

CTAE/WBL Update

2019 Data Collection Conference

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Legislation that Affects CTAE

- House Bill 400- Bridge Bill mandated Individual Graduation Plans and Career Development
- House Bill 186- Mandated Career Clusters/Pathways
- House Bill 713- Added Elementary as a Career Awareness focus for CTAE
- House Bill 766- Re-defined the Youth Apprenticeship program and codified all categories of Work-Based Learning
- Senate Bill 2 – MOWR, defined graduation for Technical College completers
- House Bill 132- MOWR, expanded options for high school students
- House Bill 366- Changed age required for “worker permit” to under 16
- House Bill 364- Reduced testing requirements, TKES & LKES
- House Bill 402- Workers Compensation discount for WBL employers
- Federal Carl Perkins Act- Federal funding for improvement of CTAE programs
- SB 3 – Creating Opportunities Needed Now to Expand Credentialed Training (CONNECT) Act

CTAE Career Cluster and Pathways

K-12 Programs + MOWR



Career Awareness in Elementary Schools – Who Am I?

- Career-related Cluster Awareness activities in Grades 1-5
- Career Portfolio in Grade 5



Career Exploration in Middle Schools – Where Am I Going?

- Student accounts on websites such as Gafutures.org
- Career Inventories taken in Grades 6 & 7
- Individual Graduation Plan (IGP) by the end of the 8th grade with student and parent consultation



Career Development in High Schools – How Will I Get There?

- Completion of a Career Pathway incentivized on CCRPI
- End of Pathway Assessments/Industry Credentials
- Work-Based Learning/Capstone Project
- On-going advisement with student and parents

Why Career Clusters?

Career Clusters are:	Career Clusters are NOT:
A framework created by the National Association of State Directors of Career Technical Education Consortium to integrate academic/technical education	A product of the federal government mandated to states (SEAs) or local school systems (LEAs)
Options for students to experience all aspects of a business or industry organized around occupational categories	A system that “pigeon holes” students into specific elective classes
An opportunity for students to earn industry credentials	Courses for students that are good at “working with their hands”
Motivation for students to stay in school. The graduation rate for CTAE pathway completers is 95%	The option for those not going to college.

What Are The 17 Clusters?

Agriculture, Food & Natural Resources

Architecture & Construction

**Arts, Audio/Video Technology &
Communications**

Business Management & Administration

Education and Training

Energy Systems

Finance

Government & Public Administration

Health Science

What Are The 17 Clusters?

Hospitality & Tourism

Human Services

Information Technology

Law, Public Safety, Corrections & Security

Manufacturing

Marketing

**Science, Technology, Engineering &
Mathematics**

Transportation, Distribution & Logistics

Six (6) examples of Health Science Pathways

Pathways

Patient Care Fundamentals

Allied Health and Medicine

Therapeutic Services

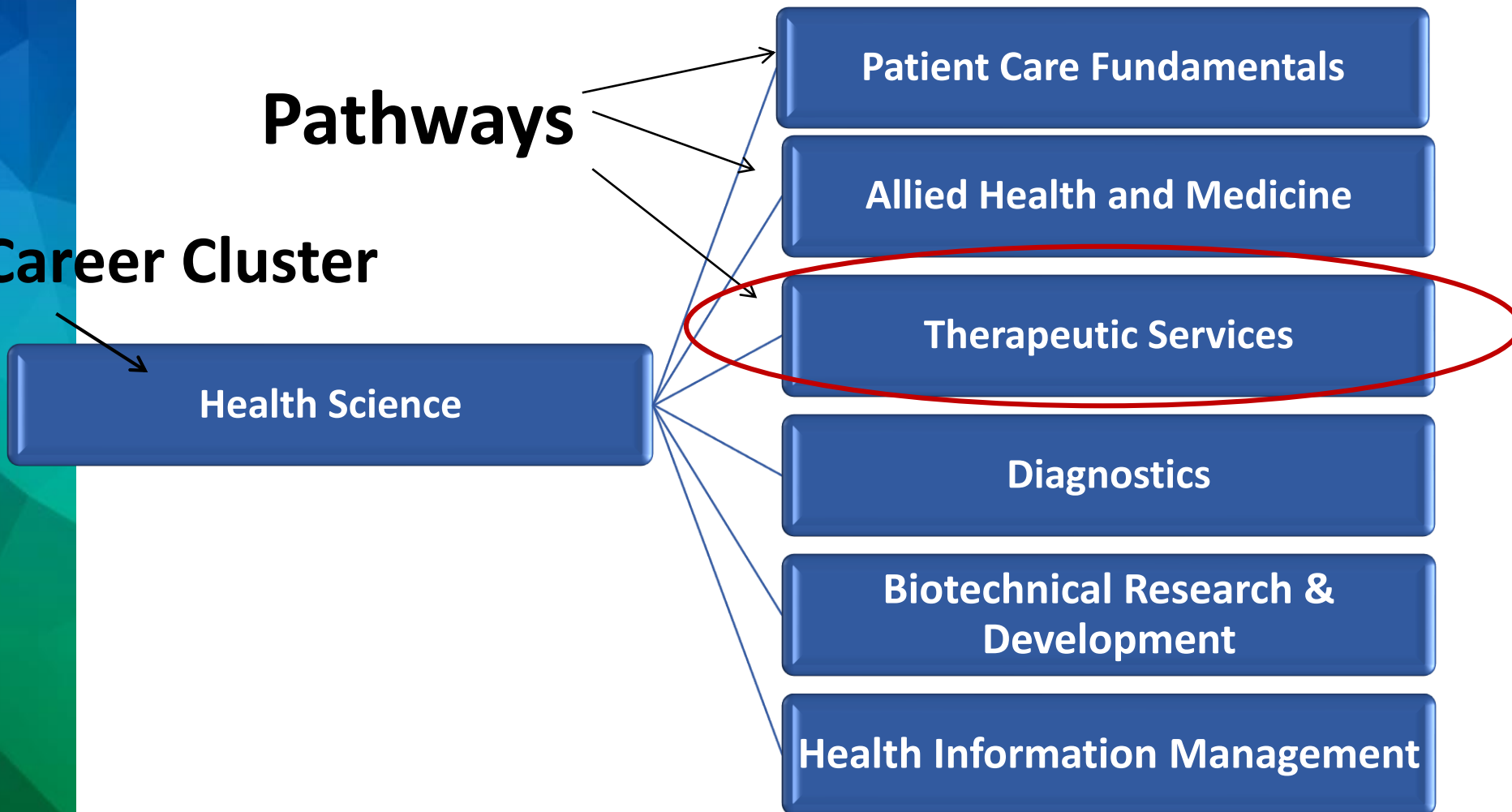
Diagnostics

Biotechnical Research &
Development

Health Information Management

Career Cluster

Health Science



**Career
Pathway**

**Therapeutic Services
Pathway**

**CTAE
Courses**

25.52100
**Introduction to
Health Science**

25.44000 **Essentials
of Healthcare**

25.58000 **Principles
of Physical Medicine**

Navigating the GaDOE Website for CTAE Related Information

FINDING CTAE ON THE DOE WEBPAGE



Search this site...

