



NAHO NEWS

*...benefitting hearing officials
and the individuals they serve...*

NATIONAL ASSOCIATION OF HEARING OFFICIALS

JUNE 2023

2023 NAHO Annual Professional Development Conference

This special edition of NAHO News presents the latest updates and information about the September Annual Professional Development Conference and other timely information – read on!

Our 35th Conference!

The 35th NAHO annual Conference will be held on September 10 -13, 2023, on the campus of the National Judicial College in Reno, Nevada.

From the first conference held 37 years ago, this event has grown from being the primary NAHO educational offering to the highlight of the wide range of NAHO’s continuing education for hearing officials. Only canceled twice (due to the impacts of 9/11 and the pandemic), the Conference continues to be the “must attend” experience of the year.



This is a time when NAHO members and others involved in the administrative hearing process can take time to earn up to 15 hours of MCLE credit, enjoy getting to know

other NAHO members, and bring family or friends along for some fun!



The National Judicial College and NAHO

NAHO and the NJC have a distinct relationship; using the exceptional NJC campus for our Conference is a wonderful benefit of that bond. Had it not been for the NJC, there might not be a NAHO. In the mid-1980s, the NJC and the New Hampshire Division of Human Services jointly sponsored conferences in New Hampshire for administrative hearing officials. From discussions that began at these conferences, and with the input of hearing officials across the nation, NAHO was formed in 1987; its first conference was held in 1988 at the NJC in Reno.

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The purpose of the NJC, which first opened its doors in 1963, was - and is - to instruct newly-appointed or elected judges of all kinds in the finer points of judging and provide a place for their continuing judicial development. The NJC had an idea on how best to do this, which was novel at the time - judges teaching other judges.



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2023 PROFESSIONAL DEVELOPMENT CONFERENCE From page 1.

In 1972, the NJC started offering classes for administrative hearing officials. Just as the NJC has tribal judges teaching other tribal judges and appellate judges teaching other appellate judges, the faculty teaching administrative hearing officials is comprised of knowledgeable, experienced administrative hearing officials.

Of Course, Our Courses are the Main Event

This year's Conference will be a special opportunity for NAHO to show its continuing dedication to educating hearing officials and others involved in administrative law. Situated in the NJC's exemplary facility, the Conference will provide speakers and sessions on the latest issues in administrative law, including ethics, recognizing and reducing implicit bias, best practices for conducting hearings, decision writing, basic and advanced issues in evidence, and many more valuable topics.

NAHO instructional presentations are designed for ALJs and other administrative adjudicators and hearing officers, Chief ALJs, Board or Commission Members, attorneys whose practice involves administrative law and hearings, and agency administrators and representatives who wish to expand their knowledge of the process of administrative adjudication.

NAHO's quality faculty includes law professors recognized as experts in administrative law, appellate judges, attorneys, and experienced practitioners in administrative hearings and law.

Hotel Accommodations

NAHO's host hotel, the Whitney Peak Hotel, is a non-gaming, non-smoking hotel near the Truckee Riverwalk in the heart of downtown Reno.

The hotel's sauna, steam-room, and Fitness Center are free to all guests. The Whitney Café is open for breakfast, lunch, and dinner and in-room dining is also available.



The hotel has artificial climbing walls both inside and outside. In fact, it is in the Guinness Book of World Records for having the world's tallest indoor climbing wall.



Our hotel is a 1.4-mile drive (6 minutes) or a one-mile walk (cutting through the University of Nevada-Reno campus) from the NJC. The weather in Reno in September is ideal with an average high of 82 degrees. The NJC campus is uphill from the hotel. Many NJC attendees ride up the hill in the morning and walk down the hill in the afternoon. There is a bus that makes a circuit from downtown Reno to the UNR campus every 12 minutes at a cost of \$2.00. The bus makes other stops; it will take about 20 minutes to arrive at the NJC.

You can make your hotel reservations online at: <https://res.windsurfercrs.com/ibe/details.aspx?hotelID=13492&lang=en-us&group=NAHO-2023&hgID=0&curRID=1&dt1=8652&nights=7&rooms=1&adults=1> or by calling 775-398-4500 and providing the Group Code: NAHO-2023.

Sign Me Up! How to Register

To register for the conference online, visit the NAHO conference website at www.naho.org.

