

Top Takeaways for Investigators from the EEOC's New Harassment Guidance

By Eli Makus, Elena Paraskevas-Thadani, and Erich Knorr



Introduction

On April 29, 2024, the United States Equal Employment Opportunity Commission (EEOC) updated its Enforcement Guidance on Harassment in the Workplace for the first time in 25 years (the “New Harassment Guidance” or “Guidance”).¹ The New Harassment Guidance creates a single, unified resource that supersedes the EEOC’s previous five guidance documents. It sets forth the EEOC’s views on how the anti-harassment laws apply in the modern workplace, in light of recent legal developments and advancing technological and societal norms. This article provides a broad overview of the EEOC, the New Harassment Guidance, and how it impacts the work of impartial workplace investigators. While the EEOC and its Guidance directly applies to employers operating in the United States, it has lessons for investigators in all jurisdictions.

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What Is the EEOC and Why Does It Issue Guidance?

The EEOC is a federal agency tasked with enforcing federal employment laws that make it unlawful to discriminate against job applicants or employees because of the person’s race, color, religion, sex (including pregnancy, childbirth, or related conditions, gender identity, and sexual orientation), national origin, age (40 or older), disability, or genetic information. These laws include Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and the Age Discrimination in Employment Act (ADEA). The EEOC has the authority to investigate charges of discrimination against employers. If the EEOC concludes a violation of law occurred, it seeks to resolve the dispute either through settlement procedures with the employer or litigation.

The EEOC also seeks to prevent discrimination before it happens through education and outreach. Issuing guidance is a key element of this education and outreach function. Over the years, the EEOC has issued guidance documents on a variety of subjects that directly relate to anti-discrimination laws in the United

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Letters to the editor are welcome; email awijournal@awi.org. Nothing contained in this publication constitutes legal advice.

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President's Message

As we are nearing the end of 2024, I feel tremendously proud of the community at AWI and the many accomplishments this year. These accomplishments are thanks to the work of all the dedicated volunteers contributing in so many ways by sharing their time and subject matter expertise.

Notable achievements from the year highlight AWI's mission to promote and enhance the quality of impartial workplace investigations:

- Eleven webinars on topical issues in the field of workplace investigations
- Four live offerings of the Virtual Basics Seminar Series and the launch of the new on-demand format
- Three new interactive virtual workshops on the core investigation skills of Interviewing, Credibility, and Report Writing
- Four Training Institutes and the addition of 179 AWI Certificate Holders (results still pending from the fourth Institute)
- Fifty issues of the *AWI Weekly*, including a new advocacy column to alert membership to cases and legislation affecting workplace investigations
- Three publications of the *AWI Journal* including its first themed issue
- Three new member orientations attended by 201 new members and 100 individual welcomes to new members not designated to a local circle
- Over 100 local circle and affinity group meetings
- Exhibited at four employment and HR related conferences including New York, Florida, Washington, and California
- Co-hosted a workplace investigations conference in British Columbia, Canada
- The biggest annual conference in AWI history with 544 attendees
- Guiding Principles for the Australia and New Zealand chapters
- A sold-out workplace investigations skills seminar introducing AWI to Ireland
- A 12% increase in membership with a total of 2,785 members across 48 U.S. states and 18 countries

In addition to the highlighted achievements in 2024, AWI has taken steps to improve its organizational culture by completing Phases 1 & 2 with Tayden Impact Partners. In particular, we completed the gathering of data, assessment stage, and are in the early development of new policies, processes, and charters to increase consistency across committees and organizational transparency.

As we plan for 2025, we look forward to several exciting initiatives:

- The launch of a new user-friendly website with comprehensive information about committees, and AWI operations such as the selection processes for Board members, committee leadership, and speakers
- A new, two-day, in-person advanced training program
- The creation of an AWI scholarship program that will offer scholarships for the Training Institute, annual conference, and membership dues
- The implementation of a Culture Toolkit resource and Culture Dashboard to monitor progress on culture initiatives
- AWI's first annual conference on the East Coast in Atlanta, Georgia

I am grateful for the volunteer service of so many AWI members as we work towards fulfilling our goal to become the leading authority on workplace investigations. I am also honoured to be part of a caring community of professionals conducting workplace investigations who are passionate about improving workplaces. I hope that everyone has a restful winter holiday season and a happy New Year. ■

Committee Letter

As we reflect on 2024 and look forward to 2025, the AWI Editorial Board is more focused than ever on bringing content and resources to our members. This past year, we included articles on a variety of topics, like pay equity and secondary trauma. Going into 2025, we aim to continue to bring a variety of topics that interest, and are useful to, the ever-growing assortment of AWI members.

