

TNI Board of Directors Meeting Summary November 12, 2014

1. Roll Call

Directors	Present
Jordan Adelson	X
Joe Aiello	X
Aaren Alger	X
Steve Arms	X
Justin Brown	
Scot Cocanour	
George Detsis	
Judith Duncan	
Zonetta English	X
Jack Farrell	X
Keith Greenaway	
Myron Gunsalus	X
Sharon Mertens	X
Judy Morgan	
Lara Phelps	X
Patsy Root	
Scott Siders	X
Alfredo Sotomayor	X
Dave Speis	X
Elizabeth Turner	X
Staff	
Lynn Bradley	X
Carol Batterton	X
Ken Jackson	X
Jerry Parr	X
Ilona Taunton	X
Janice Wlodarski	X
Guest	
Jeff Flowers	X

2. Approval of September Minutes

Motion to Approve: Elizabeth Turner

Second: Scott Siders

Abstentions: Lara Phelps

Approved: Unanimous

3. Proposal for Credentialing of Third-Party Assessors (Attachment 1)

At its October 21 meeting, the Laboratory Accreditation Body Expert Committee (LAB) approved the Third-Party Assessor Proposal in Attachment 1 -- an expanded proposal for Phases 3 & 4 of the Third Party Assessor Option 4 assignment, from the AB Assistance Task Force. After approving Phases 1 and 2 of the original proposal, the Board directed LAB to develop an expanded concept for Phases 3 and 4. This new proposal addresses that expansion.

An earlier version of this current document was discussed at the LAB's session during conference in DC in August 2014, and the current version addresses the concerns expressed by the participants in

that session. The original proposal is also appended to Attachment 1. The listing of Third Party Assessors on the TNI website, at http://www.nelac-institute.org/howto.php#pab1_5, is the product of the first two phases of this proposal. No additional assessors have submitted information for posting since the initial four, who responded shortly after the website was announced.

Discussion with Jeff Flowers

- There needs to be a cost recovery process since the proposal will require TNI staff support.
- Proposal from LAB: No new requirement for assessors established through this process.
- Only the requirement in the Standards will be part of what's looked at.
- We're basically creating another accreditation requirement – now we need somebody who has the authority to determine whether the third-party meets the requirements.

Should TNI be involved in the credentialing of third-party assessors? Differing opinions.

We have 3 objectives:

- 1) Set up the process where ABs can access all the necessary information.
- 2) Be a resource for assessors and for assessor training as defined within the standard, and
- 3) Potentially evaluating and credentialing/approving assessors.

The original task was to find a way to ease the resource requirement on an AB.

How many ABs could use this?

We need to decide, as a Board, whether or not this is something we want to continue to explore. If we do, we need to flesh this out further – whether by LAB or a subcommittee of the Board or something else.

Do we want to continue to look into this and decide where we're going to go? Do we think it's a good idea or not?

Take the tasks associated with actual credentialing and take them off the table – at least #7 and #8. Then take the rest – that will create tools to assist assessors – 1 through 4 or 1 through 5 and say yeah, we're interested in doing those and find out a) what the cost will be to do those and b) what the market is. Change the end product to something that's more in line with what the AB Task Force had envisioned.

Certain items already exist on the website: Four names listed under the Contract Assessors for NELAP Accreditation Bodies. Each of them completed the appropriate template (from the website) listing the things that you'd want to know about the assessor – training/qualifications. Item 2A in the proposal – already done.

Item 3 is incorporated, to a certain extent, in 2A. LAB has not tried to do any of this yet. It is estimated to take 6 – 12 months to #'s 1 – 5 with a volunteer committee. Not sure LAB is the right mix of people/skillset to do this.

Who's in favor of continuing on with a portion of proposal or the entire proposal?

Discussion/decision tabled until the next meeting with big question: What do we do next? Decision point at the next meeting for LAB. Everyone should review the original request from a few years ago.

Where do we get the info? Jerry – will take care of sending out this info for everyone to review.

4. Strategic Plan

A first draft of the Strategic Plan from Milwaukee was provided as a separate document. Sharon proposes we briefly review this in the call this week and then be prepared to vote on it at the December meeting.

Jerry and staff will take a first cut at assignments, for later review and comment by the Board. We will hold a separate call to review the Strategic Plan in early December before the next BOD call.

