



TO: Higher Education Committee

FROM: John L. D'Agati *John L. D'Agati*

SUBJECT: St. Paul's School of Nursing: Extension of Provisional Authority to Confer Degrees

DATE: December 7, 2017

AUTHORIZATION(S): *Margaret Elin*

SUMMARY

Issue for Decision

Should the Board of Regents grant permanent degree authority or extend provisional degree conferring authority to St. Paul's School of Nursing at its Queens and Staten Island campuses?

Reason(s) for Consideration

Required by State regulation.

Proposed Handling

This question will come before the Higher Education Committee at its December 2017 meeting, where it will be voted on and action taken. It will then come before the full Board at its December 2017 meeting for final action.

Procedural History

Pursuant to §224 of the Education Law, the consent of the Board of Regents is required for a for-profit institution to award degrees. Section 3.58 of the Rules of the Board of Regents authorizes the Board of Regents to determine whether to grant permanent authority, extend the provisional authority to confer degrees for an additional period of up to five years, or deny continuing degree-conferring authority past the term of the previously granted provisional authority.

Background Information

Brief Description of the Corporation and Schools: Education Affiliates (EA) Inc. is a Delaware c-corporation engaging in the acquisition and operation of for-profit, postsecondary, career-oriented schools. In 2008, EA owned 20 postsecondary schools with 35 campuses located in 9 states. EA had expanded its holdings to operate 53 campuses in 17 states in 2013. In 2016, EA reported that it operates 48 campuses in 17 states.

On December 16, 2008, the Board of Regents determined that EA satisfied the regulatory criteria for provisional authority to confer the Associate in Science (A.S.) degree as St. Paul's School of Nursing upon final transfer of assets from St. Vincent's Catholic Medical Center for a five-year term. The transaction was completed on April 13, 2009 and St. Paul's School of Nursing - Staten Island campus and St. Paul's School of Nursing - Queens campus (the Schools) were established to provide academic programs and award degrees. The Schools operate separately under the administrative authority of a campus President with a direct line of responsibility to the EA Regional Vice President.

On February 18, 2013, the Schools submitted an application for permanent degree-granting authority. Following a review of the application, it was determined that the Schools were not fully compliant with the pertinent provisions. At its December 2014 meeting, the Board of Regents voted to extend the School's provisional authority to confer degrees until December 31, 2016 based on the recommendation of the Deputy Commissioners.

The mission of the Schools is to serve the needs of the community by offering education that exemplifies the "highest standards for nursing practice and healthcare education." Both Schools offer an Associate in Science (A.S.) degree program in Nursing (registered in June 2009) and an Associate in Occupational Science (A.O.S.) degree in Medical Assistant (MA) (registered in July 2010). The Staten Island campus also offers an A.O.S. program in Dental Assistant (DA) (registered in May 2010).

Review Process of the Schools' Application: The Schools submitted an application for permanent authority to confer degrees on March 30, 2016. As part of the review process, on August 3-5, 2016, staff members from the New York State Education Department (the Department) coordinated two separate peer review site visits to each campus. Each team consisted of a Nursing Associate from the Office of the Professions and two peer reviewers. Peer reviewers to the Queens campus included a Dean of Nursing at a private, single purpose institution offering Nursing programs at the associate degree level and a Chief Academic Officer at a proprietary school that offers nursing and allied healthcare programs. The Staten Island campus peer reviewers consisted of a director of a single purpose institution offering Nursing programs at the associate degree level and a Vice President for Academic Affairs at a private institution.

In addition to the Schools' application for permanent authority to confer degrees and findings of the August 2016 peer review site visits, the following documentation was

considered during the review process: the School's progress reports; annual Nursing program reports; financial reports from the Department's Office of Audit Services; institutional statistics from the Department's Office of Research and Information Systems; reports from the School's accreditation agency; and findings from the Office of Federal Student Aid of the USDE.

Deputy Commissioner's Recommendation: Based upon the review of the materials and records related to the Schools' application, the financial health of the corporate owner remains a concern. In addition, the following issues persist: the education effectiveness of the registered programs, specifically, the Nursing programs outcomes for first-time candidates on the National Council Licensure Examination for Registered Nurses (NCLEX-RN); the implementation of the Medical Assistant and Dental Assistant programs based on enrollment patterns; the inconsistent application of policies and procedures at the program level; the lack of institutional and program effectiveness plans; and the participation of faculty and students in the governance of the Schools.

