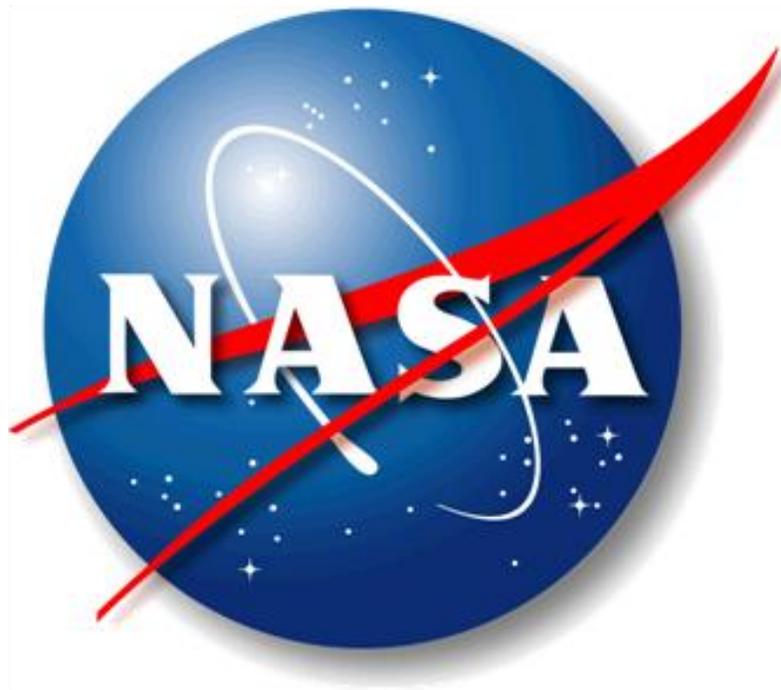




NASA Guidelines on Gender Transition



April 2014

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NASA GUIDELINES ON GENDER TRANSITION

OVERVIEW

NASA embraces diversity and inclusion in the workplace and provides equal opportunity in Federal employment regardless of race, color, religion, sex (including gender identity¹ or pregnancy), national origin, age, disability, genetic information, sexual orientation, or status as a parent. We understand that today's workforce in the United States is more diverse than ever – the Nation's best and the brightest represent an endless variety of cultural, geographical, and educational backgrounds, not to mention life experiences and perspectives.

NASA welcomes diversity because we recognize that workforce diversity, when fully utilized, leads to inclusion of more ideas and viewpoints, which in turn leads to more creativity and innovation. When individuals are able to bring their whole selves to work, they thrive and NASA thrives. To remain competitive and to continue to innovate, NASA needs the best employees to design creative and innovative technical solutions. We must, therefore, attract, fully utilize, and retain the best talent. This includes being viewed as an employer of choice for a diverse workforce.

The purpose of this document is to help foster an understanding of transgender issues in the workplace and to provide guidance to managers and the broader NASA workforce on how to achieve a welcoming and supportive environment for NASA employees undergoing transition in the workplace.² Just as there are gay, lesbian and bisexual employees in our workforce, there are also employees who are transgender. Some are open about their gender identity or expression, “out”, and others may not be. In order to live consistently with his or her gender identity, a transitioning person will come out full-time. For the transition to be successful, NASA managers, employees and co-workers will participate in an employee's transition during the transition process.

¹ The U.S. Equal Employment Opportunity Commission (EEOC) recently held in the case of *Macy v. Holder* that discrimination based on gender identity is a form of sex discrimination under Title VII. The Commission stated: “When an employer discriminates against someone because the person is transgender, the employer has engaged in disparate treatment ‘related to the sex of the victim.’ This is true regardless of whether an employer discriminates against an employee because the individual has expressed his or her gender in a non-stereotypical fashion, because the employer is uncomfortable with the fact that the person has transitioned or is in the process of transitioning from one gender to another, or because the employer simply does not like that the person is identifying as a transgender person.” *Macy v. Holder*, 2012 WL 1435995, *7 (EEOC April 20, 2012).

