

# 2008-2009 Quality Assurance (QA) Report for **Exemplary Programs** (Final) Juvenile Justice Educational Enhancement Program (JJEED)

Florida Department of Education, Bureau of Exceptional Education and Student Services

## RESIDENTIAL COMMITMENT PROGRAM (Low/Mod)

<b>School Name (MSID)</b>	ICARE - NORTH	<b>School #</b> 13-7809 <b>School District</b> Dade <b>County</b> Dade	<b>Security Level</b> Moderate Risk  <b>Career Type</b> 2  <b>ESE Service Delivery</b> Consultation Support Facilitation
<b>Program Name</b>	Bay Point Schools North	<b>Capacity</b> 28 <b>Population</b> Male	<b>Diplomas by Program</b> None
<b>Address</b>	20660 NW 47th Ave Carol City, FL 33055	<b>Head Count</b> 24 <b>SD Registered</b> 25 <b>HSD/GED</b> 0 <b>DJJ Committed</b> 25	<b>Other School in SD</b> All Alternative Outreach
<b>Education Provider</b>	Miami-Dade School District (School District)	<b>Max Ratio (Student: Teacher)</b> 14:1	<b>Students' Home/Zoned Schools</b> None
<b>Facility Provider</b>	Bay Point Schools, Inc. (Not-For-Profit)		
<b>Education Provider Change</b>	NA	<b>Title I, (A)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>Title I, (D)</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Students who have reading deficiencies</b> 18
<b>SD Contract Manager</b>	Miguel Torres	<b>Phone</b> (305) 636-6147 <b>Fax</b> (305) 636-6199	<b>E-mail</b> migueltorres@dadeschools.net
<b>Other SD Contact</b>	Barbara Union - Van Leer	<b>Phone</b> (305) 636-6151 <b>Fax</b> (305) 636-6199	<b>E-mail</b> bvanleer@dadeschools.net
<b>Lead Educator</b>	Pedro Suarez	<b>Phone</b> (305) 628-7213 <b>Fax</b> (305) 620-2331	<b>E-mail</b> 216698@dadeschools.net
<b>Facility Director</b>	Octavian Henderson	<b>Phone</b> (305) 628-7207 <b>Fax</b> (305) 474-7016	<b>E-mail</b> ohenderson@baypointschoolsnorth.com
<b>SD Transition Contact</b>	Maria Gutierrez	<b>Phone</b> (305) 261-4822 <b>Fax</b> (305) 273-9252	<b>E-mail</b> mdgutierrez@dadeschools.net
<b>QA Reviewer</b> George Pesta <b>Review Dates</b> March 25, 2009		<b>E-mail</b> gpesta@fsu.edu	<b>A full follow-up QA review is required.</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

# JJEEP QA REVIEW METHODS

**The findings in this report are based on interviews, document review, and on-site observations.**

<b>Pre-Review Contacts and Self-Report Verification</b>				
<input checked="" type="checkbox"/> SD Contract Manager or Designee <input checked="" type="checkbox"/> Lead Educator <input checked="" type="checkbox"/> Facility Director <input type="checkbox"/> Education Coordinator				
<b>Interviews</b>	<input checked="" type="checkbox"/> SD Contract Manager <input checked="" type="checkbox"/> Other SD Contact <input checked="" type="checkbox"/> Lead Educator <input type="checkbox"/> Facility Director	<input type="checkbox"/> Registrar <input type="checkbox"/> Education Coordinator <input type="checkbox"/> SD ESE Consultant <input type="checkbox"/> ESE Coordinator	<input type="checkbox"/> Reading Coach <input type="checkbox"/> SD Transition Coordinator <input type="checkbox"/> Others:	1 Teachers 0 Teacher Aides 0 Guidance Staff 4 Students
<b>Document Review</b>	<input checked="" type="checkbox"/> Self-Report <input checked="" type="checkbox"/> Previous Year's QA Report <input type="checkbox"/> Previous Year's CAP <input type="checkbox"/> Private Provider Contract <input type="checkbox"/> Quarterly Expenditures <input checked="" type="checkbox"/> Program Evaluation Materials <input type="checkbox"/> Behavior Management Plan <input checked="" type="checkbox"/> Educational Policies/Procedures	<input type="checkbox"/> Meeting Agendas/Logs <input checked="" type="checkbox"/> Curricula/Resources <input type="checkbox"/> Volunteer Logs <input checked="" type="checkbox"/> Annual School Calendar <input type="checkbox"/> Guidance Forms <input checked="" type="checkbox"/> Class Schedules <input checked="" type="checkbox"/> Attendance Rosters <input type="checkbox"/> Student Progression Plan	<input type="checkbox"/> Community Involvement Logs <input type="checkbox"/> Visitors Log <input checked="" type="checkbox"/> Teachers' Lesson Plans <input type="checkbox"/> Student Work Samples <input checked="" type="checkbox"/> Bell Schedule <input checked="" type="checkbox"/> Personnel Files <input type="checkbox"/> SD Comprehensive Reading Plan <input type="checkbox"/> School Improvement Plan	<input checked="" type="checkbox"/> Cooperative Agreement 6 Current Educational Files 4 Cumulative Transcripts <input type="checkbox"/> Others:
<b>On-site Observations</b>	1 Classrooms	0 Treatment Team Meetings	Others: None	