If you attended the recent AWI Annual Conference in San Diego, California, you may have heard our update, which remains relatively consistent throughout the years: We are always on the lookout for articles and topics that AWI members want to contribute. There are more ways to contribute to the Journal as well. For example, being a liaison for another committee and helping us source topics that appeal to your committee.

As always, please do not hesitate to reach out to us at awijournal@awi.org. We look forward to seeing all of you in 2025!

Happy Holidays and New Year,

The AWI Editorial Board ■

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States. For example, the EEOC has issued guidance on retaliation, pregnancy discrimination, race and color discrimination, reasonable accommodation and undue hardship, employee benefits, workers' compensation, and many others. A complete list of the EEOC's guidance documents can be found on its website.² The EEOC issues a number of other resources, including fact sheets and resources for small businesses. The New Harassment Guidance is a significant development in the EEOC's effort to provide education to stakeholders subject to, and responsible for, complying with federal anti-discrimination laws.

The New Harassment Guidance is a significant development in the EEOC's effort to provide education to stakeholders subject to, and responsible for, complying with federal anti-discrimination laws.

A. To Whom Does the Guidance Apply?

The Guidance interprets federal laws that apply to all employers in the United States. However, the Guidance itself is not law nor is it a regulation. The primary purpose of EEOC's Guidance is to serve as a resource. While courts may refer to EEOC guidance when it is found persuasive, it is not controlling. Further, it is important to recognize that many states have laws that are more protective than federal employment laws. Therefore, in those states, an employer is generally bound to follow the more protective state laws.

What Does the Guidance Replace?

The New Harassment Guidance consolidates and supersedes five prior guidance documents on workplace harassment, which the EEOC issued between 1987 and 1999. Specifically, the following guidance documents were suspended with the publication of the New Harassment Guidance:

- Compliance Manual Section 615: Harassment (1987),
- Policy Guidance on Current Issues of Sexual Harassment (1990),
- Policy Guidance on Employer Liability under Title VII for Sexual Favoritism (1990),
- Enforcement Guidance: Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), and
- Enforcement Guidance on *Harris v. Forklift Sys., Inc.* (1994).

While the New Harassment Guidance replaces several outdated publications, the underlying legal framework for analyzing harassment claims has not changed substantially. The EEOC has not abandoned its analytical frameworks or changed its positions. Rather, the EEOC reorganized and synthesized existing material in one place in the new Guidance and accounted for new laws, changes in interpretation, and developments in the modern workplace.

B. How Is the Guidance Structured?

At over 140 pages, with 387 footnotes and more than 75 detailed examples, the EEOC Guidance is a dense and detailed document. Understanding how the Guidance is structured makes it much easier to use as a quick reference guide for busy investigators seeking to understand how employment laws may be interpreted in specific situations.

The EEOC explains in the introduction to the Guidance that it is organized based on the three components of a harassment claim, each of which must be satisfied for harassment to be unlawful under federal EEO laws:

- **Covered Bases and Causation:** Was the harassing conduct based on the individual's legally protected characteristic under the federal EEO statutes?
- **Discrimination with Respect to a Term, Condition, or Privilege of Employment:** Did the harassing conduct constitute or result in discrimination

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- **Liability:** Is there a basis for holding the employer liable for the conduct?

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What Is Different in the New Harassment Guidance?

The Guidance includes six key updated areas of focus: harassment based on sexual orientation and gender identity, the rise of technology and remote work, childbirth and pregnancy, color, retaliation, and intersectional harassment.

A. Harassment Based on Sexual Orientation and Gender Identity

The Guidance sets forth the EEOC's position that Title VII's prohibition on sex-based harassment encompasses harassment based on a person's sexual orientation and gender identity. This includes, for example, repeated or intentional misgendering by using an employee's deadname or incorrect pronouns, denying an employee access to a bathroom or other sex-related facilities consistent with the employee's gender identity, and "outing" an employee, which is the disclosure of an individual's sexual orientation or gender identity without permission. The EEOC represents that its views are consistent with the 2020 *Bostock v. Clayton County* Supreme Court decision, holding that firing an employee merely for being gay or transgender violates Title VII.³ While the EEOC received comments that its interpretation went beyond *Bostock*, the EEOC dismissed these comments and explained it "did not attempt to [...] impose new legal obligations on employers with respect to any aspect of workplace harassment law, including gender identity discrimination."

