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Rounding Third But Not Home Yet: Seventh Circuit Puts the Brakes on EEOC’s Push to Expand Title VII to Encompass Sexual Orientation Discrimination
By: David J. Oberly

*Rounding Third* examines the Seventh Circuit’s holding in *Hively v. Ivey Tech Community College*, 2016 WL 4039703 (7th Cir. July 28, 2016) and explores the practical effect of Title VII’s protections not including sexual orientation discrimination.

Marketing Tidbits from Top ABA Litigators
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*Marketing Tidbits* provides valuable marketing advice from the most experienced litigators.

Broadening Jury Pools and Protecting Against Implicit Bias
By: Stephen Saltzburg

*Broadening Jury Pools* explains recent changes to Principles 2 and 6 of the ABA Principles for Juries and Jury Trials and their intended effect on implicit bias.

Section 1557 of the ACA: A Blank Slate for Civil Rights in Healthcare
By: Drew Stevens

In addition to “the future of healthcare discrimination litigation,” “the legal side of health equity,” and “a sleeping giant,” Section 1557 of the ACA can be described as “A Blank Slate.”

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Rounding Third But Not Home Yet: Seventh Circuit Puts the Brakes on EEOC’s Push to Expand Title VII to Encompass Sexual Orientation Discrimination

By: David J. Oberly

I. WHY IT MATTERS

Same-sex couples now enjoy the right to marry, but sexual minorities still do not have the right to be free from discrimination in the workplace under federal law. In the Hively v. Ivy Tech Community College decision, 830 F.3d 698 (7th Cir. 2016), the United States Court of Appeals for the Seventh Circuit was afforded the first opportunity for a federal circuit court to adopt the position recently espoused by the United States Equal Employment Opportunity Commission (“EEOC”) that discrimination based on sexual orientation necessarily involves a form of sex discrimination prohibited under Title VII of the Civil Rights Act of 1964. The court declined to do so, holding that Title VII's protections did not extend to sexual orientation discrimination. The decision is noteworthy as the Seventh Circuit effectively pumped the brakes on the EEOC's vigorous quest to expand the protections of Title VII to encompass sexual orientation. In doing so, however, the Hively court also authored a stinging expose of the current state of the law on sexual orientation discrimination, setting the stage for our nation’s highest Court or Congress to reverse established precedent that for years has kept this particular form of discrimination beyond the reach of Title VII.

II. ANALYSIS OF THE SEVENTH CIRCUIT DECISION

Jennifer Hively, a part-time adjunct professor at Ivy Tech Community College (“Ivy Tech”), filed a charge of discrimination with the EEOC claiming that she had been discriminated against as a result of being denied full-time employment and promotions based on her sexual orientation in violation of Title VII. In response, Ivy Tech argued that Title VII did not apply to claims of sexual orientation discrimination, and, therefore, Hively had made a claim for which there was no legal remedy. The district court agreed with the college, and granted Ivy Tech’s motion to dismiss. Hively appealed.

On appeal, the Seventh Circuit held that a claim for sexual orientation discrimination was beyond the scope of Title VII, reasoning that Title VII’s prohibition on discrimination based on “sex” extends only to discrimination based on a person’s gender, and not a person’s sexual orientation. The court's holding was based on two principal considerations. First, the court concluded that the phrase in Title VII prohibiting discrimination based on "sex," in its plain meaning, implied that it is unlawful to discriminate against women because they are women and against men because they are men. Second, the court also considered and evaluated the legislative history of Title VII, and Congress’s course of conduct following its implementation of the federal anti-discrimination statute. The court concluded that based on the statute’s legislative history, Congress held a "narrow" view of sex when it passed Title VII that encompassed only the "traditional notion of sex," but not discrimination on the basis of sexual orientation.

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Id. at *5. Moreover, the court also reasoned that because Congress had repeatedly chosen to reject legislation that would have broadened Title VII to encompass sexual orientation as a protected class on multiple occasions, the absence of sexual orientation from Title VII was intentional. Combined, the court concluded that Title VII provides no protection from nor redress for discrimination on the basis of sexual orientation.

Despite ultimately declining to add sexual orientation to the umbrella of protection afforded by Title VII, the court spent the strong majority of its opinion highlighting the glaring flaws in the current state of the law that “values the wearing of pants and earnings over marriage.” Id. at *46. In doing so, the Seventh Circuit highlighted the “paradoxical legal landscape” that currently exists as a result of courts recognizing discrimination based on gender stereotyping as a cognizable form of discrimination under Title VII, while at the same time rejecting claims of discrimination based on sexual orientation. The Seventh Circuit found this to be a particularly troublesome line of reasoning that results in the “absurd conclusion” that the law protects effeminate men from employment discrimination, but only if they are believed to be heterosexuals. Id. at *24.