To register via US mail, please print the form from the NAHO website and mail the form and accompanying payment to:

2023 NAHO Conference
c/o YesEvents
PO Box 3024
Westminster, Maryland 21158

Registrations by facsimile may be sent to (410) 559-2217. For registration assistance, call (800) 937-8728. For all other conference-related questions, call (612) 760-2787. 📧

NAHO Conference registrants making their hotel reservations before Wednesday, August 16, will receive a special discounted room rate of \$114.00 per night based on the per diem set by the General Services Administration. This rate is only available from Saturday, September 9 through check out on Friday, September 15.



Rooms will be available before and after these dates at the prevailing rate. These rates are subject to 8.27% sales tax and 13.5% lodging tax. Guest rooms are equipped with Keurig coffeemakers and a mini fridge. NAHO conference attendees will receive complimentary Wi-Fi and complimentary self-parking at the hotel's parking garage.

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2023 PROFESSIONAL DEVELOPMENT CONFERENCE *From page 2.*

Registration Fees, Food and Fun

Yes, the registration fees are a bit higher than usual, but they include 6 meals—a hot breakfast and a hot lunch on Monday, Tuesday, and Wednesday. NAHO will be catering beverages (including coffee and tea), a hot breakfast, and a hot lunch on each of the three full days of classes.

Full conference registration fees include the following:

- Sunday, September 10, 5 to 7 PM, Welcome Reception at Whitney Peak Hotel
- Monday, September 11, Hot Breakfast and Lunch at the NJC Dining Hall
- Tuesday, September 12, Hot NJC Breakfast, Lunch and Honors & Appreciation Dinner at Whitney Peak Hotel
- Wednesday, September 13, Hot Breakfast and Lunch



Scholarships Available for Conference

NAHO’s driving mission is to provide quality education to people who practice as hearing officials or who are interested in learning about the important work done by administrative agencies.

With the 2023 NAHO Annual Conference fast approaching, many NAHO members may already be in the process of organizing their September trip to Reno, Nevada.

NAHO recognizes that not every employer will be able to make financial arrangements for hearing officials to attend the 2023 NAHO Annual Conference and that finances can sometimes be a barrier to accessing quality education.



With the goal of making great education accessible, the NAHO Board has authorized a limited number of partial and full scholarships to attend the 2023 NAHO Annual Conference. Full scholarships cover the registration fee for the Annual Conference and all associated group meals. Partial scholarships also include these meals and part of the registration fee.

To be eligible for a scholarship, an applicant must be a member in good standing with NAHO, or have applied to be a NAHO member, at the time the application is filed. NAHO also offers full and partial scholarships to NAHO members who have graduated from the National Judicial College.

Applicants will need to provide: 1) the applicant’s NAHO membership details; 2) the applicant’s employment details (employer, job title, time served as hearing official); 3) a statement as to whether financial assistance (if any) will be provided by the applicant’s employer; 4) the status of the applicant’s NAHO certification (if being pursued); and 5) a statement as to whether NAHO has provided a scholarship to the applicant in the past. If the applicant’s employer will not be providing financial assistance, the applicant should also include a letter from the applicant’s employer to that effect.

The scholarship application form is available on request. Please contact the scholarship committee chair, Caroline A. Stephens Ryker at caroline.ryker@naho.org, to request a scholarship application form. Scholarship applications should be emailed to Ms. Stephens Ryker by or on July 7, 2023. Applicants will be notified by July 21, 2023 as to whether they will be receiving a scholarship.

Please reach out to Ms. Stephens Ryker with questions concerning the scholarship application process.

It’s never too early to start planning to attend the 2023 NAHO Annual Conference! 📌

Conference Registration Fees

NAHO Members or Associate Members paid prior to August 16, 2023	\$699
Conference + Join/Rejoin NAHO paid prior to August 16, 2023	\$759
Non-Member Registration Fee paid prior to August 16, 2023	\$829

Late Registration Fees (on or after August 16th, 2023)

NAHO Members or Associate Members paid on or after August 16th, 2023 ..	\$779
Conference + Join/Rejoin NAHO paid on or after August 16, 2023	\$839
Non-Member Registration Fee paid on or after August 16, 2023	\$909

All About RENO

After a long and enriching day of learning at the NAHO conference from the wonderful presenters, nothing sounds better than spending the evening relaxing and enjoying the sites of our host city. Whether you're a thrill seeker or simply a person who wants to enjoy a nice evening with friends and family, Reno has something for everybody. Reno, Nevada is known as "The Biggest Little City in the World". It is often considered a kinder, gentler sister city to Las Vegas. Reno is a preferred spot for singles, couples, and professionals alike as it has something for everybody. Fine dining, Check; Culture, Check; History, Check; Gaming, Check; Adventure, Check. Reno has it all.