Richard Woods, Georgia's School Superintendent


Offices & Divisions - Programs & Initiatives - Data & Reporting - Learning & Curriculum - State Board & Policy - Finance & Operations - Contact -

LATEST Georgia State Schools ▶ Students make gains on Spring 2017 Georgia Milestones Assessments

Success in Georgia Public Education

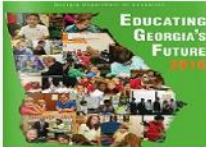



ESSA: Developing a Plan for Georgians, By Georgians



"With the passage of the Every Student Succeeds Act, we have an enormous opportunity to reshape Georgia education and get rid of the standardized, one-size-fits-all model that became prevalent under No Child Left Behind." – State School Superintendent Richard Woods

Got questions? AskDOE



Parents

- ▶ Information for Parents
- ▶ Parent Advisory Council
- ▶ Home Schooling

PARENT PORTAL

Teachers

- ▶ Teacher Resource Link
- ▶ Teacher/Leader Effectiveness
- ▶ Professional Learning

GREAT TEACHERS

Students

- ▶ Student Advisory Council
- ▶ Career Clusters/Pathways
- ▶ Assessments

STUDENT SPOTLIGHT

ABCs

- ▶ Accountability
- ▶ Accounting Services
- ▶ Advanced Placement

SCHOOL FINDER

Teaching and Learning

- Curriculum & Instruction
- Georgia Virtual Learning
- Student Support Teams
- Teacher and Leader Support and Development

External Affairs & Policy

- AskDOE
- Charter Schools
- Communications
- Excellence Recognition
- Governmental Affairs
- Policy
- State Board of Education

Finance & Business Operations

- Accounting Services
- Budget Services
- Facilities Services
- Financial Review
- Human Resources
- Internal Support
- Pupil Transportation
- School Nutrition

Technology Services

- Data Collections
- Georgia's Statewide Longitudinal Data System
- Infrastructure
- Instructional Technology
- PCGenesis

School Improvement

- Federal Programs
- Special Education Services and Supports
- School and District Effectiveness

Assessment & Accountability

- Accountability
- Assessment
- College and Career Ready Performance Index (CCRPI)

Career, Technical, Agricultural Education

State Schools

Parents

- ▶ Information for Parents
- ▶ Parent Advisory Council
- ▶ Home Schooling

Teachers

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- ▶ Teacher/Leader Effectiveness
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Students

- ▶ Student Advisory Council
- ▶ Career Clusters/Pathways
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ABCs

- ▶ Accountability
- ▶ Accounting Services
- ▶ Advanced Placement

PARENT PORTAL

GREAT TEACHERS

STUDENT SPOTLIGHT

SCHOOL FINDER

Guidance and Counseling

- [Guidance and Counseling Overview](#)
- [Career Development](#)
- [Counselor Resources](#)
- [Guidance and Counseling](#)
- [Capstone Career Related Project](#)
- [Hospital Homebound Services](#)
- [School Counselor Information](#)
- [School Social Work](#)

Clusters/Pathways

Development and Transition

- [Development and Transition Overview](#)
- [Career Related Education](#)
- [Transition Career Partnerships](#)
- [High Schools That Work](#)
- [Industry Certification Standards](#)
- [JROTC](#)
- [Middle School Performance Standards](#)
- [Nontraditional Occupations](#)
- [Professional Development](#)
- [Science, Technology, Engineering, Mathematics \(STEM\)](#)

Career, Technical and Agricultural Education

Career, Technical, and Agricultural Education (CTAE) is preparing Georgia's students for their next step after high school—college, beginning a career, registered apprenticeships, or the military. Georgia CTAE pathway course offerings, and the new Educating Georgia's Future Workforce initiative, leverage partnerships with industry and higher education to ensure students have the skills they need to thrive in the future workforce. CTAE offers students more than 130 career pathways within the 17 Georgia Career Clusters.

GACTE 70th Summer Leadership Conference CTAE Presentations



Contact Information

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 Career, Technical and Agricultural Education
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State Staff List

- [State CTAE Staff Contact List](#)

CTAE Quick Links

- [CTAE Partners Educating Georgia's Workforce Meetings](#)
 The Georgia Department of Education and the Career, Technical, and Agricultural Education Division invite you to join us as we connect with business and industry partners for economic development.

Guidance and Counseling

Guidance and Counseling Overview

Career Development

Counselor Resources

Guidance and Counseling

Capstone Career Related Project

Hospital Homebound Services

School Counselor Information

School Social Work

Clusters/Pathways

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Development and Transition Overview

Career Related Education

Transition Career Partnerships

High School Pathway Performance Standards

High Schools That Work

Industry Certification Standards

JROTC

Middle School Performance Standards

Nontraditional Occupations

Career Clusters/Pathways Resource Page

Students currently in grades 10, 11, or 12, and were enrolled in a Georgia public high school during the 2012-13 school year, and completed a Career Pathway course, please [visit this page](#) for additional information.

The information and links listed below are for new students entering a Georgia public high school in Fall 2013.

Web Pages and Information for Career Clusters/Pathways

- Career Clusters and Pathways courses

For each Career Cluster, the determined career pathways and sequenced courses are identified. Each Career Cluster web page lists the possible career pathways and courses needed for a student to be a successful pathway completer.

- Career Clusters/Pathways Plans of Study

A listing of academic, required elective, and recommended elective courses for students interested in a specific Career Pathway is available for students to review and follow as a guide through high school and to help prepare for postsecondary studies.

- Career Clusters/Pathways Information

This webpage features an overview of each Career Cluster along with survey

Cluster and Pathway Resources

- Pathway Comparison Chart
- CTAE Data Sets for FY16 CCRPI

Guidance and Counseling

[Guidance and Counseling Overview](#)

[Career Development](#)

[Counselor Resources](#)

[Guidance and Counseling](#)

[Capstone Career Related Project](#)

[Hospital Homebound Services](#)

[School Counselor Information](#)

[School Social Work](#)

Clusters/Pathways

Development and Transition

[Development and Transition Overview](#)

[Career Related Education](#)

[Transition Career Partnerships](#)

[High School Pathway Performance Standards](#)

Career Clusters and Pathway Courses

- Agriculture, Food, and Natural Resources
- Architecture and Construction
- Arts, AV/Technology, and Communications
- Business, Management, and Administration
- Education and Training
- Energy
- Finance
- Government and Public Administration
- Health Science
- Hospitality and Tourism
- Human Services
- Information Technology
- Law, Public Safety, Corrections, and Security
- Manufacturing
- Marketing
- Science, Technology, Engineering, and Mathematics
- Transportation, Distribution, and Logistics

CTAE Plan of Study Documents

- [CTAE Plan of Study page](#)

- [Return to Georgia's Career Pathways home page](#)

Guidance and Counseling

[Guidance and Counseling Overview](#)

[Career Development](#)

[Counselor Resources](#)

[Guidance and Counseling](#)

[Capstone Career Related Project](#)

[Hospital Homebound Services](#)

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[School Social Work](#)

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[Development and Transition Overview](#)

[Career Related Education](#)

[Transition Career Partnerships](#)

[High School Pathway Performance](#)

Health Science

Therapeutic Services/ Pharmacy

- [Introduction to Healthcare Science](#)
- [Essentials of Healthcare](#)
- [Pharmacy Operations and Fundamentals](#)