The Guidance discusses how an employee's use of social media can contribute to a hostile work environment, even if it does not occur in a work-related context.

B. The Rise of Technology and Remote Work

The new Guidance addresses considerations arising from the rapid growth of technology and the increasing number of people working from home. The Guidance discusses how an employee's use of social media can contribute to a hostile work environment, even if it does not occur in a work-related context. For example, the Guidance describes that if an Arab American employee is the subject of ethnic epithets on a coworker's personal social media page, and the employee learns about the post directly or from other coworkers who see the comment and discuss it at work, then the social media posting can contribute to a hostile work environment, even though it "took place" outside of work. However, the EEOC clarified that when a person posts something negative on a social media account regarding a protected class, this does not necessarily automatically contribute to a hostile work environment if the posts do not target the employer or its employees.

C. Childbirth and Pregnancy

The Guidance clarifies that sex-based harassment under Title VII includes pregnancy, childbirth, and related medical conditions (such as lactation, morning sickness, and other similar conditions), contraceptives, and abortion. The EEOC gives examples in the Guidance that illustrate how before, during, and after pregnancy, a person can be harassed based on different medical conditions.

D. Color

The Guidance explains that harassment based on "color" is independently covered by Title VII. The EEOC distinguishes color from national origin or race, even though they can be related, as color includes an individual's pigmentation, complexion, skin shade, or tone. According to the EEOC, this harassment can occur by people of the same race (intraclass harassment).

E. Retaliation

The EEOC also addresses the concept of retaliatory harassment, explaining that this has a different threshold than a discriminatory hostile work environment. In particular, the EEOC states that retaliatory conduct does not need to be so severe or pervasive as to alter the terms and conditions of employment by creating a hostile work environment. Instead, the EEOC explains that retaliation may arise out of anything that might deter a reasonable person from engaging in protected activity.⁴

F. Intersectional Harassment

The Guidance addresses intersectional harassment, which is harassment based on the intersection between two or more protected characteristics. It recognizes that this type of harassment can compound the harm. The Guidance states that intersectional harassment should be analyzed under each of the protected characteristics. For example, if a woman is age 40 or older and harassed based on stereotypes about older women, this harassment is covered as both age and sex discrimination.

Even if one does not read the Guidance in its entirety, it can assist in evaluating complaints during investigations.

Why Does the Guidance Matter for Investigators?

The Guidance is an invaluable tool for analyzing discriminatory and harassing conduct. Its clear, structured format makes it easy to reference. Even if one does not read the Guidance in its entirety, it can assist in evaluating complaints during investigations. Here are five key insights from the Guidance that every investigator should consider.

The Importance of Conducting an Investigation

A fundamental takeaway is the critical role of conducting investigations. The Guidance, for the first time, expressly addresses standards by which to judge investigations. While this may seem straightforward, U.S. jurisprudence has long debated the necessity of investigations. In

California, for instance, it is well established that an investigation is a crucial step in resolving employment disputes. Failing to conduct a thorough investigation in California can even lead to additional legal claims. Many other states follow the federal standard, interpreting the Faragher/Ellerth frameworks as implicitly requiring an investigation to take advantage of an affirmative defense.⁵ In 2005, the 7th Circuit Court of Appeal emphasized that a prompt investigation is a “hallmark of a reasonable corrective action.”⁶

One fundamental takeaway is the critical role of conducting investigations. The Guidance, for the first time, expressly addresses standards by which to judge investigations.

Historically, the EEOC has stressed the importance of a “prompt, thorough, and impartial” investigation.⁷ The new Guidance reiterates this, noting that even with an adequate policy and complaint procedure, failing to carry out an effective investigation means an employer has not fulfilled its duty to exercise reasonable care. Essentially, conducting an investigation is an inherent part of implementing an effective complaint process, and it is crucial for employers seeking to defend against claims of a hostile work environment created by supervisors.

A. Process Matters: Ensure Investigations Are Prompt and Adequate

The Guidance underscores that investigations must be both “prompt” and “adequate.” While this concept is not new, having been introduced in 1999 in the Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors, the new document offers clearer details.