5. Proposed Changes to Bylaws (Attachment 2)

During the strategic planning meeting, a discussion on streamlining the process for approval of SOPs and Policies was discussed. Essentially, Policy will have final approval authority for policies and SOPs unless either the Policy Committee or the Board believes that the Board should review individual documents; the exception will be documents originating with Policy Committee, and all of those will require Board review.

Policy Committee has prepared revisions to the Bylaws and to the "Policy and SOP Approval" SOP 1-116 that will streamline the approval process for those types of documents. In accordance with the Bylaws, the proposed changes are being provided at this meeting and will be voted on in December (Attachment 2). The revised SOP 1-116 will be presented to the Board after the Bylaws revisions are accepted.

6. Third Quarter Financial Performance

TNI 3rd quarter financial data was reviewed during the meeting.

7. Program Reports (Attachment 3)

Attachment 1

TNI Recognition of Assessors for Contracting with NELAP ABs Laboratory Accreditation Body Expert Committee, October 21, 2014

The LAB Expert Committee has prepared a proposal for a voluntary program to address the charge from the TNI Board to implement Option 4 of the Final Report of the AB Assistance Task Force (July 2011.) LAB offered a proposal to the TNI Board on January 8, 2013, for how to proceed. The Board approved the initial listing of individuals and organizations available to work as contract or third party assessors (TPAs) and LAB was asked to prepare a more detailed proposal for a program to provide a vetted credentialed community of TPAs that are qualified to conduct assessments in support of NELAP Accreditation Bodies.

This document is a suggested outline for that more detailed proposal, with steps in roughly chronological order.

1. Establish a staff position and committee to support this activity.
2. 2a. Use collective knowledge of the LAB as incorporated into the templates on the TPA website plus assessor qualifications as specified in V2M1 § 6.2.6.3 and V2M3 §4.2.3-4.2.5 as baseline qualifications.
2b. Survey NELAP ABs and NGABs briefly to determine what training and experience are required and offered in current contracts and for in-house assessors (per V2 of 2009 TNI ELSS) as well as how on-going monitoring of assessors is conducted. If actual written tests are used, obtain example tests, if possible, for various scopes per V2M3 §4.2.6 (these may need to be held confidentially at the staff level.) At minimum, the scopes would be the technical disciplines listed in the “note” of V2M3 §4.2.4.
2c. Merge that information into a preliminary checklist or matrix for assessor qualifications for lead assessor, assessor and as required expertise for the various scopes. Establish a matrix of suitable training and experience for assessors in the areas noted in V2M1 §6.2-6.3 and V2M3 §4 of the 2009 TNI Environmental Laboratory Sector Standard (ELSS.)
3. Determine whether and how well the credentials of existing TPAs match that matrix and use that as the basis for creating a model set of credentials that each AB could use to eliminate redundancies in the TPA applications and AB approval processes.
4. Vet that matrix with the existing NELAP ABs, understanding that it would initially apply ONLY to TPAs. Adapt as warranted within the language of V2, with the goal of creating a single uniform way of presenting TPA qualifications that is usable by all NELAP ABs.
5. Agree on appropriate personal attributes and incorporate those into a standardized interview which could be used with all TPAs would undergo (videoconference if not in person) during the contracting/hiring process (*For example, from ISO 19011 – ethical, open-minded, diplomatic, observant, perceptive, versatile, tenacious, decisive and self-reliant.*) Interview to include verbal check on credentials presented, also.
6. Determine form of recognition to be awarded upon vetting the submitted credentials. [*Recommend certificate with listing of scopes for which the individual assessor is qualified.*]
7. Establish acceptable AB/TNI evaluation techniques and tools for on-going monitoring of performance and competence of TPAs, plus settle on acceptable refresher training. Include recognition of in-service observations of assessments as well as continuing education opportunities.
8. Establish feedback mechanism for peers and laboratories to reduce program redundancy and minimize costs.
9. Succession planning: Investigate necessity and practicality of identifying suitable commercial courses or establishing TNI training for future assessors, whether online or in person, for both basic assessor training as well as in the technical disciplines. **PERFORM THIS STEP CONCURRENTLY WITH STEPS 4-9.**

Attachment 1 cont.
**Appendix: Laboratory Accreditation Body Committee Proposal to the
TNI Board of Directors for Evaluation of Third Party Assessors**

Date: Jan 8, 2013

Scope: Third Party Assessors that are hired by Accrediting Bodies to support on-site assessment activities.
Not State Assessors

Work Plan: Four-phase Program

- I Produce and publish on the TNI website names of individuals and/or organizations conducting on-site assessments (for initial list see Appendix B)
- II Using contact information from Phase I, collect information on criteria outlined in Appendix A and produce a report of findings.
- III Develop a program to vet information found in Phase II.
- IV Implement program based on information found in Phases I, II and III.