Therapeutic Services/ Public Safety Communications

- [Introduction to Healthcare Science](#)
- [Essentials of Healthcare](#)
- [Public Safety Communications](#)

Therapeutic Services/ Exercise Physiology

- [Introduction to Healthcare Science](#)
- [Essentials of Healthcare](#)
- [Fundamentals of Exercise Physiology](#)

Therapeutic Services/ Dental Science

- [Introduction to Healthcare Science](#)
- [Essentials of Dental Science](#)
- [Dental Science II](#)

Therapeutic Services/ Emergency Medical Responder

- [Introduction to Healthcare Science](#)
- [Essentials of Healthcare](#)
- [Emergency Medical Responder](#)

Therapeutic Services/ Sports Medicine

- [Introduction to Healthcare Science](#)
- [Essentials of Healthcare](#)
- [Sports Medicine](#)

Health Science Cluster
Introduction to Healthcare Science
Course Number 25.52100

Course Description:

Introduction to Healthcare Science is the foundational course for all Health Science pathways and is a prerequisite for all other Healthcare Science pathway courses. This course will enable students to receive initial exposure to the many Healthcare Science careers as well as employability, communication, and technology skills necessary in the healthcare industry. The concepts of human growth and development, interaction with patients and family members, health, wellness, and preventative care are evaluated, as well as the legal, ethical responsibilities of today's healthcare provider. Fundamental healthcare skills development is initiated including microbiology, basic life support and first aid. This course will provide students with a competitive edge to be the better candidate for either entry into the healthcare global marketplace and/or the post-secondary institution of their choice to continue their education and training. The pre-requisite for this course is advisor approval.

Course Standard 1

HS-IHS-1

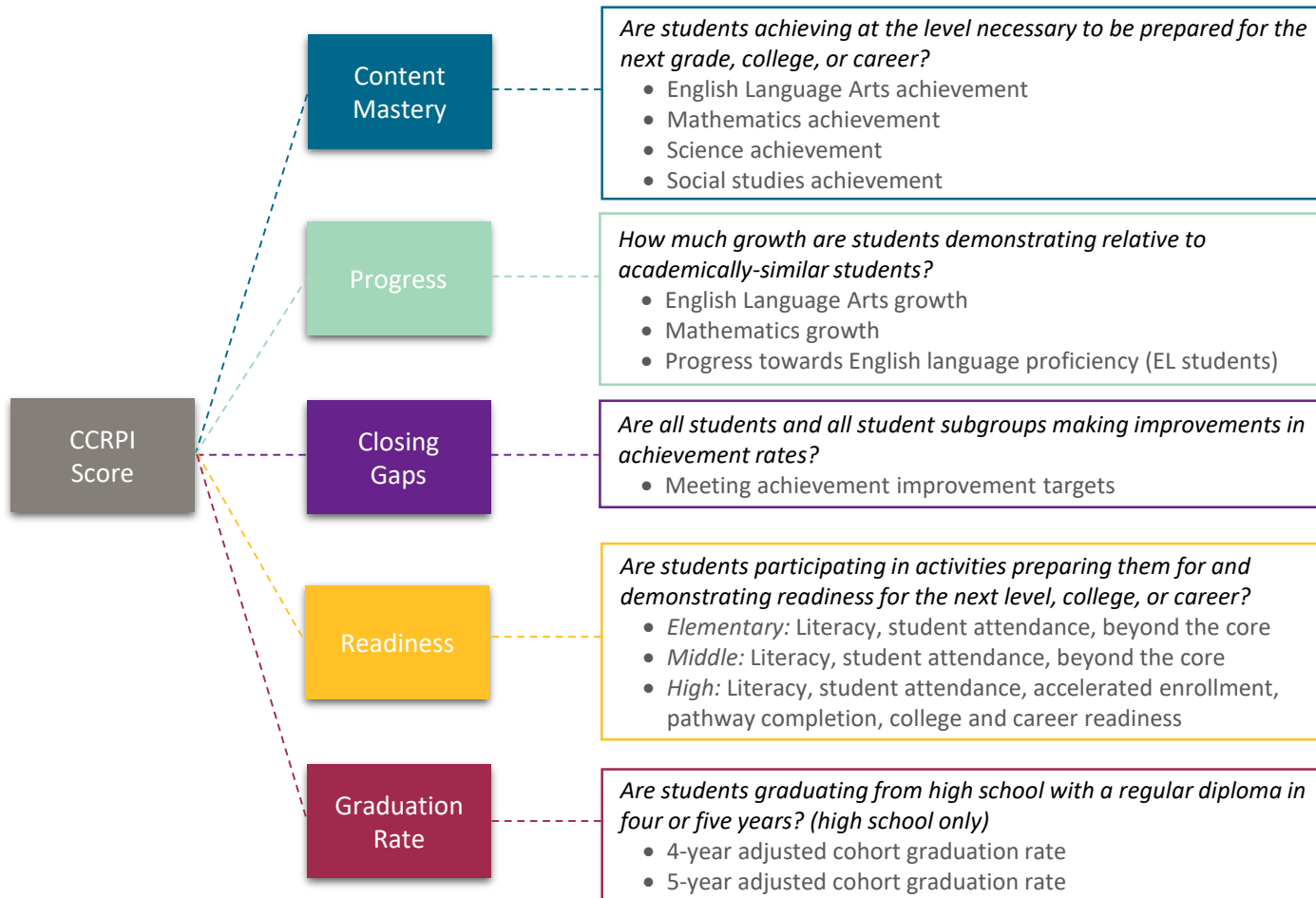
Demonstrate employability skills required by business and industry.

The following elements should be integrated throughout the content of this course.

- 1.1 Communicate effectively through writing, speaking, listening, reading, and interpersonal abilities.
- 1.2 Demonstrate creativity with multiple approaches to ask challenging questions resulting in innovative procedures, methods, and products.
- 1.3 Exhibit critical thinking and problem solving skills to locate, analyze, and apply information in career planning and employment situations.
- 1.4 Model work readiness traits required for success in the workplace including integrity, honesty, accountability, punctuality, time management, and respect for diversity.
- 1.5 Apply the appropriate skill sets to be productive in a changing, technological,

CTAE Specific CCRPI Indicators

Redesigned CCRPI



Readiness Indicators

CCRPI Readiness Indicators

Elementary School

Literacy: Percent of students in grades 3-5 demonstrating reading comprehension at or above the lower bound of the College & Career Ready “Stretch” Lexile Band for each grade level.

Student Attendance: Percent of students in grades K-5 absent less than 10% of enrolled days.

Beyond the Core: Percent of students earning credit in fine arts or world language.

Middle School

Literacy: Percent of students in grades 6-8 demonstrating reading comprehension at or above the lower bound of the College & Career Ready “Stretch” Lexile Band for each grade level.

Student Attendance: Percent of students in grades 6-8 absent less than 10% of enrolled days.

Beyond the Core: Percent of students earning credit in fine arts, world language, physical education/health, or career exploratory.

High School

Literacy: Percent of students in 9th Grade Literature and American Literature demonstrating reading comprehension at or above the lower bound of the College & Career Ready “Stretch” Lexile Band for each course.

Student Attendance: Percent of students in grades 9-12 absent less than 10% of enrolled days.