A “prompt” investigation is defined as one that begins “reasonably soon” after the employer has notice of possible harassment. Timeliness depends on the nature of the allegations and the reasons for any delay. The Guidance states that starting an investigation the day after receiving a complaint is clearly prompt, while waiting two months without justification is not.

An “adequate” investigation is thorough and impartial. It must be comprehensive enough to “arrive at a fair estimate of the truth” and conducted by an unbiased investigator who is outside the chain of command of the parties involved. The investigator should also be well-trained in interviewing witnesses and assessing credibility.

Knowing the standards for investigations used by the EEOC (and applicable state laws) is important to ensure that investigations are fair and equitable. This is consistent with the AWI Guiding Principles that provide for “a fair and impartial process for the complainant and respondent and to reach reasoned findings based on the information gathered.”

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B. Broad Protection under Federal EEO Laws

The Guidance serves as a roadmap for federal liability concerning discrimination and harassment based on various protected characteristics. It contains a comprehensive list of these characteristics and offers examples of how harassment might manifest for each. Although some may find these examples somewhat basic, they serve as benchmarks for understanding when conduct is related to protected characteristics.

Additionally, the Guidance clarifies different types of harassment, including intraclass harassment (where the harasser and complainant share the same protected characteristic), perception-based harassment (where harassment is based on the belief that someone has a protected characteristic), associational discrimination (harassment due to associations with individuals in

protected classes), and intersectional harassment (harassment based on overlapping protected characteristics).

C. Understanding Causation for Accurate Analysis

Analyzing causation while drafting our investigative reports often presents challenges. Causation determines whether the alleged conduct was because of the complainant’s protected characteristic. This can be straightforward if the respondent directly references the characteristic, but it is often more complex.

The Guidance offers several helpful factors for analyzing causation, such as:

- **Stereotyping:** Was the conduct based on social or cultural expectations about a particular group, regardless of whether the stereotyping was positive or negative?
- **Context:** What was the context in which the conduct occurred? The interpretation of words or actions can vary, so context is important.
- **Link between Conduct That Is Not Explicitly Connected to a Protected Class and Facially Discriminatory Conduct:** Was the conduct that is neutral on its face linked to other conduct that is facially discriminatory?
- **Timing:** Did the alleged conduct escalate after the respondent learned of the complainant’s protected status? Timing can provide important insights.
- **Comparative Evidence:** Were there differences in how individuals from various groups were treated?

These factors can assist us with framing questions, gathering evidence, and evaluating causation.

D. Aligning Policies with EEOC Guidance

Finally, the new Guidance offers an opportunity for internal investigators and human resources teams to align their policies with the latest standards. It is

The Guidance serves as a roadmap for federal liability concerning discrimination and harassment based on various protected characteristics.

important to review and update policies to ensure they meet the requirements for establishing an affirmative defense. Additionally, investigators should keep in mind the specific laws, regulations, and case law governing harassment in their jurisdiction.

By learning and integrating these insights from the Guidance, an investigator can strengthen their approach to investigating discrimination and harassment claims.

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Conclusion

The Guidance is a valuable resource for workplace investigators. While it is generally not an investigator's role to make legal findings, the Guidance provides dozens of practical, real-life examples of workplace misconduct that will help investigators evaluate how to think about workplace disputes. The Guidance helps investigators and employers understand what should be investigated and the possible implications for substantiated findings.



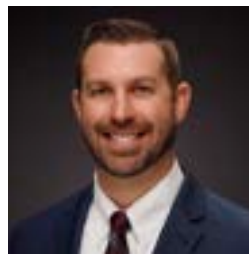
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Erich Knorr is a partner at Van Dermeyden Makus Law Corporation and he leads the Tempe, Arizona office. Erich is committed to advancing the field of workplace investigations and is a frequent speaker on workplace investigations topics and best

practices. He is an active member of the Association of Workplace Investigators (AWI) and serves on the Seminar and Webinar Committee. Erich is also a co-convenor for AWI's Phoenix Local Circle and a convenor of AWI's nationwide Public Sector Affinity Group.

Endnotes

1 See *EEOC Enforcement Guidance on Harassment in the Workplace*, <https://www.eeoc.gov/laws/guidance/enforcement-guidance-harassment-workplace>

2 See *EEOC List of Guidance Documents in response to Office of Management and Budget Final Bulletin for Agency Good Guidance Practices*, <https://www.eeoc.gov/eeoc-list-guidance-documents-response-office-management-and-budget-final-bulletin-agency-good>

3 *Bostock v. Clayton County*, 590 U.S. 644 (2020).