PHASE I

Phase I will help to understand the extent of the community involved in providing on-site assessment activities. It should include only those persons and organizations having an interest in supporting NELAP.

The goal of Phase I is to develop a listing of individuals/companies that either provide or are interested in providing accreditation services in support of the NELAP. Also, the list would only include individuals/companies that have expressed an interest in having their names and qualifications published on the TNI website. At this phase the list will be for informational purposes only and will not in any way be in a format that would imply a TNI endorsement. The list would make available contact information that could be used to support NELAP AB activities when soliciting third party assessors. Individuals and/or companies would also gain some visibility by having their names published on the TNI web site. The list would also be used to provide contact information for any future activities relating to Phases II, III and IV below.

Implementation plan:

- (1) Add Bullet in the NEWS section of the TNI web page to announce Phase I.
- (2) Add a page on the TNI website to provide plans and the criteria given in Appendix A. WEB Page will also include all future information relating to TNI's activities with Third Party Assessors.
- (3) Publish an article in the next TNI Newsletter on TNI's Third Party Assessor activities.
- (4) Discuss plans at the Denver Conference

Resources Needed by the LAB:

LAB will need access to the web master and possibly the Information Technology (IT) Committee for design and production of the web page announcements. LAB will prepare an announcement article for publication in the Newsletter.

PHASE II

The goal of phase II is to get the information on as many of the qualification criteria (Appendix A) from the group of participants as possible. These criteria have been reviewed by the LAB and discussed at public meetings during two conferences. While some of the informational items will not apply to every respondent, they in total do help a reader understand more about an individual assessor or an organization conducting assessments. For example, the geographical location item will help the reader understand where that firm operates normally, but is not a 'requirements type' item. At this phase the list will continue to be for informational purposes only and will not in any way be in a format that would imply a TNI indorsement.

Resources Needed by the LAB:

Access to the Web Master, and possibly the IT Committee, for design and production of the web page form to collect and display information. This may use a survey form or something of less technology if the number of participants is low as well as web posting of the collected information.

PHASE III

Develop a program in TNI that provides a vetted credentialed community of Third Party Assessors (individuals and/or organizations) found qualified to conduct on-site assessments in support of NELAP Accrediting Body activities. Phase III is the most challenging to produce. The product of this phase could be of several different forms and as of yet has not been determined. It could be in the form of an SOP, an additional TNI Program or some other TNI format.

Implementation Plan:

The development of this phase will take some time to design and finalize. It will take the next 1 to 2 years to complete. Implementation plan will be addressed once approval is granted by the TNI BOD.

Resources Needed by the LAB:

Significant resources will be needed from the LAB over the next 1 to 2 years. The full extent of resources needed is yet to be determined and will be dependent on findings from Phases I and II.

PHASE IV

Implement the program based on the findings from Phases I, II and III.

Implementation Plan:

Yet to be determined.

Resources Needed by the LAB:

Yet to be determined. Depending on the final development of the program there could be a long term commitment from TNI to administer future and ongoing activities.

Attachment 2 Proposed Change to Article VII, Core Programs, of the TNI Bylaws

Section 2 – Principles Governing Core Programs

Each core program will be managed by an Executive Committee of seven (7) to fifteen (15) individuals representing all stakeholder interests whose role is to provide strategic direction, growth and fiscal management of the program.

