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Post-Recognition Monitoring Report

The International Curriculum and Assessment Agency
Examinations Ltd

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Introduction

Regulating qualifications

Responsibility for regulating qualifications lies jointly with three regulators respectively:

- Office of Qualifications and Examinations Regulation (Ofqual), the regulator for qualifications awarded in England and vocational qualifications awarded in Northern Ireland
- Department for Children, Education, Lifelong Learning and Skills (DCELLS), the regulator for Wales
- Council for the Curriculum, Examinations and Assessment (CCEA), the regulator responsible for qualifications (other than vocational qualifications) for Northern Ireland.

The regulators systematically monitor awarding organisations and their regulated qualifications against the requirements set out in the statutory regulations. The aim of this activity is to promote continuing improvement and public confidence in the quality of regulated qualifications.

Where an awarding organisation is found not to comply with relevant criteria, the regulators will identify areas of non-compliance that must be rectified within a certain period. Even if an awarding organisation is compliant, the monitoring team may make observations on ways that the awarding organisation could change its systems and procedures to improve clarity or reduce bureaucracy.

Non-compliances and observations arising from this monitoring activity are specified at the end of each section of this report. Awarding organisations are required to produce an action plan to show how they will deal with the non-compliances identified through monitoring activity. The regulators will generally agree the action plan and monitor its implementation.

The regulators will use the outcomes of monitoring and any subsequent action taken by awarding organisations to inform decisions as to future monitoring and/or the possible imposition of sanctions.

Banked documents

As part of its awarding organisation recognition processes, the regulators require awarding organisations to submit certain documents to Ofqual for the purposes of 'banking' them centrally. Information from banked documents will be used to inform monitoring activities and may also affect the awarding organisation's risk rating.

A suite of documents has been identified as suitable for banking and are those that are considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. To maintain the currency of the banked documents, awarding organisations are responsible for updating them as and when changes occur. They are also reminded to review them at least annually as part of the self-assessment return.

About this report

This report is the outcome of a monitoring activity on The International Curriculum and Assessment Agency Examinations Ltd (ICAAE) awarding organisation and was carried out by Ofqual in May 2010. It draws together Ofqual's findings on the areas of:

- corporate governance
- resources and expertise
- qualifications development
- the quality assurance and control of internal and independent assessment
- determination and reporting of results

This is the second post-recognition monitoring activity on ICAAE's activities. The monitoring activities included desk research of information already held by the regulators, the awarding body recognition update (ABRU) submission and scrutiny of the website. The monitoring team visited ICAAE's head office to conduct interviews with staff and review documentation. It also visited centres and observed an examination to check how the awarding organisation's quality assurance systems worked in practice.

About ICAAE

ICAAE provides access to vocationally related qualifications (VRQs) in Business Chinese and information and communications technology (ICT). For more information about ICAAE and the qualifications that it offers, visit the website at www.icaa.com.

Corporate governance

This is subject to the *Statutory Regulation of External Qualifications in England, Wales and Northern Ireland (QCA/04/1293)*, paragraphs 5, 6 and 7.

Findings

1. The ICAA Group consists of four companies: The Information and Communications Technology Training Group Ltd (ICTTG Ltd) responsible for in-service training (INSET) services and professional development for teachers, Chapel House Inspection Unit (CHIU), which offers a quality assurance function such as pre-Ofsted inspections for schools, the awarding organisation ICAAE, and a property company, International Curriculum and Assessment Agency Property Ltd (ICAAP Ltd).
2. ICAAE the awarding organisation is a public limited company. It sits within the ICAA Group of companies that offers a range of educational services in the UK and overseas. These services include managing and coordinating part-time specialist consultants, the design of learning and assessment, staff development and training, quality assurance and inspection, and the certification of accredited qualifications.
3. The awarding organisation is going through a period of immense change. Its relationship for awarding GCSEs with CCEA will end in July 2010. It was recognised as a GCSE awarding organisation in 2008 and is currently applying for QCF recognition.
4. ICAAE provided the regulators with an organisational structure and its management reporting lines. The ICAAE organisational chart shows how the awarding organisation reports to the chief executive officer (CEO) via the head of examinations who is the accountable officer responsible for maintaining the quality and standards of all qualifications. This role was clearly identified in the relevant job description. ICAAE also showed the regulators the ICAA Group business structure chart, which depicts the different companies in the Group and their reporting lines. Although functions such as finance and IT are shared, the regulators were satisfied that there are no conflicts of interest between the different companies in the Group.
5. Currently, the Executive Board is made up of five directors, including the CEO who oversees the activities. The CEO stated that other people such as curriculum specialists are co-opted onto the Executive Board when necessary. The terms of reference for the Executive Board states that it meets three times per year, but ICAAE staff confirmed that it only meets formally every 12 months and has informal meetings with co-opted members when required. Therefore, ICAAE is not following its documented procedures. The awarding organisation

