2024-2025 LEA TAPE Tool

This form is completed by the local Career and Technical Education Administrator and by the ALSDE staff to evaluate CTE Program quality.

Level 1 indicates the Quality Program Indicator (QPI) does NOT meet the minimum standard.

Level 2 attainment descriptors for each section represent the minimum Quality Program Indicator (QPI) achievement required to identify quality CTE program(s). Please use the Level 2 attainment descriptors as you review CTE programs within your LEA.

EPIC Level attainment descriptors are provided to assist in achieving the highest level of program quality required of an Enhanced Pathway Industry Certification (EPIC) program. EPIC reviews will be conducted at the request of the LEA.

Program	_ Teacher(s)

Section to be completed by the CTE **Director**:

Requested TAPE 101 PD for LEA CTE staff (optional, but best practice is 1 year prior) Prior to review month, requested program specific Technical Assistance (optional, best practice is early in review year) Encouraged teachers to contact ALSDE Ed. Specialists with questions Accessed CTE Directors' Schoology Course, TAPE Folder Observed syllabus for each course of the program for required content Observed each course working on comprehensive anchor assignment Observed lessons for integrated literacy, numeracy, AND science Discussed evidence expectations with teachers (binders or digital storage, annual review expectations, etc.) Responded to email to confirm programs Notified programs that are undergoing review Secured subs for programs undergoing review Received evidence for ALL programs undergoing review Print and provide SPP report for ALL programs undergoing review, if applicable (CRI evidence for QPI 2.1H) Uploaded evidence into Cognia for ALL programs undergoing review (prior to 1st of month) Marked 1 or 2 in Cognia for 2.1A-D, at a minimum, for EACH program undergoing review Move each cluster to WorkSpace in Cognia once evidence is uploaded & 2.1A-D are scored for ALL clusters with programs undergoing review Contacted TAPE liaison for guestions as needed Assured teachers reviewed and director completed post-review survey

Section to be completed by the **ALSDE Reviewer**:

Section to be completed by the New Provider.	
Offered technical assistance to ALL teachers on compliance	
monitoring list in your clusters, early in review year	
Copied CTE Director on all emails	
Made teacher(s) aware of TAPE Schoology Group and other resources	
Communicated the order of the review, after TAPE notification date	
(if reviewing multiple programs in the same system)	
Completed desk audit prior to review	
Communicated initial findings from desk audit prior to review	
Provided technical assistance onsite to include resources specific to	
desk audit findings	
If applicable, initiated PIP onsite in collaboration with program area	
teacher(s)	
Provided post-review survey card to teacher	
Participated in the consistency meeting prior to finalizing findings	
10 days post review –	
Followed up with teacher for additional evidence	
Scored review in Cognia	
Entered findings in Cognia, if applicable	
Saved PIP (named appropriately) in TAPE folder in Cognia	
Sent conclusion email containing: notification of review completion in	
Cognia, appreciation for their work, and a finalized copy of the PIP	
Monthly follow ups to assess progress towards goals (if PIP created)	
Cleared findings in Cognia as evidence was provided	
Notified TAPE Liaison if there is a lack of progress towards goals prior	
to the 12-month deadline	

Career and Technical Student Organizations (CTSO)

- Teaches professional methods of planning, applying, and evaluating an organization's improvement plan.
- Teaches the importance of participation in your professional organization.
- Models leadership and professional contributions to the associated professional organization.
- Provides opportunities for integrating instruction in leadership, essential skills, and career-specific skills.
- Teaches the planning process for professional meetings, to include action items necessary to meet organizational needs.
- Teaches the professional method for legally documenting the work of the organization.
- Models and teaches the characteristics of effective leadership.
- Incorporates reading for comprehension and time management skills.
- Integrates professional characteristics: sportsmanship, responsibility, ethics, etc.
- Provides opportunities to advance career-related content knowledge beyond classroom content.
- Encourages collaboration with other students and local stakeholders.
- Models the importance of philanthropy in their career field.
- Teaches effective and equitable planning, implementation, and evaluation of collaborative activities.