It is recommended that the Board of Regents extend provisional degree granting authority for a period of three years ending December 31, 2019. Concerns were identified with the following provisions of Section 3.58 of the Regents Rules: compliance with regulations, laws, and rules; financial resources; and effective operations. The owners of the Schools were committed to implementing the effective strategies to address those concerns. During the period of approval, the Schools shall operate under the stated enrollment plans for each program. The Schools shall submit annual progress reports addressing identified areas in need of improvement. Consideration of degree granting authority beyond December 31, 2019, will be contingent upon EA demonstrating improvement in financial health and EA and the Schools being in compliance with pertinent state and federal laws, regulations, and rules. Application for permanent degree granting authority must be received 12 months prior to the end of the provisional authority period.

On July 19, 2017, notification of the Deputy Commissioner's recommendation along with the factual basis for recommendation was sent to the School. The School responded on August 16, 2017 that the Schools were not requesting reconsideration of the recommendation.

Recommendation:

VOTED, that the Board of Regents extend provisional degree granting authority for a period of three years ending December 31, 2019. Consideration of degree granting authority beyond December 31, 2019 will be contingent upon EA demonstrating improvement in financial health and EA and the Schools being in compliance with pertinent state and federal laws, regulations, and rules. Application for permanent degree granting authority must be received 12 months prior to the end of the provisional authority period.

Timetable for Implementation

The Regents action will take effect immediately.

Attachment

St. Paul's School of Nursing Compliance with Regulatory Provisions

Rule §3.58 (d)(2)(i)(a): *Evidence confirming that the institution is in compliance with the Education Law, program registration standards set forth in Part 52 of this Title, other Rules of the Board of Regents and Regulations of the Commissioner of Education, other State statutes and regulations, and Federal statutes and regulations, relevant to the operation of degree-granting institutions.*

Findings:

Resources: The Queens campus and the Staten Island Campus have adequate classrooms, computer labs, and offices to support the programs. At the Staten Island campus, the nursing skills labs are spacious and equipped with all the necessary technical learning aids. At the Queens campus, the clinical skills lab can accommodate as many as 30 MA students per class session, while the number of nursing students is limited to 8-10 per session. It was noted that the clinical lab equipment was insufficient in quality and quantity to provide the students adequate skills training. Additionally, earmarked for the nursing program are two simulation labs with high and medium fidelity mannequins with an attached control and debriefing room. Although these resources have been shown to improve clinical skill and critical thinking in nursing students, the equipment is not utilized due to lack of appropriately trained faculty.

Faculty: For most of the positions, the minimal requirements established by both campuses meet the pertinent regulations and guidelines. The Schools require part-time instructors for clinical or laboratory assignments to have, at minimum, a bachelor of science in nursing degree. This is not consistent with the Department's expectations that all nursing faculty have a minimum of a master's degree in nursing or be enrolled in a graduate program and making steady progress towards completion.

For courses requiring special subject matter emphasis, i.e. Anatomy & Physiology and Microbiology, the Schools require faculty to hold a master's or doctoral degree in the field. The Schools require that other general education courses be taught by faculty with education or experience relevant to the subject matter. The Department expects faculty members teaching at the certificate, associate degree, and baccalaureate levels hold at least a master's degree in an appropriate field and have the background for in-depth teaching, curriculum development, and program evaluation responsibilities. The Department recognizes that in certain occupational specializations faculty may merit demonstration of competence alternative to a master's degree. In all institutions, faculty with master degrees and beyond, and with substantial collective experience in college teaching and academic administration should be strongly predominant. The schools do not fully meet this expectation.

In August 2016, at the Queens campus, there were 21 full-time faculty (17 nursing; 2 medical assistant; and 2 general education) and 30 part-time faculty (15 nursing; 4 medical assistant; and 11 general education). All faculty members meet the minimum standards as required by the school. At the Staten Island campus, there were

18 full-time faculty (12 nursing; 1 MA; 1 DA; and 4 general education) and 33 part-time faculty (17 nursing; 2 MA; 2 DA; 3 shared between the MA and DA programs and 9 general education). Three of the part-time liberal arts and science faculty members hold a baccalaureate degree and provide instruction in English, Microbiology, Mathematics and Pharmacology. The remaining faculty members all hold master's degrees. None of the DA program faculty are licensed in New York State for Dentistry. During the student externship experience, students are supervised by licensed dentists. Some of the part-time nursing faculty teach the didactic courses.