The core programs work in cooperation towards a common vision. Each core program has the authority to establish policies, procedures, and guidance for its program, make decisions, and operate independently, but with the following restrictions:

- ~~• The Board of Directors reviews all policies, procedures, and guidance to ensure they do not create a program that cannot be funded or puts TNI at risk.~~
- The Policy Committee reviews all policies, procedures, and guidance to ensure the policies, procedures and guidance from different core programs are not in conflict with each other.
- The Policy Committee submits any policies, procedures, and guidance it develops to the Board of Directors for endorsement.
- The Policy Committee submits a report to the Board of Directors of all policies, procedures, and guidance it reviews. The TNI Board of Directors retains the right to review any policies, procedures, and guidance reviewed by the Policy Committee.
- The reviews performed by the Board of Directors and the Policy Committee will be used to provide feedback to the core programs and, as appropriate, each core program will address any issues raised before implementing policies, procedures, and guidance.
- Each core program will provide an annual report to the Board of Directors describing progress towards the goal of the program. The Board of Directors will provide feedback to the program for future efforts.
- Each program will establish strategic goals and objectives that will be reviewed by the Board of Directors to ensure the goals and objectives are aligned with TNI's mission.

A core program accepts by adoption the work product of another core program for use within its program. A core program does not have authority to change the work product of another core program, but it may return the work product to the core program that developed it with recommendations for changes. It will then be the responsibility of the core program that developed the work product to decide on the course of action.

Attachment 3 PROGRAM REPORTS

CONSENSUS STANDARDS DEVELOPMENT

- The American National Standards Institute (ANSI) has completed its audit of the consensus standards development program. The auditors require some minor changes to the procedures Governing Standards Development (SOP 2-100). Although this SOP was approved previously by ANSI, there have been some changes in their essential requirements that must now be reflected in the SOP. In addition, there were three audit findings, and the attached corrective action response has been prepared. It must be submitted to ANSI electronically no later than November 14, 2014.
- A task force has been formed to revise the standards development process, in order to address shortfalls that have come to light during the development of the 2015 Environmental Sector Standard. Specifically, the Chemistry and Proficiency Test Expert Committees received comments at the Voting Draft Standard stage that should have been raised and addressed earlier when the Working Draft Standards were presented. The Task Force has held its first teleconference and has reached broad agreement on an approach that will more closely engage the stakeholders throughout the standards development process. Further meetings will be held to refine the process, with a goal of having the changes in place within 6 months. The revised standards development procedure will then be submitted for ANSI approval together with the changes required in the SOP by the ANSI auditors.
- The Chemistry Expert Committee has held two teleconferences, one with the Laboratory Accreditation System Executive Committee, and the other with an Accreditation Body stakeholder, in an attempt to resolve differences on the Calibration Interim Standard (IS). This has resulted in further modifications of the IS, which will now be presented one more time for voting by the membership.
- The Chemistry Expert Committee has prepared a Working Draft Standard on Detection and Quantitation that will be published shortly. A webinar will be scheduled in December for its public discussion.
- The Proficiency Test Expert Committee is continuing to consider the voters' comments on its Voting Draft Standards for V1M1 (laboratory requirements) and V2M2 Accreditation Body requirements). The committee has almost completed preparation of its Voting Draft Standards for V3 (PT Provider requirements) and V4 (PTPA requirements).
- The Stationary Source Audit Sample Committee has posted the following Voting Draft Standards: V1M1, General Requirements for Stationary Source Audit Sample Providers; and V1M3, General Requirements for Participation in the TNI Stationary Source Audit Sample Program. The closing date for voting is November 30, 2014.
- The Radiochemistry Working Draft Standard has been completed and has been posted on the TNI website. A webinar is planned on December 5th.
- The Modified Working Draft Standard for Microbiology should be completed during the next November meeting. It will then be posted and a webinar planned for mid-December.
- After receiving feedback from the assessor community at conference in DC, the Laboratory Accreditation Body committee revised and approved the recommended process for verifying credentials of third party (contract) assessors, as requested by the Board in January 2013. The process awaits Board consideration and approval.

NEFAP

- The Evaluation SOP was approved by the committee and forwarded to the Policy Committee for finalization.
- During the Strategic Planning meeting in Milwaukee, a concern was raised by the Board to look at the Preliminary Recognition process for ABs. This was discussed at the last NEFAP EC meeting and has been taken on as an action item to review current wording and propose alternate wording during the November meeting.
- Mobile Lab Subcommittee: The subcommittee has met and is revising a survey to obtain further information.
- SOPs 5-103 and 106 have been updated by Justin. The EC is reviewing comments by mail and they hope to finalize these updates in November. SOP 5-102 still needs to be updated.
- The technical evaluation has been completed for a NEFAP AB. The Recognition Committee is still waiting for the Lead Evaluators report.
- A guidance document application is being submitted to the Policy Committee so the committee can start work on a Scope Guidance Document.