Start your day enjoying the beautiful natural ambiance of Reno. Imagine waking up, energized and ready to learn from some of the best instructors NAHO has to offer. As you get ready, you make a fresh cup of delicious coffee and look out your room window and see one of the most beautiful mountain views you could imagine. While this sounds like a scene out of a movie, it could be your reality by attending this year's conference. Our host hotel, The Whitney Peak, is located at the base of the Sierra Nevada Mountains and features 310 guest rooms with panoramic views of the Sierras.

In addition to the awesome views of the Sierras, Reno has plenty of other natural attractions to please everyone from the most seasoned sightseer to the novice. Our hotel is about a half a block from the bridge over the Truckee River and Riverwalk. It's a great place for a sit or a stroll and there are a few nearby restaurants within walking distance to both Mid-Town and Downtown Reno.

In both Mid-Town and Downtown, you will have a chance to experience Reno's rich art scene which is home to many of the cities well known murals.



In addition to the wonderful art scene, Reno is also known for its museums. The National Auto Museum is within walking distance from the hotel. Reno also boasts several other museums such as The Nevada Museum of Art and The Wilbur D. May Museum, which features the art by artist, hunter, rancher, traveler, and philanthropist Wilber D. May. The Perry Lee Wells Nevada Discovery Museum features several hands-on galleries and exhibits dedicated to STEM learning.

If you're looking for sports, entertainment, and fitness, Reno has you covered. The Whitney Peak houses Cargo Concert Hall, a unique gateway to the sounds of Reno and a highlight of the Reno music scene. It is known as Reno's best live concert venue. Whitney Peak also houses Basecamp Climbing Gym, a 7,000 square-foot indoor bouldering park and home to the Guinness Book of World Records "World's Tallest Artificial Climbing Wall." The hotel's complimentary full-service fitness center has been named as one of the top 10 hotel gyms in world publications such as Outside Magazine and Esquire. Looking for something more relaxing? All hotel guests have access to the steam room and sauna free of charge.

The World's largest hot-air balloon festival! If you arrive before the Conference, you can enjoy the Great Reno Balloon Race September 8-10. Conference attendees arriving in Reno before the conference starts can watch the Great Reno Balloon Race on September 8-10.



One of Reno's most colorful and spectacular events, this free festival is just two miles from downtown Reno.

Do you love sports? If so, while in town, watch the Reno Aces AAA baseball team take on the Salt Lake Bees at the Greater Nevada Field located less than a ½ mile from the hotel.

After a productive day of learning, why not finish the day off with dinner, a movie, or shopping at the Summit Reno, an upscale shopping center with both retail shops and dining restaurants. It offers more than 65 unique shops with a variety of goods and features live music. Or catch a movie at the Century Summit Movie theater, playing many of the latest must-see movies. Want to try something different to satisfy your inner foodie? Reno has an eclectic mix of cuisines and plenty of restaurants to choose from whether you're in the mood for Asian, Italian, Mexican, a traditional Buffet, or a Steakhouse. Reno is also known for its sushi and has over 50 restaurants that feature sushi on the menu. Rather stay at the hotel? Heritage is a farm to table restaurant located in Whitney Peak with a menu that changes with the seasons. Whatever your tastebuds crave Reno will deliver.

Whether traveling alone, with a partner, or the whole family, Reno has something for everyone. Not only will you spend your days learning the ins, outs, and nuances of becoming the best ALJ while networking with your colleagues, but you can spend your nights exploring a wonderful city. Hope to see you at this year's conference! 🍷

2023 Spring Virtual Mini-Conference

NAHO presented its 2023 Spring Virtual Mini-Conference on April 20, 2023. This mini-conference offered hearing officials three hours of training on the use of demeanor evidence, recent developments in administrative law and instruction on developing and preserving the hearing record. Over 100 hearing officials from across the country (and the Marianas Islands!) attended the very informative virtual conference offered on NAHO's Zoom platform.

