

# Validating the use of Criminal and Financial History in Employee Selection



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# Quick Disclaimer

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- The information in this presentation is provided for general information purposes only and this information is not intended to provide specific legal advice. Please talk to a lawyer to discuss your specific situation.

# Background Check Components

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- Criminal History
- Financial History
- Employment & Education History
  - Confirmation of resume information
  - References
- Military Record
- “Life” History
  - Family, friends, neighbors

# Why Conduct Background Checks?

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- Confirm accuracy of information
- Look for signs of trouble
  - Negligent hiring
  - Counterproductive work behaviors
- Predict future employee performance
- Put clients/customers at ease

# Legal Issues in Background Checks

Nature of Policy	Potential Employer	Previous Employer
Insufficient	Negligent hiring	Negligent reference
Over Aggressive	Discrimination	Defamation



- The courts have generally upheld the use of criminal history in employee selection (most case law is old)
  - Employer had a business-related reason for considering criminal history
  - Employer's policy was "reasonable"
    - Was not a blanket, "no convictions ever" policy
    - Did not consider arrests
    - Considered the "Green" Factors (*Green v. Missouri Pacific Railroad*, 1977)
      - Nature and gravity of the offense
      - Nature of the job for which the applicant applied
      - Time that has passed since conviction and/or completion of the sentence
- There has not been a recent case that has made it to trial and been decided on the merits of the validation efforts
  - *EEOC v. Freeman*
- Minimal case law involving credit checks
  - *EEOC v. Kaplan*

- It is exceedingly reasonable for an employer to rely upon an applicant's past criminal history in predicting trustworthiness (*EEOC v. Carolina Freight*, 1989)
- For many employers, conducting a criminal history or credit record background check on a potential employee is a rational and legitimate component of a reasonable hiring process. The reasons for conducting such checks are obvious. Employers have a clear incentive to avoid hiring employees who have a proven tendency to defraud or steal from their employers, engage in workplace violence, or who otherwise appear to be untrustworthy and unreliable (*EEOC v. Freeman*, 2013).

## EEOC v. Carolina Freight (1989)

- It is true that Mr. Rios' conviction and prison term were over ten years old at the time he applied for employment with Carolina Freight and he had no subsequent convictions. Although this court rejoices along with the angels of God for every sinner that repents, to say that an applicant's honest character is irrelevant to an employer's hiring decision is ludicrous. In fact, it is doubtful that any one personality trait is more important to an employer than the honesty of the prospective employee.



## EEOC v. Carolina Freight (1989)

- Obviously a rule refusing honest employment to convicted applicants is going to have a disparate impact upon thieves. That some of these thieves are going to be Hispanic is immaterial. That apparently a higher percentage of Hispanics are convicted of crimes than that of the "White" population may prove a number of things such as: (1) Hispanics are not very good at stealing, (2) Whites are better thieves than Hispanics, (3) none of the above, (4) all of the above.
- If Hispanics do not wish to be discriminated against because they have been convicted of theft then, they should stop stealing.

# “Typical Job Analysis”

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- Information Sought
  - Tasks performed
  - Conditions under which the tasks are performed
  - Competencies needed to perform the tasks under the identified conditions
- Goal is to identify employees who can best perform the tasks
- Background checks are different
  - Rather than predict task performance, the goal is often to mitigate risk
    - Financial harm
    - Physical violence
    - Policy violations

# Credit History Checks



## Use by Employers is on the Decline

2010 60% check for at least some jobs (SHRM)

2012 47% (SHRM)

2016 29% (CareerBuilder)

# Why Use Credit Checks?

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- People who owe money (bad credit history) might be more likely to steal or accept bribes
  - Required by a bonding agency or state/federal government
  - Concern about negligent hiring suit
- People with good credit are more responsible and conscientious and thus will be better employees
- People with low credit scores will be stressed due to the financial burden and thus will perform more poorly at work
  - Corrected correlations between stress and:
    - Performance ( $p = -.13$ ; Podsakoff et al., 2007)
    - Organizational citizenship behaviors ( $p = -.16$ ; Chang, Johnson, & Yang, 2007)
  - Employees under financial stress more likely to miss work and spend work time trying to solve financial problems

