Federal CARES Act Offers Relief to Small Businesses

Last week, Congress passed and President Donald J. Trump signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), which, among other provisions, provides financial relief for small businesses through the way of small business loans that can ultimately turn into grants.

Under the CARES Act, the Paycheck Protection Program (PPP) offers help to small businesses to weather the economic upheaval caused by the COVID-19 pandemic.

Small businesses generally work with narrower profit margins, relying on consistent customer buying habits and knowledge of seasonal ebb and flows in sales. Mandatory closures for a month or longer are disastrous.

Paycheck Protection Program

The PPP provides funds to pay up to eight weeks of payroll costs, including benefits. Funds can be used to pay interest on mortgages, rent, and utilities.

These funds are loans that will be fully forgiven as long as at least 75% of the loan is used for payroll. Forgiveness is based on maintaining or quickly rehiring employees at the same salary. If an employer’s workforce decreases, the amount of the loan that will be forgiven also decreases.

All small businesses with 500 or fewer employees are eligible, including self-employed individuals, sole proprietors, independent contractors, nonprofits, tribes and veteran organizations. There is a very limited opportunity for larger businesses in certain industries.

Loan payments not qualifying for forgiveness will be deferred for six months. Collateral or personal guarantees are not required.

Application Information

Small businesses and sole proprietorships may begin to apply for this loan on April 3.

Independent contractors and self-employed individuals can apply for this loan starting April 10.

Funding for the PPP is capped. The

See Federal CARES Act: Page 4

Governor Signs Executive Order to Help Small Business

Governor Gavin Newsom this week signed an executive order that will provide some relief for small businesses struggling during the COVID-19 crisis.

The Governor’s March 30 executive order allows the California Department of Tax and Fee Administration (CDTFA) to offer a 90-day extension for tax returns and tax payments for all businesses filing a return for less than $1 million in taxes. That means small businesses will have until the end of July to file their first quarter returns.

Additionally, the order extends by 60 days the statute of limitations to file a claim for refund to accommodate tax and fee payers.

The executive order also includes extensions that affect state government workers, as well as consumers. For instance, the Department of Motor Vehicles will limit in-person transactions for the next 60 days, allowing instead for mail-in renewals. In addition, the Department of Consumer Affairs will waive continuing education requirements for several professions, also for the next 60 days.

Further, the order will extend the Office of Administrative Law deadlines to review regular department-proposed regulations. The order also extends by 60 days the time period to complete investigating

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Cal/OSHA Corner

Guide to Safety/Health Requirements During COVID-19 Outbreak

As an employer, where can I find safety and health information about the coronavirus (COVID-19) outbreak that is affecting my ability to do business?

The state Division of Occupational Safety and Health (DOSH) has developed a website compiling relevant information explaining an employer’s methods and responsibilities for maintaining a safe and healthful workplace during the COVID-19 pandemic.

Since our introduction to COVID-19 in early January, the public has been increasingly inundated by various prognosticators as to what is happening and the best way to survive in the environment where we now find ourselves.

Fortunately, even when it appears that chaos is the norm, there are individuals and groups who are practical, logical and patient enough to research and develop interim solutions to mitigate to the best extent humanly possible with existing information the situation that is occurring.

Extensive Guidance

The DOSH has compiled and posted extensive guidance recommendations and requirements from many sources to assist the employer during this time.

To access the guidance on requirements to protect workers from coronavirus, start at the Department of Industrial Relations website, dir.ca.gov, and click on the bold banner declaring “Cal/OSHA Safety Guidance on Coronavirus.” This opens to a webpage containing a table of contents of websites for various areas that may or may not be applicable to your particular situation.

There are two references to “General Industry.” The first, “Cal/OSHA Interim Guidelines for General Industry on 2019 Novel Coronavirus Disease (COVID-19),” is the reader’s digest version. It details the employers covered and not covered by the Aerosol Transmissible Diseases Standard and reminds webpage visitors of other Cal/OSHA regulations—such as the Injury and Illness Prevention Program (IIPP)—that apply to all employers.

The second reference is a link to download and print a PDF brochure providing some of the information covered on the webpage.

On the “Cal/OSHA Interim Guidelines” webpage is a link to the Centers for Disease Control and Prevention (CDC), which offers considerably more detailed recommendations on its “Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019” webpage.