Each presenter provided written materials which accompanied their session. If you are a NAHO member, you will be able to access these materials in the Members Only section of the NAHO website.

Using Demeanor Evidence to Determine Facts

Professor Ogden has been a long-time teacher for NAHO and graciously reprised his demeanor evidence course that is usually offered at NAHO's in-person professional development conferences. In this class, he discussed the nature, history and use of demeanor evidence by judges and administrative law judges.

Demeanor evidence, "wordless communication" by a witness, has been widely recognized as a tool used by judges and juries to judge the truth or lack of truth of witness testimony historically. Professor Ogden reviewed several Supreme Court and federal court decisions where the opinion writer recognized the value of demeanor evidence in ascertaining the truth. In both civil and criminal settings, these judges recognized that fact-finders can use not just the words of a witness, but also how those words are expressed in order to determine facts in a dispute. Professor Ogden then reviewed other court decisions where judges questioned the reliability of demeanor evidence. These judges pointed out the danger of

misinterpreting non-verbal cues. Professor Ogden echoed this caution by noting that traditional cultural indicia of telling the truth, such as eye contact, may not mean the same thing in other cultural contexts.

Professor Ogden's discussion then moved to the use of demeanor evidence in telephone hearings. He presented the analysis of two courts analyzing the use of telephone hearings as it relates to providing adequate due process. In one case, a review of an unemployment compensation decision, the court held that the presiding officer was capable of using auditory cues to assess the credibility of the testimony. Therefore, there was no deprivation of due process. Another court, reviewing the revocation of driving privileges held that the petitioner was deprived of due process where the presiding officer did not have the benefit of visual cues to assess the demeanor of the witnesses, thereby elevating the risk of erroneously depriving the petitioner of his right to drive.

Professor Ogden discussed the use of video hearings, now commonplace in many tribunals. He used his own experience teaching classes during the COVID-19 pandemic and the challenges to reading visual cues of student engagement and class participation, as "food for thought" for hearing officials who conduct video hearings and the potential challenges to evaluating demeanor to make a judgment about the truth of a witness' testimony.

The session closed with a discussion of deference of the reviewing tribunal to fact-finding based on demeanor evidence. Professor Ogden pointed out that in state law, there is a variety of approaches from jurisdiction to jurisdiction.

Look for Professor Ogden to provide more instruction on this topic at the 2023 Annual Professional Development Conference in Reno.

Recent Developments in Administrative Law

The purpose of this course was to review recent U.S. Supreme Court decisions. Justice Gillette made the argument that even state court hearing officials need to be aware of legal trends in the federal court system because many of these evolving issues may show up in state proceedings as well.

Justice Gillette's presentation classified these cases around four legal doctrines: exhaustion (the doctrine that appellate courts should not rule on legal issues until the review process in agencies and lower courts is complete); deference aka the Chevron doctrine (when should courts defer to an agency's interpretation of legislation); judicial restraint – "first door out" (courts should only rule the dispositive legal issue and avoid opining on other arguments that are not necessary); and the separation of power doctrine (what powers can a legislature delegate to an agency). He then discussed a sampling of Supreme Court and federal appellate court decisions in each of these areas and offered a critique of the reasoning and lessons that may be learned from them.

Developing and Preserving the Hearing Record for Review

The last session of the Mini-Conference was on a practical topic central to the work of all hearing officials: developing a fair and complete record. A well-developed record is essential to render a complete decision with findings of fact based on the evidence and a legal conclusion based upon those facts. This session walked through this process step-by-step and offered useful checklists and tips for both new and experienced hearing officers.

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Developing and Preserving the Hearing Record for Review From page 5.

Justice Gillette and Judge Boone first discussed what “the record” means to the administrative hearing official and what materials compose the record. A decision record generally includes the written documents, such as pleadings, motions and briefs; the verbatim transcript of the hearing itself; and exhibits and other evidence such as video recordings or other physical evidence. A full and complete record might also include any facts that you “judicially” noticed or rulings made on motions or procedure during the case.

Judge Boone and Justice Gillette then counsel that a hearing official cannot just sit idly and let the proceeding unfold. Instead, as administrative hearing officials we must take an active role in developing the record to ensure that the proceeding is fair and that all of the information that is necessary to make a decision is included in that record. This process begins with a thorough review of the file in order to spot potential procedural problems, such as lack of jurisdiction or timeliness. The hearing officer should also consider whether a party might need an interpreter or whether the case presents an ethical conflict.

