

# COMPLIANCE WITH THE EMPLOYMENT PROVISIONS OF THE FDA FOOD CODE AND THE ADA IN FOOD SERVICE ESTABLISHMENTS

by: Juan M. Casellas

The Puerto Rico Health Department, by means of the General Regulation on Environmental Health #6090, adopted the FDA Food Code ("Food Code") in Puerto Rico. The FDA Food Code regulates food service establishments with the purpose of guaranteeing food safety in the United States. Any operation that stores, prepares, packages, serves or otherwise provides food for human consumption is considered a food establishment covered by the Food Code.

Under the Food Code, employees with certain listed symptoms must be "restricted" from performing food handling duties and others who suffer certain listed diseases must be "excluded" from a food establishment. To comply with this requirement, food service employers must ask employees and employment applicants to provide information about their health regarding foodborne diseases. The Food Code's "Model Form 1-A" provides a list of questions to determine whether the employee or applicant is affected by or may cause a risk of a food borne disease.

The Food Code currently identifies four pathogens, "the Big 4", which may cause food borne disease: (1) Salmonella Typhi, (2) Shigella spp., (3) Shiga toxin-producing Escherichia coli, and (4) Hepatitis A virus. Employees or applicants for employment who are diagnosed with any of these infectious agents must be excluded from a food service establishment until the appropriate regulatory authority (Puerto Rico Health Department) approves the removal of the exclusion, and the excluded person provides medical clearance to return to work in the food service establishment. Also, employees or applicants for employment with certain symptoms of gastrointestinal illness must be restricted from performing food handling tasks until the symptoms are gone, provided that no food borne illness occurs.

Employers in the food service industry must comply with the Food Code while observing the restrictions imposed by the Americans with Disabilities Act ("ADA"). Mindful of this, the Equal Employment Opportunity Commission ("EEOC") has issued a guideline for restaurants and other food service employers on

how to comply with the ADA. This guideline explains how the ADA applies to employees in the food service industry and how employers can follow the Food Code rules in accordance with the ADA.

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The employment provisions of the ADA, applicable to employers who have 15 or more employees, prohibit discrimination against “qualified persons with disabilities.” As part of this discrimination prohibition, the ADA requires employers to provide reasonable accommodation to qualified employees or applicants with disabilities to enable them to have equal employment opportunities. Under the ADA, employers are not allowed to make inquiries regarding the health of applicants prior to a conditional employment offer, nor are they allowed to make inquiries regarding the health of employees unless they are job related.

The ADA has special provisions regarding food handling jobs under which the Centers for Disease Control and Prevention (“CDC”) must publish a list of infectious and communicable diseases that are transmitted through the handling of food. Employees or applicants covered by the ADA may be excluded or restricted from a food handling position if they have one of the diseases listed by the CDC and there is no reasonable accommodation that will not pose an undue hardship to the employer which would prevent the transmission of the disease through the handling of food.

The Big 4 pathogens addressed by the Food Code are included in the CDC list of infectious and communicable diseases. Thus, food service employers may abide by the Food Code while at the same time complying with the ADA. However, this requires that the medical inquiries and reasonable accommodation provisions of the ADA be met.

The ADA allows employers in the food service industry to ask questions about the health of applicants provided that such questions: (1) are job related, (2) are made to all applicants for the same

job category and (3) are made after the applicant has been given a conditional offer of employment. Such inquiries must be made in the same manner to all applicants for food service positions. Employers are also allowed to require food service employees to provide medical information in accordance with

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the Food Code, as long as the request is job related and designed to protect the public health.

If an employee or applicant suffers an illness or condition which requires an employment restriction or exclusion under the Food Code, the employer must assess whether the employee or applicant is covered by the ADA. If the employee or applicant suffers from a disability, then the employer is required to provide reasonable accommodation. In the case of an applicant who is disabled by an illness listed in the Food Code Big 4, his/her job offer may only be cancelled if: (1) it is for a food handling job and (2) there is no reasonable accommodation which would eliminate the risk of transmitting the disease through food which would not be an undue hardship to the employer.