# Important Considerations

- Why are you using credit checks?
  - Avoid theft?
  - Avoid bribes?
  - More responsible employees?
- What other factors could explain bad credit for a particular applicant?
  - Life Problems
    - Job layoff
    - Divorce
    - Medical expenses
  - Irresponsible Behavior



- Illegal in 11 states (with some exceptions)
  - California, Colorado, Connecticut, Delaware (public employers), Hawaii, Illinois, Maryland, Nevada, Oregon, Vermont, Washington
  - Exceptions can include police officers, bank employees etc.
- Other states considering making credit checks illegal for employers
- EEOC held a public meeting on 10/20/2010 to discuss the use of employment credit checks

# What Do We Know?

- People with low credit scores
  - Less likely to repay a loan
  - More likely to be involved in automobile accidents
    - People with low credit scores have claim losses 53% higher than average. Worst credit scores (bottom 10%) average claims of \$918 per policy compared to \$558 for the top 10% (University of Texas study, 2003)
    - Study of Canadian taxi drivers: 34% of drivers with multiple accidents had low credit scores compared to 6% of drivers with no crashes
    - Washington State study (1968): 64% of drivers with no crashes had good credit compared to 3% with multiple crashes
- More likely to have an external locus of control (Perry, 2008)
  - External locus of control correlated negatively with performance ( $r = .14$ ,  $p = .22$ ; Judge & Bono, 2001)

- Federal Reserve System
  - 2007 report to Congress
  - 301,536 people in 2003
  - Standardized credit scores (50 = average)
  - Asian 54.8
  - White 54.0
  - Hispanic 38.2
  - Black 25.6



# Potential Adverse Impact



2000 Data from Freddie Mac

Race	Credit Score		
	Bad	Indeterminate	Good
Black	48%	16%	36%
Hispanic	34%	15%	51%
White	27%	12%	61%

- Bernerth (2012) found a negative correlation between credit scores and minority status
- Although credit scores have adverse impact in the general population, use of credit history may not have adverse impact for employers
  - Employment credit checks do not use credit scores
  - Applicants with bad credit probably don't apply for positions involving credit checks

## Correlations with Having Bad Credit History

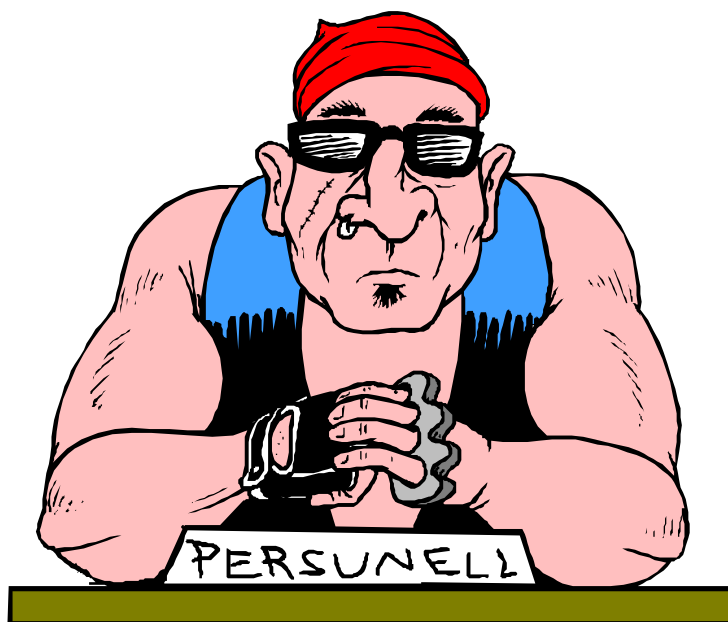
Criterion	K	N	r	90% Lower	90% Upper	SE %
Work Problems	13	11,025	.116	.09	.14	35%
Discipline	8	9,341	.103	.08	.13	39%
Absenteeism	6	1,844	.190	.16	.23	100%
Performance Ratings	4	674	-.152	-.32	.02	13%

- Understand why you are using credit history
  - Is it job-related?
  - Target to specific jobs
- Are there better ways to accomplish your goal?
- Treat each case individually
  - What is the reason for the poor credit history?
- Use during the final stages of the hiring process
  - Conditional offer of hire would be best
- Have an appeal and review process

