limited to the current authorized SCHAC staff. Additional “seats” for our Agency EEO Officers would be a significant expense and contract modification and was not the best option available.

Due to the October migration of employee file data to the CAAMS v5 (SaaS) platform and our own internal training of staff (two new to CAAMS) on the new system in November, training a large external group was not an option at the time. The team had to conduct extensive data validation and complete the Report to the General Assembly by February 1, 2022. This meant providing daily technical assistance to new HR staff providing us with data, which was not efficient but was the only option at the time.

When asked, those State Agency EEO Officers and HR staff indicated a willingness to participate in focus groups to assist us in ensuring routine questions on the GA Report process are identified. Experienced HR staff resoundingly agreed that having static training material to reference would be of great benefit for all. It would benefit those that only complete portions of the process once a year, as well as those that are tasked with training new staff on the reports. New HR staff, often overwhelmed by the GA Report process and searching for materials that may or may not have been left behind by their predecessor, also fully supported having a reference tool they could refer to before calling us for technical assistance. All supported SCHAC’s provision of a variety of asynchronous tools to which they could refer (PowerPoint, flowcharts, podcasts, or videos). As these are state employees, training materials could be provided to them via SCEIS Learning

Management System or FileShare. The focus groups, anticipated to be scheduled to meet in March, will indicate their preferred initial access point.

HR Directors with a variety of staff, including tradespeople and others with limited access to computers during their workday, were interested in podcasts and alternative asynchronous employment training options that would permit staff to test upon completion. Overwhelmingly, employers want to pursue training that can permit more flexibility for their diverse workforce. HR Directors acknowledged that younger employees (Generation Y and Z) often listen to podcasts while working. HR Directors suggested quizzes upon completion to ensure content was received by employees. An additional benefit of asynchronous training that came up was that it would allow for dubbing voiceovers in other languages to reach a more diverse audience and ensure information on South Carolina employment laws are available to our English language learning population.

Sean Birch, Director of South Carolina Public Radio, was interviewed on February 11, 2022, to discuss podcast development. While South Carolina ETV and Public Radio lacked the capacity for taking on a training podcast proposal this year, Mr. Birch provided helpful suggestions and resources needed to produce podcasts in-house (see Appendix).

Kelly Coakley, Director of Strategic Communications, Office of the Executive Director with the SC Department of Administration, was interviewed as her CPM project had covered training. Ms. Coakley encouraged contacting Stephanie Duncan, State Training Director, for additional information, providing assurances that it was not a conflict of interest. On February 11, 2002, Stephanie Duncan was interviewed about the Learning Management System and pricing of

training (modules, podcasts, etc.). When pricing, one should evaluate the development time and expense it took, any materials printed/copied, timing of staff to present or expense of talent to do the voiceover, length of training session, any customization time, and add an additional amount to cover incidental expenses.

DATA ANALYSIS

To identify associated resources and expenses, and to assist the employer who made the request, an *EEO is the Law* module was developed as a training pilot. Once the PowerPoint was completed and scripted, Michelle Flamos, SCEIS Training and Development Director, permitted use of SCEIS equipment for the voiceover. She and her staff graciously provided technical assistance and development pointers. The pilot module was completed and provided to the employer in late November 2021. DTO provided the ability to upload the 233,667KB MP4 Video to the FileShare and give permissions to the employer for access. The intent was to maintain control of the product, so that once the access time had expired access could be revoked. It would also permit SCHAC to track the number of individual users accessing the training for our Accountability Report numbers. Problems were encountered during the delivery of the product. Unfortunately, FileShare access required each individual user to create a distinct password (for approximately 1200 employees). The process, from the employer's perspective, was not user friendly. The HR Director had sufficient difficulty in setting up her initial account and login information that I sought DTO's advice. The employer sought assistance from her IT department, and they were able to access the file. DTO researched the FileShare options thoroughly and determined the only way to simplify the process was to allow the employer to download the product. The employer

was amenable, agreed to track the number of end users, and provide SCHAC with total count of employees provided the training by a certain date each year. The parties agreed that if laws changed, the module would no longer be appropriate for use. This delivery and control dilemma led to getting a quote from a law firm to develop a basic business contract on usage and terms (see Appendix). In the meantime, Technical Services and Training will continue to research and identify alternate platforms that permit SCHAC to maintain control over the product.