Both the Cal/OSHA and CDC interim guideline pages contain website references that should be reviewed for information that may be relevant to your industry.

Note that the interim guidelines are subject to change.

The California Chamber of Commerce webpage at calchamber.com/coronavirus provides COVID-19-related federal, state and local resources, including CalChamber coverage.

Column based on questions asked by callers on the Labor Law Helpline, a service to California Chamber of Commerce preferred and executive members. For expert explanations of labor laws and Cal/OSHA regulations, not legal counsel for specific situations, call (800) 348-2262 or submit your question at www.hrcalifornia.com.

Next Alert: April 17

See calchamber.com/events for the latest list of CalChamber-sponsored seminars, trade shows and webinars.
The Workplace

Key Points and Guidelines of Federal COVID-19 Leaves

In Episode 57 of The Workplace podcast, CalChamber Executive Vice President and General Counsel Erika Frank and employment law expert James Ward discuss key points and guidelines issued by the U.S. Department of Labor (DOL) on the Families First Coronavirus Response Act (FFCRA), which took effect on April 1.

Frank points out that the guidelines and requirements surrounding the FFCRA have been changed recently and can be changed at any moment by the DOL. She recommends that listeners regularly visit the DOL website to ensure they have the most up-to-date information. Listeners also can visit calchamber.com/coronavirus for updates on federal and state programs related to the COVID-19 pandemic.

To hear the full discussion of each topic, visit the time stamps noted in the story below.

Requirements, Exemptions

Time discussed: 02:30

On March 18, the federal government passed the Families First Coronavirus Response Act (FFCRA), which includes the Emergency Paid Sick Leave Act (PSL) and the Emergency Family and Medical Leave Expansion Act (EFMLA). Both leaves are temporary and will sunset on December 31, 2020, Frank explains.

Both leaves apply to employers with fewer than 500 employees. Health care providers and emergency responders, however, are excluded from the paid family leave, Ward says. Moreover, employers are eligible for the EFMLA if they have been employed for a minimum of 30 days; employees are eligible for the PSL from the first day of hire.

There is a small business exemption provision that exempts employers with fewer than 50 employees from the EFMLA and PSL if the leave requested is for child care and school closures related to COVID-19, Ward explains.

According to the DOL, a small business may claim this exemption if an authorized officer of the business has determined that one of the following three criteria applies:

1. The provision of paid sick leave or expanded family and medical leave would result in the small business’s expenses and financial obligations exceeding available business revenues and cause the small business to cease operating at a minimal capacity;

2. The absence of the employee or employees requesting paid sick leave or expanded family and medical leave would entail a substantial risk to the financial health or operational capabilities of the small business because of their specialized skills, knowledge of the business, or responsibilities; or

3. There are not sufficient workers who are able, willing, and qualified, and who will be available at the time and place needed, to perform the labor or services provided by the employee or employees requesting paid sick leave or expanded family and medical leave, and these labor or services are needed for the small business to operate at a minimal capacity.

Leave Time, Intermittent Leave

Time discussed: 08:14

Given that California already has a mandatory sick leave requirement law and many employers already provide additional sick leave benefits, Frank asks Ward, are the new federal leaves in addition to state-mandated leaves/employer-provided benefits, or can the leaves run concurrently?

The federal leaves are in addition to state- or employer-provided paid sick leaves, Ward answers. Moreover, the leaves are not retroactive, so if an employer already has provided an employee with leave for one of the COVID-19-related reasons of the EFMLA or PSL before April 1, that time cannot be deducted from the EFMLA or PSL.

Concerning the EFMLA, the provision will be treated as an additional qualifying event to the Family Medical Leave Act (FMLA) and does not provide an additional 12 weeks to the original FMLA, Ward explains.

Another common question that is arising, Frank says, is whether employees can use the new federal leaves intermittently—which taking half of the day off or taking off only certain days.

The availability of intermittent leave will depend on the type of worker, Ward replies. Employees working remotely may use intermittent leave under both the EFMLA and PSL, in any increment, given that the employer agrees to the arrangement.