Field Activities Expert Committee (FAC)

- The FSMO Tools Subcommittee is reviewing the Final Draft of the Accreditation Process Summary document. They are also putting a document together to highlight the changes to the new Standard that will be posted with the new Standard. They had a great discussion on what is limiting FSMOs from applying. The next set of tools developed by the subcommittee will center around removing these limitations.
- The Container Subcommittee has met, but they are looking for more members to better understand the issue and whether there really is a need for this work. Justin will plan a meeting with the group to hopefully come to some conclusions by the end of the year.
- The committee is continuing to work with the NEFAP EC on mobile lab issues.
- The committee charter is being reviewed and a new member is being added to the committee.
- The committee will work on the Scope Guidance Document to support NEFAP EC efforts. Justin sent a message to the Chair of the NEFAP EC to gather more information.
- A member for the Standard Review Council has been selected and information has been forwarded to the CSDP.
- The committee is looking for a Vice-Chair.

NELAP

Accreditation Council

- The AB evaluation for IL is complete. All corrective actions were completed and approved, but there is an issue of consistency among the NELAP ABs (not related to conformance with the standard) still under discussion. Once this issue is resolved, the 2011-2013 round of evaluations will be complete.
- Three ABs have been approved for renewal of their Certificates of Recognition as NELAP ABs. Five additional AB evaluations are underway, with two of the site visits completed.

- Working with LAS EC, the AC proposed a editorial change to the Calibration Interim Standard that will resolve concerns about consistency with drinking water program requirements. CSD EC will review the proposed change as an edit, since the conflict was not “caught” until after the Voting Draft Standard was already approved, but the Chemistry Expert Committee is agreeable to the addition of this short phrase.
- SOP 3-103, Standards Review and Acceptance, is in process of being voted upon by the Council, with approval anticipated, after being recommended to the AC by the LAS EC.
- The Council has begun discussion about identifying needed policies and their desired content, with the expectation that LAS EC will be asked to “flesh out” those general concepts. The AC understands that the LAB Expert Committee is also willing to assist with preparing this documentation, if the LAS chooses to enlist it.
- Problematic SIRs continue to be discussed as needed, and either resolved within the AC or sent back to the LAS with explanations. While there are 3 “old” SIRs still awaiting resolution, due to various problems that continue to be addressed, there is no longer a “backlog.” Does the Board still want monthly status reports on these or would quarterly reports be satisfactory, or even semi-annual?
- Preliminary discussions have occurred with the new California accreditation program manager, Christine Sotelo, and a conference call will occur on November 13.

Laboratory Accreditation System Executive Committee (LAS EC)

- The LAS EC Chair is participating in a small workgroup with CSD EC representatives to determine the optimal revisions to the standards development, review and acceptance packages. Once agreement is reached about the stage of development when the LAS EC review needs to begin, the Standards Review for Suitability SOP 3-106 will be revised accordingly. For now, that SOP remains as Provisional status with reviews occurring at the Interim Standard stage, and this will be suitable for the PT modules and volumes which are the next ones approaching review.
- LAS EC received approval from Policy Committee for its proposal to develop and post to the TNI website “Implementation Guidance” – explanations to SIRs that are worthwhile questions but do not meet the criteria for needing an actual interpretation of the standard. Nine of these are approved by LAS and all that remains is to design a suitable web page to display them. Three more are in development.
- LAS EC is reviewing the NELAP Mutual Recognition Policy 3-100 prior to recommending it to the AC for approval. LAS is also updating the “How to Become a NELAP-Accredited Lab” flowchart on the website.
- LAS EC is processing SIRs as they arrive, whether new submissions or returns from the AC or responses from the expert committees. The “backlog” no longer exists, thanks to the efforts of both the AC and the LAS’ SIR subcommittee.
 - SIR Update:

Total Number	Closed Out	At LASEC Review	At NELAP AC	At Committee
269	240	6	7	15

PROFICIENCY TESTING

- The PT Expert Committee brought 3 comments from the Working Draft Standard (WDS) process to the PTPEC for a response. Two deal with FoPT table concerns and the third is a concern about Volume 4 and involves compiling PT data for PTPEC use. The responses are due mid January so they can be discussed by the PT Expert Committee at the winter meeting.