Discussions on asynchronous training modules, training videos and training podcasts shared common elements. Without speaker engagement, topics should be limited to no more than 10 minutes per topic. Culling material to 30 minutes, while providing adequate coverage was challenging. While the first module was a pilot for testing purposes and to assist a repeat customer short on time, future modules should have diverse voices. If the skillset is not readily available, hiring external voice talent may be required to provide a quality product that is representative of the vision and mission of the South Carolina Human Affairs Commission. External voice talent would be an additional cost that factors into pricing.

When following up with the pilot customer approximately two months later, the customer stated, “The employees are enjoying the flexibility of the Module. It covers all of the issues that we need addressed.” She also asked to be kept updated on the development of other training options.

RECENT DEVELOPMENTS

Currently there are five new South Carolina bills addressing Critical Race Theory this legislative session. At present, there does not appear to be a consensus on what is Critical Race Theory.

House Committee members acknowledged in a recent February 16, 2022, committee meeting that there is a lot of ambiguity and room for interpretation as the bills are currently written. The confusion and heightened emotions surrounding this topic, and the bills as they are currently written, could negatively impact requests for the respect-based training materials the South Carolina Human Affairs Commission offers. While the bills appear to primarily focus on what is taught in schools, the more comprehensive House Bill 4605: Freedom from Ideological Coercion and Indoctrination, as currently written, would jeopardize the legitimacy of all training currently provided and requested by both public and private sector entities. The bill as proposed would remove private and public employers' opportunities to prevent problems in their workforces through training, increasing liability in courts and through federal intervention by the Equal Employment Opportunity Commission. SCHAC will closely monitor the bills to ensure compliance with the law.

IMPLEMENTATION PLAN

Technical Services and Training is responsible for SCHAC training curriculum development. Priority will be placed on training for HR staff and EEO Officers on the process for completing the Report the General Assembly. Focus groups will be scheduled for March of 2022 to prioritize training needs. Standalone modules will be developed for each step of the process since various staff of the larger agencies may complete separate tasks. This training module will not require the legal contract priced in the appendix and voiceovers can be provided by the training staff. As this training is provided for state employees, there is no fee for the training. Draft modules will be reviewed by the focus groups prior to publication. Additional conversations will need to be

had with the SC Department of Administration on incorporating materials into the SCEIS Learning Management System, if the focus groups deem that the best venue for access, to determine publication timelines. In the meantime, due to potential size of files, ShareFile would be the appropriate venue for accessing draft materials.

The DEI asynchronous training modules will proceed with feedback from the customers, including employer specific scenarios. One State agency training module has been requested by October 2022. Discussions on any material that could conceivably be limited by H. 4605 will need to be addressed with both the customer and SCHAC legal staff before proceeding.

We are still waiting to hear back from the Municipal customer. The bills on Critical Race Theory may be causing delays while employers and their legal staff evaluate next steps. In the meantime, SCHAC legal staff has identified outside counsel to develop and receive the External Training Contract by June 30, 2022.

EVALUATION METHOD

Customer-based feedback will continue to be used to evaluate the training materials. In the case of the GA Report Process training, the focus groups will provide the first level of feedback in the product development. Once the initial scripted product is developed, additional feedback will be sought via SurveyMonkey.

For other asynchronous training curriculums (whether PowerPoint module or podcast), the customer making the request for the training is part of development and is consulted during and upon conclusion of the training. Technical Services and Training will continue to use

SurveyMonkey for anonymous feedback of training materials from training attendees. This allows us to ensure we have adequately communicated the material and to determine if there are outstanding questions remaining. The training team currently uses a 3-2-1 survey method; requesting participants to identify three things done well, two things that could be improved on, and to identify one question the participant may still have. We have found this provides us with more accurate feedback.

SUMMARY AND RECOMMENDATIONS

A diverse workforce also requires diverse methods of training to ensure all employees receive the information they require to comply with the law and contribute to a harmonious workplace. Businesses promoting diversity in the workplace, recognizing its competitive advantage and business opportunity, also recognize the need to be flexible to create a success-oriented workplace. In support of business efforts to foster diversity, SCHAC must consciously strive to provide accessible training and meet our customers changing needs. The research conducted supports that asynchronous training modules and podcasts can be developed and provided at minimal expense and provide additional tools in support of SCHAC's mission to eliminate and prevent unlawful discrimination in Employment, Housing, and Public Accommodations. These additional tools will provide additional opportunities for SCHAC to reach a larger audience and achieve its training goals.

Development of additional SCHAC training tools should proceed, as identified in the implementation plan, allowing employers to access training materials independent of staff in-person training availability.