Quality Program Indicator (QPI)	Indicator/Verification of Compliance	(Compliance	
		1	2	N/A
1.1.A Program of Work (POW)	 A Program of Work for the CTSO which includes: Goals Activities, to include co-curricular activities Timelines Member responsibilities Responsibilities of EACH program area teacher 			
1.1.B Membership / Affiliation	 □ A copy of the check for membership payment OR a zero-balance invoice. AND □ A membership roster, from the national/international organization, matching the payment amount. 			
1.1.C CTSO Meetings	 CTSO Meeting Minutes (minimum of four within the last 12-month period) which include: Creation and approval of the CTSO POW Community Service activity (member discussion and voting) Discussion and review of community service activity once completed (additional evidence in 1.1F) Membership approval of the CTSO financial expenses 			
1.1.D Leadership Opportunities	☐ List of CTSO officers.			

1.1.E Competitive	☐ CTSO registration for student participation in state or nationally sponsored CTSO events (regional, district, state, or national level)
Events / Activities	OR
	 □ Proof of a local sponsored event(s) using CTSO competitive event guidelines (description with DATED pictures, articles social media posts, etc.) ■ AND □ List of judges used to score the local event.
1.1.F Learning Through Community Service	 □ CTSO minutes documenting the discussion and review of the completed community service activities (evidence is provided in 1.1.C and does not require duplication here) AND □ Picture evidence of community service activities, to include a description of event AND dates. Examples include: • Screenshots of social media posts with picture(s) • Newspaper articles with picture(s) • Dated pictures with brief description of activity • Videos of the activity which include the date
1.1.G CTSO Integration as an Integral Part of the Curriculum	Evidence demonstrating the integration of the CTSO related to the curriculum content standards. Examples include: Lesson plan(s) with integrated CTSO activities related to course content standards Not the introduction of the CTSO Using CTSO competitive events in instruction, evidenced by: Dated picture evidence, course and content standard being taught (with a brief description), AND a copy of the CTSO competitive event rubric used in the integrated classroom activities Examples include: Job interview skills Career exploration Debate format to express ideas Public Service Announcements Skilled events related to the content standard Use of CTSO activities in instruction, evidenced by: Dated picture evidence, course and content standard being taught, AND a description of the integrated CTSO activity. Examples include: Teaching professional leadership skills through officer training Teaching professional leadership skills through meetings or mock meetings (training on agendas/parliamentary procedure/minutes/committees) Teaching professional dress through a CTSO dress code day Using CTSO Governance documents to teach about career related administrative documents (Policies and procedures, by-laws, program of work, etc.)

EPIC Level Quality Performance Indicators Evaluated separately and ONLY at the request of the LEA				
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	ALL students affiliate and participate in the CTSO as evidenced by: o CTSO membership roster from the national/international organization MATCHING the program enrollment rosters from PowerSchool.			
	There is evidence of an evaluation of the program of work. Students participate in regional, state, and/or national competitive events and earn at least two awards annually. o Registration invoice AND			
	 Dated pictures of students with awards, OR dated screenshots from the state/national website listing the awardees, OR dated newspaper articles, social media posts, newsletters indicating the awards, etc. Students participate in state and/or national leadership opportunities. 			
СОММ	ENTS:			