While the ratio of full-time to part-time is adequate at both schools, there is an over-reliance on part-time faculty to offer the liberal arts and science courses. Part-time faculty do not fully participate in program evaluation activities or the governance of the School. There is not a consistent process in place to mentor new faculty into the educator role. Only full-time faculty share in the academic advisement of students.

Curricula and Awards: The courses for each program at the campuses are designed to support student learning outcomes and meet program registration standards. Each program has developed program evaluation plans. The MA and DA programs collect end of course evaluation and student performance data on national certification exams since the 2012-2013 academic year. The Nursing programs have rudimentary systematic plans of evaluation and established benchmarks for NCLEX-RN pass rates and student performance on standardized tests. The data indicates that the Nursing programs are not meeting the program purpose and stated outcomes or NYSEDs expectation of a minimum acceptable NCLEX-RN pass rate of 75 percent for first-time candidates.

***First -Time Candidate Pass Rates on the NCLEX-RN: Queens Campus**

Year	# of First-time Attempts	# Passed	% Passed	NY State Rate
2013	145	85	58.6%	78.1%
2014	177	74	41.8%	76.8%
2015	154	86	55.8%	80.6%
2016	168	128	76.2%	82.9%

***First -Time Candidate Pass Rates on the NCLEX-RN: Staten Island Campus**

Year	# of First-time Attempts	# Passed	% Passed	NY State Rate
2013	206	96	44.6%	78.1%
2014	198	87	43.9%	76.8%
2015	192	103	53.7%	80.6%
2016	118	72	61%	82.9%

*NCLEX pass rates calculated for first time candidates as reported by National Councils of State Boards of Nursing (NCSBN).

Admissions: As of August 2016, there were 450 enrolled students at the Queens campus (101 full-time MA students, 212 full-time nursing students and 137 part-time nursing students) and 374 students (92 MA students; 30 DA students; 180 full-time nursing students, and 72 part-time nursing students) at the Staten Island campus. Student admissions for all programs at both campuses are based on established criteria. The Schools have developed a procedure to admit students to the MA and DA programs every six weeks. Instead of following a sequence of study, students take the courses that are offered at the time of their enrollment and continue through the program until all modules are completed. The Schools refer to this model as the "wheel." While the approach maintains course enrollment, it does not support offering the curriculum in a logical progression of content from basic to complex. Additionally, part-time faculty reported that the "wheel" model leads to gaps in their teaching assignments and opportunities for continuous employment.

Administration: An EA operational team provides administrative support to the Schools. At Queens campus, the current campus President was appointed in 2013. The Dean of Education has been on staff for one year. The Registrar has been in place for six months. The Financial Aid Director has been with the School since 2011. The Director of Admissions was appointed in 2016 (the Director held the position of the Assistant Director for the past four years). The Dean of Nursing position was vacant with a search in progress. EA Regional Dean of Nursing, with regional responsibilities at four other EA campuses is serving as Interim Dean of Nursing at the campus. The Interim Dean has a long-term familiarity with the School as she was previously the Administrative Director of the St. Vincent Catholic Medical Centers, School of Nursing, Queens and Staten Island. The campus President indicated that there are no anticipated changes in leadership.

At the Staten Island campus, the Interim President, since May 2016, remains responsible as a Regional Director of schools under the EA umbrella and reported that the primary focus is leading the changes at the Staten Island campus. The Interim President has been located on the campus since his appointment. The Interim Dean of Nursing is the same individual serving in this position at the Queens campus. An Assistant Dean of Nursing with 5½ years of service assumes administrative responsibility for the daily operations of the Nursing program in the absence of the Interim Dean. The Director of Admissions was recently appointed in 2016 and previously held the position of Assistant Director of Admissions since 2012. The Registrar has served the school since 2010 and the Financial Aid Director has been with the School since 2010.