is small and the CEO discusses issues that arise on a daily basis with staff. However, it is not clear how decisions affecting the awarding organisation are made as ICAAE could not provide any minutes from the Executive Board meetings.

6. A variety of committee structures supported by an organisational chart were presented to the regulators. These included the Executive Board (formally the Board), the Governing Board responsible for qualification standards, the Question Paper Evaluation Committee and the Awards Committee. The regulators noted that all committees apart from the Executive Board referred to general qualifications, not VRQs.
7. Operational issues are the responsibility of the head of examinations. Any changes to policy documents are made by the head of examinations and ratified by the CEO. The regulators reviewed the banked documents and ICAAE was required to make changes to existing policies to meet the regulatory criteria.
8. The regulators noted that the job title of the accountable officer was not consistent in the documentation, although the role was the same. For example, in job descriptions for other staff, the title of accountable officer was either head or director of examinations. Further evidence was seen of confusion and inconsistencies in ICAAE documentation, which is a recurring theme throughout this report. The regulators asked for specific information, which was incorrect when it was provided. For example, the head of examinations' report to the directors for September 2009 was dated September 2010.

Non-compliances

1. ICAAE must ensure that it follows or reviews its existing procedures for governance. In addition, ICAAE must record all management decisions relating to awarding organisation activities (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 5a).

Observations

1. ICAAE should review all job descriptions to ensure consistency in job roles and titles.
2. ICAAE is reminded to provide the regulators with the revised policies for banking.

Resources and expertise

This is subject to *The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 8 and 10, and the *NVQ Code of Practice* (QCA/06/2888), paragraphs 4, 5, 19 and 71.

Findings

1. ICAAE currently has a team of three staff dedicated to awarding organisation functions – the head of examinations (accountable officer) and two full-time administrative posts. One has responsibility for the day-to-day operation of ICAAE's GCSE provision and the other for the day-to-day operation of the vocational qualifications, namely Business Chinese and the ICAAE e-awards. A further post of principal officer was vacant at the time of the monitoring activity.
2. The ICAAE Group supports the awarding organisation function with the provision of human resource and IT services.
3. All staff have an annual appraisal and performance review through which learning and development activities are identified and implemented.
4. Although the members of the team have their individual responsibilities, they are able to multitask as required, covering other posts during holidays and sickness.
5. The regulators consider that the number of staff is adequate for the existing VRQ provision. However, ICAAE is aware that if it extends the number of qualifications offered or candidate numbers increase significantly, it will need to recruit additional staff.
6. Awarding organisations are required to ensure that its staff and external experts are competent in the design and development of qualifications, assessment and awarding procedures, the subject matter of qualifications and supporting the equality of opportunity. ICAAE confirmed that members of staff had attended external courses relating to QCF development, but it is not clear what training or guidance could be accessed by existing staff and/or external experts in these areas for its National Qualifications Framework (NQF) provision.
7. In addition to its full-time staff, ICAAE contracts with specialists who are experts in the subject areas of the vocational qualifications offered. Specialists are recruited following advertisements in the national press or from existing ICAAE networks. Curricula vitae (CVs) are submitted and reviewed by the head of examinations before appointment. Some, but not all, may be interviewed.
8. For the ICAAE e-awards, the awarding organisation contracts with a chief examiner and a moderator. The Business Chinese suite of qualifications has a

chief examiner and an assistant examiner. These are sufficient for the existing numbers of candidates, although ICAAE is reviewing the need for an additional moderator for the ICAAE e-awards.