Quality Instruction

- Creation of the syllabus assures the course has a structured plan for success. The teacher has taken pre-requisites into account, has reviewed the course content standards to plan for the instruction and delivery to students. Assessment procedures are thought out and communicated to the student/parent with the associated grading scale. There is a systematic plan to include significant assignments highlighting numeracy, literacy, and science in the content standards, as well as a plan to utilize the CTSO to teach essential skills and leadership characteristics.
- Perkins V requires a planned focus on the integration of literacy and numeracy.
- Science is one of the core indicators for Alabama.
- Embedding core content increases student comprehension through application.
- Students are more likely to meet expectations when they fully understand those expectations and how they apply to their future plans. Parents are more likely to support your classroom strategies when they are fully aware of the expectations prior to the implementation.
- Lesson plans including career related application of science, mathematics, mathematics vocabulary, technical reading and writing increases student comprehension and success in career/college.
- A program budget demonstrates an annual review of program equipment and supplies in respect to projected finances. This allows a realistic plan for CTE budgeting across the LEA and demonstrates good financial stewardship.
- Proficiency on the general safety exam provides evidence students will be able to enter the lab in a manner safe for the students and their peers.
- The completed CTIP demonstrates the individual assessment of a student's needs in direct correlation to the laboratory environment, the expected skills, and assigned projects in a CTE learning environment. It provides the best plan for the individual student's safety and success in the CTE program using the specific guidelines of that student's IEP.
- Preventative Maintenance schedules mimic workforce practices, teaches proper care/storage of equipment, results in less repair downtime because potential problems are addressed prior to breakage. This encourages good stewardship of educational finances.
- Proper chemical storage mimics work environments, models acceptable career/OSHA practices for the program area and provides for their safety.
- Safety Data Sheets mimic workplace safety requirements and provides emergency instruction for exposure to chemicals.
- Posted evacuation procedures meet safety laws and provide students with direction in the event of an emergency.
- Emergency current interruption, first aid supplies, and eyewash capabilities, and PPE mimic workplace safety requirements and provides a process designed to limit student injury in an emergency.
- Credentialing (including stackable certificates) demonstrates the importance of obtaining career related competencies and provides knowledge and skills which will help enable students to obtain employment in their chosen field.
- Assessment of pass rates allows for the evaluation of instructional methods and the continued improvement of the program. It encourages professional collaboration and pinpoints areas in need of technical assistance.
- The students must meet benchmarks prior to sitting for a CRI exam. This encourages personal ownership of educational opportunities, simulates advanced credentialing requirements in the workplace, demonstrates financial responsibility, and provides rewards for academic success.
- Integrated core content and application assignments are best reviewed through planning documentation and classroom observation. Therefore, the CTE Director would be in the best position to provide quality assessment through classroom observation of the lessons and projects related to the syllabi and documented plans provided.

Quality Program Indicator (QPI)	Indicator/Verification of Compliance	Compliance		ince
		1	2	N/A
2.1.A CTE Syllabus	*To be evaluated by the CTE Director through direct observation. An indication of 2 in the Cognia Diagnostic serves as the CTE Director's assurance all QPI requirements are met.			
*Subject to random audits	 Course syllabi (for each course listed on the daily schedule) which include the following Course title, description, and pre-requisites Program/instructional delivery plan Course goals, assessment procedures Grading scale CTSO integration Embedded numeracy anchor assignment (reference QPI 2.1.B) Embedded literacy anchor assignment (reference QPI 2.1.C) Embedded science anchor assignment (reference QPI 2.1.D) Available industry recognized credential offered (indicate "N/A" if not applicable) 			
2.1.B Embedded Numeracy *Subject to random audits	*To be evaluated by the CTE Director through direct observation. An indication of 2 in the Cognia Diagnostic serves as the CTE Director's assurance all QPI requirements are met. Lesson Plan(s) demonstrating the integration of mathematics and math vocabulary related to the lesson plan's content standard. o Integration of mathematics appropriate to program area no Industry appropriate mathematical vocabulary			
2.1.C Embedded Literacy *Subject to random audits	*To be evaluated by the CTE Director through direct observation. An indication of 2 in the Cognia Diagnostic serves as the CTE Director's assurance all QPI requirements are met. Lesson Plan(s) demonstrating the integration of technical reading and writing related to the lesson plan's content standard. Integration of technical reading appropriate to program area Integration of writing skills appropriate to the program area			
2.1.D Embedded Science *Subject to random audits	*To be evaluated by the CTE Director through direct observation. An indication of 2 in the Cognia Diagnostic serves as the CTE Director's assurance all QPI requirements are met. Lesson Plan(s) demonstrating the integration of science related to the lesson plan's content standard. Integration of science concepts appropriate to program area Industry appropriate science vocabulary			
2.1.E Use of Technology,	 Annual program area budget prepared by the teacher which includes Administrator signature Expected income: 			