The next area to which the hearing official must be alert is the quality of the verbatim transcript. Judge Boone and Justice Gillette offered tips to make sure that everything is properly recorded in the transcript as well as techniques for asking questions and when to intervene or clarify the record of the hearing.

Creating a full and complete record is the essential function of any administrative hearing official. Judge Boone and Justice Gillette offered a clear roadmap that any hearing officer can follow to develop or enhance these important skills.

NAHO’s Membership Will Vote on Proposed Bylaw Revisions at Annual Meeting

Proposed revisions to the NAHO Bylaws are on the agenda for the annual membership meeting at the Conference. These revisions include changes to Board membership, clarifications and more complete descriptions of the tasks that are performed by Board committees, and other necessary additions and updates. These proposed revisions will be provided to the membership at the annual meeting and the membership will be asked to vote on these proposed changes. These revisions will also be posted on the NAHO website, www.naho.org, prior to the Conference. Questions? Please contact Sarah Huber, Chair of the Bylaws, Policies and Resolutions Committee, at Sarah.Huber@naho.org.

Why are these changes being proposed?

Along with the many ways this country has adapted to new ways of doing business over the past few years, NAHO has changed to maintain a better connection with its membership between conferences. Since September 2020, when we provided our first webinar, our membership has grown significantly. We went from an organization that had around 200 members, a light social media presence, and no virtual offerings, to an organization that has regular webinars, is present on four social media platforms, and has a membership pushing 400. The functioning of NAHO—conferences, certification, committee work, the on-demand video library, the newsletter, the merchandise, the membership, the NAHO website, and the budget—are all performed by our 12-member volunteer Board of Directors.

As NAHO’s membership grew and we added webinars and mini-conferences, a significant social media presence, and far

more frequent changes to our website to the other Board-performed tasks, we recognized that adding two more “at-large” members to the Board would provide more hands to better perform all NAHO’s operations. With this change, the Board’s four appointed at-large members will also bring some much-needed continuity to a Board that turns over most of its membership when elections are held every two years.

To add members to the Board required a revision of the Bylaws. The Board also needed to describe the roles of the proposed “at-large” Board members and to better define the tasks of other Board members. The Bylaws also need to be revised to add a Statement of Non-Discrimination and a Conflict-of-Interest Policy (required by the IRS for all non-profit organizations).

What about the 2023 Elections?

Because any change to the Bylaws requires the September vote of NAHO’s membership, the Board needed to postpone the 2023 elections. The election process, which was scheduled to be held over the summer with results announced at the Conference, will start with a call for nominations in October. More details about the election process will be provided at the annual membership meeting at the Conference and announced on the NAHO website.

The Board is confident that these proposed changes will enhance the way NAHO operates with its volunteer Board and provide a more effective way for the Board to continue to provide NAHO’s expanded and improved services to its membership. 🐾

Our Next NAHO News:

Justice Gillette on Axon Enterprise, Inc. v. FTC

At a very recent NAHO webinar, Justice Mick Gillette was asked about a recent decision of the US Supreme Court, *Axon Enterprise, Inc. v. FTC*, ___ US___ (No. 21-86, April 14, 2023). This decision is important because it involves the question of whether hearing officials lack authority to decide the cases in front of them because there is insufficient constitutional authority (state or federal) for their appointment as hearing officials in the first place.

Justice Gillette delivered on his promise to provide his assessment of this case and prepared a thoughtful and thorough analysis. However, *NAHO News* received so many contributions for this edition of the newsletter that articles had to be limited to those that featured news and information about the upcoming Conference and pending NAHO business. Justice Gillette's article was put on hold.

The next newsletter, which will be published after the September Conference, will include the article by Justice Gillette in full. You can look forward to some interesting reading in the fall edition of *NAHO News*! 📖

An NJC Gem: Jennifer Gee

For many years, NAHO's special relationship with the National Judicial College has included sharing professional development faculty. Speakers and presenters at NAHO conferences and programs have included current and past NJC instructors, as well as alumni of the NJC programs specifically designed for administrative hearing officials. The National Judicial College long has recognized that all hearing officials, no matter their titles, are judges benefiting from judicial training.

Attendees of the 2023 NAHO Conference not only will enjoy the excellent NJC instructional facilities, but also programs presented by current and past NJC faculty and staff.