9. The duties and conditions of appointment for these specialists were shown to the regulators. ICAAE has used the same template for each of the chief examiner posts. However, there are differences in the roles. For instance, the Business Chinese qualification does not use trained assessors, so this should not be included. The ICAAE e-awards do not have an examination, yet one of the duties listed for its chief examiner is for an examination report. The duties and conditions for the moderator of the ICAAE e-awards also refer to examinations, which is incorrect.
10. A further team of about 45 trained assessors carry out assessment for the ICAAE e-awards. These are usually staff from within the centres. ICAAE requires the assessors to attend a one-day training event within 18 months of commencing their role. Records of attendance are kept and certificates cannot be claimed unless the trained assessor has completed the training. Evidence from centre visits confirmed this process. The regulators looked at the training package used, which was comprehensive and included exemplar materials.
11. The regulators noted that ICAAE has two website addresses. Staff stated that a second website address had been used to test a new IT platform for electronic assessment of the Business Chinese suite of qualifications. This project had proven too costly for centres, but the address had remained.
12. The regulators noted the variation in names and logos for the ICAAE's vocational qualifications in guidance documentation and on the website. They are referred to as iTQ or ICAAE e-awards. This could be confusing for users. *The Teacher's Handbook* for the ICAAE e-awards also has an Accredited logo. Staff at ICAAE stated that this was a brand name for the ICAAE e-awards, which had been requested by the chief examiner as a search facility.
13. ICAAE operates within a secure environment and has a member of staff responsible for IT provision and security. This person also manages the contracts with IT maintenance providers. There is a documented disaster recovery plan and processes to restore data are in place. These procedures have been tested by ICAAE.

Non-compliances

1. ICAAE must ensure that all staff and external contractors have access to training and/or guidance in the design and development of qualifications, assessment and awarding procedures, the subject matter of qualifications and supporting the equality of opportunity (*The Statutory Regulation of External*

Qualifications in England, Wales and Northern Ireland (QCA/04/1293), paragraph 10).

Observations

1. ICAAE should keep its staff resources under review.
2. ICAAE should review and amend the duties and conditions of appointment for specialists to ensure that they accurately reflect the differing job roles and responsibilities.
3. ICAAE should review the use of logos, branding and how VRQ qualifications are described within its documentation, so that it is clear to users.

Qualifications development

This is subject to *The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 1–4, 33(a) and 43–55.

Findings

1. Awarding organisations are required to have procedures in place to design and develop qualifications. A plan of provision was available, demonstrating that ICAAE has reviewed its provision and considered areas where provision could be extended.
2. The existing VRQs offered by ICAAE were accredited prior to the appointment of its current staff. It was clear from discussions with these members of staff that no records concerning the development of these qualifications were available, and there were no documented procedures to support the design and development of VRQs. Therefore, it was not possible to determine or test how the current qualifications had been developed or what processes had been used to decide how the methods of assessments had been selected.
3. It is a regulatory requirement for awarding organisations to have documented procedures for the design, development and review of qualifications on the current National Qualifications Framework (NQF). In addition, awarding organisations must have a procedure for withdrawing qualifications. Currently, there is no documented procedure for the withdrawal of a qualification.
4. ICAAE is putting together its submission for supplementary recognition onto the new Qualifications and Credit Framework (QCF). The regulators were shown documents that are going to be used as evidence to support this submission, including draft procedures for unit and qualifications development.

Non-compliances

1. ICAAE must develop procedures for the design, development, review and withdrawal of qualifications (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 1–4 and 43–52).

Observations

There are no observations for this section.

The Quality assurance and control of internal and independent assessment

This is subject to *The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 13, 36, 38–42, 56–58 and 59–62.