Equipment, and Facility Program Budget	 Required: Local maintenance of effort funds, state O&M funds, Perkins's funding, CTSO monies Optional (as applicable to program): fundraisers, sponsorships, classroom dues, etc. Expected expenditures: Required: CTSO dues and activities, equipment, and supplies Optional (as applicable to program): fieldtrips, professional development, etc. 	
2.1.F Use of Technology, Equipment, and Facility Classroom/Lab Safety (ONSITE REVIEW)	 Evidence that all students have completed a general safety exam with 100 percent proficiency, for each course taught, as evidenced by student samples. Random audits will be performed on site A Career and Technical Implementation Plan (CTIP) is developed by the teacher as part of, or in addition to, the Individualized Education Program (IEP) process upon the student entering the CTE program. Random audits will be performed on site The program has a clearly defined process of quality and expectation of technology, equipment updates, and facility maintenance as evidenced by: Preventative maintenance schedule, OR ASE accredited program evidence 	
	*ASE accredited programs ONLY Where indicated in the QPIs, validating evidence will be satisfied by uploading the following here in 2.1F: 1) ASE Accreditation Certificate 2) Current Form 14-1 if ASE accreditation was completed > 12 months prior to the TAPE review.	
2.1.G Use of Technology, Equipment, and Facility Facilities (ONSITE REVIEW)	 □ A process to ensure safety and proper use of chemicals, facilities, equipment, and technology is provided and policies are posted for ○ evacuation procedures ○ medical emergencies, first-aid kit is in place and highly visible, eyewash is easily accessible and highly visible ○ emergency current interruption for power supply ○ Safety Data Sheets for each chemical in the program area ○ Personal Protective Equipment appropriate to the program area □ Facilities meet safety regulations for adequate access to updated equipment which meet local, regional, and/or state industry needs □ Adequate space is available for seated and laboratory work for the number of students enrolled in the program □ Classroom and instructional laboratory are clean, orderly and replicates a professional working environment □ Students are given adequate access to relevant facilities, equipment, and technology as evidenced by current program equipment list □ Secured storage is sufficient 	

2.1.H Industry Credentialing and Technical Assessments	 □ The program provides students with adequate access to credential opportunities (to include stackable credentials) which determine career readiness. (i.e., BLS CPR, OSHA) ○ Dated student certification OR ○ Certification agency generated report with dates AND/OR □ 84% > of students who sit for a certification exam (CRI) obtain a passing score ○ SPP application report: Student Program Credentials Count – Schools (provided by CTE Director) ■ AIM Portal, CT Student Profile Tile, enter year/system/school, click Reports Tab, click 	
	"Credential – Student test counts- schools", export to XLS, sort by cluster and program	
	EPIC Level Quality Performance Indicators Evaluated separately and ONLY at the request of the LEA	
□ CTE teachers are utechnical reading □ Academic and CTE □ Teachers embed rabout the technical Evidence exists the by advisory common Example: □ 10% of equipment equipment list, ad □ Passing industry-race 95% or more	cepts verified by associated projects and rubrics. using two or more major anchor assignments and instructional strategies, in all courses, to improve students' mathematics AND and writing skills as evidenced by lesson plans E teachers collaborate to embed academics as evidenced by proof of meetings held, agendas, sign in sheets, etc. eading readiness standards by having students summarize, paraphrase, categorize, infer, predict, use vocabulary, research, and write all field as evidenced by student samples at current industry/workplace needs, best practices, and requirements are the focus in delivery models of the CTE Program as evidenced littee meeting minutes Simulated workplace trom the optional section of the program equipment list is available for use by the program OR, if not documented on the optional ditional equipment goes above and beyond current industry standards. ecognized credential(s) (CRI) leading to state and/or national licensure or certification ore of the students who sit for a certification exam obtain a passing score	
COMMENTS:		

Program Pathway Implementation

- Research consistently indicates students who take a series of CTE courses along a pathway are statistically more likely to graduate, take fewer remedial courses in college, and earn higher wages (specific pathways). Therefore, every student should have an opportunity to succeed through the minimal offering of three courses in a pathway.
- Planned lessons are more organized and thorough. Collaboration time with other teachers has instructional value.
- Research indicates that parental involvement in student learning has a positive impact on a student's work, participation, and success.
- Involved parents are in a better position to recognize the value of CTE in a student's education and will also be a marketing tool for your programs.
- The Advisory Committee provides current, program specific, workforce information in an effort to keep instruction relevant and to offer courses designed to meet local workforce needs.
- Having diversity in the Advisory Committee assures a varied viewpoint designed to encompass the entire program area. It also provides resources and content knowledge across the spectrum of the program, thereby assuring students are introduced to a multitude of career related information/skills.
- Meeting multiple times in a school year allows for consistent evaluation of the implemented program of work.
- Using the knowledge of a variety of career experiences provides well-rounded suggestions designed to assure the program continues to meet current workforce needs using current standards and practices.
- An Advisory Committee, employed in the local workforce, is best positioned to determine in-demand credentialing opportunities.
- Developing a program of work designed to evaluate the program, assess areas in need of improvement, and create a plan of implementation is a way to encourage career stakeholders to invest in program improvement while assuring the program remains effective in preparing students for careers in the pathway.
- An active Advisory Committee will invest in the program and can provide assistance with guest speakers, internships, sponsorships, equipment, competitive event preparation, and job opportunities.
- Effective marketing is necessary in all career fields. It provides information to students/stakeholders about the CTE program and facilitates increased enrollment of informed students with realistic expectations and a sincere interest in the program's career fields.