APPENDIX A

Asynchronous Training Expenses

Training Resources	Provider	Cost	Contact/Link
	<i>State of SC</i>		
Recording Studio	SCEIS	No Charge	Michelle Flamos, SCEIS
Microphone	SCEIS	No Charge	Michelle Flamos, SCEIS
Adobe Captivate	SCEIS	No Charge	Michelle Flamos, SCEIS
Internal Distribution Platform	SCEIS	No Charge	Michelle Flamos, SCEIS
External Distribution Platform	SC Division of Technology Operations	No Charge - DTO Customer	Kristoffer Plus and James Elkins, DTO
	<i>External</i>		
Adobe Stock Images Subscription	Adobe	\$29.99 – \$79.99/mo	https://stock.adobe.com/plans
Legal Contract for external training customers regarding usage rights	Outside Counsel	\$250.00- \$500.00	SCHAC General Counsel - Caroline Scrantom
Blue Yeti USC Microphone	Amazon	\$99.99	https://www.amazon.com/dp/B00N1YPXW2?ref=emc_p_m_5_i&th=1
Isolation Booths 1. Monoprice Microphone Isolation Shield 2. Pyle Pro Sound Recording Booth Box and Isolation Filter Cube	1. Amazon 2. B & H Photo	1. \$59.99 2. \$36.00	1. https://www.amazon.com/Monoprice-Microphone-Isolation-Shield-Absorbing/dp/B00GR9W1MS/ref=sr_1_7?crd=3CI7GG4B7JO8Q&keywords=recording%2Bbooth&qid=1644598259&sprefix=recording%2Bbooth%2Caps%2C75&sr=8-7&th=1 2. https://www.bhphotovideo.com/c/product/1244152-REG/pyle_pro_psib27_sound_recording_booth_box.html

Audacity (audio)	Audacity	Free, Open-Source	https://www.audacityteam.org/
Adobe Audition – advanced Podcast Production		\$33.99/mo	https://www.adobe.com/products/audition.html?ssid=KKQPG&mv=search&ef_id=Cj0KCCQiAr5iQBhCsARIsAPcwROOOugdTHN2RuR_e8QjzDPpfZTgYeEz58F3_L-ug5gfmAJQf0eeq9XQaAqidEALw_wcB:G:s&s_kwid=AL!3085!3!379243313516!e!!g!!adobe%20audition!1712851908!83024457248&gclid=Cj0KCCQiAr5iQBhCsARIsAPcwROOOugdTHN2RuR_e8QjzDPpfZTgYeEz58F3_L-ug5gfmAJQf0eeq9XQaAqidEALw_wcB
SmartSound (Paid royalty-free music service – to layer in podcast production)	SmartSound	\$199.00	https://www.smartsound.com/sonicfire/

Appendix B

<u>Interview Date</u>	<u>Assigned Name</u>	<u>Estimated Participants</u>	<u>Training Content</u>	<u>Category</u>
01-Mar-21	Ind. Contractor	2	Sexual Harassment Prevention	Module
21-May-21	County Govt A	1200	EEO is the Law	Module
14-Jun-21	State Employer A	50 - 75	EEO is the Law	In-person
14-Jun-21	State Employer A	90 -100	ADA	Virtual
14-Jun-21	State Employer A	90 -100	PAA/LSA	Virtual
26-Jul-21	State Employer B	20 – 30	DEI and EEO is the Law	In-person
05-Aug-21	State Employer C	15 - 20	EEO is the Law	In-person
06-Sep-21	State Employer D	15 - 20	EEO is the Law	In-person
22-Sep-21	Fire Department A	50 - 60	EEO is the Law	Virtual
17-Oct-21	State Employer E	20 - 30	Anti-Harassment/Bullying	In-person
03-Nov-21	City Govt A	15 - 20	DEI	Virtual
15-Nov-21	School District A	30 - 40	EEO/ADA	In-person
29-Nov-21	Special Services Dist.	55 - 65	EEO is the Law	In-person
31-Jan-22	State Employer F	4000 - 4500	DEI module	Module
02-Feb-22	City Govt A	800 - 1000	DEI module	Module
07-Feb-22	Town A	45 - 50	EEO is the Law & PAA/LSA	In-person
14-Feb-22	State Employer G	under 10	PAA/LSA	Virtual
15-Feb-22	Govt Contractor	50 - 60	PAA/LSA	Virtual
22-Feb-22	Other	15 - 20	PAA/LSA	Virtual

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