Findings

1. ICAAE offers two VRQs at different levels within its NQF provision. Both are evidence based, but one has an additional independent assessment component. The regulators looked at the quality assurance and control systems in place to support the assessment of the ICAAE e-awards and the Business Chinese suite of qualifications.
2. The awarding organisation provides centres with a specification detailing the learning outcomes, range statements and types of evidence to be collected for each suite of qualifications. In addition, teacher handbooks are issued. Terms such as ‘trained assessor’, ‘approved assessor’, and ‘approved trained assessor’ appear throughout a variety of guidance documents, including the teacher handbooks. This is confusing and ICAAE should decide on the terminology it wishes to use and apply it consistently throughout its documentation.
3. According to the National Database of Accredited Qualifications (NDAQ), to achieve an ICAAE e-award a candidate must complete two compulsory and two optional units. Each unit has 30 learning outcomes; 15 practical and 15 knowledge skills. However, the *Candidate Log* (February 2005) issued by ICAAE and shown to the regulators refers to candidates completing three compulsory and one elective unit.
4. The majority of learning outcomes are internally assessed by the teacher/internal assessor to pass level only. The final assessment is carried out by an approved assessor and includes assessment of three specified learning outcomes at pass level to confirm the pass grade. Additional learning outcomes, which determine either a merit or distinction grade, can be assessed by the approved assessor. Discussions with an approved assessor confirmed that these activities were carried out. The centre provided the regulators with examples of completed candidate logs and clearly explained the assessment process.
5. Candidates must meet 70 per cent of the learning outcomes, including those assessed by the approved assessors to achieve a unit. The regulators require candidates and assessors to confirm the sufficiency and authenticity of evidence. ICAAE provides a candidate log for each unit, which the candidate

signs. However, the statement 'I have produced the work to meet the Pass criteria statements without help apart from that indicated by the teacher either in the work or elsewhere' is confusing. ICAAE has not provided its centres with any guidance on the limits of assistance that can be given to candidates with work that will be assessed.

6. Another issue with the candidate log is the statement below the candidate signature. This is signed by the teacher, confirming the merit, not pass, criteria statement. This merit criteria statement is repeated again after the explanation of a merit grade and signed by the teacher. The candidate log needs to be reviewed, so that it is clear what the candidate and teacher are confirming in relation to the evidence presented for assessment.
7. The regulators found the rationale for determining pass, merit or distinction grades confusing. Currently, the approved assessor determines the merit or distinction grade, not the internal assessor, although they can make recommendations on candidate performance. In this scenario, the approved assessor is actually taking the role of an independent assessor. Therefore, ICAAE must have systems in place to moderate those decisions.
8. Before results are issued for the ICAAE e-awards, centres send ICAAE a sample of candidate portfolios for standardisation. The sample required is stated in *The Teacher's Handbook* as a minimum of four to a maximum of ten across all grade profiles. The centre visited confirmed that the sample verified by the approved assessor is sent to ICAAE.
9. ICAAE uses candidates' work to evaluate the work of the approved assessor rather than moderating candidates' work, although grades and standards across time are considered as part of the process. Standardisation is carried out by the chief examiners, moderators and the chair of examiners. The awarding organisation provides guidance in the document *Instructions to Chairs of Examiners, Chief Examiners and Moderators, 2009 – Conduct of the iTQ Standardising Meeting*. There is some confusion in the documentation as it refers to 'external assessment conducted by the trained assessor' when the specification and *The Teacher's Handbook* clearly states that assessment is by portfolio only, and that the approved assessor will validate ten per cent of the learning outcome statements at pass level.
10. The process of standardisation used is suitable for monitoring approved assessor practice. ICAAE uses a traffic light system to measure whether approved assessors are applying the standards correctly and that marking is within specific tolerances. Approved assessors' status is green, amber or red. ICAAE stated that approved assessors evaluated as amber indicated that a centre visit should be made, and if the status is red, they would require retraining. One issue to be considered is that ICAAE will not alter candidate

grades through this process unless the evidence submitted is well above the awarded grade. It is not clear from the guidance what happens if a candidate's evidence is well below the standard for a grade.