Accelerated Enrollment: Percent of graduates earning credit for accelerated enrollment via Move on When Ready, Advanced Placement, or International Baccalaureate courses.

Pathway Completion: Percent of graduates completing an advanced academic, CTAE, fine arts, or world language pathway.

College and Career Readiness: Percent of graduates entering TCSG/USG without needing remediation; achieving a readiness score on the ACT, SAT, two or more AP exams, or two or more IB exams; passing a pathway-aligned end of pathway assessment (EOPA) resulting in a national or state credential; or completing a work-based learning program.

ACHIEVEMENT

2017 Post High School Readiness Indicators
1.875 points each

Indicator Number	Indicator	Description	Denominator	Numerator	Data Sources
13	Percent of graduates completing a career-related Work-Based Learning Program. Green indicates that this indicator is benchmarked at the 95 th percentile based on state level data.		Count of graduates with a regular diploma	Count of graduates earning WBL credit.	Course Credit, Course Number, Diploma Type, GTID, School Code, System Code, Student ID, Withdrawal Code

Work-Based Learning Basics

History of WBL in Georgia

- Pre 1970 - Specific on the job opportunities built into some vocational and training courses. Diversified Cooperative Training (DCT) was created and funded by the state.
- 70's and 80's - Development of Trade and industrial Education and many other vocational areas focused on occupational training. Coop or internship was added to many curricula.
- 1994 Youth Apprenticeship Law was passed and pilot sites were conducted in 1995. State funded grants are used to support existence of Youth Apprenticeship coordinators in the schools.
- 2004 Youth Apprenticeship grant was expanded to allow all local systems to apply for funding.
- 2006 WBL Re-Engineering consolidated all fragmented programs into one school wide WBL coordinator model to serve students from all CTAE areas.
- 2007-2016 - large increase in the number of WBL coordinators and enrollment.
- 2007 - Creation of the 12 for Life program in Carrollton with Southwire.
- 2015 - First MOU between GaDOE and Great Promise Partnership.
- 2016 - Creation of the German Apprenticeship model within the WBL program at CEC and Swiss model at Whitfield Career Academy.
- 2017 -WECEP application to the federal government to allow 15 year olds to participate on the worksites of the German Apprenticeship model.
- 2018 Latest revision of the WBL Manual.
- 2019 Student Scholarships being awarded by the WBL Affiliate of GACTE.



State Board Rules

- **160-4-3-.14 WORK-BASED LEARNING PROGRAMS** - Establishes requirements for public schools offering Work-Based Learning:
 - ✓ (b) Follow State and Federal Laws
 - ✓ (c) Manageable workload for student placements
 - ✓ (d) Supervision during times student is receiving credit
 - ✓ (e) Must submit annual data to GaDOE
 - ✓ (f) Keep up-to-date records in C-NET
 - ✓ (g) Follow State WBL Manual
 - ✓ (h) WBL must meet PSC certification requirements and complete State sponsored training
- **160-4-3-.13 YOUTH APPRENTICESHIP PROGRAMS** - Defines requirements for systems applying for State grant funds to offer YAP as part of their WBL program:
 - ✓ Coordinator must attend State sponsored training
 - ✓ 720 hours on-the-job training; achieve a post secondary credential
 - ✓ Established partnership with businesses who desire to grow their own workforce
 - ✓ Follow all requirements defined in the Georgia WBL Manual



Georgia

Work-Based Learning Program Standards and Guidelines

A Resource Manual for WBL Coordinators 2018



Mr. Richard Woods, State School Superintendent
"Educating Georgia's Future"



- Section i: Introduction to Work-Based Learning and YAP**
- Section 1: CTAE Programs and Participants' Responsibilities**
- Section 2: Career Awareness Activities**
- Section 3: Career Exploration Activities**
- Section 7: The Work-Based Learning Delivery Model**
- Section 8: Certification and Training for WBL Coordinators**
- Section 9: The WBL Advisory Committee**
- Section 10: Teaching Employability Skills**
- Section 11: Individual Graduation Plans and Pathways for WBL Students**
- Section 12: Business Partnerships and Creating Worksite Placements**
- Section 13: Recruitment, Student Application, and Admission Procedures**
- Section 14: Student Mentors**
- Section 15: Policy, Legal and Labor Issues**
- Section 16: Training Agreements**
- Section 17: Training Plans**
- Section 18: Student Evaluation Procedures**
- Section 19: Course Credit and Student Records**
- Section 20: Work Site Visitation**
- Section 21: Post-Secondary Opportunities**
- Section 22: Public Relations and Program Promotion**
- Section 23: WBL Students at Risk or with Special Needs**
- Section 24: Program Assessment**

Visit the WBL Website www.gawbl.org



Is a work-based learning program right for your business?

Work-Based Learning and Youth Apprenticeship Program



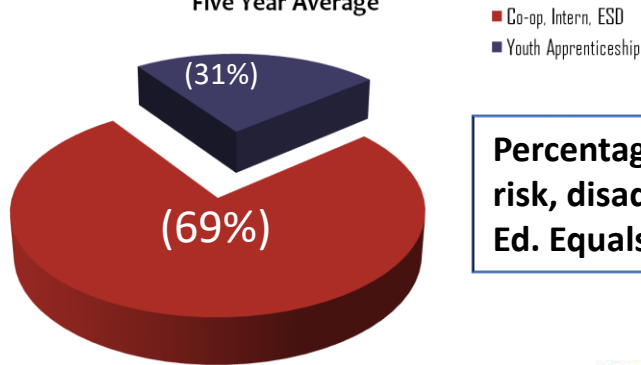
Student Enrollment in CTAE Classes FY18

(Students enrolled in one or more CTAE courses)

60% of all Students in Grades 9-12 Statewide (**350,948 students**)

96% Graduation Rate for CTAE Concentrators

Youth Apprenticeship Enrollment Compared to Work-Based Learning Enrollment Five Year Average