Similarly, an employer may only exclude a disabled employee from the food establishment pursuant to the provisions of the Food Code if: (1) no reasonable accommodation can eliminate the risk of transmission of the disease while allowing the employee to work in the food handling position or (2) all reasonable accommodations would pose an undue hardship on the employer; and (3) there is no vacant position which does not involve food handling duties to which the employee may be assigned.

On most occasions, the illnesses or conditions which may require an employer in the food service industry to exclude an employee from a food service establishment are temporary and do not cause the employee to be disabled. However, employers should always consider the provisions of the ADA while complying with the Food Code, particularly since the ADA provisions regarding medical inquiries are applicable to all employees, regardless of whether they are disabled. ■

# EMPLOYERS: BEWARE OF THE HIDDEN DANGER BEHIND MARITAL STATUS DISCRIMINATION

by: Rafael I. Rodríguez Nevares

Puerto Rico’s current law protects married couples who work together or who might work together. Men and women working together on a daily basis may lead to feelings of affection developing between them. After all, sometimes more time is shared with your co-workers than with your own family. On the other hand, working with one’s spouse might create conflicts that otherwise might not ensue if the two did not have a personal relationship to begin with.

Act 100 of June 30, 1959, 29 L.P.R.A. Sec. 146 (the “Act”), protects employees from being discharged, laid off, or otherwise discriminated against due to marital status, among others. The Act applies to companies or businesses who employ fifty or more employees. The Act is applicable to current employees who marry as well as job candidates. The Act imposes civil as well as criminal liability on employers who violate its provisions.

In situations where hiring a married couple or a person married to an employee poses a significant conflict for the company’s operations, the employer is initially required to provide reasonable accommodation to the couple. Nevertheless, reasonable accommodation must be made in a way that will not affect the employer’s prerogative to establish reasonable rules regarding the work conditions of married couples employed in the same department, division, or physical facility.

In Belk Arce v. Martínez, 146 D.P.R. 215 (1998), the Puerto Rico Supreme Court

identified the following considerations in order to determine what exactly constitutes a reasonable accommodation as defined by the Act:

- The size of the company’s physical facilities;
- the number of employees;
- the company’s organizational chart;
- the hierarchy and management lines;
- the physical needs of the company; and
- the problems or difficulties that would arise in the workplace due to the employee’s marital status.

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Therefore, it is the employer’s duty to be prepared to prove that: 1) hiring the married couple clearly prompted a conflict that posed an adverse effect on the company’s day-to-day operations; 2) it is impossible to provide a reasonable

accommodation and 3) any reasonable accommodation offered was rejected.

The employer should be able to establish the above in order to reduce the risk of liability.

In addition, employers who incur in this type of discrimination will be subject to civil liability:

- A.(1) For a sum equal to twice the amount of damages sustained by the employee or applicant for employment on account of such action;
  - (2) or for a sum of not less than one hundred (\$100) nor more than one thousand dollars (\$1,000), at the discretion of the court, if no pecuniary damages are determined;
  - (3) or twice the amount of the damages sustained if such amount is under the sum of one hundred dollars (\$100), and
- B. he shall also be guilty of a misdemeanor, and upon conviction, shall be punished by a fine of not less than one hundred dollars (\$100) nor more than five hundred dollars (\$500), or by imprisonment in jail for a term not less than thirty (30) nor more than (90) days, or by both penalties in the discretion of the court. 29 L.P.R.A. Sec.146.