- Kaplan used credit histories to determine if the applicant might be under such “financial stress or burdens” that they would commit fraud
- Kaplan’s Protocol
  - Used credit histories on a limited number of jobs
  - Limited its examination to only a small number of credit problems
  - Excluded medical debts
  - “Flagged” individuals were further reviewed

- Court awarded summary judgment to Kaplan
- Reasons:
  - EEOC used “race raters” to determine race of applicants which is not reliable and thus does not meet the *Daubert* standards
  - EEOC did not use a random or representative sample to determine adverse impact
  - EEOC, itself, conducts credit checks for 84 of its 97 positions

# Criminal Records



# Use of Criminal Records

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- 86% of employers check the criminal records of at least some job applicants (2012 SHRM survey)
  - 2016 CareerBuilder Survey found similar numbers (82%)
- Many states require consideration of criminal records for certain jobs (e.g., police)
  - A 2007 study in Florida indicated that 39.2% of jobs have some employment restrictions based on criminal records (Lukis, 2007)
- 31 states and over 150 cities and counties have “ban the box” policies (National Employment Law Project, 2018)
  - 20 states – The ban affects only public employers
  - 11 states – The ban affects both public and private employers
    - In 17 cities and counties, the ban affects both public and private employers



## Employers Have Three Concerns About Hiring Applicants with Criminal Records

1. Employees with criminal records will commit on-the-job crimes
  - Economic damage to the organization (e.g. theft)
  - Increased legal liability (i.e. negligent hiring)
2. A criminal record suggests that an applicant will not be a good employee (e.g., not conscientious, lazy)
3. The public will not trust an organization that has employees with criminal records

- In April, 2012, EEOC issued *EEOC Enforcement Guidance on the Consideration of Arrest and Conviction Records in Employment Decisions*
- OFCCP issued Directive 306 on January 29, 2013 - *Complying with Nondiscrimination Provisions: Criminal Record Restrictions and Discrimination Based on Race and National Origin*
- Several states have passed legislation limiting the use of convictions (e.g., New York, Wisconsin, Hawaii, Pennsylvania)
  - Wisconsin
    - Conviction must “substantially relate to the circumstances of the particular job”
  - New York
    - Conviction must have a *direct relationship* to the job
  - Hawaii
    - Conditional offer may be withdrawn if the conviction record “bears a *rational relationship* to the duties and responsibilities of the position”
  - Pennsylvania
    - Conviction must *relate* to the job

- 2012 EEOC Enforcement Guidance on the Consideration of Arrest and Conviction Records in Employment Decisions
- Adverse Impact. EEOC cites the following statistics:
  - the number of men expected to serve time in prison during their lifetime
    - 1 in 17 White men
    - 1 in 6 Hispanic men
    - 1 in 3 African American men
  - In 2010, Black men had an imprisonment rate nearly 7 times higher than White men and 3 times higher than Hispanic men
- Incomplete or inaccurate criminal records

# The Presumption of Adverse Impact

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- Although national statistics show race/ethnicity differences in arrest and conviction records, adverse impact does not always occur
  - Applicant self-selection
  - Use of conditional offers of employment
- In general, the courts have been skeptical of the use of national norms in establishing adverse impact
- Conducting a local analysis is likely the best approach to understanding potential adverse impact for a particular organization

- Two criteria to meet the “job-related and consistent with business necessity defense”
  - The employer validates the criminal conduct exclusion for the position in question in light of the Uniform Guidelines on Employee Selection Procedures (if there is data or analysis about criminal conduct as related to subsequent work performance or behaviors); or
  - The employer develops a targeted screen considering as least the nature of the crime, the time elapsed, and the nature of the job. The employers policy then provides an opportunity for an individual assessment for those people identified by the screen, to determine whether the policy as applied is job-related and consistent with business necessity.
    - Although Title VII does not require individualized assessment in all circumstances, the use of a screen that does not include the individualized assessment is more likely to violate Title VII.