In addition, the Seventh Circuit laid the groundwork for addressing the scope of protection afforded to sexual minorities in the workplace moving forward. After observing that “recent legal developments and changing workplace norms require a fresh look at the issue of sexual orientation discrimination under Title VII,” the court opined that there was no rational reason to entertain sex discrimination claims for those who defy gender norms by looking or acting stereotypically gay or lesbian (even if they are not), but not for those who are openly gay but otherwise comply with gender norms. Id. at *14. The Seventh Circuit also noted that the courts would not necessarily need to expand the definition of “sex” discrimination beyond the present narrow understanding of “sex” as applying only to a person’s gender to conclude that lesbian, gay, and bisexual employees who are discriminated against for their sexual conduct or their perceived sexual conduct have been discriminated against on the basis of sex. The court concluded by inviting the Supreme Court and Congress to consider extending Title VII’s protections to include sexual orientation as a protected class.

Ultimately, however, the Seventh Circuit held that while “the writing is on the wall” is that our society cannot continue to condone a legal structure that allows sexual orientation discrimination in the workplace, because the writing is absent from any Supreme Court opinion or the language of Title VII, the court was compelled to find that sexual orientation discrimination is not covered under Title VII. Id. at *55.

III. CONCLUSION

The issue of discrimination based on sexual orientation in the workplace remains in a state of flux at this time. The *Hively* decision constitutes a significant setback for the EEOC and the LGBT community in the crusade to expand Title VII’s protections to encompass sexual orientation discrimination. While the “writing is on the wall” in terms of the essential need to extend LGBT protections against discrimination and harassment to the workplace, until that writing comes in the form of a Supreme Court opinion or Congressional legislation, LGBT employees lack affirmative protections against discrimination in the employment setting in those regions of the country where sexual orientation discrimination is not barred by state or local law. Id.

However, though the courts continue to refuse to recognize sexual orientation bias as a cognizable form of discrimination under federal law, a host of other factors suggest that it is only a matter of time before the LGBT community is afforded workplace protections under Title VII. Many states and
municipalities have implemented their own statutory protections against sexual orientation discrimination. Moreover, the EEOC made it crystal clear that eradicating discrimination against gay, lesbian, bisexual, and transgender workers under Title VII’s sex discrimination protections is one of its national priorities, as identified by the EEOC’s Strategic Enforcement Plan. Perhaps most importantly, the cultural, political, and social landscape of the country has recently trended significantly in the direction of expanding legal rights to members of the LGBT community, placing significant public pressure on both the judicial system and politicians to extend anti-discrimination protections to LGBT workers under federal law.

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Marketing Tidbits from Top ABA Litigators

By: C. Pierce Campbell

C. Pierce Campbell is a commercial and probate litigator at Turner Padget in South Carolina, where he chairs the firm’s Business Litigation Practice Group.

1a. What has been the most successful marketing activity you have done in your practice?

Being involved in organizations in my community and my profession.

1b. What kinds of rewards has it garnered?

Organizations offer people the chance to get to know you. More importantly, it gives you the chance to show your talents to others. Always be sure you give it your all once you commit. Failing to meet obligations within an organization has the opposite effect.

2. What is the best/most effective piece of business development/marketing advice you have received?

When marketing to clients or potential clients, always try to think about how you can offer them value. Sometimes this takes the form of free legal advice or CLEs. Sometimes it is insightful industry information. And sometimes, it is as simple as bringing along others. A mixed group of attorneys, bankers, accountants, brokers, or people in other professions others often provides everyone with something they are looking for.

3. What tricks have you used to make sure you have time for marketing/business development?

Make it a part of everything you do. When you or your firm is buying a product or service, consider your clients or potential clients first. If you find you have time for an unexpected lunch, think about including a client or referral source. When you sponsor a luncheon or golf tournament, always invite a client or potential client to attend with you.

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4. What groups have you found to be the most effective in generating business and why?

The most important thing is to select an organization that you enjoy. If you don’t like the group, you won’t give it your all. This will be obvious. If you don’t like other lawyers all that much, don’t join a lawyers’ group. If you don’t like doing philanthropy, don’t join the board of your local charities. Everyone is different. Do what you like!