The court shall also order employers found guilty in a civil action under the provisions of the Act to reinstate the employee in his/her position and to cease and desist from further engaging in the discriminatory act. Violations under Act 100 can be extremely costly to employers. ■

# NEW PENAL CODE CREATES CRIMES THAT MAY HAVE REPERCUSSIONS IN THE WORKPLACE

by: Miguel Rivera-Arce

On May 1, 2005, the new Puerto Rico Penal Code (the “New Code”) came into effect. The New Code codifies many crimes which its predecessor did not include. Among these new offenses are a number which are relevant to an employer’s business and/or its workforce. These include:

- Money laundering
- Alteration and use of personal data found in records
- Protection to legal entities
- Illegal searches
- Illegal recording of images
- Possession and distribution of child pornography
- Attenuated aggravated aggression
- Negligent injury
- Sexual harassment
- Poisoning of water destined for public use
- Environmental contamination
- Aggravated environmental contamination
- Electronic communications, data and systems fraud

Since the introduction of the proposed New Code before the Legislature, most of the debate focused on controversies related to the guidelines for the imposition of penalties, and on controversies related to the new environmental crimes. Nonetheless, in this debate, the public discussion generally overlooked issues regarding the impact in the workplace of some of the proposed new crimes. This is specially significant since the New Code defines a “person” as including both natural persons and legal entities,

making it possible for a corporation or any other legal entity to be charged with any of the new offenses.

It is important for employers to be informed of the new crimes/offenses, specially those that may significantly impact the workplace. These are: negligent injury, sexual harassment, and illegal recording of images.

Article 124 of the New Code defines the crime of “negligent injury” as negligently causing another person bodily harm

which requires medical treatment or causes permanent damage or mutilation. This offense is a fourth degree felony. The negligent injury crime could impact the workplace because it creates a new crime for negligent actions or omissions which cause bodily harm. For example, if an employee, causes bodily harm to a fellow employee while negligently mishandling heavy machinery in the work area, he could be charged with negligent injury.

Although this crime might seem to apply only to natural persons, its definition is sufficiently vague to allow for criminal liability of legal entities as well. For example, it is plausible to interpret this crime as to allow criminal liability of a corporation that negligently creates an unsafe working environment for its employees, which consequently results in permanent bodily injuries. Therefore, although an employer might be immune to civil liability under its worker’s compensation policy for an unsafe working condition that caused bodily harm to an employee, the employer could still be criminally liable under the New Code. However, it is important to note that, to date, this interpretation has not been tested in the courts.

Article 146 of the New Code defines the “sexual harassment” crime as soliciting, within the workplace context, sexual favors in exchange for improving work conditions and/or benefits, and/or creating a pervasive hostile work environment through acts of a sexual nature. This crime covers both

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of the modalities of sexual harassment prohibited by Act No. 17 of April 22, 1988 (the quid pro quo and the hostile work environment variations), which hold the employer civilly liable for sexual harassment in the workplace. This offense is categorized as a misdemeanor and, if convicted, the harasser could spend up to six months in jail.

Since a legal entity cannot solicit or provoke sexual behavior, it cannot be charged with this offense; only natural persons can be charged. However, it may still be found to be civilly liable for the actions of its employees under Act No. 17 and/or under federal law. Employers should consider advising their employees of the criminal implications of sexual harassment; this could be considered a powerful dissuasive to such behavior.

The “illegal recording of images” offense is of particular importance to employers since it could have a direct impact on legal entities. Article 179 of the New Code defines “illegal recording of images” as recording video images, with or without audio, for the secret surveillance of private places where persons might have a legitimate expectation of privacy, without legal authority or justification, or without a legitimate investigative purpose. Thus, if a legal entity installs a hidden surveillance system with the intent to record images of its employees, with or without sound, in areas where the employees have an expectation of privacy, the legal entity can be charged with committing this crime. This offense is categorized as a fourth degree felony.

The “illegal recording of images” crime codifies some of the guidelines established by the landmark case of Vega Rodríguez v. Telefónica de PR, 2002 TSPR 50. There, the Puerto Rico Supreme Court held that an

electronic surveillance system is not unconstitutional per se. However, the Court concluded that there are areas where an employee has a reasonable expectation of privacy and, as such, he/she should not be subject to surveillance. This new crime deals with advances in technology, as legislators try to balance an employer’s legitimate business needs with an employee’s privacy rights. Thus it is imperative to interpret Article 179 alongside the holdings of Vega.