- Two Options
  - Content validity
  - Criterion validity
- Types of Current Employer Policies
  - Will not hire any ex-cons
    - Unacceptable to EEOC and OFCCP
  - Does not consider criminal history
  - Will hire ex-cons depending on the situation

# Option 2: Individualized Assessment

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- Notice to the individual that he was screened out because of a criminal conviction
- An opportunity for the individual to demonstrate that the exclusion should not be applied due to his particular circumstance
- Consideration by the employer as to whether the additional information provided by the individual warrants an exception to the exclusion and shows that the policy as applied is not job related and consistent with business necessity

- General
  - Eliminate policies that automatically exclude individuals with a criminal record
  - Do not mention criminal history in recruitment ads/materials
  - Indicate on the application that a conviction will not automatically bar an applicant from being hired
  - Consider criminal history after a conditional offer of hire
  - Train hiring managers about Title VII
- Develop a narrowly-tailored policy
  - Determine the specific offenses that may demonstrate unfitness for performing such jobs
  - Determine the duration of exclusions for criminal conduct
  - Conduct individualized assessments
  - Document the justification for the policy and procedures

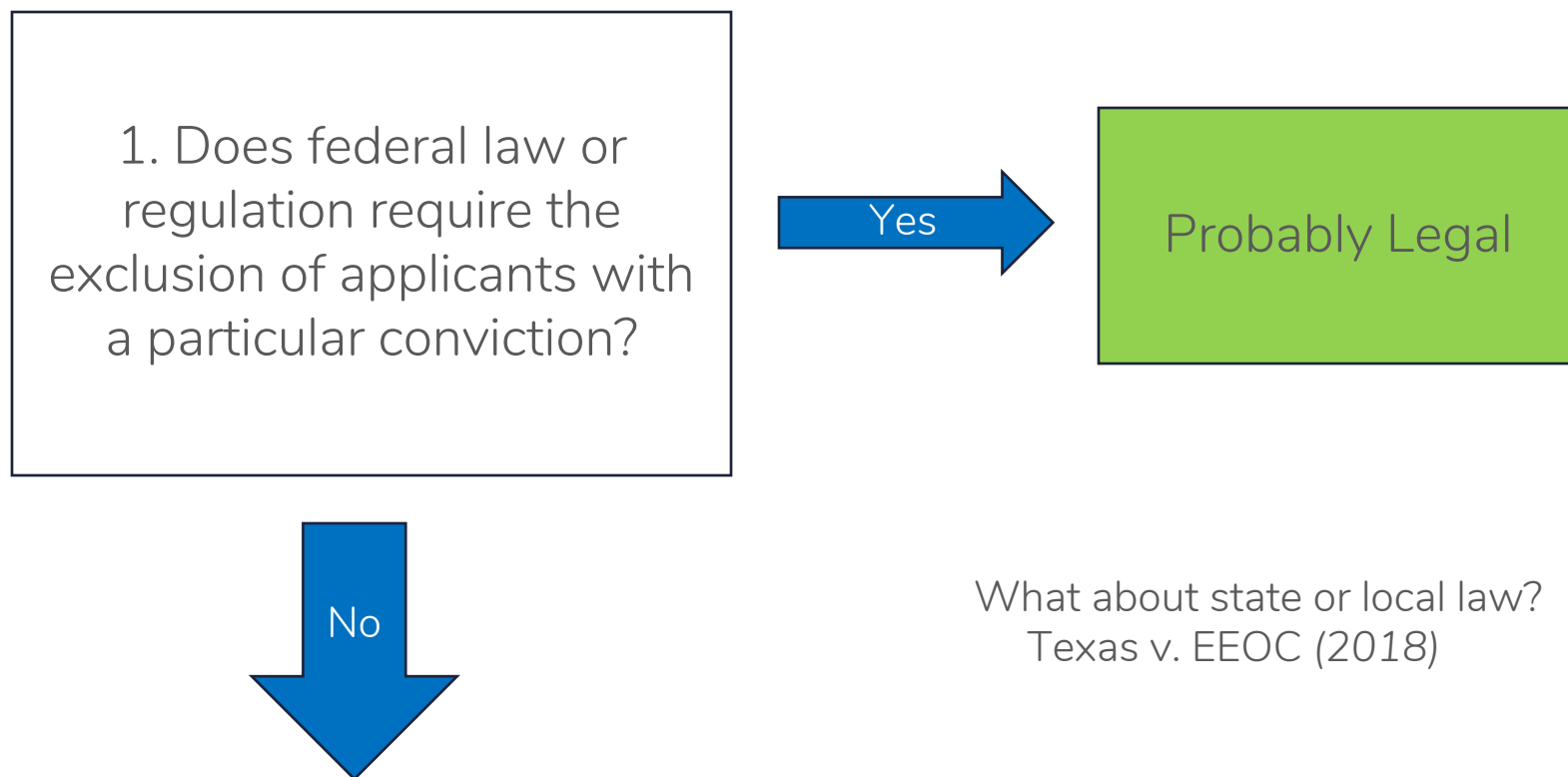


# EEOC and OFCCP Policies are Consistent with the “Green Standards”

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- *Green v. Missouri Pacific Railroad, 1975*
- In using convictions, employer must consider
  - The nature of the job held or being sought
  - Nature and gravity of offense
  - Amount of time that has passed since the conviction and/or completion of the sentence