² This guidance document is based on best practices from other Federal agencies and private-sector companies which have implemented similar guidelines. It is also based on reports developed by the Human Rights Campaign (HRC), one of the Nation's leading advocacy groups for the lesbian, gay, bisexual, transgender (LGBT) community. See, e.g., Human Rights Campaign Fund Foundation, *Transgender Inclusion in the Workplace*, (April 2008).

TRANSITIONING: RIGHTS, RESPONSIBILITIES

INTRODUCTION

The term transgender is an umbrella term that refers to anyone whose gender identity or gender expression does not conform to society's expectations for, or stereotypes about, one's designated sex at birth. As an umbrella term, the word "transgender" is an adjective that covers a wide spectrum of people including transsexuals, cross-dressers, and other gender-variant people. Not all people who consider themselves, or may be considered by others, as transgender will undergo a gender transition. "Transsexual," on the other hand, is a term used to refer to a person who, with or without medical treatment, has changed, or is in the process of changing, his/her physical sex to match with his/her internal sense of gender identity. Those transitioning from male to female are often referred to as "MTFs" or "transwomen" and those transitioning from female to male are frequently called "FTMs" or "transmen."

This document focuses primarily on people who have or who plan to transition genders, many of whom identify as transsexual and many of whom have undergone or are undergoing medical treatment - such as hormone therapy and sometimes surgery - to align their bodies with their internal sense of gender. Transgender people also employ non-medical methods to live and express themselves consistent with their gender identity, such as wearing preferred-gender clothing and body-shaping garments, adjusting mannerisms and speech patterns, and asking friends and family to call them by their preferred names and pronouns.

The process of a transgender individual publicly changing his or her gender presentation in society is known as "transitioning". The transitioning individual usually changes his/her name, clothing, and appearance. S/he may also seek anatomical changes through medical intervention. If the individual remains at his or her same place of employment during this transition, it is known as "transitioning on the job" or "transitioning in the workplace". This transition may include hormone therapy, sex reassignment surgery and/or other components and is generally conducted under medical supervision based on a set of standards developed by medical professionals.

Many transgender individuals face difficult situations/interactions in their personal, professional, family, and financial lives simultaneously. Additionally, those who have begun the transition process may have begun hormone therapy, which may affect the individual's disposition during the time they are receiving the hormone therapy. We encourage everyone at NASA, to be aware and sensitive to the stresses placed on the transitioning individual both internal and external to NASA.

The process for transitioning individuals is extensive. It is accomplished with the help of medical professionals, in accordance with recognized standards of care. In general, the process will involve psychological evaluation, monitoring, and counseling; hormone therapy; electrolysis; and a trial living period of at least one-year (the "real life experience") to ascertain the level of

comfort the individual has in the reassigned gender. It is usually as the individual approaches this trial living period that an employer is given notice of the individual's transition plan. Each individual transitioning will have a set of unique factors that will require a customized plan. It is important that the transitioning individual work with his/her supervisor and Human Resources Representative in an open and honest way to allow a smooth process within the workplace.

RIGHTS AND RESPONSIBILITIES

There are rights, expectations and responsibilities of each party associated with a transition in the workplace and it is essential that open and honest communication be established to build trust for each party. A successful transition in the workplace can only occur with commitment and understanding of each involved party.

Transitioning Employees

Transitioning employees have the right to be open and to experience a workplace free of discrimination, including harassment. All employees have the right to express gender identity without fear of consequences.

Planning

To ensure a transition that is as smooth as possible, employees are encouraged to contact their immediate supervisor and Human Resource Representative well in advance of the planned transition date so that the necessary steps can be taken. Understand that supervisors, HR contacts and others may not be educated about transgender issues and may not understand clearly what is needed. Allowing some time to educate people may be required.