## QA Rating Scale

### ***Superior Performance – Rating of 7, 8, or 9***

The expected outcome of the indicator is clearly being met; the program exceeds the overall requirements of the indicator through an innovative approach, extended services, or demonstrated program-wide dedication to the overall performance of the indicator.

### ***Satisfactory Performance – Rating of 4, 5, or 6***

The expected outcome of the indicator is clearly being met; some minor exceptions or inconsistencies in meeting specific benchmarks may be evident.

### ***Partial Performance – Rating of 1, 2, or 3***

The expected outcome of the indicator is not being met, and frequent exceptions and inconsistencies in meeting specific benchmarks are evident.

### ***Nonperformance – Rating of 0***

The expected outcome of the indicator is clearly not being addressed.

## SUMMARY

Bay Point School North primarily serves middle school and lower-level high school students. The school district uses multiple strategies for evaluation, oversight, and assistance to the program such as providing support personnel in the areas of curriculum, reading, exceptional student education (ESE,) and transition services.

The program has a full-time support facilitator who provides direct services daily to students in the classrooms and maintains weekly student progression logs that detail ESE students' progress toward their IEP goals and objectives.

Reading and literacy are encouraged throughout the program. Based on the results of this review, the program maintains its exemplary status.

The findings in this report are based on document review, interviews, and on-site observations.

## QA TRENDS: Bay Point Schools North

When making cross-year comparisons of your program's QA scores keep in mind that JJEP's educational standards generally become more demanding each year as the bar is raised with the expectation for continuous improvement. State average scores for **low/moderate security programs** are provided for comparison purposes between your program's performance and the state average.

Note that the score for *Standard Four: Contract Management* is not included in the program's overall average because it solely measures the performance of the supervising school district.