The Faculty Handbook and the EA Employee Handbook set forth the general governing policies for faculty and staff. Faculty members report that some input is provided at the program level with most policies being generated by the corporate parent organization. There is a committee structure that provides opportunities for faculty to be involved in governance. Meeting minutes were insufficient to support the extent to which these committees meet and the scope and effectiveness of their function. Faculty and staff at both schools were not fully engaged in the assessment of institutional effectiveness. The budgeting process is an activity of the Deans and School

President. Material requests are filtered through the faculty to the Deans to the School administrative team. There are no policies on academic freedom, rank, or promotion.

Support Services: Academic Support Services are provided primarily through faculty intervention or by a student self-initiating assistance from a faculty member. Academic Support Services are not widely available for the liberal arts and science courses. Research and writing assistance is offered through the LRC. For matters concerning financial aid counseling, billing, and disbursements, students confirm that staff is readily available both during the day and evening hours. Students, in general, report satisfaction with these services. Each campus has technology support staff.

The Staten Island campus has a full-time psychology faculty member to provide counseling and referral for social/psychological issues. Most recently, release time from teaching assignments was provided for this function and the position title changed to Director of Student Services. In an announcement, students were notified that if there is potential conflict of interest, alternate arrangements would be made available for mental health counseling.

Information for Students: In general, information is consistent across media types with some minor discrepancies. In some cases, faculty degree credentials were not reported correctly. The web site, which covers both the Staten Island and the Queens campuses, focuses on the mission and philosophy of the Nursing program rather than the institution.

Information on cost of attendance and financial assistance is available in the Schools' Catalogs and upon request to students seeking admission. Cost of attendance is not made publicly available. Students are provided this information during the application process for financial aid by a counselor. Refund and student financial responsibility information is available from counselors listed in the college catalog and reviewed when students accept the financial aid package.

An overview academic calendar is published. The frequency of course offerings is not specified in the course descriptions in the catalog. The HEGIS code for the registered programs is not included in the catalog. Required federal compliance reports are available on the website and upon request.

Areas for Improvement:

1. The admission standards must be able to identify only those potential students having the capacity to undertake and successfully complete the Nursing program.
2. The current decentralized system of providing academic and other student support services is a barrier for student access and the effectiveness of these services cannot be measured.
3. Faculty in all programs must be appropriately educated and credentialed as outlined on the NYS Higher Education website. Additionally, the position descriptions for faculty must align with the Department's expectation that faculty members teaching at the associate degree level hold at least a master's degree

in an appropriate field and have the background for in-depth teaching, curriculum development, and program evaluation responsibilities.

4. Improve the organizational structure to encourage participation of the part-time faculty, particularly the Liberal Arts & Science faculty in school governance and evaluation activities.
5. Implement a formalized mentoring policy and procedure to meet State Regulations which require each inexperienced faculty member to receive special supervision during the initial period of appointment.
6. Develop and implement policies and procedures related to academic freedom, rank, and promotion to be compliant with State Regulations.
7. Develop and implement strategies to recruit and retain qualified dean(s) for the nursing programs.
8. Develop and implement policies and procedures to streamline the collection, distribution and access to protect private health information of the students at the Schools and to be compliant with Federal and State statutes and regulations.
9. Admissions to the MA and DA programs must be done in a logical order so the curriculum sequence is from basic to more complex.
10. Develop and implement a functional Systematic Evaluation Plan (SEP) that will monitor the use, maintenance and replacement of resources, especially in the skills lab and the simulation lab at the Queens campus.
11. Fully engage all faculty and staff in the assessment of institutional and program effectiveness.
12. Develop and implement strategies to improve outcomes for first-time candidates on NCLEX.
13. Published materials across media types must be publicly available and accurate. The promotional materials shall include accurate and current information on the cost of attendance and faculty credentials.

Rule §3.58 (d)(2)(i)(b): *Evidence confirming that the institution has sufficient financial resources to ensure satisfactory conduct of its degree programs and achievement of its stated educational goals.*

Findings:

Education Affiliates LLC owns 674,807,980,950 shares of EA Inc., which is approximately 60% of the total outstanding shares. No other individual stockholder holds more than 10% of voting shares. EA Inc. does not provide an annual report to stockholders.