We recommend that a transitioning employee create, together with supervisor and HR representative, a Workplace Engagement Plan as part of the process to lay a roadmap on what steps need to be taken to ensure a successful transition. This plan should, at a minimum, include:

- The date on which the employee would like to assume his/her new gender identity at work;
- Whether time off will be necessary for surgeries or other procedures associated with your transition;
- The manner in which coworkers, clients, and others in the workplace will be made aware of the transition;
- Who will be told; and
- When the announcement will be made.

Equal Employment Opportunity and Anti-Harassment

If you are not sure or perhaps uncomfortable contacting the above-mentioned individuals, contact the Agency Diversity Program Manager who can help provide the right connections.

Remember you are covered under NASA's equal employment opportunity and non-discrimination policy and your communications will remain confidential.

If an employee believes s/she has been discriminated against based on gender identity, the right to file a complaint of sex discrimination under the EEO complaints process may be exercised. To do so, contact an EO Counselor within 45 days of the date the discrimination occurred. Contact information for Center EO offices may be found at <http://odeo.hq.nasa.gov/install.html>.

In addition, if an employee believes s/he has been subjected to harassing conduct, the manager or supervisor, or the Center Anti-Harassment Coordinator should be notified. Harassment based on gender identity is covered under the Agency's Anti-Harassment Procedures http://www.hq.nasa.gov/office/nasaonly/odeo/Anti-Harassment_Brochure-Final.pdf.

Supervisors and Managers

At NASA, diversity and inclusion in the workplace is a major contributing factor to the success of the Agency. The more diverse and inclusive NASA is, the better able we are able to recruit and retain a high quality workforce. If an employee at NASA informs you of his or her desire to transition or if an individual within your office is currently in the transition process, your support is critical. Transgender employees are a vital component of the NASA workforce. Being transgender has nothing to do with a person's ability to perform his or her job. To assist you in ensuring that transitioning employees are treated with dignity and respect and that the transition process is a smooth one, we offer the following guidance.

Confidentiality, Privacy, and Respectful Disclosure

First and foremost, the transgender status of an employee is considered confidential. Managers and HR representatives, who are privy to an employee's transgender status, including any health information, must take steps to safeguard such information. As a reminder, the Privacy Act (5 U.S.C. 552a) protects from disclosure information maintained by an agency about an individual, including, but not limited to, his/her medical history. Generally speaking, disclosure is prohibited except when express permission is granted by the employee.

There needs to be a routine use to disclose PA protected information absent the consent of the individual.

In addition, control over the flow of information is vital to managing the transition process. Both the manner in which employees are informed about the transitioning employee's change in gender and the timing of the disclosure are critical to a smooth transition process. Therefore, confidentiality is of primary concern during the early stages of the transitioning process. It is critical that supervisors do not prematurely disclose information about an employee's impending transition prior to putting in place a plan for managing the transition process.

Workforce Engagement Plan Development

Ensuring a successful transition in the workplace requires thoughtful planning on the part of management and the transitioning employee. It is recommended that the transitioning employee,

with his/her supervisor and HR representative, develop a workplace engagement plan that addresses, among other things, the *timing* for informing employees in the work place of the transitioning employee's impending change in gender, *how* co-workers will be told (e.g. by e-mail, in a staff meeting, one-on-one, etc), and *who* should be told. In addition, the plan should include an official statement from management addressing support for the transgender employee and reminding others that discrimination and harassment will not be tolerated. Also, the plan ought to contemplate providing training for employees who have contact with the transgender employee, as well as managers who may have to deal with issues that arise relating to the transition and the employee.

Some things to consider:

- When does the transitioning employee anticipate being ready to assume his/her new role? Usually s/he will have a date and time frame in mind for when s/he would like to assume his/her new identity.
- Will the transitioning employee require time off for surgeries or other procedures? If so, how much time and when?
- How would the transitioning employee like to inform others in the workplace about his/her change in gender? Does s/he want to inform employees? Would s/he prefer that management do so? What problems, if any, are anticipated? Has s/he thought of solutions?
- What kind of awareness training will be provided and to whom? Are outside experts needed to train employees and managers regarding transgender issues?
- What personnel records will need to be revised? Who will undertake seeing that the necessary records are revised?