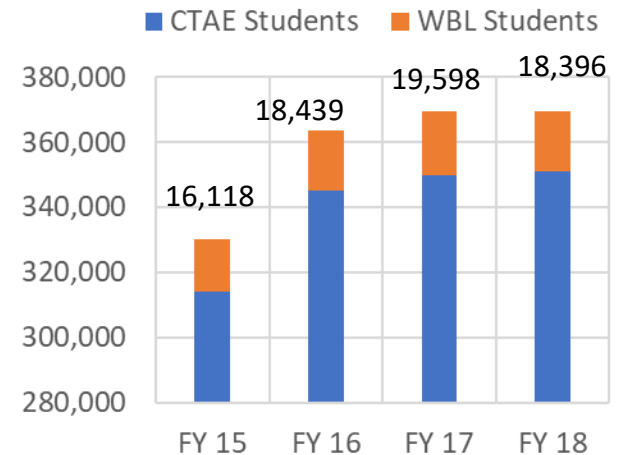


- Co-op, Intern, ESD
- Youth Apprenticeship

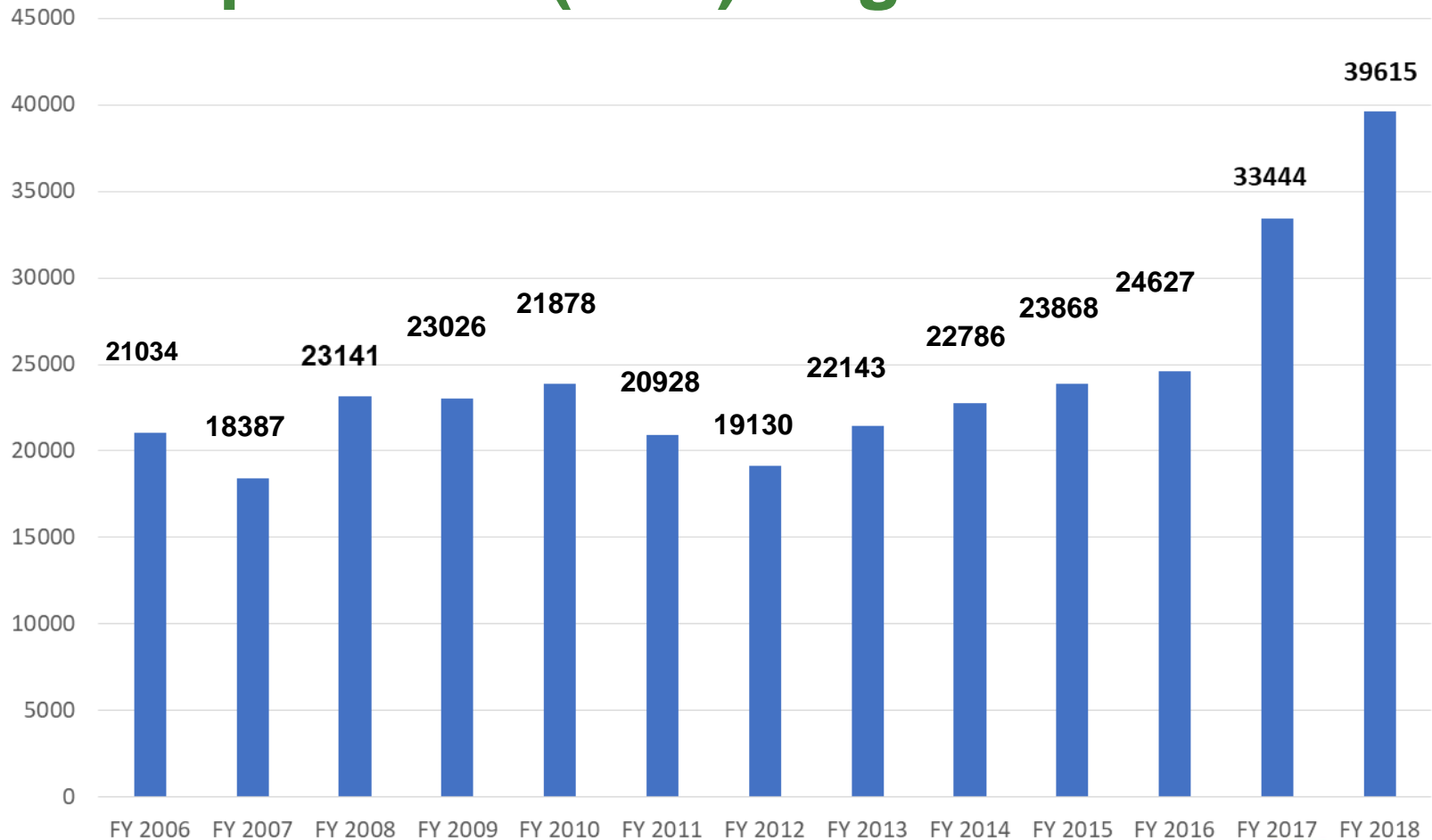
Percentage of WBL Students at risk, disadvantaged or Special Ed. Equals 13% (3 year average)