As of June 30, 2015, all of the institutions owned and operated by EA were certified by the USDE as eligible to participate in the federal financial aid programs under Title IV of the Higher Education Act of 1965. The audited consolidated financial

reports were reviewed for years ending December 31, 2012, December 31, 2013, June 30, 2014, and June 30, 2015. In 2012, the Corporation had a net operating income of \$1.3M. In 2013, a \$23M net operating loss was reported. In 2014, the Corporation reported a net operating loss of \$298M. The latter reflected primarily the need to take an impairment of goodwill in continuing operations in the amount of \$255.3M. Accounting standards require that goodwill assets be regularly tested. In this instance, the impairment of goodwill was taken because, in early 2014, forecasts of revenues and cash flows were revised, in part due to expected declines in student enrollment at the Schools, and news of the expected controlled shut-down and sale of a large public for-profit education company.

In 2013-2014, several EA schools and the EA corporate parent were subject to program review/subpoenas by government entities for actions spanning 2010 – 2014. A settlement agreement between the company, the USDE, and the Department of Justice (DOJ), and other parties was reached on June 8, 2015, whereby the company agreed to pay \$13M to the DOJ over a period of approximately six years.

On June 26, 2015, the company amended and restated its Certificate of Incorporation to allow for the issuance of additional capital stock. The majority stockholder made a cash capital contribution to the company of \$10M and was issued shares of common stock. The proceeds were to support the liquidity and working capital needs of the business. The company also restructured all existing funded debt so that the principal amount of term loans were forgiven and deemed cancelled in exchange for shares of preferred stock. This provided the former lenders approximately 40% of the company's voting stock. Unaudited financials for EA through January 31, 2016 (initial 7 months) showed a net income after tax of \$7.4M.

Calculation by the Department's Audit Services shows that the Corporation federal composite scores for the fiscal years 2006 through 2015 have been consistently below 1.0. Less than 1.0 is considered by the USDE to be not financially responsible. A school with a score less than 1.0 may continue to participate in Title IV programs under provisional certification. As a result, EA was required to post letters of credit in the amount of \$50.3M for both 2013 and 2014. For the fiscal year ending June 30, 2015, EA's composite score was 0.2 and was mandated to post letters of credit. In the October 26, 2015 letter from the USDE, following the restructuring, the amount required in the letter of credit requirement was \$36.4M.

The Queen campus appears to be financially solvent. This determination is based upon the balance sheets for the fiscal years ending December 31, 2014 and December 31, 2015 provided by the School. The campus showed positive assets to liabilities of \$2.9M and \$3.2M respectively, and net income of \$661,000 and \$344,000 respectively. Further, the institution provided unaudited figures for the first seven months of 2016 ending June 30, 2016, which demonstrated net income after tax of \$1.8M. Five-year budget projections (2016–2020) for the Queens campus indicate forecasted net income after tax of \$861,000, \$799,000, \$764,000, \$904,000, and \$932,000, respectively.

Review of the balance sheets of the Staten Island for the years ending December 31, 2012, December 31, 2013, June 30, 2014, and June 30, 2015 show that the School appears to be financially solvent. During this time frame, the campus showed positive assets to liabilities of \$8.9M, \$11.4M, \$15.6M, and \$16.5M, respectively, and net income of \$2.6 M, \$2.6M, \$4.8M, and \$884,000, respectively. The unaudited figures for the first seven months ending June 30, 2016 show a net income after tax of \$958,000. Five year budget projections (2016–2020) for the Staten Island campus indicate forecasted net income after tax of \$727,000, \$862,000, \$1M, \$2.2M, and \$2.3M, respectively.

Areas for Improvement:

1. Continued efforts to stabilize and improve the financial health of institution.

Rule §3.58 (d)(2)(i)(c): *Evidence that the individuals having ownership or control of the institution are operating the proprietary college in an effective manner and that the degree programs meet their educational objectives.*

Findings:

The Schools provide, via its college catalog and its web site, information on the college's mission and purposes. In brief, the mission of the Schools is to provide traditional and non-traditional college students the opportunity to enhance their preparedness to take on professional occupations through participation in career-focused associates-level educational programs. In addition to providing training in particular occupational tracks, the college provides the means for students to develop individually and professionally, and supports graduates in finding training-related positions in the community.