Conference attendees in 2023 are privileged to have the opportunity to hear and learn from retired District Chief ALJ Jennifer Gee, who has served

as faculty for the NJC since 1994, and was awarded the NJC's Robert Payant Award for Teaching Excellence in 2018. From 2007 to 2019, Judge Gee served as the District Chief Judge with the U.S. Department of Labor Office of Administrative Judges in San Francisco, presiding over formal hearings under 84 diverse, labor-related sections of the federal code.

She served as a judge since 1982, serving with the U.S. Merit Systems Protection Board hearing personnel-related cases, and the Office of Hearings and Appeals for the Social Security Administration, hearing Social Security disability benefits cases.

She previously served eight years as a trial attorney for the U.S. Equal Employment Opportunity Commission. Judge Gee is a past president of the California/Nevada Women Judges Association and served



on the Board of Directors of the National Association of Women Judges.

For the NAHO conference, Judge Gee will be teaching *Managing Complex Administrative Hearings*, *Decision-Writing for Complex Cases*, and *Expert and Opinion Evidence*. However, she is only one among the many excellent instructors who will provide instruction for conference attendees. This array of faculty and programs will be included in the conference registration materials, allowing attendees to choose from a broad array of educational programs best suiting each judge's interests and professional development. 📖

ON DEMAND: WHAT'S NEW

Whether you are working on your NAHO certification or just want to upgrade your skills, the NAHO OnDemand has a title for you!

The NAHO On Demand video library can help you polish skills you already have or provide you with a foundation for new skills that you need to effectively do your job. These courses are taught by expert hearing officers from across the country. Many of the more recent recordings also have written materials which are available for you to access in the Member's Section of the NAHO website.

What's In It For Me: Getting the Most out of NAHO Resources. This year NAHO created a special video for members which reviewed important resources and contacts in NAHO. This video is FREE upon request: mary.long@naho.org

Other titles that have been added for 2023 include:

2023-01 *Time and Caseload Management for Hearing Officials*

2023-02 *What You Should Know: A Survey of Administrative Fundamentals*

2023-03 *Using Demeanor Evidence to Determine Facts*

2023-04 *Recent Developments in Administrative Law – Spring 2023*

2023-05 *Creating and Preserving the Record for Review*

Please see the NAHO website for detailed information about renting On Demand titles and a list of NAHO's full video inventory: www.naho.org/library

If you received an OnDemand credit for renewing your membership, don't forget to use it by the end of the calendar year! 🏠

ENJOY THE BENEFITS OF NAHO MEMBERSHIP

How to Join NAHO: Please go online and apply at www.naho.org to the "Join NAHO" tab at <https://www.naho.org/page-18088>. The application process will guide you through setting up a password, completing the application, and paying the application fee through the secured Affini payment portal. Prefer to mail a check? You can send it to the address below.

To Renew or Update your Email or Password: If your membership lapsed in 2023, there is still time to renew it. Log into your profile at <https://www.naho.org/Sys/Profile>.

Don't know your password?
Reset it here <https://naho.org/Sys/ResetPasswordRequest>

Groups: If your agency has five or more members that are joining or renewing AT THE SAME TIME, your group is entitled to a special discount. Have the group administrator or managing member request a group invoice at marilyn.slifman@naho.org and to add new members or with any questions.

2023 Membership and Renewal Dues: (January 1-December 31; \$10 late fee after March 1)

	MEMBERSHIP DUES	RENEWAL
NEW MEMBER - 1 YEAR	\$60.00	\$50.00
NEW MEMBER - 3 YEARS	\$135.00	\$115.00
NEW ASSOCIATE – 1 YEAR	\$45.00	\$35.00
NEW ASSOCIATE – 3 YEARS	\$120.00	\$100.00
GROUPS OF 5 OR MORE AT SAME TIME FROM SAME AGENCY – 1 YEAR	\$50.00 EACH	\$40.00 EACH
GROUPS OF 5 OR MORE AT SAME TIME FROM SAME AGENCY – 3 YEARS	\$120.00 EACH	\$115.00 EACH

Please include the name of the member or a copy of your invoice if mailing a check to: **NAHO, PO Box 492286, Lawrenceville, GA 30049.**

Membership questions can be directed to Marilyn Slifman, Membership Committee Chair at marilyn.slifman@naho.org. 🏠