- There were further discussions on the need to collect method preparation data with PTs. There is a complaint being worked on by the committee dealing the effect of preparation methods on PT results (RE: Method 3051A).
- The FoPT Table Update Subcommittee met in October, but there were not enough members present to do any business. The subcommittee is meeting next week and will elect their chair and begin work.
- Work is progressing on the finalization of the new WET FoPT table. It was presented to the NELAP AC and concerns were expressed about a footnote that had detail they felt should be included in PT instructions instead of the table. Associate members of the PTPEC that are PT Providers expressed great concern about handling the information through the PT instructions. This will be further discussed in November and Maria will work directly with the WET FoPT Subcommittee to help solve the issue.
- Another complaint was received that is similar to a previous complaint where the PTPEC was asked to review the data that lead to an FoPT analyte limit update. The Chemistry FoPT Subcommittee will look into this complaint and report back to the PTPEC. This is still in progress.
- The Chemistry FoPT Subcommittee is continuing the review of SCM data. Metals and General Chemistry have been completed and work on semi-volatiles will begin in November.
- The PTP SOP Subcommittee is continuing their work on the Limit Determination SOP.
- The PTPEC will work on two outstanding SIRs in November.

ADMINISTRATION

Advocacy Committee

- The Advocacy Committee is helping to plan the 20th Anniversary celebration for the Crystal City meeting. We are looking for an attendee list from the 1995 meeting.
- Work has resumed on the PT Position statement.
- Gary Ward reported that all labs analyzing medical marijuana on Oregon will be subject to TNI quality systems standards.
- The next newsletter is on target to be published on November 15.
- The Advocacy Committee is recruiting additional members to replace members who have retired or changed jobs.

Non-Governmental Accreditation Bodies

- The NGAB working group and the TNI Non-Governmental Accreditation Body Recognition Committee (TNRC) are continuing to meet jointly. Pending items include: approval of the evaluation SOP by the TNI Board, development of supporting documents and forms for the evaluation process, development of training for evaluators, and development of a budget and fees for the program.
- The target date for implementation of the program is February 2015.

Policy Committee

- At the Board's request, Policy Committee has prepared revisions to the Bylaws and to the "Policy and SOP Approval" SOP 1-116 that will streamline the approval process for those types of documents. Essentially, Policy will have final approval authority for policies and SOPs unless either Policy Committee or the Board believes that the Board should review individual documents; the exception

will be documents originating with Policy Committee, and all of those will require Board review. The revised SOP will be presented to the Board after the Bylaws revisions are accepted.

- From late summer, four SOPs from the NELAP are at Provisional stage, with Policy Committee approval. These will remain Provisional until the new process is in place. They include the NELAP Evaluation SOP, the NELAP Voting SOP, the LAS EC SIR Management SOP and the LAS EC Standards Review for Suitability SOP.
- Three PTPEC SOPs underwent initial review in the past two months, and the Policy Committee comments will be transmitted back to PTPEC. A determination was made not to review the PTPA Evaluation SOP, since there are no PTPAs to be evaluated for two more years and the revised Volumes 3 and 4 of the ELSS will likely be approved and implemented by then, so that the SOP will need to be revised before its next use.

Training

- In Progress: The review of the ethics training has been expanded to add information about a 5 minute portion of the training where the microphone was not working. Language has been agreed on to provide information about using the Ethics training for annual and refresher training. Jack has decided to prepare a 5 minute webcast that will be added to the training. Update: Ilona will work on the update and get Jack's input. Plan to complete this in November so labs can use the information to provide Ethics Training. Ilona will also work on a document to support this training by providing details on what the lab needs to complete their training if using the webcast.
- A webinar is being planned by the Chemistry Expert Committee on December 11th and by the Radiochemistry Expert Committee on December 5th.

Winter Meeting

- Registration has opened for the 2015 meeting in Crystal City.
- Contract being finalized for winter 2016 in Tulsa, OK.

Summer Meeting

- NEMC 2015 is up on the website.
- All information and instruction documents for 2015 have been prepared and/or updated.
- All information for preparing the database and abstract upload process has been forwarded to William.
- Call for abstracts has been mailed.

Membership Report

- There were six new committee applications this month.