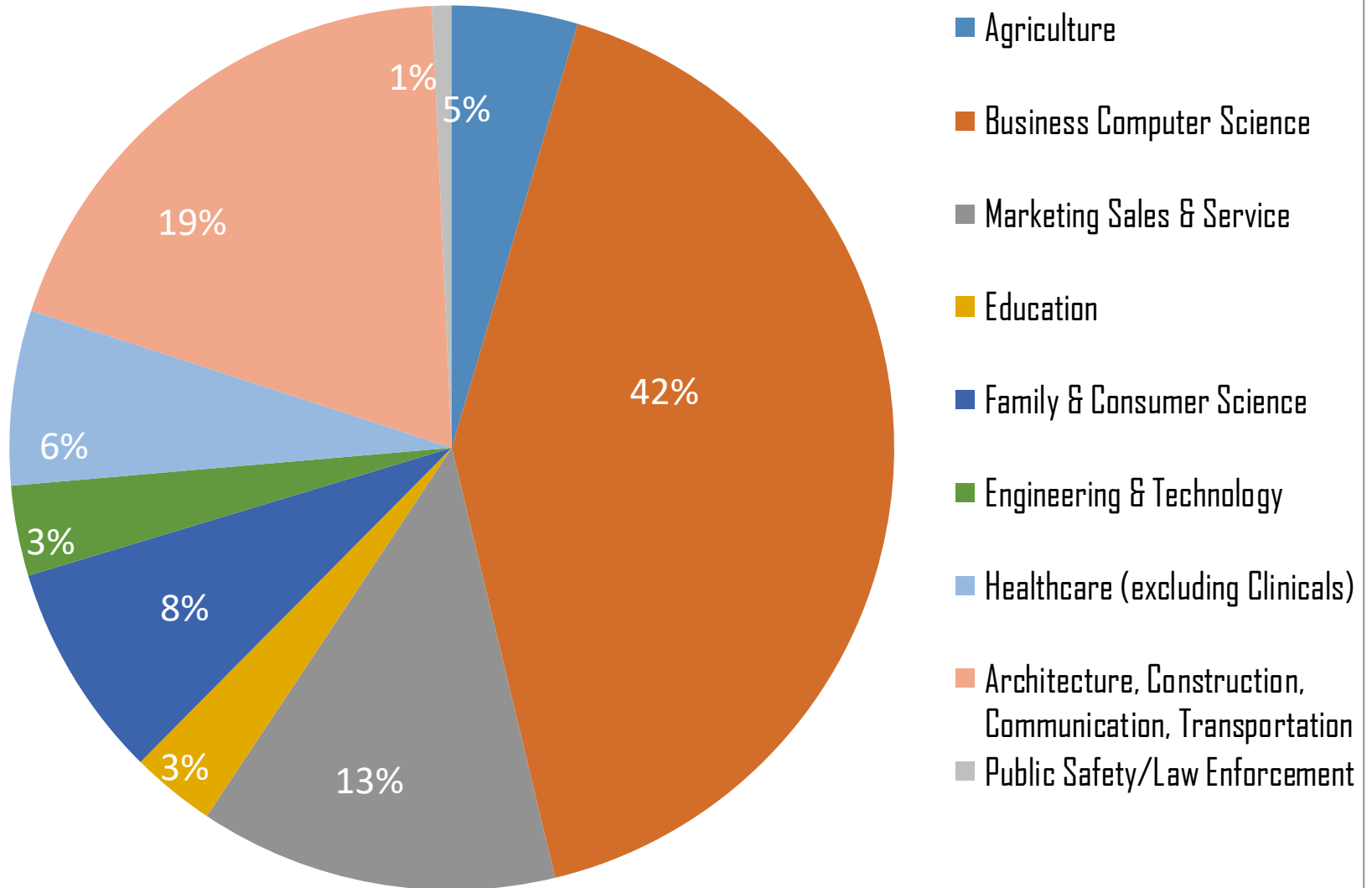
WBL Participators in CTAE



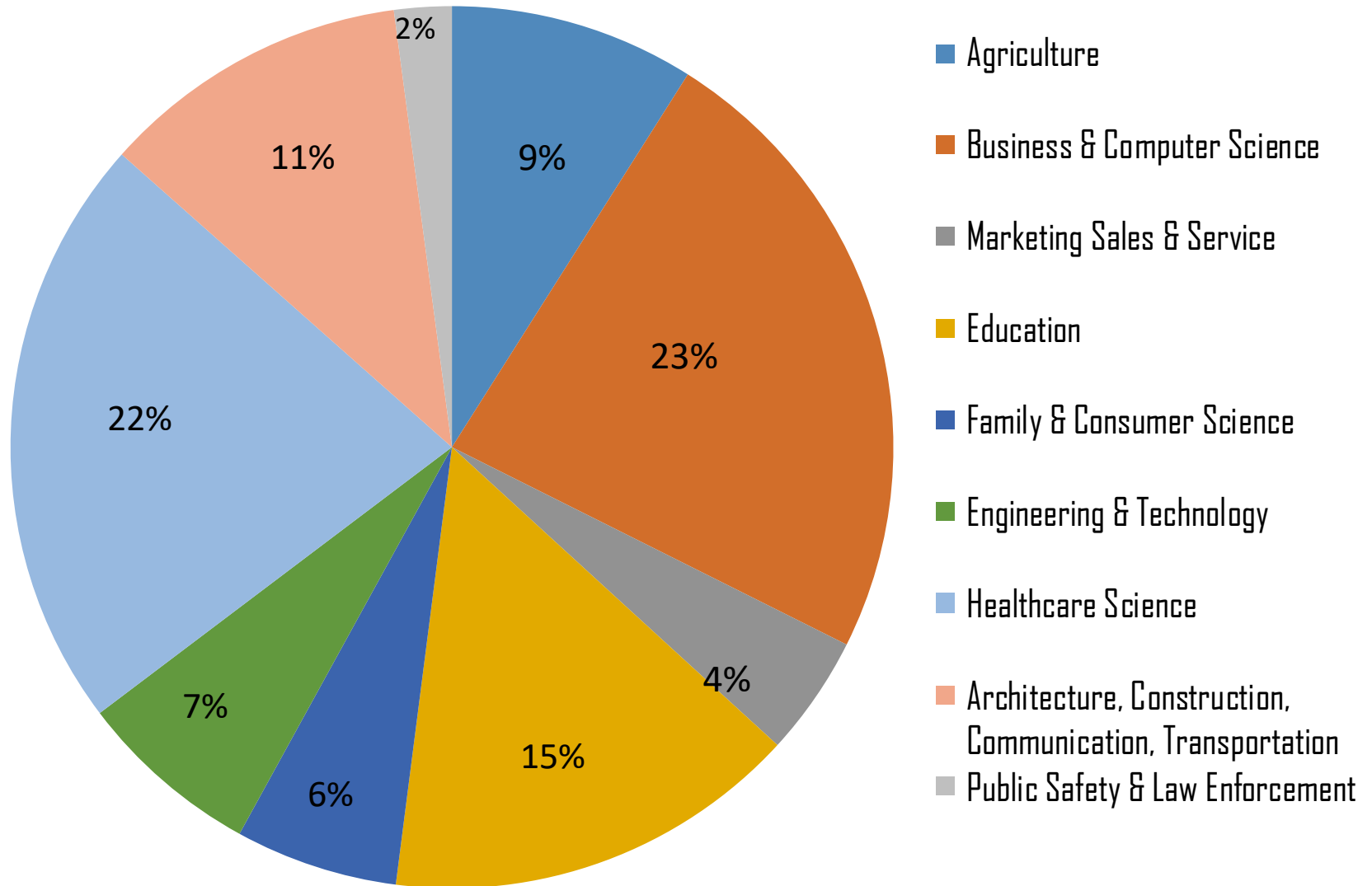
WBL Student Enrollment Credit Earned in Full Time Equivalent (FTE) Segments