2. Did plaintiffs demonstrate that a particular aspect of the background check resulted in adverse impact?

No

Probably Legal

Yes

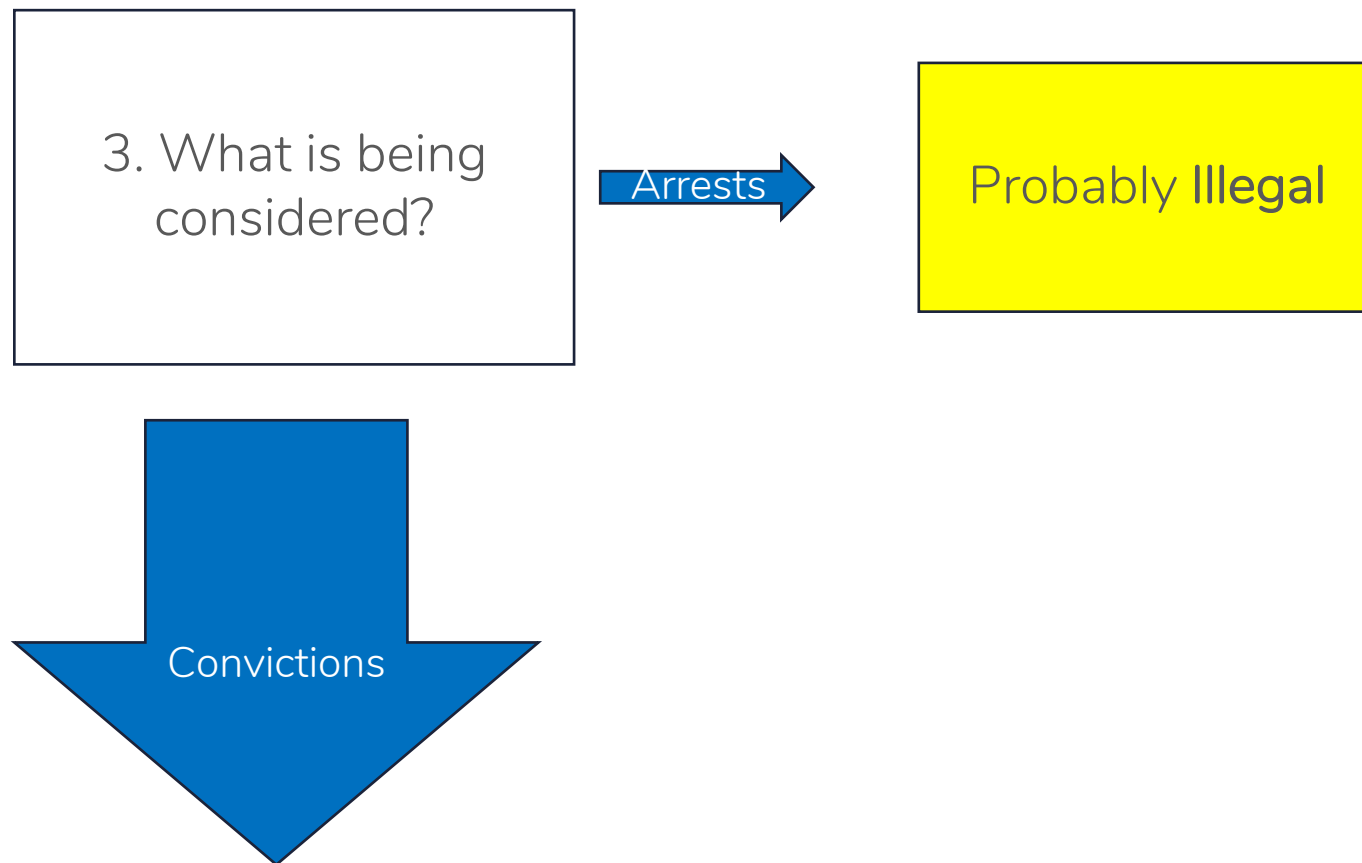
### Key Points

- Courts don't assume AI
- Plaintiff has the burden
  - National data are not acceptable
  - Applicant flow must be used
- Is it the check as a whole or is it the individual components?