According to Vega, an employee’s reasonable expectation of privacy is determined by analyzing whether the employee (1) has an actual subjective expectation of privacy in the place under scrutiny; and (2) whether society is objectively prepared to recognize that expectation. In other words, the question is whether the employee has a subjective expectation of privacy which is objectively reasonable.

Although, generally speaking, business premises suggest a much diminished privacy expectation (than, for example, privacy expectations at a residence), certain factors have to be considered in order to establish the subjective and objective criteria: (1) whether the work area in question was assigned for the employee’s exclusive use; (2) the extent to which others have physical or visual access to the work area; (3) the nature of the employment; (4) whether office regulations placed the employee on notice that certain areas were subject to employer intrusions. For example, open and undifferentiated work areas, such as hallways, common areas, offices with no divisions, and storage areas do not create a reasonable privacy expectation.

Furthermore, the employer has the burden of demonstrating that it has compelling reasons for the minimal invasion of the

privacy of its employees. The invasion of privacy of the employees, which undeniably results from installing any kind of electronic surveillance system, has to be outweighed by the employer’s justification for installing such a system.

As a result the creation of this new crime employers are well advised to exercise great care when considering whether to install video surveillance systems, as they could potentially face both civil liability and criminal liability. Nonetheless, it is important to note that in order to be charged with this crime there has to be an intent to capture such images and the surveillance has to be secret. Thus, for example, if a surveillance camera captures by mistake an image that includes part of an area where an expectation of privacy exists, the employer probably has a valid defense. Also, if the cameras are visible or employees are given prior notice of where the cameras were installed, then the secrecy criteria of the crime is not met, and thus, the employer should not be found to be criminally liable.

However, be advised that even if an employer is not criminally liable, it could still face civil liability for the same actions. Therefore, before installing surveillance systems, employers are well advised to create and enforce proper policies so that they are properly protected against both civil and criminal liability.

Finally, it is important to mention that the penalties against legal entities are different than those against natural persons. For legal entities they are: (1) monetary fines; (2) suspension of activities; (3) cancellation of the certificate of incorporation; (4) dissolution of the entity; (5) suspension or revocation of licenses, permits or authorizations; (6) restitution; and (7) probation. ■

# ARE YOUR HEALTH PLANS ADMINISTERED IN ACCORDANCE WITH THE FINAL HIPAA PORTABILITY REGULATIONS?

by: Elaine Maldonado Matías

On December 30, 2004, after approximately seven years of the enactment of the Health Insurance Portability and Accountability Act, commonly known as "HIPAA", the Departments of Health and Human Services, Labor and Treasury, the three agencies responsible for enforcing rules pursuant to the statutes, issued their final regulations on portability requirements (the "final regulations"). Thus, the interim rules issued back in 1997 were finalized. The final regulations are similar to the 1997 regulations. However, employer plans should be updated if they are not already in compliance with them.

The final regulations became effective for group health plans and insurers for plan years beginning on or after July 1, 2005. This article intends to provide a brief overview on the regulations that impact most employers that sponsor group health plans.

One of HIPAA's main objectives is to provide health coverage portability rights to employees that change jobs. To achieve this, the final regulations impose restrictions on group health plan preexisting condition limitations that last more than twelve months from the enrollment date (18 months for late enrollees), create special enrollment rights for employees and their dependents and require notification of certificates of

creditable coverage to employees upon termination of coverage.

As plan sponsors, employers should review the provisions of their group health plans in order to determine if there are any preexisting condition limitations included in the plan. Any such condition exclusions must comply with all limitations set out in HIPAA or be eliminated from the plan. For example, group health plans can only exclude conditions treated within six months preceding the enrollment date. Furthermore, this period must be reduced by any prior creditable coverage under a medical plan.