4 For a more detailed discussion of retaliation, see <https://www.eeoc.gov/laws/guidance/enforcement-guidance-retaliation-and-related-issues>

5 *Faragher v. City of Boca Raton*, 524 U.S. 775 (1998); *Burlington Indus., Inc. v. Ellerth*, 524 U.S. 742 (1998).

6 *Cerros v. Steel Techs., Inc.* 398 F.3d 944, 954 (7th Cir. 2005).

The Guidance helps investigators and employers understand what should be investigated and the possible implications for substantiated findings.

CASE NOTE

White v. Smule (2022) 75
CA5th 346, 290 CR3d 328

Prohibiting Employers from Using Misrepresentations about Work

By Sara Church Reese

This case involves a little-known California law prohibiting an employer from using misrepresentations about the “kind, character, or existence” of work to induce a worker to relocate for a job. (Cal. Labor Code §970) Although the law was originally enacted to protect migrant farm workers from abuses by unscrupulous employers, the statute is not restricted to farm labor or other mass hiring situations.

Background

Plaintiff, an experienced project manager, claimed that he quit his job in Washington State and moved to the San Francisco Bay Area for what was supposed to be long-term employment, only to be told five months later that his role was being eliminated.

Plaintiff said he relied on a promise of stable, long-term employment as a lead project manager, but that all defendant really intended was to experiment with plaintiff and see what immediate recommendations he would make to improve defendant’s ineffective operations. Plaintiff also alleged that defendant falsely told him that the company’s Bulgaria office would assist



The agreement expressly stated that any promises not in the letter—oral or written—were not valid or binding on the company.

in its San Francisco operations, not replace them, and that plaintiff’s role would include managing other project managers and building a functional project management team, hiring new workers to be based in San Francisco.

The defendant painted the claim as only involving false representations about the length of time plaintiff’s position would last. It noted that plaintiff signed an offer letter establishing that his employment was at-will, thus enabling his employment to end at any time and for any reason. The agreement expressly stated that any promises not in the letter—oral or written—were not valid or binding on the company.

Defendant moved for summary judgement, arguing that the integrated at-will agreement negated one of the

Although the law was originally enacted to protect migrant farm workers from abuses by unscrupulous employers, the statute is not restricted to farm labor or other mass hiring situations.

elements of a §970 claim—“justifiable reliance” on the promises said to be false. The trial court granted the motion.

Appellate Court Decision

The appellate court agreed that the at-will agreement meant plaintiff could not show justifiable reliance on promises of long-term employment. However, it did not affect plaintiff’s reliance on the *other* misrepresentation alleged—those about the kind or character of work, specifically the nature of the plaintiff’s role—as opposed to its duration.

Plaintiff put in evidence that he was told he would supervise a team, identify deficiencies, draft training

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protocols and manuals, and head a reorganization of operations. Some of his duties were transferred to Bulgaria and after he had submitted a comprehensive, multi-year plan to improve the company’s product and engineering operations, his employment was terminated. Soon after, the company terminated everyone he had worked with. Moreover, deposition testimony showed conflicting statements about the circumstances of plaintiff’s termination. Taken together, a trier of fact could reasonably conclude defendant never intended to employ plaintiff in the leadership position as represented, instead desiring nothing more from him than a

The AWI Journal contacted plaintiff’s counsel to find out what happened in the case after it was reversed and remanded for further proceedings. Counsel reported that the matter was resolved at a mediation.

consultation or improvement plan on how to enhance its operations. Accordingly, the summary judgment for the defendant was reversed.

The AWI Journal contacted plaintiff’s counsel to find out what happened in the case after it was reversed and remanded for further proceedings. Counsel reported that the matter was resolved at a mediation. He also reported that the appellate court opinion was initially not designated for publication. However, given the dearth of case law on Labor Code §970, the plaintiff requested that the court change its mind and publish the case, which request was granted. ■



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Public Law Group, LLP, where she serves public entity employers. In addition to conducting investigations, Reese advises clients on effective investigation policies and procedures, and designs and delivers training to human resources personnel on how to perform investigations. She can be reached at scr@investigations.law.