- *EEOC v. Freeman* (2013)
  - “The complete inapplicability of such numbers to the present situation is particularly notable when considering that” the EEOC’s experts “cite to the notable statistical disparity between White and Hispanic with regard to credit ratings, arrest, and convictions, but found no significant differences between those races with respect to Defendant’s hiring policies.”

- *EEOC v. Carolina Freight* (1989)
  - “Even if the EEOC had demonstrated an imbalance of Hispanic truck drivers at the Fort Lauderdale terminal, there was inadequate proof that Carolina’s lifetime conviction bar caused the alleged disparities. Because the EEOC study did not examine applicant flow data, there was not evidence that any specific number of Hispanic drivers were disqualified for employment.”

- *Reynolds v. Sheet Metal Workers* (1981)
  - “Under this theory, general population figures indicating the disproportionate effect of the threshold requirement are irrelevant.”



4. Is the policy a blanket no convictions ever?

Yes

Probably Illegal

No

The “Green” Factors

- *Green v. Missouri Pacific Railroad* (1977)
  - Nature and gravity of the offense
  - Time that has passed since the conviction and/or completion of the sentence
  - Nature of the job for which the applicant has applied



There are certainly many categories of employment for which specific prior criminal history profiles of applicants would be a poor fit and pose far too great a risk to the interests of the State of Texas and its citizens. However, there may well be instances in which otherwise qualified job applicants with certain felony convictions in their criminal histories pose not objectively reasonable risk to the interests of the State of Texas and its citizens. To find otherwise would be illogical. **Thus, a categorical denial of employment opportunities to all job applicants convicted of a prior felony paints with too broad a brush and denies meaningful opportunities of employment to many who could benefit greatly from such employment in certain positions.**

State of Texas v. EEOC, No. 5:13–CV–255, 2017 U.S. Dist. LEXIS 30558 (N.D. Tex. Feb. 1, 2018)

5. Can employer demonstrate a link between the criminal check and requirements of the job?

No

Probably Illegal

Yes

### Key Points

- Courts have accepted the notion of criminal history being job related
- Two strategies for job relatedness
  - Criterion validity study
  - Individualized assessment

# Determining Job Relatedness Criterion Validity



- Process
  - Compare performance (e.g., supervisor ratings, turnover, discipline problems) of current employees with criminal history and those without a criminal history
- Problems
  - The employer must have employees with criminal records
    - What is the range of prior criminal behavior?
  - There must be sufficient sample size
  - There must be a sufficient number of discipline incidents

## Correlations With Criminal History

Criterion	K	N	r	90% Lower	90% Upper	SE %
Work Problems	13	19,844	.071	.05	.09	40%
Performance Ratings	8	1,982	-.208	-.13	-.29	20%

Correlations may underestimate utility

- Four studies: Being fired
- Correlations: .08, .14., .25, .27
- Odds ratios: 1.45, 2.10, 2.83, 3.33

# Determining Job Relatedness Content Validity



# Content Validity Approach

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## 1. Job/Risk Analysis

Identify major duties; required knowledge, skills, abilities; performance standards; and risk opportunity

A blue arrow pointing to the right, containing the text "2. Define Relevant Crimes".

## 2. Define Relevant Crimes

Determine categories of crimes most relevant to the job or jobs

A blue arrow pointing to the right, containing the text "3. SME Validation".

## 3. SME Validation

Use subject matter expert judgments to rate and evaluate relationships between each crime and risk opportunity

A blue arrow pointing to the right, containing the text "4. Determine waiting times".