Leading by Example

The most effective way for a manager to set the tone in an office or other workplace setting is to *lead by example*. Transgender and gender non-conforming employees and coworkers should be treated with respect and dignity. If an employee begins to transition from one gender to another or discusses being transgender, or if other employees learn that a co-worker is transgender, there are many ways in which a manager's words and actions can lead to a welcoming, supportive, and safe atmosphere. Some specific examples include:

- **Pronouns and Name Changes.** Refer to an employee by the name and the gender-specific pronoun by which s/he wants to be called. If a co-worker is transitioning and it is not clear which pronouns to use, it is appropriate to respectfully ask his/her name and which pronouns to use. In general, it is considered insensitive to refer to someone by the wrong pronouns once it is established which set of pronouns he/she prefers. Continued intentional misuse of the employee's name and pronouns may put him/her at risk of

harm, and in some circumstances, may be considered harassment in violation of NASA's policy and Federal law.

- **Appearance Standards.** Individuals who are transitioning will assume the appearance and role for their gender identity. The decision as to when and how to begin the real-life experience remains the employee's choice. Part of that experience is dressing in the desired gender role. Human Resource Representatives, Diversity Program Managers, or NASA's Office of Diversity and Equal Opportunity are available to provide advice and assistance for supervisors working with a transitioning individual. Generally, a transitioning employee will dress the same as other individuals of the desired gender in the workplace. Dress codes, where they exist, should be applied to employees transitioning to a different gender in the same way that they are applied to other employees of that gender. For example, if all male employees are required to wear jackets and ties, an employee transitioning to male should wear a jacket and tie as well. Dress codes must not be used to prevent transgender employees from living full-time in the role consistent with their gender identity.
- **Restroom and locker room access.** Restroom access issues need to be handled with sensitivity, not only due to NASA's obligation to provide transitioning individuals with the same level of restroom access available to non-transgendered individuals, but also due to the emotional responses of co-workers related to the idea of sharing facilities with a transgender co-worker. Unisex restrooms avoid this potential issue; however, most facilities will have gender specific designations on their restrooms and locker rooms. Once the "real life experience" begins, a transitioning individual will not be required to use the restroom of his or her designated sex at birth. A transitioning individual should use the facility based on his/her current gender presentation; specifically, his/her reassigned gender following commencement of the "real life experience" and from that point forward. Transitioning employees should not be required to undergo, or provide proof of, any particular medical procedure to use facilities designated for use by a particular gender. Under no circumstances may any Center require an employee to use facilities that are unsanitary, potentially unsafe for the employee, or located an unreasonable distance from the employee's workstation. Co-workers who have personal concerns about sharing a restroom or locker room with a transgender individual should be invited to have an honest discussion with an appropriate Human Resource Representative, Diversity Program Manager, or a representative of the Office of Diversity and Equal Opportunity.
- **Identity documentation.** Consistent with the Privacy Act, the records in an employee's Official Personnel Folder (OPF) and other employee records (e.g. pay accounts, training records, benefits documents, ID badges, e-mail account, business cards, telephone directory, etc.) should be changed to show the employee's new name and gender, once the employee has begun working full-time in the gender role consistent with the employee's gender identity.
- **Religious Objections or Other Concerns.** Employers have the right and responsibility to set an expectation of fair treatment of all employees. Some employees may not agree

with the decision to protect transgender workers, just as they may not agree with other workplace policies. However, protections are not about changing people's beliefs, but rather preventing inappropriate workplace behavior and allowing all employees to do their jobs. Most employers find that when they consistently iterate this message, workplace discontent with non-discrimination policies dissipates. Employers can often reduce employee discomfort and encourage further understanding through training and education.