For nonremote workers, the PSL must be taken in full-day increments (unless there is a school closure or issue of child care availability). Leave under the EFMLA, however, may be taken intermittently with the employer’s permission.

Documentation

Time discussed: 17:14

Since employers will be receiving a tax credit for any EFMLA or PSL leave provided, proof documentation will be required.

A list of eligible documents has not yet been released by the DOL, but Ward suggests that in the event that an employee requests leave due to reasons covered by the EFMLA or PSL, employers should collect documentation such as quarantine orders from government officials, written documentation from a health care provider, or, in the event of a school closure, an email notice from the school or child care center, or an online notice printout.

New Posting Requirement

Time discussed: 20:40

The DOL also has issued a required notification poster for the Families First Coronavirus Response Act. In addition to posting the notice in the workplace, employers also need to either mail or email a copy of the notice to employees working remotely, Ward says.

An FAQ published by the DOL on the posting requirement can be found at https://www.dol.gov/agencies/whd/pandemic/ffcra-poster-questions.

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Guidance on Temporary CalWARN Suspension for COVID-19

As previously reported, California Governor Gavin Newsom issued an executive order on March 17 temporarily suspending the notice requirements of California’s Worker Adjustment and Retraining Notification Act (CalWARN Act), provided employers meet certain conditions specified in the order. Newsom’s order also directed the California Labor and Workforce Development Agency to issue guidance on how to comply with the order. The agency, along with the California Department of Industrial Relations (DIR) and the California Employment Development Department (EDD), has issued guidance in a Q&A format, which can be found on all three agency websites (they contain the same content).

Qualifying Conditions

The CalWARN Act guidance provides additional clarification on the executive order’s conditions employers must satisfy in order to qualify for the 60 days’ notice requirement suspension.

First, the layoff/termination must be caused by COVID-19-related “business circumstances” that were not reasonably foreseeable at the time that notice would have been required.” The state’s guidance confirms that the “business circumstances” should be understood to be consistent with the identical exemption under the federal WARN Act. It also notes that the U.S. Department of Labor has interpreted such “business circumstances” to include “[a] government ordered closing of an employment site that occurs without prior notice.”

Employers must give notice “as soon as practicable,” or reasonably possible, which the state’s guidance says is meant to be consistent with the same provision of the federal WARN Act. Courts have observed that there is no bright-line rule on what constitutes a “practicable” notice period; it depends on the employer’s unique factual circumstances.

Employers subject to CalWARN requirements should consult with legal counsel regarding their specific circumstances if they are facing a COVID-19-related mass layoff/termination.

Brief Statement Needed

As a reminder, in the CalWARN notice, employers must also provide a brief statement as to why the notification period could not be met.

The guidance also specifies that the following information must be included:

• Name and address of the employment site where the closing or mass layoff will occur.
• Name and phone number of a company official to contact for further information.
• Statement as to whether the planned action is expected to be permanent or temporary and, if the entire location is to be closed, a statement to that effect.
• Expected date of the first separation, and the anticipated schedule for subsequent separations.
• Job titles of positions to be affected, and the number of employees to be laid off in each job classification.
• In the case of layoffs occurring at multiple locations, a breakdown of the number and job titles of affected employees at each location.
• An indication as to whether bumping rights exist.
• Name of each union representing affected employees, if any.
• Name and address of the chief elected officer of each union, if applicable.

The CalWARN Act guidance addresses several additional issues, including practical concerns, such as how to send CalWARN notices (mail, personal delivery or email), to whom notices must be sent and some timing issues. Employers can read the full text on the state Department of Industrial Relations (DIR) website, dir.ca.gov/dlse/WARN-FAQs.html.

Employers must note that the Executive Order is specific to CalWARN requirements. Federal WARN requirements are still in effect and employers subject to the federal law must still comply with its notice requirements.

With COVID-19 causing uncertainty, these situations continue to change rapidly. The California Chamber of Commerce will continue to provide updates as circumstances develop.

Free Forms

The CalChamber has added two FREE forms to HRCalifornia:

• WARN Notice to Employees (California) — COVID-19 Exception
• WARN Notice to State/Local Officials (California) — COVID-19 Exception

These forms are based on California Executive Order N-31-20 and can be used only to notify employees and state/local officials, respectively, of mass layoffs, relocations or terminations that are directly caused by COVID-19-related business circumstances.