## 4. Determine waiting times

Use subject matter experts to establish exclusionary time periods since the crime

# Step 1: Identify Areas of Risk

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- For each job, determine potential areas of risk
  - Job descriptions
  - Employee/supervisor focus groups
  - Interviews with HR and security departments
  - Observations
  - Disciplinary/incident logs
- Three main job considerations
  - Exposure
  - Opportunity
  - Public Trust



# Exposure Examples

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- Money
- Merchandise
- Drugs/alcohol
- Sensitive information
  - Credit card numbers
  - Personal data
- People
  - Coworkers
  - Customers/General public
    - Adults
    - Children

# Example for Pizza Delivery

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- Delivers in high-crime neighborhoods
- Works alone and at night
- Delivers at, or near, drug houses
- Carries cash at all times
- Enters people's property (perhaps their residence)
  - Elderly
  - People with mental health issues
  - People with disabilities
- Drives a motor vehicle
- Has access to credit card information?
- Encounters angry customers
- Encounters aggressive pets

- Extent of supervision
- Presence of other employees
  - Is the person ever alone with a customer or other employee?
- Security procedures (e.g., guards, cameras, metal detectors)
- Size of merchandise
- Has there been a history of problems (e.g., high rates of theft, workplace violence)?
- Types of situations encountered

- Bank teller – previous credit fraud
- Police officer – former drug dealer
- Daycare provider – sex offence conviction
- School bus driver – DUI conviction
- Cable repair – Murder or rape

Job Title	Exposure/Opportunity				
	Money	Merchandise	People	Sensitive Information	Drugs
Street paver	No/No	No/No	No/No	No/No	No/No
Bank teller	Yes/No	No/No	Yes/No	Yes/Yes	No/No
Retail clerk	Yes/No	Yes/Yes	Yes/No	Yes/Yes	No/No
Home care nurse	Yes/Yes	Yes/Yes	Yes/Yes	Yes/Yes	Yes/Yes

# Step 2: Create Categories of Crimes

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- Violent Index Crime
  - Murder
  - Criminal sexual assault
  - Robbery
  - Aggravated assault and battery
- Property Index Crime
  - Burglary
  - Theft
  - Motor Vehicle Theft
  - Arson
- Drug Charges

## Step 3: Link Types of Crimes to Areas of Exposure



Exposure	Type of Crime			
	Property	Violent	Sex	Drugs
Sensitive information	X			
Money	X			
Drugs				X
Merchandise	X			
People		X	X	

- Time consuming
- The committee doing the linking must understand both the jobs in question and the crimes in general
- Grouping crimes is difficult
- Crimes differ in many ways such as motive and severity
- States and localities often have different terms and definitions for crimes
- Balance between individual crimes and broad categories



# Is it Actually Appropriate to Link Crimes?

- Linkage assumes that criminals are “specialists” who only commit one type of crime
- The recidivism research suggests otherwise

Original Crime	Crime Rearrested For				
	Any	Violent	Property	Drug	Public Order
ALL	77%	29%	38%	39%	58%
Violent	71%	33%	30%	28%	55%
Property	82%	29%	54%	39%	62%
Drug	77%	25%	33%	51%	56%
Public order	74%	29%	33%	30%	60%

Source: Durose, Cooper, & Snyder (2014), Table 10

- Durose, Cooper, & Snyder (2014)
- 404,638 inmates released in 2005 from 30 states
- 5-year period
- Percent rearrested for any crime
  - 84.1 Larceny/motor vehicle theft
  - 81.8 Burglary
  - 77.1 Assault
  - 77.0 Robbery
  - 77.0 Fraud
  - 76.9 Drug offenses
  - 73.6 Public order offense
  - 60.1 Rape
  - 51.2 Homicide

## Step 4: Determine Exclusionary Periods

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- For each crime, or category of crime, SME panel will determine, “How many conviction-free years must pass since release from prison before the applicant becomes an acceptable risk?”
- More on this step in a few minutes

6. Did the employer search for alternatives with equal validity but less adverse impact?

No

Probably Illegal

Yes

### Key Points

- Courts have generally been silent on this regarding criminal history
- Is the alternative a comparison of policies rather than a different method of selection?