- **Name, Gender, Badges, Photograph Changes.** Upon notification of a legal name change of the transitioning individual, change his/her name and gender in all personnel and administrative records. At the first opportunity, replace all photographs on display in the workplace with an updated photo portraying the individual in his/her new, re-assigned gender. Ensure that staff directories, e-mail addresses, name plates, etc. are updated to reflect the individual's new name. (Ref: Guide to Recordkeeping and the Federal guide and regulations utilized to process personnel actions.)

Engage Employee Resource Groups

Consulting employee resource groups that address LGBT issues in the workplace can be instrumental in educating management and the workforce about transitioning in the workplace and other LGBT issues, can assist with awareness training, and may prove valuable in ensuring an open and inclusive environment. NASA EAP Clinicians, as mental health professionals, serve as valuable resources to organizations, supervisors, and managers in gender transition processes. Confidentiality, objectivity, and a respectful workplace are of significant concerns. Examples of how Center EAP Clinicians can serve as a conduit between employees and their managers include:

- Serving as a coach to groups, managers, and/or supervisors on the gender transition process, sensitivities, challenges, and answering general questions--via general outreach and awareness sessions Center-wide
- Assisting employees who may struggle with the concept of transition and transgendered/transsexual employees/co-workers
- Assisting Centers' Office of Human Resources and Office of Diversity and Equal Opportunity (ODEO) points of contact in developing a Center-specific strategy, based on the Center's demographics, local culture, and other factors for which EAP is likely already aware
- Assisting specific supervisors/managers with productivity issues anticipated or currently being experienced within the office in which an individual is going through transition, including identifying methods to lessen the gossip that sometimes accompanies these situations
- Coaching supervisors/managers about identifying potential signs of employee/team discomfort within their organization and examples of approaches that can be used to improve the working environment
- Educating directly-affected employees to dispel their fears about a colleague undergoing transition. Discomfort about such things as sharing restrooms, not understanding

transsexualism, and addressing misconceptions based on media portrayals and inaccurate Internet search results about the topic can be discussed with, and by, an EAP Clinician.

- Assisting employees who might be offended by the idea of a person changing sex, due to their religious or personal beliefs. Negative reactions may be lessened by fostering a respectful workplace, instructions on the proper "etiquette" for certain circumstances, and emphasizing the need to treat all employees fairly
- Assisting Center Human Resources and Senior Management in the event that a NASA employee at a more senior level (more publicly visible) undergoes a transition.

Assistance Through the NASA Shared Services Center (NSSC)

The NSSC is available to assist the Center HR Office (HRO) with an employee's name change and/or gender change upon the transition. Once the employee has decided to change his/her name and/or gender, HR Offices are to notify the NASA Shared Service Center (NSSC) Benefits team via an encrypted email to nssc@nasa.gov.

- **Requesting a Transgender Name Change:** NSSC will initiate the name change action once the request is received from the Center HRO. If the employee is requesting a name change, the Center HRO must ensure a copy of the social security card along with other supporting documentation such as driver's license, court order, marriage certificate or passport are attached. The Center HRO will submit a confidential email request along with the supporting documentation to the NSSC as stated above. Once the name change is processed, the NSSC's Benefits Team will notify the Center HRO and employee.
- **Requesting a Transgender Name Change and/or Gender Change:** NSSC will initiate a name change action once the request is received from the Center HRO. If the employee is requesting a name change, the Center HRO must ensure the supporting documentation is attached as indicated in the paragraph above. If the employee is also requesting a gender change, the Center HRO must review and verify the supporting documentation such as medical certification, passport or state form of identification reflecting evidence of the gender change in accordance with the [Guide to Personnel Recordkeeping](#). Once the supporting documentation is verified, the Center HRO will include a statement that the supporting medical documentation has been verified for the gender change. The Center HRO will submit the name change and/or gender change request in an encrypted email to nssc@nasa.gov. The NSSC Benefits Team will provide counseling and assistance as necessary with any issues related to employee benefits such as changing designation of beneficiaries and the like. Once the request is complete, the NSSC's Benefits Team will notify the Center HRO and employee.
- **Requesting a reconstruction of the electronic Official Personnel Folder (eOPF) due to Gender Change:** Employees requesting a reconstruction of their electronic Official Personnel Folder must provide a written statement with their signature and