Broadening Jury Pools and Protecting Against Implicit Bias

By: Stephen Saltzburg

At the House of Delegates meeting in San Francisco on August 9, 2016, the House adopted without opposition Resolution 116 which amended two of the ABA Principles for Juries and Jury Trials. The first amendment added several categories of individuals whose eligibility for jury service should not be denied or limited as a result of discrimination. As amended Principle 2(B) (with the additions underlined) reads:

2(B) Eligibility for jury service should not be denied or limited on the basis of race, national origin, gender, age, religious belief, income, occupation, disability, marital status, sexual orientation, gender identity, gender expression or any other factor that discriminates against a cognizable group in the jurisdiction other than those set forth in A. above.

The second amendment added a new subsection (C) to Principle 6 and reads:

The court should:

1. Instruct the jury on implicit bias and how such bias may impact the decision making process without the juror being aware of it; and

2. Encourage the jurors to resist making decisions based on personal likes or dislikes or gut feelings that may be based on attitudes toward race, national origin, gender, age, religious belief, income, occupation, disability, marital status, sexual orientation, gender identity, or gender expression.

Principle 2 seeks to assure that the jury pool and individual juries are representative of the communities they serve. The American jury is recognized as a fundamental aspect of our democratic government and is enshrined in three different places in our Constitution: in Article III, Section 2; in the Sixth Amendment; and in the Seventh Amendment. State constitutions also provide substantial rights to trial by jury.

When the United States Constitution and those of most states were adopted, jury pools and individual juries did not include representatives of all cognizable groups. Discrimination against minorities and women was common. Over time, decisions of the United States Supreme Court and state courts prohibited some forms of discrimination, but the Principles go far beyond the minimum constitutional protections that have been judicially recognized in the belief that the broader the participation of citizens on juries, the greater will be the public trust and confidence in the decisions made by American juries and the judgments of our courts.

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The addition of marital status, gender identity, and gender expression to the list of factors that should be deemed irrelevant to the right of individuals to serve on juries reflects that growing recognition that discrimination against individuals based upon factors that have nothing to do with their fairness, judgment, and intellect is wrong. Principle 2 is intended to be as protective as possible and send a message that any form of discrimination should be prohibited when juries are summoned and selected. The addition of three more personal characteristics to the list of those that should be off limits in jury selection is a continuation of the American Bar Association’s history of battling bias wherever it adversely affects the rights and responsibilities of individuals, with particular emphasis on assuring equal justice in our courts.

Principle 6(C) identifies implicit bias as a genuine problem with which courts, as well as other governmental actors, must deal. It does two things. First, it asks trial judges as part of their introductory jury instructions to alert jurors to the reality that many people, including jurors, have attitudes or beliefs of which they might not be aware that could cause them to unfairly reward or penalize litigants or credit or discredit the testimony of witnesses. Second, the Principle asks trial judges to identify for jurors the kinds of litigant or witness characteristics that could cause a juror not to be impartial and to encourage the jurors to resist making decisions based on personal likes, dislikes, or gut feelings toward these characteristics. The factors that are specifically identified are race, national origin, gender, age, religious belief, income, occupation, disability, marital status, sexual orientation, gender identity, or gender expression (the same factors identified in Principle 2). Principle 6(C) assumes that there is a real possibility that when jurors are asked to look inward evaluate whether they are deciding a case on the basis of evidence or prejudice, they will make an effort to focus on evidence and decline to make judgments about individuals simply on the basis of their group identity.

The ABA has focused on implicit bias in a number of important ways in recent years. The focus is consistent with ABA Goal III–Eliminating Bias and Enhancing Diversity. Immediate Past President Paulette Brown obtained approval from the Board of Governors to create the ABA Diversity & Inclusion 360 Commission, which is charged with taking a comprehensive “360 degrees” look at the state of diversity and inclusion in the legal profession and producing sustainable action plans that will significantly move the needle forward. One of the Commission’s four working groups is on implicit bias. The 360 Commission, joined by the Commission on the American Jury, championed the amendments to the Principles on implicit bias adopted at the 2016 ABA Annual meeting.

Stephen A. Saltzburg has taught at The George Washington University Law School since 1990. Professor Saltzburg is the author of numerous books and articles on criminal law and procedure, evidence, litigation and trial advocacy. From 1990-2004, he was the Howrey Professor of Trial Advocacy, Litigation and Professional Responsibility.

Section 1557 of the ACA: A Blank Slate for Civil Rights in Healthcare

By: Drew Stevens

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In earlier articles, I have called Section 1557 “the future of healthcare discrimination litigation,”1 the “legal side of health equity,”2 and a “sleeping giant.”3 In this article, I would like to add “blank slate.”