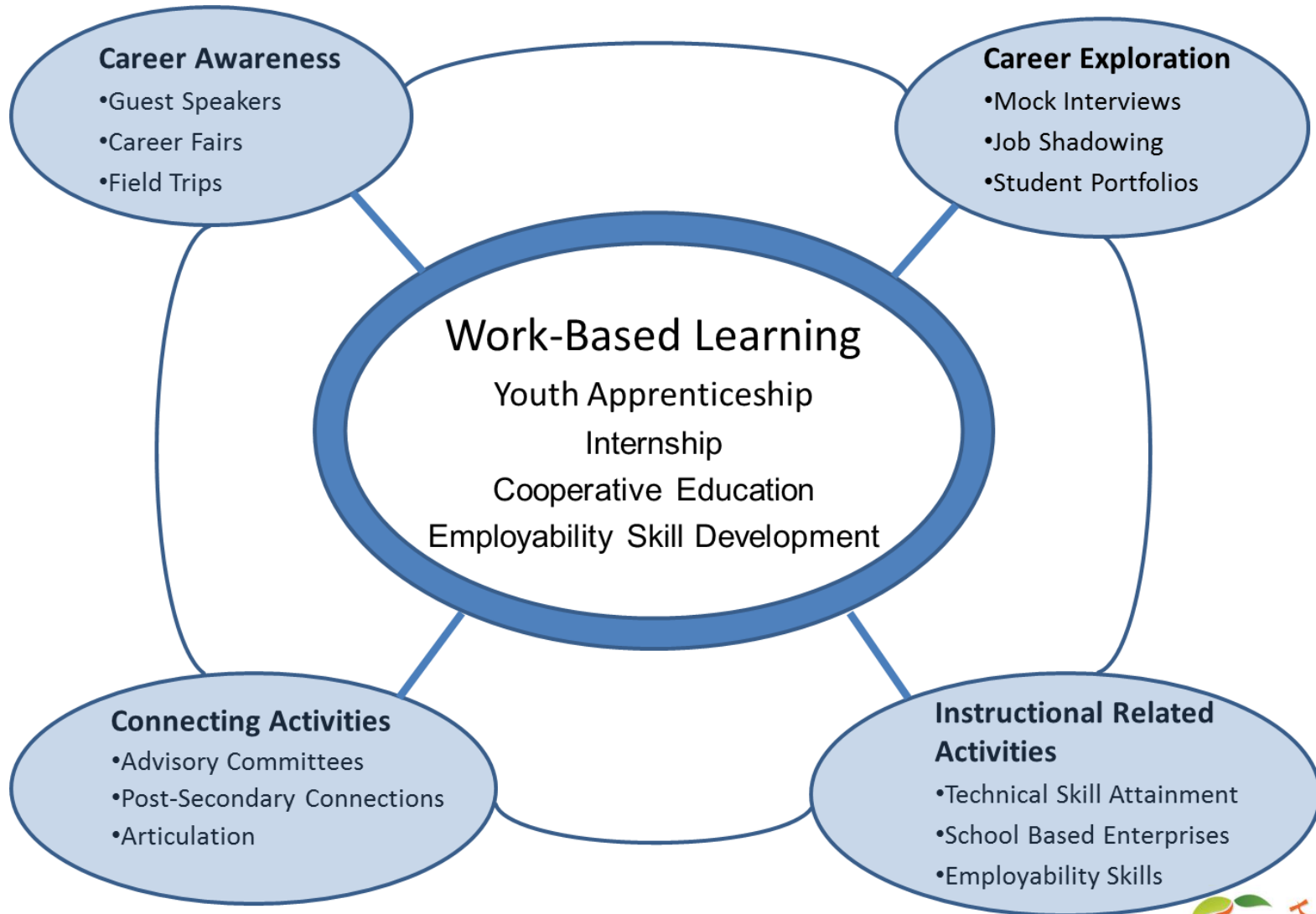
Three Year Average WBL Enrollment Data



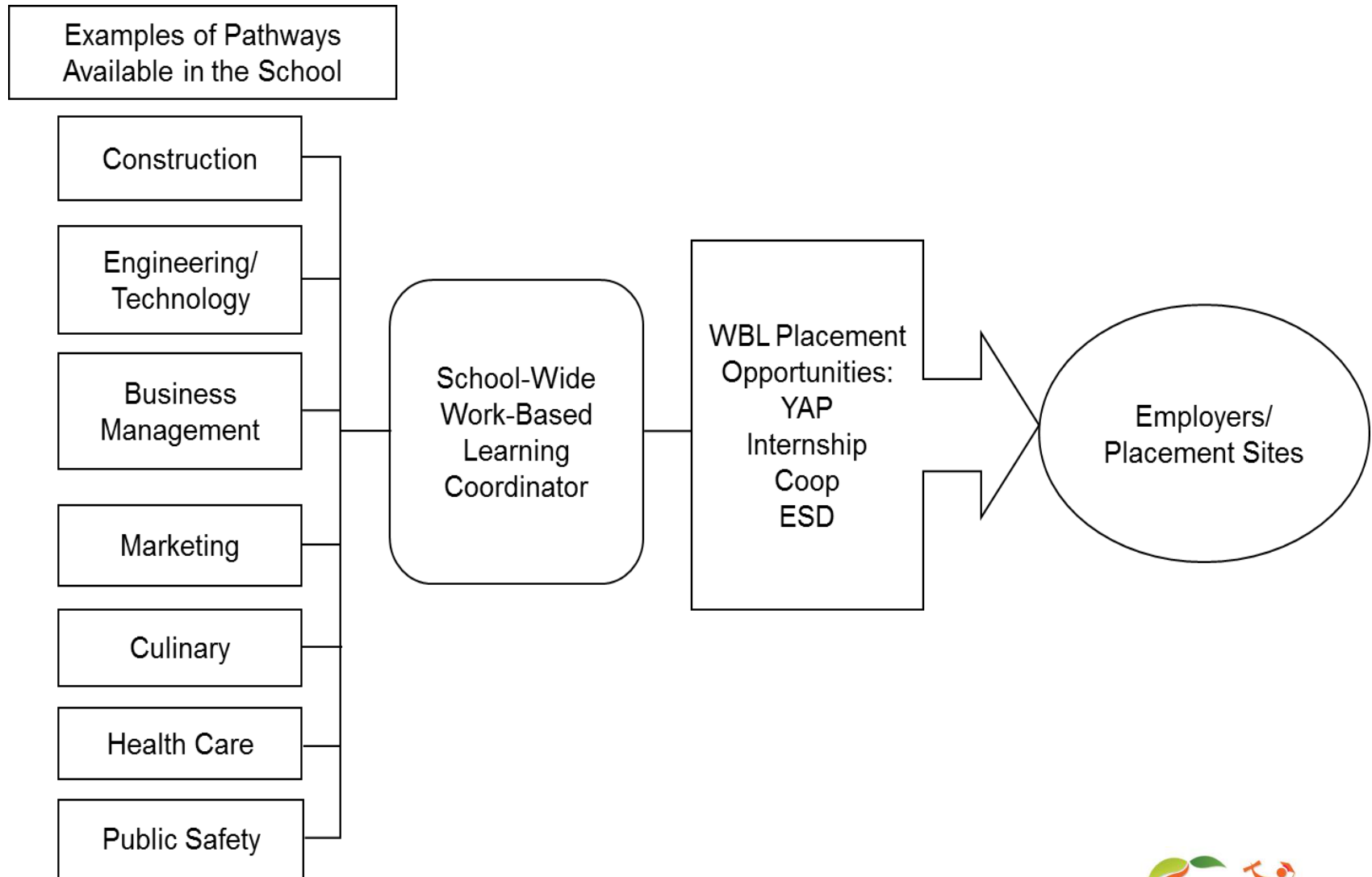
Three Year Average YAP Enrollment Data



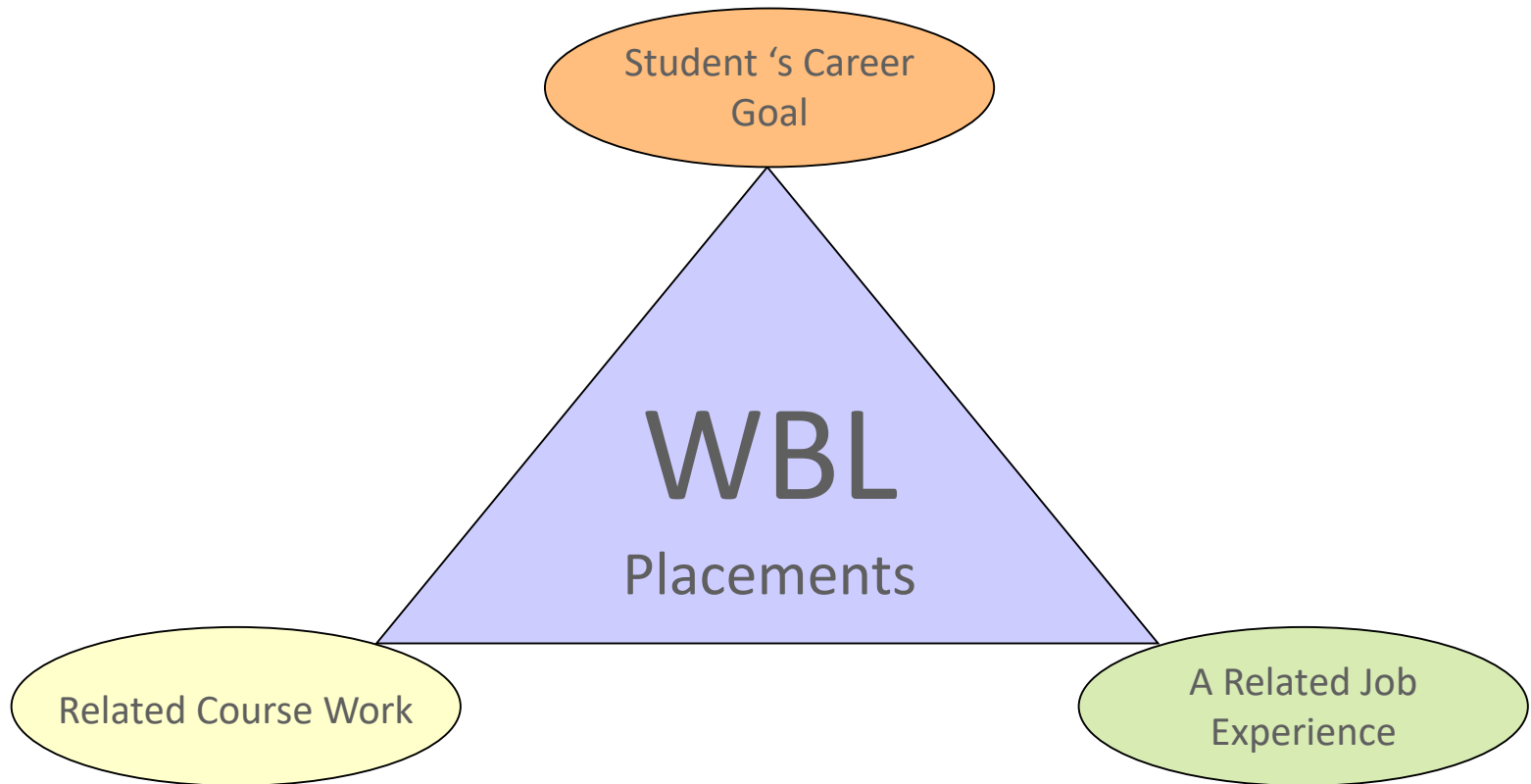
Career Related Education



Georgia WBL Delivery Model



Three Common Denominators for All Work-Based Learning Placements



Work Based Learning Categories

- Youth Apprenticeship – Placement requires completion of one unit of related instruction; must include a post-secondary training component; 720 hours of on-the-job training; for high wage, high skill, high demand jobs
- Internship - Placement requires completion of one unit of related instruction; may be paid or unpaid
- Cooperative Education – Must be concurrently enrolled in the related CTAE course; must be a paid job
- Employability Skill Development – Student is taking or has taken a CTAE course; must be a paid job; training plan based on application of identified employability skills
- Great Promise Partnership (GPP)– Non-profit Foundations that works with GADOE under a MOU to place at risk students on WBL sites.

Admissions and Scheduling for WBL

- Selective vs. Elective
- Application Process
- Requirements and Coordination of Student Selection
 - Students Career Goal
 - Related Coursework Taken
 - Job Placement/Training Plan
- Placement by the WBL Coordinator vs. Approval of Job Acquired by the Student

Work Based Learning Update

- Work Based Learning numbers require insertion of the subject CIP code.

The first digit past the decimal is “7” for all WBL enrollments.

Indicates Semester 1 or 2 of WBL enrollment

Last two digits for local use.

XX.711400

Subject Code is inserted matching the student’s pathway

Indicates Year 1 or 2 of WBL enrollment

4 = one credit
5 = two credits
6 = three credits

CIP	Cluster/Pathway Title	Funding Weight
01.	Agriculture	K
02.	AgriScience	K
03.	Natural Resources	K
06.	Business Management	K
07.	Business Computer Science	K
08.	Marketing	K
10.	Communication Technologies	K
11.	Information Technology	K
12.	Personal Services Occupations	K
13.	Education	K
20.	Family and Consumer Sciences	K
20.	Culinary Arts	K
21.	Engineering and Technology	K
25.	Healthcare Science	K
28	Junior ROTC	K
35	Great Promise Partnership (GPP)	K
43.	Public Safety	K
46.	Construction Technology	K
47.	Architecture, Construction, Communication & Transportation	K
48.	Precision Production Occupations	K
49.	Manufacturing & Engineering Sciences	K
26.	Life Sciences	K
40.	Physical Sciences	K
23.	Language Arts	K
27.	Mathematics	K
45.	Social Sciences	K
50.	Visual Arts	K
51.	Dance	K
52.	Theatre Arts	K
53.	Music	K
60-63	Spoken Languages	K

Subject Codes for WBL Course Numbers

WBL Professional Development

- Region Meetings – 3 or 4 per year
 - Most important professional learning event for WBL.
 - Even though this is a challenge with part time coordinators find a way to enable them to attend.
- GACTE – Technical updates on affiliate day
- WBL/YAP Conference
- Basic Training Part A (June) and Part B (January or February) – Geographically located, North, Central, South
- WBL Update/Refresher Training – Always in June
- Top Gun – Best of the Best by invitation only

Perkins V

- On July 31, 2018, the President signed the *Strengthening Career and Technical Education for the 21st Century Act* into law. This bill reauthorizes the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins) and will be referred to as Perkins V.
- Perkins V one-year transition plan was due Spring 2019, the four-year state plan is due Spring 2020.