The 20 educational institutions and 48 campuses owned and operated by EA are accredited individually by a number of accrediting bodies approved by the USDE. These accrediting bodies include the Accrediting Commission of Career Schools and Colleges (ACCSC), the Higher Learning Commission (HLC), the Accrediting Bureau of Health Education Schools (ABHES), the Council on Occupational Education (COE) and the Accrediting Council for Independent Colleges and Schools (ACICS). Most recently, ACICS has lost its approval as an accreditation agency by the USDE. Colleges owned and operated by EA, will have 18 months to find new accreditors. While the New York Schools are not accredited by the ACICS, the potential impact on the parent organization and possibly the Schools cannot be assessed.

The USDE Federal Student Aid three-year official cohort default rates for Fiscal Years (FY) 2011-2013 for St. Paul's Queen campus is 2.3, 3.3, and 3.6 percent respectively; and for the Staten Island campus 0.0, 5.8, and 9.2 percent respectively. The national three-year cohort default rate for FY 2011 – 2013 is 13.7, 11.7, and 11.3 percent respectively. The Schools' application provides default data issued in 2015 for

the 20 institutions operated by EA; seventeen of the twenty institutions have default rates in the range of 9.2 to 18.5 percent.

At the Schools, administration tracks overall student outcomes, including first time pass rates on licensing and certification exams, retention, graduation and employment placement at the program level. However, there is no evidence that the institution has a Systematic Evaluation Plan (SEP) to address deficiencies and improve performance. For example, while academic program outcomes were being monitored, evidence is lacking with respect to how non-academic student support services such as the LRC, admissions, financial aid, bursar, tutoring, etc. are evaluated for effectiveness. At the program, level directors and faculty were not able to articulate knowledge of a SEP.

Despite the lack of direction from SEP, the School does address some of its identified deficiencies. For example, the Interim President at the Staten Island campus provided a list of initiatives specifically focused on improving NCLEX-RN pass rates. These initiatives include: change in the campus President in 2016; greater rigor in nursing admissions; increased faculty classroom observations; providing teacher professional development; regular administrative review of the NCLEX-RN Performance Improvement Plan; providing a dedicated faculty member to tutor graduates who failed the NCLEX-RN on the first attempt; and a proposal to change the nursing curriculum to be consistent with that in use at other EA institutions. In addition, the President provided a proposal to create 'Master Faculty' to enhance faculty development and teaching excellence. These initiatives have not been integrated into an overall effectiveness plan.

An informal process for sharing data and analysis of assessment findings with the college community contributes to the overall lack of effective communications. For example, the institution's nursing graduates have performed below state and national benchmarks on the NCLEX-RN exam for several years, yet the nursing faculty at both Schools did not know this information or how it was used to determine the improvement plan.

Areas for Improvement:

1. Develop a campus-wide effectiveness plan that systematically and continuously evaluates, summarizes and addresses areas of concern holistically, including academic, financial, and student support services and which then uses the results of the evaluation to focus improvements and demonstrate that the school operates in an effective manner and that the degree programs meet their educational objectives.
2. Establish formal processes and forums to share with the entire campus community the results of assessment data so that all members of the institution are involved in collecting and analyzing data, and designing improvements to move the School towards achieving its mission.

Standard: §3.58 (d)(2)(i)(d): *Evidence that the individuals having ownership or control of the institution have not engaged in fraudulent or deceptive practices;*

Findings:

EA attests that there are no felony convictions, pending felony charges or actions of debarment from participation in federal programs involving any owners, partners, officers, directors and/or principal stockholders of EA Inc. Although the Department's review revealed no apparent evidence of fraudulent or deceptive practices by the individuals having ownership or control of the Schools, it should be noted that, during the application process, the owners disclosed seven pending civil litigations; one case in New York. In this case the plaintiff claims wrongful dismissal following an incident wherein the plaintiff was accused of taking a picture of an exam. The plaintiff has agreed to arbitration.

Areas for Improvement: None

Standard: §3.58 (d)(2)(i)(e): *Evidence that substantiates the institution's beneficial contributions to the community or communities it serves.*

Findings:

The Schools have invested significant resources to establish well-equipped campuses in the respective boroughs. It provides both employment and educational opportunities for the communities it serves. Most students report a positive learning experience and improved communications and services at each campus. Based on Labor Department projections, there is a workforce demand for the targeted professions, and the Schools provide graduates that can meet the needs of health care providers in the region. Most schools in the five boroughs of New York City offer certificate programs in MA and DA. However, these two programs at the Schools enhance employment prospects as they lead to the A.O.S. degree.

Areas for Improvement: None