date to their Center HRO at the time they are requesting a Gender Change. The Center HRO will attach the employee's request in the email to the NSSC's Benefits Team. The Benefits Team will notify the eOPF Team of the request once the gender change is complete. The eOPF Team will reconstruct the employee's personnel folder in accordance with the [Guide to Personnel Recordkeeping](#). Once complete, the NSSC's eOPF Team will notify the Center HRO and employee.

- **Changing NASA ID Badge and PIV Credential**
Concurrent with the process of a transgender name change, the employee will also need to change his/her PIV credential and NASA ID badge. Employees should coordinate the name change with the Center HR Office and Security Office. The processes described in Identity and Credential Management, NPR 1600.4 Chapters 3.5, On-Site Enrollment and Issuance Procedures for NASA Credentials and 6.6, PIV Credential Re-issuance should be followed.

Re-issuance of a NASA ID badge and PIV credential requires the employee re-enroll and provide approved USCIS Form I-9 documentation that supports the legal name change prior to enrollment and issuance of the new NASA ID badge and PIV credential.

CONCLUSION

We each have an obligation, whether as managers, team leaders or co-workers, to be supportive of our NASA colleagues and to help each other to continue to thrive in our jobs. A gender transition is a profoundly life changing experience, and it comes with many challenges. These guidelines are designed to show the ways in which the NASA workplace, individually and institutionally, can be supportive of someone going through a transition and confronting various challenges. We hope that these guidelines will be useful for members of the NASA family who have, are, or will go through the transitioning process.

APPENDIX A: TERMINOLOGY

The following definitions will help you understand and explain the terms used when discussing gender identity in the workplace.

SEX

The term *sex* refers to the classification of people as male or female. At birth, infants are assigned a sex based on a combination of biological characteristics including: chromosomes, hormones, and reproductive organs.

GENDER

The term *gender*, while often used interchangeably with sex, can refer specifically to the behavioral, cultural, psychological, or social traits typically associated with one sex, rather than biological characteristics.

GENDER IDENTITY

The term *gender identity*, distinct from the term sexual orientation, refers to a person's innate, deeply felt psychological sense of gender, which may or may not correspond to the person's body or designated sex at birth (the sex originally listed on a person's birth certificate).

GENDER EXPRESSION

The term *gender expression* refers to all of a person's external characteristics and behaviors — such as dress, grooming, mannerisms, speech patterns, and social interactions — that are socially identified with a particular gender. Social or cultural norms can vary widely and some characteristics that may be accepted as masculine, feminine or neutral in one culture may not be assessed similarly in another. A person's gender expression may also be referred to as his or her gender presentation. Workplace practices should generally apply to an employee's full-time gender presentation.

GENDER DYSPHORIA

The term *gender dysphoria* is a psychological diagnosis recognized by the American Psychiatric Association. This disorder is marked by severe distress and discomfort caused by the conflict between one's gender identity and one's designated sex at birth. Not all transgender people experience gender dysphoria or are diagnosed with gender dysphoria.

SEXUAL ORIENTATION

The term *sexual orientation* refers to an individual's physical and emotional attraction to the same and/or opposite gender. "Heterosexual," "bisexual," and "homosexual" (aka gay or lesbian) are all sexual orientations. A person's sexual orientation is distinct from a person's gender identity and expression.

TRANSGENDER

The umbrella term transgender (sometimes shortened to trans) encompasses people who experience and/or express their gender differently from conventional or cultural expectations — either in terms of expressing a gender that does not match the sex listed on their original birth certificate (i.e., designated sex at birth) or physically altering their sex. The term includes transsexuals, cross-dressers, and other gender-variant people; not all people who consider themselves or who may be considered by others as transgender will undergo a gender transition. Transgender people should not be referred to as transgendered.