Employers should use the forms in compliance with Executive Order N-31-20 and the state’s implementing guidance and in consultation with legal counsel.

CalChamber members can read more about the Temporary Exception to WARN Act for COVID-19 (Coronavirus) in the HR Library on HRCalifornia.com.

Staff Contact: James W. Ward

Federal CARES Act Small Business Relief

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program is implemented by the U.S. Small Business Administration (SBA).

A business may apply through any SBA 7(a) lenders or through any federally insured bank, credit union or Farm Credit System institution.

Other regulated lenders will be available to make these loans once they are approved and enrolled in the program.

Application forms, a list of participating lenders and more information can be obtained from the U.S. Treasury Department website at https://home.treasury.gov/policy-issues/top-priorities/cares-act/assistance-for-small-businesses.

Links to information also are available on the California Chamber of Commerce website at calchamber.com/coronavirus.

Staff Contact: Valerie Nera
Reminder: Families First Coronavirus Response Act Now in Effect

The Families First Coronavirus Response Act (FFCRA), federal legislation President Trump signed on March 18, 2020, providing paid sick leave (PSL) and emergency family and medical leave for qualifying reasons related to COVID-19 (also known as the coronavirus), took effect on April 1. Employers should remember a few things about this new law.

Important Details
To whom does it apply?
The FFCRA applies to employers with fewer than 500 employees.

Which employees are eligible for leave?
Generally, all employees are eligible for paid sick leave under the FFCRA as of April 1, 2020. The new leave is available immediately, regardless of how long the individual has been employed — meaning it does not have to be accrued.

The eligibility for emergency Family and Medical Leave Act (FMLA) is different. Employees must be employed for at least 30 calendar days to be eligible for emergency FMLA.

Health care providers and emergency responders may be excluded from both PSL and emergency FMLA.

How much paid leave do employees get?
Paid Sick Leave: Under the PSL requirements, full-time employees are entitled to 80 hours of paid leave while part-time employees are entitled to two weeks of paid leave based on their normal schedule. This is a new leave entitlement, provided in addition to any other paid leave available to employees. Employees may take PSL for the following qualifying reasons:

- Subject to a federal, state or local quarantine or isolation order related to COVID-19;
- Advised by a health care provider to self-quarantine due to concerns related to COVID-19;
- Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
- Caring for an individual who is subject to a government quarantine or a self-quarantine advised by a health care provider (reasons 1 and 2 above);
- Caring for their child if the child’s school or place of care has been closed, or the child care provider is unavailable due to COVID-19 precautions; or
- Experiencing any other “substantially similar condition” specified by the Secretary of Health and Human Services.

Employees must be paid PSL at their regular rate for reasons No. 1 through No. 3 above, except that pay cannot exceed $511 per day and $5,110 total. Employers can pay employees two-thirds their regular rate for reasons No. 4 through No. 6 above, except that pay cannot exceed $200 per day and $2,000 total in those circumstances.

Family and Medical Leave: Under the new emergency FMLA requirements, eligible employees are entitled to up to 12 weeks of leave. The first 10 days may be unpaid (employees can use new PSL during this time), and the remaining time is to be paid at a rate of no less than two-thirds of their regular rate of pay for the hours normally scheduled. Paid leave under emergency FMLA is capped at $200 per day and $10,000 in total per individual.

Employees may take emergency FMLA leave for only one reason, to care for their child if the child’s school or place of care has been closed, or the child care provider is unavailable due to COVID-19 precautions.

Are small businesses exempt?
The FFCRA contains a small business exemption for employers with fewer than 50 employees. The exemption for both PSL and emergency FMLA, however, is limited to the qualifying reason of caring for a child if the child’s school or place of care has been closed, or the child care provider is unavailable due to COVID-19 precautions. Thus, small businesses are not exempt from paying for PSL for the other five qualifying reasons listed above. Small businesses can claim the exemption only if paying for such leave would jeopardize the viability of the small business as a going concern.

Are employers required to post a notice?
Yes, employers are required to post notice of the law’s requirements in conspicuous places. The U.S. Department of Labor (DOL) created a poster (also available in Spanish) for employers to use. The DOL also stated that employers could send the notice to remote employees by mail, email or posting on an employee information internal or external website.