- New emphasis on “in-demand” industry sectors and occupations.
- References the WIOA term “recognized postsecondary credential,” but limits the list for the purposes of this law to industry-recognized credentials, certificates, or associate degrees to ensure funding remains focused on sub-baccalaureate credentials.
- Includes new references to work-based learning, career exploration, and secondary-postsecondary connections,

Work-based Learning

- A new, formal definition of work-based learning is included. It emphasizes sustained interactions with industry or community professionals in real workplace settings where possible, but includes simulated environments as well. Under the definition, work-based learning must foster in-depth, first-hand engagement with the tasks required of a given career field and be aligned to curriculum and instruction.

1. There are a total of 25 permissible uses of funds under this section, which vary greatly in scope and feasibility. In brief, they are:
 - developing statewide programs of study;
 - approving locally developed programs of study;
 - establishing statewide articulation agreements;
 - establishing statewide sector or industry partnerships;
 - high-quality comprehensive professional development;
 - supporting eligible recipients in eliminating inequities in student access to high-quality programs of study and effective instructional personnel;
 - awarding incentive grants to eligible recipients;
 - supporting the adoption and integration of recognized postsecondary credentials and work-based learning into programs of study, and for increasing data collection associated with recognized postsecondary credentials and employment outcomes or consultation with other state agencies on licenses or certifications;
 - pay for success initiatives leading to a recognized postsecondary credential;
 - supporting CTE programs for adults and out-of-school youth;
 - supporting competency-based curricula;
 - supporting programs of study or career pathways in areas declared to be in a state of emergency;
 - partnering with qualified intermediary organizations;
 - improving career guidance and academic counseling programs;
 - supporting the integration of employability skills into CTE programs and programs of study;
 - supporting programs and activities that increase access, student engagement, and success in science, technology, engineering, and mathematics fields (including computer science, coding, and architecture), supporting the integration of arts and design skills, and supporting hands-on learning, particularly for students who are members of groups underrepresented in such subject fields;
 - supporting career and technical student organizations (CTSOs);
 - **establishing and expanding work-based learning opportunities;**
 - integrating and aligning programs of study and career pathways;
 - supporting the use of CTE programs and programs of study aligned with in-demand industry sectors or occupations;
 - making all forms of instructional content widely available;
 - developing valid and reliable assessments of competencies and technical skills and enhancing data systems to collect and analyze data on secondary and postsecondary academic and employment outcomes;
 - supporting accelerated learning programs that are part of a program of study;
 - supporting career academies; and
 - other State Leadership activities that improve CTE

**Questions
Or
Comments**



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