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BOOK REVIEW

Our Hidden Conversations: What Americans Really Think about Race and Identity By Michele Norris

(Simon & Schuster, 2024)

Review by Anne E. Garrett



As workplace investigators, we communicate with people from all backgrounds and life experiences. Empathy is crucial for our work, along with the ability to identify and address our own implicit biases and blind spots. This is especially important in this U.S. presidential election year, when empathy and understanding seem particularly endangered.

Michele Norris's innovative *Our Hidden Conversations: What Americans Really Think About Race and Identity* (2024) is a tool for greater empathy and understanding. Written by the respected NPR journalist, the book features personal stories, interviews, and essays from hundreds of Americans with wildly different perspectives, backgrounds, and opinions. Norris herself won a Peabody Award for her work on the Race Card Project, the project underlying *Hidden Conversations*.

“Race. Your thoughts. 6 words.
Please send.”

In *Hidden Conversations*, Norris skillfully organizes and provides context for the diverse statements she gathered using a method she calls “the race card.” “The race card”—originally, a literal postcard, and [now an online form](#)—contains a prompt: “**Race. Your thoughts. 6 words. Please send.**” (“**Anything Else?**” was later added.) Starting in 2010, Norris left postcards with these prompts wherever she traveled. The honest and intimate responses she received led Norris to take “a magnificent detour” from her successful journalist career to focus on

the extended stories, historical experiences, and social/demographic patterns behind these six-word responses.

The book challenges readers’ certainties and convictions, even for people like workplace investigators who work in this space. Norris acts as a guide and presenter of the race card responses and other material, but ultimately allows the responders to tell their own stories, often in vivid and devastating language.

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certainties and convictions, even for
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Hidden Conversation is divided into twelve chapters, each with a theme that ranges from “How Do You Define Racism?” to “America: A Freight Train of a Word.” Within the chapters, the race card responses intermingle with responders’ essays and transcriptions of Norris’s interviews with them. The print version of the book is beautifully designed with many photos and artwork appearing between responses and essays. (There is also an audio book version, read by Norris and a cast of audio narrators.)

I enjoyed *Hidden Conversations*. It
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I enjoyed *Hidden Conversations*. It is deeply engaging and thought-provoking. The race card responses themselves are by turns touching, intriguing, witty, and shocking as they describe everything from microaggressions and family secrets to lynchings. Norris does a masterful job of using the responses to delve into historic patterns and themes. A particularly effective aspect of the book is Norris's juxtaposition of sometimes jarring perspectives. For example, she places the following responses on the same page:

- "Anti-racist is a code for anti-White." (Page xxx)
- "Pro-Black doesn't mean anti-White." (Page xxx)
- "Lights flipped, pulled over, relax brother." (Page 95)
- "Hated for being a white cop." (Page 95)

The book has some limitations and may be critiqued on a few points.

The book has some limitations and may be critiqued on a few points. Because *Hidden Conversations* incorporates materials from approximately 2010 to 2023, dates on the race card responses would have provided helpful context. Some discussion of racial theory and strategies for combatting bias might have been relevant additions. And there are submissions that leave the reader wanting a longer story: "Mixed baby coming soon [,] in-laws afraid." (Page 57) But none of these issues detracts from the book's mission of educating readers through the thoughts and stories of people with dramatically different perspectives.

During this polarized time, I would recommend this book to any reader interested in different viewpoints and perspectives on race and identity. (And for busy investigators: the book lends itself to bite-sized reading. It need not be read linearly, or even in full, to expand the

During this polarized time, I would recommend this book to any reader interested in different viewpoints and perspectives on race and identity.

reader's world.) The website for the Race Card Project is also worth a look, especially for organizations that might want to use its resources for internal trainings: <https://theracecardproject.com>.

As Norris writes, "The essays have served as invitations into worlds previously unavailable to me—or perhaps to any of us—because many people who submit their stories say they've never shared them with anyone before." (Page xxxv) We investigators have all heard an interviewee say, "I've never told anyone this before," and, in a sense, many of our interviews are "hidden conversations" about deeply personal and painful experiences. Read this book to continue learning and understanding different viewpoints and experiences. ■



Anne E. Garrett is principal of the Law Office of Anne Garrett PC, a practice that exclusively focuses on neutral workplace investigations and trainings. With more than 25 years of experience as a labor and employment lawyer, she has conducted workplace investigations at worksites ranging from large public agencies and Fortune 100 companies to smaller non-profits and family-owned businesses. A past chair of the AWI Weekly, she can be reached at anne@annegarrettlaw.com.

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