2006			2007-2008			2008-2009	
Educational Indicators	Score	Low/Mod State Avg.	Educational Indicators	Score	Low/Mod State Avg.	Critical Benchmarks	Score
Transition Services	6	5.44	On-Site Transition Services	7	4.94	Enrollment	Pass
Testing & Assessment	5	4.73	Testing & Assessment	7	5.73	Entry Academic Assessment	Pass
Student Planning	7	4.65	Student Planning	7	4.18	Individual Academic Plans (IAPs)	Pass
			Community Reintegration	8	5.60	Individual Education Plans (IEPs)	Pass
<b>STANDARD ONE: TRANSITION Standard Average</b>	<b>6.00</b>	<b>4.94</b>	<b>STANDARD ONE: TRANSITION Standard Average</b>	<b>7.25</b>	<b>5.13</b>	Substantial Academic Curriculum	Pass
Academic Curriculum & Instruction	7	5.45	Academic Curriculum & Instruction	5	4.94	Explicit Reading Instruction	Pass
Reading Curriculum & Instruction	7	4.51	Reading Curriculum & Instruction	7	4.52	ESE Process	Pass
Employability & Career Curriculum & Instruction	5	5.63	Employability & Career Curriculum & Instruction	7	6.05	Adequate Instructional Time	Pass
ESE & Related Services	2	5.37	ESE & Related Services	7	5.45	Teacher Certification	Pass
<b>STANDARD TWO: SERVICE DELIVERY Standard Average</b>	<b>5.25</b>	<b>5.34</b>	<b>STANDARD TWO: SERVICE DELIVERY Standard Average</b>	<b>6.50</b>	<b>5.27</b>	Data Management	Pass
Collaboration	4	5.49	Collaboration	6	5.69	Contract Management Oversight	Pass
Educational Personnel Qualifications	5	4.86	Educational Personnel Qualifications	6	5.00	Full Follow-up QA Review Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Professional Development & Teacher Retention	5	5.40	Professional Development & Teacher Retention	6	5.46		
Learning Environment & Resources	5	5.00	Learning Environment & Resources	7	5.53	Exemplary programs who fail two or more critical benchmarks will receive a full follow-up QA review the same year.  For state agency and annual reporting purposes, the QA scores for those programs who receive exemplary status are carried over each year for the duration of their exemplary status until they receive another full educational QA review.	
<b>STANDARD THREE: EDUCATIONAL RESOURCES Standard Average</b>	<b>4.75</b>	<b>5.39</b>	<b>STANDARD THREE: EDUCATIONAL RESOURCES Standard Average</b>	<b>6.25</b>	<b>5.50</b>		
<b>OVERALL AVERAGE</b>	<b>5.27</b>	<b>5.25</b>	<b>OVERALL AVERAGE</b>	<b>6.67</b>	<b>5.31</b>		
<b>STANDARD FOUR: CONTRACT MANAGEMENT</b>	<b>3.00</b>	<b>3.87</b>	<b>STANDARD FOUR: CONTRACT MANAGEMENT</b>	<b>7.00</b>	<b>4.82</b>		

# Bay Point Schools North-- 2006-2007 SURVEY 5 DATA

## STUDENT DEMOGRAPHIC DATA 2006-2007

STUDENTS SERVED						Attendance File	59	TOTAL 66			
						Dropout Prevention File	57	(Unduplicated)			
GENDER	#	%	AGE	#	%	GRADE LEVEL	#	%	ESE	#	%
Male	66	100	12 & under	8	12	K-5	0	0	Mentally Handicapped (EMH, TMH, PMH)	1	2
Female	0	0	13	12	18	6	3	5	Emotional/Behavioral Disabilities	13	20
RACE	#	%	14	18	27	7	21	32	Specific Learning Disabled	10	15
White (NH)	7	11	15	17	26	8	9	14	Autism Spectrum Disorder	0	0
Black (NH)	49	74	16	5	8	9	24	36	Speech/Language Impaired	2	3
Hispanic	10	15	17	5	8	10	6	9	Sensory Impaired (hearing, visual, dual) & Orthopedic Impairment	0	0
Other	0	0	18	1	2	11	3	5	Gifted	0	0
			19 & above	0	0	12	0	0	Traumatic Brain Injured	0	0
FCAT PARTICIPATION	#	%				Adult	0	0	Hospital Homebound	0	0
2006-07 Reading	20	95	Diplomas Earned	#	%				Other Health Impaired	2	3
2006-07 Math	20	95	Standard *	0	0				<b>TOTAL ESE</b>	28	42
2007-08 Reading	22	100	GED	0	0	LEP STUDENTS	#	%			
2007-08 Math	22	100	Special	0	0		1	2			

**NOTE: Student counts are based upon an unduplicated count of students served as reported in both the attendance and the dropout prevention files. This unduplicated count is matched to the demographic and the ESE files. Diplomas earned are independently retrieved from the end-of-the-year file.**