# What Does Predict Recidivism?

Variable	Least Likely	Most Likely
Age	50+	Under 18
Prior recidivism	No	Yes
Years since release	5+	< 1
Time in prison	5+ years	1 year
Type of crime	Violent	Property
Education	High School	< 9 <sup>th</sup> grade
Gender	Female	Male
Race	White	Black

7. Was employer's criteria for the length of time since conviction or release reasonable?

No

Probably Illegal

Yes

#### Key Points

- Based on seriousness of crime
- The recidivism literature has some interesting findings

# Determining a “Reasonable” Time Since Conviction or Release



- Durose, Cooper, & Snyder (2014)
  - Studied 404,638 state prisoners released in 2005 in 30 states
  - 76.6% of ex-cons are arrested within 5 years of release
  - 67.8% were arrested within 3 years of release
  - Property crimes have the highest recidivism rates
  - Violent crimes have the lowest recidivism rates
- Hazard Rate
  - Probability, over, time, that a person who has stayed clean will be arrested
- Redemption
  - The point at which a person with a criminal record has the same probability of offending as a person without a criminal record



# What is a “Reasonable” Exclusionary Period?

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- Not much guidance available
- Should certain crimes for certain jobs have a life-long exclusion?
- Based on Time since Conviction or Time since Release?
- Recidivism research
  - Redemption seems to occur by 7 or 8 years
  - Depends on the type of crime and age at which the crime was committed
- Professional judgment
  - Court decisions
  - Federal law
  - State background check laws
  - State expungement Laws

- S.A.F.E. Mortgage Licensing Act (2008)
  - Licensed mortgage loan originators
  - No felony conviction in past 7 years
  - A person convicted of a felony involving fraud, dishonesty, breach of trust or money laundering can NEVER be licensed
- Commercial drivers applying to the TSA for a hazardous materials endorsement
  - Lifetime ban if ever convicted of any of 19 listed crimes

- Consideration of Any Conviction
  - Hawaii (10 years)
  - Washington (10 years)
- Consideration of Misdemeanor Convictions
  - Kentucky (5 years)
  - Massachusetts (5 years)
- Consideration of Minor Marijuana Convictions
  - California (2 years)
  - Ohio (cannot be considered)

- No state allowed expunging violent felonies or sex crimes
- For nonviolent felonies, waiting periods of 10 years or “never” were the most common
- For misdemeanors, 3 and 5 years were the most common waiting periods

Type of Crime	Lawyers/HR Managers	State Supreme Court Justices
<b>Violent Crime</b>		
More severe/related to job	> 10 years	Never hire
Less severe, related to job	4-7 years	5 years
More severe, not related	2 years	5 years
Less severe, not related	No waiting	No waiting
<b>Property Crime</b>		
More severe/related to job	7-10 years	Never hire
Less severe, related to job	4-7 years	1 year
More severe, not related	No waiting	5 years
Less severe, not related	No waiting	No waiting
<b>Moral Crime</b>		
More severe/related to job	No waiting	Never hire
Less severe, related to job	No waiting	1 year
More severe, not related	No waiting	10 years
Less severe, not related	No waiting	No waiting

# When did 432 released murders kill again?

Years Since Parole	N	%	Cumulative %
0	94	21.76	21.76
1	84	19.44	41.20
2	55	12.73	53.94
3	36	8.33	62.27
4	25	5.79	68.06
5	21	4.86	72.92
6	18	4.17	77.08
7	18	4.17	81.25
8	13	3.01	84.26
9	9	2.08	86.34
10	10	2.31	88.66

# When did 432 released murders kill again?

Years Since Parole	N	%	Cumulative %
11	10	2.31	90.97
12	7	1.62	92.59
13	5	1.16	93.75
14	3	0.69	94.44
15	1	0.23	94.68
16	3	0.69	95.37
17	2	0.46	95.83
18	2	0.46	96.30
19	4	0.93	97.22
20	3	0.69	97.92
21	1	0.23	98.15

# When did 432 released murders kill again?

Years Since Parole	N	%	Cumulative %
22	1	0.23	98.38
23	2	0.46	98.84
24	1	0.23	99.07
25	2	0.46	99.54
26	0	0.00	99.54
27	0	0.00	99.54
28	0	0.00	99.54
29	1	0.23	99.77
30	1	0.23	100.00
31	0	0.00	100.00
32	0	0.00	100.00



## Where would you set the cutoff?

- A) 6 years – covers 77% of murders
- B) 10 years – covers 89% of murders
- C) 15 years – covers 95% of murders
- D) 30 years – covers 100% of murders



8. Was a credit reporting agency used to conduct the background check?

No

Probably Legal

Yes

9. Were applicants rejected for criminal history notified and given the opportunity to explain?

No

Possible FCRA Violation

Yes

Probably Legal

# Questions?



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