Quality Program Indicator (QPI)	Indicator/Verification of Compliance	Coi	Compliance	
		1	2	N/A
3.1.A Program Scheduling	 Daily Schedule(s) for all teachers, provides evidence that CTE Program includes a sequence of 3 courses provided over a two-year period as evidenced by the student information system (PowerSchool) CTE teachers have 30 minutes or more of uninterrupted preparation/planning time OR, ASE accredited program evidence in 2.1F, do not duplicate 			
3.1.B Parent/Guardian Involvement	 Parents/guardians are provided at least <u>two</u> opportunities through student/parent/ teacher meetings and annual open houses in the CTE lab, as evidenced by DATED documentation of <u>one or more of the following</u>: Social media post screenshots Newsletters Website screenshots Emails Parent sign in sheets, etc. 			

	 □ Parents/guardians are apprised of program activities as evidenced by DATED documentation of one or more of the following: ○ Social media post screenshots ○ Newsletters ○ Website screenshots ○ Emails ○ Parent sign in sheets, etc. □ OR, ASE accredited program evidence in 2.1F, do not duplicate 		
3.1.C Advisory Committee Development and Meetings	 □ An advisory committee is established representing a minimum of five broadly based business and industry stakeholders from the program area and specifically related to program under review ○ Roster containing: each person's name, business address, job title, and contact information □ The committee meets at least twice a year and meetings have an established agenda, attendance is taken, and 51% or more of members were present for each meeting and minutes are recorded ○ Evidence required for each meeting:		
3.1.D Advisory Committee Program of Work	 □ Members develop and approve a program of work (POW) each year for the program area which includes the following: ○ Date POW was developed ○ Objectives ○ Activities ○ Timelines ○ Committee member responsibilities □ OR, ASE accredited program evidence in 2.1F, do not duplicate 		
3.1.E Marketing, Public Relations, and Community Outreach	 □ Marketing activities reflect the value of the program to students as described in the school's printed literature and website and evidenced by one or more of the following: ■ Screenshots of website ■ Screenshots of social media program promotions 		

	Brochures		
	 School newspapers 		
	Other items as applicable On ASS accordited to a green evidence in 3.15 do not double to		
	□ OR, ASE accredited program evidence in 2.1F, do not duplicate		
	EPIC Level Quality Performance Indicators Evaluated separately and ONLY at the request of the LEA		
☐ Daily Schedule(s)	for all teachers provide evidence that CTE Program includes a sequence of 4 or more courses provided over a two-year period		
☐ CTE leaders cond	uct a parent satisfaction survey used for program improvement		
☐ The advisory com	mittee <i>meets three or more times per year</i> as evidenced by meeting minutes		
☐ All meetings have	e an established agenda, minutes are recorded, attendance is taken, and 75% or more of members were present for each meet	ting	
	e of an annual evaluation of the effectiveness of the program of work		
	rogram is reflected in active marketing efforts that reach students, <i>parents, and the community</i>		
	an has been implemented to maximize program enrollment when student interest outweighs program capacity (e.g. applicati	ons,	
interviews, refere	·	. ,	
	tudents entering program continue past the foundation course to concentrator status in the program area (<i>data may be obtai</i>	ined	
from the SPP app	incution)		
COMMENTS:			