The DOL has been busy trying to answer many of the most common questions about the new law in greater detail. Employers can read more about the new law on the department’s website, dol.gov, and can expect additional updates and regulations in the future.

Other COVID-19 Resources
In Episode 57 of The Workplace podcast, CalChamber Executive Vice President and General Counsel Erika Frank and employment law expert James Ward discuss key points and guidelines issued by the DOL on the FFCRA, which took effect on April 1. Listen for free at calchamber.com/theworkplace!

Visit the CalChamber (COVID-19) webpage for more COVID-19-related federal, state and local resources, including CalChamber coverage.


Staff Contact: James W. Ward

Governor Signs Executive Order to Help Small Business

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gation of public safety officers based on allegations of misconduct.

Finally, deadlines for training, investigations, and adverse actions for state workers will also be extended.

Big Picture Changes to Unemployment Insurance with CARES Act

This brief summarizes unemployment benefits available in California, as updated by the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act, passed by Congress on March 25, 2020.

The CARES Act made sweeping changes and added new benefits to the program, so during the near-term the state Employment Development Department (EDD) will interpret these changes and implement them to provide the new benefits.

• **New Benefit Amount:** In addition to the normal unemployment insurance (UI) payments (up to $450/week, depending on salary), applicants may receive up to an additional $600/week until July 31, 2020—meaning that workers may receive up to 100% wage replacement. However, EDD’s outdated internal data processing system may hinder its ability to timely change the benefits calculations. As a result, it is unclear when EDD will begin distributing the additional $600/week provided for in the CARES Act.

• **Eligibility for Benefits:** Eligibility depends on the type of benefits. Broadly speaking, traditional requirements of UI have been loosened, but still apply: you must be able/available to work, and unable to do so through no fault of your own. EDD’s website can help clarify these limitations. Notably, employees who are facing reduced hours or being unable to work because their employer has shut down due to COVID-19 will qualify for UI.

• **New Categories of Benefits:** New categories of benefits have been added under the CARES Act to provide for self-employed individuals and other groups, as well as those who have exhausted traditional UI.

- **Pandemic Emergency Unemployment Compensation:** These benefits are available for those who were otherwise eligible for traditional UI benefits, but will extend them for 13 weeks after traditional UI has been exhausted, with equivalent benefits. These are federally funded and can be used before California’s Extended Benefits program, which saves California employers from picking up the tab.

- **Pandemic Unemployment Assistance:** This supports individuals who do not traditionally qualify for UI, such as independent contractors, or self-employed individuals, or those who have otherwise exhausted benefits. It provides benefits equivalent to UI, and includes the additional $600/week provided for under the CARES Act.

• **Duration of Benefits:** Generally speaking, UI benefits last 26 weeks, with additional programs potentially extending that period—such as Pandemic Emergency Unemployment Compensation and/or Extended Benefits, both of which add up to 13 weeks of benefits. Similarly, Pandemic Unemployment Assistance lasts 39 weeks.

• **How Long Until Benefits Received?** Although both the Governor and the federal legislation waived the one-week waiting period, EDD still takes time to process applications. This means that, even after applying, a recipient will likely not receive a check for at least three weeks. Any delayed payment will include compensation retroactive to the time of application—including that first week.

• **What If I Am Sick with COVID-19?** If an employee is unable to work due to exposure or being sick with COVID-19, and has had a positive test/other confirming documents, then the employee may be eligible for Disability Insurance (DI). DI also normally has a one-week waiting period, which also has been waived.

**Helpful Resources**

• **File for benefits at EDD’s website:** [https://www.edd.ca.gov/unemployment/filing_a_claim.htm](https://www.edd.ca.gov/unemployment/filing_a_claim.htm).


**Staff Contact:** Robert Moutrie
Proposed Amendments to Proposition 65
Eliminate Online Warning Safe Harbor

The latest proposed amendments to the state’s Proposition 65 warning regulations eliminate online warnings as a safe harbor method and are a substantial deviation from the existing plain language of the regulations. The California Chamber of Commerce and a broad industry coalition explain in a letter to the agency leading the rule drafting.