\* Includes the GED Exit Option

## BENCHMARKS

## FINDINGS

<b>BENCHMARK 1.1: ENROLLMENT</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program has transition activities that include:		
<u>1.1</u> Enrolling students in appropriate courses in the management information system (MIS) upon entry based on past records, entry assessment scores, and Florida Comprehensive Assessment Test (FCAT) results (Courses must be grade-appropriate and include English/language arts, reading, math, social studies, and science as needed for student progression or high school graduation	The program has on-site access to the MIS for record retrieval and enrollment. Education and exceptional student education (ESE) staff review prior records and assist with proper enrollment. All six current files reviewed contain students' educational records and appropriate course enrollment for progression and reading remediation, as needed. Students are enrolled based on prior transcripts and assessment information.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>BENCHMARK 2.1: ENTRY ACADEMIC ASSESSMENT</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program's testing and assessment practices include administering:		
<u>2.1</u> The Basic Achievement Skills Inventory (BASI) for reading, language arts, and mathematics within 10 school days of student entry into the facility	All six current files reviewed document that the lead educator administers the BASI to students within the required time frame.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>BENCHMARK 3.1: INDIVIDUAL ACADEMIC PLANS</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program has individual student planning activities that include:		
<u>3.1</u> Developing for all non-exceptional student education (ESE) students written age/grade-appropriate individual academic plans (IAPs) that are based on entry assessments, past records, and post-placement goals; are developed within 15 school days; include specific, individualized, and measurable long-term goals for reading, writing/language arts, math, and career/technical; include at least two short-term objectives per goal; identify remedial strategies; and include a schedule for determining progress	Teachers develop students' IAPs based on assessment and enrolment information. All three non-ESE files reviewed contain IAPs developed within the required time frame. IAPs meet the requirements listed in this benchmark.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>BENCHMARK 3.3: INDIVIDUAL EDUCATIONAL PLANS</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program has individual student planning activities that include:		
<b>3.3</b> Developing for all special education students measurable annual individual educational plan (IEP) goals and short-term objectives or benchmarks that directly relate to students' identified academic, behavioral, and/or functional deficiencies and needs	All three exceptional student education (ESE) files reviewed contain current IEPs with measurable goals and objectives based on the students' identified needs and deficiencies.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>BENCHMARK 5.2: SUBSTANTIAL ACADEMIC CURRICULUM</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program offers academic curriculum and instruction through:		
<b>5.2</b> A substantial year-round curriculum designed to provide students with educational services based on the Florida Course Code Directory and Instructional Personnel Assignments, descriptions of the courses in which students are enrolled, and the Florida Sunshine State Standards (FSSS)	The program provides a substantial year-round curriculum for middle school and lower-level high school students that includes language arts, reading, math, social studies, and science. The curriculum, lesson plans, and materials are based on the FSSS.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>BENCHMARK 6.1: DIRECT READING INSTRUCTION</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program provides reading instruction and services through:		
<b>6.1</b> Explicit reading instruction that addresses students' reading goals and objectives in their individual academic plans (IAPs), individual educational plans (IEPs), or progress monitoring plans; includes more than one class period of reading intervention (if required by the school district comprehensive reading plan) for diffident secondary level students based on school district fluency scores; and uses curricula identified in the current school district comprehensive reading plan	The program offers an extended period of reading on a daily basis, and the teachers document direct instruction and the FSSS in their lesson plans. Reading instruction is also based on students' performance levels and reading goals. The reading curriculum is aligned with the school district comprehensive reading plan and includes the James Town Source Book, Timed Readers, Reading Plus, and the Florida Comprehensive Assessment Test (FCAT) Explorer. Reading is also a core part of the program, and students have access to Quick Picks for Reluctant Readers and Graphic Novels. The school district reading coach visits the program regularly (several times per month) and assists teachers with developing lesson plans and special literacy projects.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• The program has an abundance of reading materials and curricula that enhance direct reading instruction and emphasizes reading and literacy throughout the program.</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>BENCHMARK 8.2: ESE PROCESS</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program provides educational support services to all students as needed, including:		
<b>8.2</b> Completing the ESE process:		The exceptional student education (ESE) process is initiated for appropriate students at entry. Three ESE files reviewed document that IEPs/EPs are completed in a timely manner.
<ul style="list-style-type: none"> <li>Reviewing current individual educational plans (IEPs) for students with disabilities and educational plans (EPs) for gifted students to determine whether they are appropriate</li> </ul>		
<ul style="list-style-type: none"> <li>Convening IEP/EP meetings or following required procedures to amend the plans as soon as possible when the IEP/EP services are not appropriate to meet the students' goals and objectives as written</li> </ul>		The program convenes staffings to write new and/or amend IEPs/EPs for all entering ESE students, as documented in ESE files reviewed.
<ul style="list-style-type: none"> <li>Soliciting and documenting participation from parents in ESE staffings and IEP development; mailing copies of IEPs/EPs to parents who do not attend the meetings</li> </ul>		All ESE files reviewed contain two notices requesting parents' participation in staffings: one written notice and one conducted via telephone. Copies of IEPs/EPs are mailed to parents who do not attend the staffings.
<ul style="list-style-type: none"> <li>Ensuring that all transition-related requirements (including career plans) for students who are 14 or older are addressed in their IEPs</li> </ul>		Transition-related requirements are completed on IEPs for eligible students, as documented in files reviewed.
<ul style="list-style-type: none"> <li>Providing an educational representative who is knowledgeable of the educational resources within the local school district to serve as the local education agency (LEA) representative (The LEA representative must meet the criteria noted in the clarification on p. 29.)</li> </ul>		The school district provides an LEA representative.
<b>RATING JUSTIFICATION</b>		The intent of the indicator is being met.
<b>COMMENDATIONS</b>		<ul style="list-style-type: none"> <li>None</li> </ul>
<b>RECOMMENDATIONS</b>		<ul style="list-style-type: none"> <li>None</li> </ul>