Section 1557 of the ACA

Section 1557 of the Affordable Care Act (“ACA”) is its nondiscrimination provision and the new civil rights paradigm for the healthcare industry.4 Indeed, Section 1557 is the first federal civil rights law ever to focus exclusively on healthcare nondiscrimination—and the first to prohibit discrimination on the basis of sex in healthcare in addition to prohibiting discrimination on the basis of race, color, national origin, age, and disability. Although it’s flown under the radar until now, Section 1557 is certain to have a significant and long-lasting impact on the healthcare industry for years to come.

For example, the most immediate impact of Section 1557 is the final regulation issued by United States Department of Health & Human Services (“HHS”) under the provision, which went partially into effect on July 18, 2016. Under this final rule, covered healthcare providers (any healthcare provider that accepts federal financial assistance from HHS, such as Medicare or Medicaid funds) must take immediate action to comply with the rule’s requirements.

For example, if a covered healthcare provider has 15 or more employees, that provider must:

1) designate an employee responsible for coordinating compliance with Section 1557 and the final rule;

2) adopt a grievance procedure to promptly and equitably resolve complaints of discrimination; and

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4 The text of Section 1557 itself is quite opaque, but reads in relevant part:

An individual shall not, on the ground prohibited under title VI of the Civil Rights Act of 1964, title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, or section 504 of the Rehabilitation Act of 1973, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any health program or activity, any part of which is receiving Federal financial assistance, including credits, subsidies, or contracts of insurance, or under any program or activity that is administered by an Executive Agency or any entity established under this title (or amendments). The enforcement mechanisms provided for and available under such title VI, title IX, section 504, or such Age Discrimination Act shall apply for purposes of violations of this subsection.


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3) post nondiscrimination notices, which must include language assistance “taglines” translated into the top 15 languages spoken on a State-wide basis.\(^5\)

These nondiscrimination notices must be posted conspicuously in public spaces, on a provider’s website, and in all “significant communications or publications.”\(^6\) For significant communications or publications that are “small sized,” a covered provider must post a smaller nondiscrimination statement with two taglines.\(^7\) Covered providers have until October 16, 2016 to post the notices and taglines.\(^8\)

In addition, HHS adopted several significant interpretations of Section 1557 that increase a healthcare provider’s exposure to discrimination litigation. For example, HHS interpreted Section 1557’s prohibition of discrimination on the basis of sex to extend to discrimination on the basis of “pregnancy, false pregnancy, termination of pregnancy, or recovery therefrom, childbirth or related medical conditions, sex stereotyping, and gender identity.”\(^9\) Although HHS declined to interpret “sex” as protecting against discrimination on the basis of sexual orientation, HHS will evaluate complaints of discrimination on the basis of sexual orientation to determine whether such complaints are actionable under Section 1557.\(^10\)

HHS has also interpreted Section 1557 as providing for a private cause of action for private plaintiffs and as providing for compensatory damages to aggrieved parties.\(^11\) Perhaps most impactful, however, is HHS’s express interpretation of Section 1557 as providing for a private cause of action for a disparate impact claim of discrimination in healthcare.\(^12\) Under this interpretation, any private plaintiff (e.g., a single patient, a class of patients, or a civil rights group employing an impact litigation strategy) may challenge a facially neutral policy or practice that disproportionately impacts any protected class under Section 1557.\(^13\)

Because the Supreme Court of the United States had ruled that no such cause of action existed under Title VI of the Civil Rights Act\(^14\)—only with the passage of Section 1557 may a private plaintiff

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\(^6\) Id. at 31469.

\(^7\) Id.

\(^8\) Id.

\(^9\) Nondiscrimination in Health Programs and Activities, 80 Fed. Reg. 54172, 54176 (“The term ‘on the basis of sex’ is defined to include, but is not limited to... sex stereotyping, or gender identity.”)

\(^10\) Id. at 31390.

\(^11\) Id. at § 92.301.

\(^12\) Id. at 31440 (“OCR interprets Section 1557 as authorizing a private right of action for claims of disparate impact discrimination on the basis of any of the criteria enumerated in the legislation.”).


bring a disparate impact cause of action for unintentional discrimination on the basis of race, color, or national origin.