TRANSPHOBIA

The term *transphobia* refers to the fear and hatred of, or discomfort with, people whose gender identity or gender expression do not conform to cultural gender norms.

TRANSSEXUAL

The term *transsexual* refers to a person who has changed, or is in the process of changing his or her physical sex to conform to his or her internal sense of gender identity. The term can also be used to describe people who, without undergoing medical treatment, identify and live their lives full-time as a member of the gender different from their designated sex at birth. In contrast to the term transgender, *transsexual* is not an umbrella term, and many people who identify as transgender do not identify as transsexual.

MTF: “Male to Female”– Individual who is born and perceived to be male who transitions to publicly and privately live as a female.

FTM: “Female to Male” – Individual who is born and perceived to be female who transitions to publicly and privately live as a male.

GENDER TRANSITION

The term *gender transition* refers to the process through which a person modifies his or her physical characteristics and/or gender expression to be consistent with his or her gender identity. Gender transition may, but does not necessarily, include hormone therapy, sex reassignment surgeries and/or other medical or surgical components. The process may also include telling one’s family, friends and/or co-workers, and changing one’s name and/or gender on legal documents. The transition process is generally conducted under medical supervision based on a set of standards developed by medical professionals.

CROSS-DRESSER

The term *cross-dresser* refers to people who wear the clothing and/or accessories considered by society to correspond to the opposite sex. Unlike transsexuals, cross-dressers typically do not seek to change their physical characteristics and/or manner of expression permanently or desire to live full-time as a gender different than their birth sex. People who cross-dress some of the time may fear that discovery of their cross-dressing, even when on personal time, may lead to discrimination or harassment at work. In the vast majority of cases, employers do not have the

right to monitor or regulate employees' off-the-job conduct. Employers should neither inquire about nor take adverse action against an employee should they learn about off-the-job cross-dressing from another source. (Cross-dressers are sometimes termed transvestites, but this term is considered derogatory and should not be used.)

INTERSEX

The term *intersex* refers to a person who is born with sex chromosomes, external genitalia, or an internal reproductive system that is not considered standard for either male or female. Although any intersex people do not identify as transgender, the workplace issues relating to transgender people can overlap with those that affect intersex people. (Intersex people are sometimes termed hermaphrodites, but this term can be considered stigmatizing, outdated, or misleading and should not be used.)

APPENDIX B: RESOURCES³

- Human Rights Campaign (HRC) WorkNet, <http://www.hrc.org/issues/pages/employer-resources>
- *Transgender Inclusion in the Workplace* (2d. Ed. 2008), <http://www.hrc.org/resources/entry/transgender-inclusion-in-the-workplace-2nd-edition1>
- Mildred Brown & Chloe Ann Rounsley, *True Selves: Understanding Transexualism for Family, Friends, Coworkers, and Helping Professionals* (1996).
- Joanne Herman, *Transgender Explained for Those Who Are Not* (2009)
- Human Rights Campaign, *Understanding Transgender Issues: Donna Rose's Story* (2007), <http://preview.hrc.org/issues/6828.htm>
- Transgender at Work, www.tgender.net/taw
- National Center for Transgender Equality, <http://transequality.org/>
- Out & Equal Workplace Advocates, www.outandequal.org

³ The list of resources herein are provided for reference only and are created and maintained by other public and private organizations. While we believe that these external links and resources provide useful information, we do not control this information and cannot guarantee the accuracy, relevance, timeliness, or completeness of information developed and maintained by outside sources. Further, the inclusion of particular organizations, websites, or reference materials herein is not meant to reflect their importance over other resources not mentioned, nor is it intended to endorse any views expressed or products or services offered by the author of the reference or the organization operating the site on which the reference is maintained.