	Technical Updates					
·	ncourage CTE teachers to gain new content knowledge on related workforce trends, skills, equipment, educational der to provide diverse and accurate instruction and advisement to students. It keeps the program relevant and provenhance the instruction.	ides tl	ne			
Quality Program Indicator (QPI)	Indicator/Verification of Compliance	Compliance		Com		liance
		1	2	N/A		
4.1.A Technical Updates 290-6-107 (3)	 □ Each CTE teacher in this program has had at minimum of: 8 hours of technical update in their specific program area, if 9-month contract, OR 16 hours of technical update in their specific program area, if teacher has an extended contract (9.5 months or greater) Evidenced by:					
	EPIC Level Quality Performance Indicators Evaluated separately and ONLY at the request of the LEA					
□ CTE teachers have received Technical Updates as indicated in level 2 AND professional development in the areas below, within the last five years as evidenced by professional development certificate(s) □ Embedding literacy skills into technical content □ Embedding high-level math into technical content □ Embedding science into the CTE content □ Utilizing Project-based learning to deepen understanding □ Aligning classroom assessments to challenging academic and technical standards OR □ One or more teachers in the program have obtained National Board Certification in CTE within the last five years				nced		
COMMENTS:						

Work-Based Learning

- Employers across the cluster areas consistently request training on essential/foundational skills.
- Essential/foundational skills are necessary in EVERY program area. Consistent integration throughout the course of study lesson plans encourages retention and demonstrates the importance of the skills.
- Fieldtrips, job shadowing, and the involvement of local business/industry provides differentiated instruction through <u>relevant program specific</u> experiences that prepare students to make informed decisions regarding their career goals.
- Program specific off-campus work-based learning provides students with an immersive experience in their prospective career field and knowledge which could assist in career choices, credentialing success, and post-secondary success.
- Written agreements/clinical training agreements provide concrete plans for the education, instruction, acceptable activities, and safety of the students while receiving applied instruction in an alternative program specific environment.

Quality Program Indicator (QPI)	Indicator/Verification of Compliance	Compliance		
		1	2	N/A
5.1.A Program Area Work- Based Learning (All programs except Cooperative Education)	 □ There is evidence that the CTE program addresses essential/foundational skills that employers desire of employees ○ Lesson plan demonstrating integrated essential/foundational skills □ Evidence of at least one field trip (off-site, on-site, or virtual to Career Expos, Career Fairs, Blood Drives, Fire College Burn Trailers, and/or Industry tours)			

5.1.B	☐ Student reports or evidence of off campus work-based learning experiences		
Program Area Off Site	o Daily sign in/out sheets		
Live Work	 Logs of the students' work-site activities/experiences 		
(If Applicable to Program)	o Student evaluations		
	 There is a written agreement/clinical training agreement with every off-campus work-based learning site and the school 		
	☐ OR, ASE accredited program evidence in 2.1F, do not duplicate		
	Clarification: Programs with students receiving unpaid instruction during normal school hours and through hands-on live work at local businesses should have an agreement between the two entities addressing safety & instruction (i.e., orientation to facility and safety standards, supervision, performance evaluation, skills to be performed, etc.) Health Science Internships and SAEs are examples of program activities that would require written agreements. If this in not offered in the program, indicate N/A on the Form 14-1 and in Cognia		
	EPIC Level Quality Performance Indicators Evaluated separately and ONLY at the request of the LEA		
Multiple job shadowing ofFull implementation of Si	ned field trips (off-site, on-site, or virtual to Career Expos, Career Fairs, and/or Industry tours) opportunities that rotate students through a variety of work settings related to the program area mulated Workplace (SWP) in a minimum of one course within the program area AND a minimum of the first four SW courses in the program area	P	
COMMENTS:			

Cooperative Education

This section is used exclusively to evaluate Cooperative Education Programs and is NOT applicable to other program areas.

Previous sections are NOT applicable to Cooperative Education Programs.

- Consistent communication between the employer and school provides the information needed to evaluate student learning and identify areas in need of additional instruction which ensures continued learning and a more productive employee.
- Familiarity with current child labor laws assures safe employment opportunities for all students.
- Training agreements, plans and random audits provide for the education, instruction, acceptable activities, and safety of the students while receiving applied instruction while employed in the local workforce.

Quality Program Indicator (QPI)	Indicator/Verification of Compliance	Compliance						
		1	2	N/A				
5.2.A Cooperative Education (Co-Op) (4)	 □ There is ongoing formal communication between the school and the employer providing the work-based learning to ensure quality experiences for students and employers							
	o Training plan							
EPIC Level Quality Performance Indicators								
Evaluated separately and ONLY at the request of the LEA Not applicable to Cooperative Education								
COMMENTS:								
Additional Comments and/or Suggestions:								
, isalicinal comments and or								