The coalition is requesting the revisions proposed by the Office of Environmental Health Hazard Assessment (OEHHA) be withdrawn because they are a clear violation of the Administrative Procedures Act (APA), will spur frivolous litigation with respect to warnings that are “clear and reasonable,” and cause tens of thousands of businesses to invest even more time and resources into changing their Proposition 65 warning programs yet again.

Online Warnings as Safe Harbor

The plain language of the current Proposition 65 safe harbor regulations under 27 Cal. Code Regs. Section 25620(a)(2) permits businesses selling consumer products over the internet to provide a product-specific warning online prior to purchase.

Since the regulations were adopted in 2016, thousands of companies have relied upon this safe harbor for creating and implementing their Proposition 65 warning programs by providing customers shopping online a product-specific Proposition 65 warning before they make a purchase.

OEHHA is now proposing under the current amendments to substantially change the regulations by eliminating the stand-alone online safe harbor method and creating a new two-warning approach.

The CalChamber and the industry coalition argue that the proposed amendments are not based on OEHHA’s objective that customers receive the warning prior to making a purchase. Instead, the change singles out website and mobile application sales for different treatment.

If a product has a warning on the label and is sold in a brick-and-mortar store, there is no requirement of a second warning via a shelf sign, a sign at checkout, or an electronic form of warning. Conversely, if a product has a shelf sign in a brick-and-mortar store, there is no requirement that the product also have a warning on the label.

The coalition asserts that there is no rational basis for treating products sold via a website or mobile application differently by requiring a Proposition 65 warning online prior to purchase and on the product label.

Violation of APA

The CalChamber and the coalition also identify a significant APA violation that demands OEHHA withdraw the proposed amendments.

In 2017, OEHHA published a “Notice of Non-Substantive Changes to Article 6: Clear and Reasonable Warnings.” Although Section 100 of the APA regulations allows an agency to make non-substantive regulatory changes without notice and public comment, OEHHA made at least one substantive change to the section of the regulation that explained the requirements for safe harbor internet warnings.

The coalition argues that this substantive change without notice and comment was a clear violation of the APA and substantially changed the meaning of that regulatory section.

That 2017 substantive change is now what OEHHA relies upon in its current proposed amendments to rationalize why an internet or mobile application warning is insufficient and two warnings are required for products sold online.

The CalChamber and the coalition argue that OEHHA’s current proposed amendments are an attempt to shore-up its improper amendment in 2017 and eliminate website and mobile application warnings as a stand-alone safe harbor method. Because the 2017 change was illegal and these proposed changes are not a clarification of the safe harbor warning regulations, but a dramatic change to the requirements for online warnings, the proposed changes must be withdrawn.

Unnecessary and Unjustified

From the perspective of the businesses selling online or mobile applications, adding this new requirement for on-label warnings will have a severe impact on production, distribution and manufacturing costs.

Unless a business is willing to provide an on-label warning to consumers outside of California, which the law does not require and which may cause confusion or alarm among those consumers, the business will need to create two lines of products with separate shopkeeping unit (sku) designations so that online retailers will know which are destined for California and which for other jurisdictions. This will substantially increase expenses and complexity in the supply chain and could add to consumer costs.

Furthermore, the proposed amendments will incite additional frivolous litigation by private enforcers over whether appropriate warnings were provided, the coalition explains.

As California businesses continue to reel from the unexpected economic impacts of COVID-19, introducing these unnecessary amendments to existing Proposition 65 regulations will cause substantial harm to businesses with no conceivable benefit to California consumers.

Next Steps

OEHHA will review public comments over the next several months and then decide whether to modify, withdraw or proceed with its proposed amendments. At that time, the public will have one more opportunity to comment before OEHHA finalizes its rulemaking.

Staff Contact: Adam Regele
Here to Help During These Uncertain Times

Save 50% on California and Federal Labor Law paper posters for your employees working remotely.

CalChamber’s 2020 California and Federal Labor Law Poster contains the 18 different employment notices every California employer must post in each workplace or job site—including where employees work remotely 100% of the time.

This all-in-one paper poster is a low-cost option for providing each remote employee with mandatory employment notices to post. In addition to the savings, a volume discount is available.

LEARN MORE at calchamber.com/remote2020 or call (800) 331-8877. Priority Code REA