<b>BENCHMARK 9.1: ADEQUATE INSTRUCTIONAL TIME</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The program facilitates collaboration to provide:		
<b>9.1</b> A minimum of 300 minutes of daily instruction, or the weekly equivalent		The program has six 50-minute classes. Bell schedules, students' course schedules, and interviews with students confirm that the program offers a minimum of 300 minutes of daily instruction.
<b>RATING JUSTIFICATION</b>		The intent of the indicator is being met.
<b>COMMENDATIONS</b>		<ul style="list-style-type: none"> <li>None</li> </ul>
<b>RECOMMENDATIONS</b>		<ul style="list-style-type: none"> <li>None</li> </ul>

<b>BENCHMARK 10.1: TEACHER CERTIFICATION</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
All instructional personnel:		
<b>10.1</b> In core academic areas have professional or temporary Florida teaching certification, a valid statement of eligibility, or proof of accepted application for teaching certification		Both teachers have professional certification. The reading teacher has a reading endorsement, and both teachers have an English language learners (ELL) endorsement. Both teachers teach in their certification areas and other areas as well.

<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• The program should assist the teachers in obtaining professional certification in all the subjects they teach.</li> </ul>

<b>BENCHMARK 13.2: DATA MANAGEMENT</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The school district ensures that:		
<u>13.2</u> The program is assigned an individual school number and accurately reports all management information system (MIS) data (grades, credits, student progression, certificates, entry and withdrawal dates, valid withdrawal codes, entry/exit assessment scores, and diplomas earned)	The program has a unique school number and accurately reports all student information required in this benchmark in the MIS. However, when the school district added the BASI growth scale values variable to the MIS, several student's pre-existing BASI scores were removed from the system.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• The program and school district should ensure that any deleted BASI scores are re-entered into the MIS.</li> </ul>	

<b>BENCHMARK 13.6: CONTRACT MANAGEMENT OVERSIGHT</b>		<b>PASS</b> <input checked="" type="checkbox"/> <b>FAIL</b> <input type="checkbox"/> <b>N/A</b> <input type="checkbox"/>
The school district ensures that:		
<u>13.6</u> The contract manager or designee provides appropriate oversight and assistance to the educational program that include conducting and documenting an annual evaluation of the educational program	Several contract manger designees and school district administrators visit the program weekly. More formal meetings of the contract manger, school administrators, and the teachers occur monthly. The school district provides ongoing support via coaches for reading, math, and science; an exceptional student education (ESE) specialist; a guidance counselor; a transition specialist; and school psychologists and speech/language therapists, as needed. School district administrators conducted a mock quality assurance (QA) review in December. Additionally, administrators conduct biannual reviews of the contract, annual teacher evaluations, reading walkthroughs, and monthly review of students' ESE files.	
<b>RATING JUSTIFICATION</b>	The intent of the indicator is being met.	
<b>COMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• The school district uses multiple strategies for evaluation, oversight, and assistance to the program.</li> </ul>	
<b>RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	

<b>OTHER FINDINGS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>ADDITIONAL RECOMMENDATIONS</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>