Section 1557 as a Blank Slate for Civil Rights in Healthcare

These interpretations—and the very text and structure of Section 1557—mean that Section 1557 is a blank slate for civil rights in healthcare. On August 23, 2016, several faith-based providers and states filed suit against HHS challenging HHS’s interpretation of “sex” as extending to discrimination on the basis of gender identity. *Texas v. Burwell*, 7:16-cv-00108-O (N.D. Tex. Aug. 23, 2016). In this suit, the plaintiffs argue: 1) that HHS exceeded its rule-making authority by expanding the reach of the term “sex” from its meaning in Title IX; 2) that HHS unconstitutionally infringed on the states’ sovereign authority to regulate the medical profession; and 3) that the final rule violates the Religious Freedom Restoration Act. Undoubtedly, the ultimate outcome of this case will significantly impact the reach of Section 1557 and influence how the federal courts interpret it moving forward.

In addition, because Section 1557 creates a private cause of action for a disparate impact claim of discrimination on the basis of race, color, and national origin (where none existed before), a healthcare provider’s exposure to discrimination litigation has expanded significantly. For example, under this interpretation, a private plaintiff could challenge: 1) the closure and relocation of a hospital from the inner city to the suburbs; 2) any healthcare practice or policy that limits a provider’s exposure to low-income or Medicaid patients; or 3) any health system’s failure to meet its meaningful access obligation for patients with limited-English proficiency on a system-wide basis.

Section 1557 also presents numerous other legal questions that must be resolved by courts moving forward. For example, HHS has interpreted Section 1557 as creating a claim for a “hostile healthcare environment,” which will require fleshing out by the courts. There is also an argument, noted

15 This, of course, is according to HHS’s interpretation in the final rule. Because it is so significant, it is almost certain to be challenged in the courts. See, e.g., Sarah G. Steege, *Finding a Cure in the Courts: A Private Right of Action for Disparate Impact in Health Care*, 16 Mich. J. Race & L. 439 (2011).


18 A provider’s meaningful access obligations follow from Title VI’s prohibition of discrimination on the basis of national origin—which now, under Section 1557, may be enforced under a disparate impact theory by private plaintiffs. See, e.g., Joel Tietelbaum, et al., *Translating Rights into Access: Language Access and the Affordable Care Act*, 38 Am. J. L. & Med. 348 (2012).

19 *Nondiscrimination in Health Programs and Activities* at 31405 (“Consistent with the well-established interpretation of existing civil rights laws, OCR interprets the final rule to prohibit all forms of unlawful harassment based on a protected characteristic.”).

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by HHS in the final rule, that prevailing parties under Section 1557 should be entitled to an award of reasonable attorneys’ fees.20

Most significantly, however, is the fact that courts don’t know what standard applies to claims brought under Section 1557. Indeed, although the first two courts to address Section 1557 agreed that Section 1557 creates a private right of action for plaintiffs, they expressly disagreed on the appropriate legal standard applicable to such claims. *Southeastern Pennsylvania Transportation Authority v. Gilead Sciences, Inc.*, 102 F. Supp. 3d 688 (E.D. Pa. 2015); *Rumble v. Fairview Health Services*, 2015 WL 1197415 (D. Minn. March 16, 2015). On the one hand, the *Gilead* court held that Congress must have intended to “import the various different standards and burdens of proof into a Section 1557 claim, depending upon the protected class at issue.” *Gilead Scis., Inc.*, 102 F. Supp. 3d at 698. On the other hand, the *Rumble* court held that Congress intended to “create a new, health-specific, anti-discrimination cause of action that is subject to a singular standard, regardless of a plaintiff’s protected class status.” 2015 WL 1197415 at *12.

Ultimately, the appellate courts—and perhaps the Supreme Court—will be called upon to settle this dispute and others. In other words, Section 1557 is a blank slate.

*Drew Stevens is a litigation associate at Arnall Golden Gregory LLP and a member of the firm’s Long-Term Care Industry Team. Drew is a leading author and commentator on Section 1557 and its requirements, and regularly advises healthcare providers on how to comply with the final rule and minimize their risk under the ACA.*

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20 *Id.* at 31441 (“Nothing in Section 1557 changes the laws that otherwise would govern eligibility for attorneys’ fees, including the Civil Rights Attorney’s Fees Award Act of 1976.”). This argument is syllogistic and would proceed as follows: under 42 U.S.C. § 1988, a prevailing party may recover its attorney’s fees in an action to enforce Title VI of the Civil Rights Act and Title IX. Therefore, because Section 1557 adopts the enforcement mechanisms “provided for and available under” Title VI and Title IX, Section 1557 should provide for an award of attorneys’ fees as does 42 U.S.C. § 1988. This argument would thus expand the award of attorney’s fees in healthcare civil rights cases to new classes and new causes of action.
NEWS AND ANNOUNCEMENTS

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