The final regulations clarify that there are exclusions that may be hidden within the group health plan. These may include excluding a congenital heart condition where the plan provides benefits for heart conditions that are not congenital; or a lifetime limit on coverage for an individual diagnosed with a condition before the effective date of coverage under the plan.

HIPAA portability rules also require group health plans to allow individuals to enroll in a plan without having to wait for a late or open enrollment period. These so called special enrollment rights are triggered under the following two situations: when an

individual who previously declined coverage with his/her employer loses coverage under another plan; or when an individual becomes a dependent of an employee through marriage, birth or adoption. Plan sponsors need to make sure that their health plan allows special enrollment under these circumstances and that the language included in their summary plan descriptions (known as "SPD") is consistent with the final regulations.

The final regulations clarify some of the situations where special enrollment rights need to be provided. Among the clarifications made, employers should be aware that special enrollment rights need to be provided when an employer terminates its contributions to the spouse's plan; for example, an employee and spouse who initially did not have coverage and declined the same, and in a subsequent enrollment period declined coverage because of their coverage under the spouse's employer's plan, have special enrollment rights upon the loss of the spouse's coverage.

Furthermore, certain group health plans do not allow retirees to add dependents. However, employers should bear in mind that retirees qualify for the protections under HIPAA if they are participants in a plan that covers at least two active employees. Thus, if a retiree

group health plan is part of an active employees' plan, special enrollment rights have to be offered to dependents of retirees as well.

The HIPAA final regulations restate the plan's duty to provide special enrollment notices to all employees, not only to those in the plan. The final portability regulations contain model language for this notice, which describes the special enrollment rights at or before the time an employee is initially offered the opportunity to enroll in the group health plan.

As to the certificates of creditable coverage, the final regulations contain most of the same provisions included in

the interim rules regarding the duty to provide these certificates to individuals upon termination of coverage. However, among other changes, the final regulations include a new model certificate of creditable coverage under HIPAA. Use of this new certificate form insures that the employer is in compliance with HIPAA requirements. The model certificate is similar to the one provided in the 1997 interim rules, except for an educational statement of individuals' HIPAA portability rights. However, use of the prior model notice will no longer be deemed to be in good faith compliance. The final rules also require that plans provide written procedures for individuals to request and receive certificates of creditable coverage.

In summary, employers that sponsor group health plans need to review and amend their group health plans, SPDs, HIPAA procedures, policies and notices to ensure compliance with the final regulations no later than the first day of the first plan year beginning on or after July 1, 2005. Furthermore, employers should verify that their insurers and/or third party administrators are in compliance with the final regulations. While third party administrators, service providers and consultants most likely provide valuable assistance in these matters, the employers, as plan sponsors and/or administrators of group health plans, are ultimately liable for compliance with the final regulations. ■

## DEPARTMENT NEWS *by: María Antongiorgi*

### New Attorneys

- Chloé S. Georas obtained her Bachelors Degree in Economics, Magna Cum Laude, from the University of Puerto Rico, a Masters Degree in Art History at SUNY, Binghamton, and a Juris Doctor from New York University School of Law. She has taught at the University of Puerto Rico and is a Ph.D. candidate in Art History at SUNY, Binghamton. She joined McConnell Valdés Labor and Employment Law Department in 2004.
- Rafael I. Rodríguez Nevarés obtained his Bachelors Degree, Magna Cum Laude, in Business Administration with a major in Human Resource Management from the University of Puerto Rico, and a Juris Doctor, Cum Laude, from the Inter American University of Puerto Rico School of Law. He joined the firm's Labor and Employment Law Department in 2004.
- Roberto Edwin Soto Vega obtained his Bachelors Degree in Business Administration with a major in Accounting from the University of Puerto Rico, a Juris Doctor, Magna Cum Laude, from the Inter American University of Puerto Rico School of Law, and a Masters in Law Degree from Georgetown University Law Center specializing in Labor and Employment Law. He joined McConnell Valdés Labor and Employment Law Department recently.
- Maralyssa Alvarez Sánchez obtained her Bachelor's Degree in Business Administration from the University of Notre Dame, and her Juris Doctor, Cum Laude, from the University of Puerto Rico School of Law. She participated in McConnell Valdés Summer Associate Program in 2003, and 2004 and joined the firm's Labor and Employment Law Department just recently.
- Jessica A. Figueroa Arce obtained her Bachelors Degree in Arts, Cum Laude, from the University of Puerto Rico, and her Juris Doctor from the University of Puerto Rico School of Law. She joined McConnell Valdés Labor and Employment Law Department just recently. ■

## The Labor and Employment Department

	Telephone	Fax	E-mail address
Maralyssa Alvarez Sánchez	(787) 250-5682	(787) 759-2780	max@mcvpr.com
Jorge Antongiorgi	(787) 250-5659	(787) 759-2740	jab@mcvpr.com
María Antongiorgi	(787) 250-2624	(787) 759-2741	maj@mcvpr.com
José I. Ayala	(787) 250-5617	(787) 759-2752	ja@mcvpr.com
Juan M. Casellas	(787) 250-5680	(787) 759-2743	jmc@mcvpr.com
Francisco Chévere	(787) 250-5615	(787) 759-2744	fc@mcvpr.com
Maggie Correa Avilés	(787) 250-5621	(787) 759-2745	mc@mcvpr.com
Iraida Diez	(787) 250-5817	(787) 759-2746	id@mcvpr.com
Jessica Figueroa Arce	(787) 250-2633	(787) 759-2786	jafa@mcvpr.com
Agustín Fortuño-Fas	(787) 250-5631	(787) 759-2748	aff@mcvpr.com
Chloé S. Georas	(787) 250-5643	(787) 759-2707	cs@mcvpr.com
Alfredo M. Hopgood-Jovet	(787) 250-5689	(787) 759-2750	ah@mcvpr.com
Aníbal Irizarry	(787) 250-5646	(787) 759-2751	ai@mcvpr.com
Rica López de Alós	(787) 250-2632	(787) 759-2753	rla@mcvpr.com
Elaine Maldonado Matías	(787) 250-5670	(787) 759-2754	emm@mcvpr.com
Patricia M. Márvez	(787) 250-2636	(787) 759-2765	pm@mcvpr.com
Anita Montaner	(787) 250-5652	(787) 759-2756	ams@mcvpr.com
Karen Morales	(787) 250-3607	(787) 759-2757	kmr@mcvpr.com
Sandra L. Negrón Monge	(787) 250-2638	(787) 759-2759	sln@mcvpr.com
James D. Noël III	(787) 250-5673	(787) 759-2760	jdn@mcvpr.com
José A.B. Nolla	(787) 250-2613	(787) 759-2761	jan@mcvpr.com
Luis Palou Balsa	(787) 250-5671	(787) 759-2762	lpb@mcvpr.com
Miguel Palou Sabater	(787) 250-5686	(787) 759-2763	mpe@mcvpr.com
Miguel A. Rivera-Arce	(787) 250-5634	(787) 759-2717	mar@mcvpr.com
Javier Rivera Carbone	(787) 250-5619	(787) 759-2767	jrc@mcvpr.com
Rafael I. Rodríguez Nevaes	(787) 250-5610	(787) 759-2727	rr@mcvpr.com
Juan Felipe Santos	(787) 250-5627	(787) 759-2795	jfs@mcvpr.com
Roberto E. Soto Vega	(787) 250-2634	(787) 474-9206	rs@mcvpr.com
Radamés (Rudy) A. Torruella	(787) 250-5679	(787) 759-2769	rat@mcvpr.com
Francisco A. Vargas López	(787) 250-2639	(787) 759-2773	fv@mcvpr.com

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Contributing Editors: Walter G. McConnell, Radamés (Rudy) A. Torruella and Francisco Chévere.

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270 Muñoz Rivera Avenue  
Hato Rey, Puerto Rico 00918  
PO Box 364225  
San Juan, Puerto Rico 00936-4225



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