11. Centres receive a report, *Evaluation of Approved Assessors*, detailing the assessor/s grade and comments on candidates' work. The regulators looked at two reports, which confirmed the process is followed. Each of the reports commented on the evidence submitted by candidates and whether it was a pass standard or not, with references to weak evidence in one unit. Therefore, ICAAE should be able to alter grades down if the candidate's work does not meet the standards.
12. The chief examiner reports annually on the ICAAE e-awards qualifications. Each of the reports from 2007–9 gives a detailed analysis of the evidence requirements of each unit and where improvements could be made.
13. Awarding organisations are required to have systems and procedures that produce reliable results. In the case of the ICAAE e-awards qualifications, the assessment and verification process is working, but it is hampered by the confusion in the guidance documents to the centres and examiners about the validation of assessments at centre level.
14. The Business Chinese qualifications are assessed using a form of external (independent) assessment, namely an oral test plus an internally assessed portfolio. The portfolio is usually completed electronically via the GoWell Chinese platform, a software programme aimed at avoiding internet abuse and enabling candidates to complete online tests. The evidence from these tests can then be used as part of the portfolio of evidence. ICAAE confirmed that centres found this an expensive system to operate and if they wanted to use a paper-based route they had to make a request for special consideration. ICAAE stated that it would accept paper-based evidence.
15. Information in the Level 1 Business Chinese specification is confusing. The guidance refers to internal assessors supervising the marking of assessments. However, evidence from a centre visit suggested that the majority of assessment was done online through the GoWell Chinese platform. According to the chief examiner for Business Chinese, the portfolio result is submitted online to ICAAE. Staff at ICAAE confirmed that the portfolio result is inputted into a spreadsheet and submitted by post or electronically, confirming that the candidate has met the pass criteria.
16. Page 35 of the *Teacher's Administrative Handbook (2005)* identifies by unit the skills that can be assessed online or by verbal interaction with the assessor and examiner. According to the specification, three skills within each unit have to be assessed by the examiner. In addition, the examiner is required to sample a

further ten per cent of the pass statements to validate the internal assessment. Therefore, it is not clear how this requirement is met.

17. The regulators observed an oral examination and the examiner did not sample any of the assessments from the portfolio. The chief examiner told the regulators that portfolios were not sampled during the visit. This contradicts the information in the guidance documents and raises some issues. Firstly, it is not clear how portfolios are moderated to ensure that all the specified pass statements have been met or what checks ICAAE carries out to ensure that its examiners are complying with these requirements.
18. The main purpose of the oral examination appears to be determining if candidates can be awarded a merit or distinction grade. The examiner did ask up to four questions for each unit to establish if the candidate was at the pass level. The examiner asked additional questions using prompts about everyday, simple one- or two-word translations to more complex sentences at the merit and distinction level. For example, days of the week at the pass level to 'Mr Ling is busy next Tuesday' at the higher level, or one-word translations for tea, coffee and water with phrases such as 'would you like some tea?'
19. The candidates were allocated ten-minute slots and the handbook says they have 4–6 minutes to answer questions. The first candidate started on time, but took 20 minutes to complete the questions. No candidate completed in the allocated time, which meant that some candidates were delayed by up to 30 minutes before they were examined. The chief examiner confirmed that this had been fed back to ICAAE previously and that they are aware that the specified timings are too short.
20. The regulators asked who had written the oral questions and how they were evaluated before being used. Staff at ICAAE confirmed that the chief examiner and assistant examiner wrote the oral questions and answers, but that ICAAE did not check the suitability or consistency of questions across examiners. Awarding organisations are required to ensure that assessment tasks are reviewed and evaluated against candidates' work. The chief examiner stated that the questions had been sent to ICAAE, but these had not been commented on.
21. The issue for ICAAE to consider is the rationale for using an examiner to assess merit and distinction grades. The regulators understand the reasoning behind asking questions to confirm the pass grade, but in this scenario the awarding organisation is not in control of the awarding process. It has devolved the responsibility for devising assessment tasks and the assessment of those tasks to the chief examiner without any quality assurance checks on their development or the consistency of assessment.

22. After the oral examination, the examiner inputs the four unit grades using the ICAAE aggregation table and transfers them to the *ICAAE Candidate Grade Result* form, which is returned to ICAAE. The chief examiner also completes a report, *Examiner's Report to Centre, TAC6, 2004*. This provides centres and ICAAE with general feedback on candidates' performance. The regulators noted that one of the sections in the report refers to the moderation of the centre. There was no evidence on either of the centre reports scrutinised by the regulators confirming that the moderation of candidates' work had been carried out.
23. ICAAE confirmed that it does not have any procedures in place to monitor the performance of the chief or assistant examiner for the Business Chinese qualifications or the examiners and moderators for the ICAAE e-awards.
24. The regulators require awarding organisations to carry out quality assurance checks prior to the issue of results. ICAAE inputs the chief examiner or examiner grades and checks candidates' names and spellings before issuing the result slips to centres. However, the lack of monitoring of examiners or evaluation of assessment tasks means that ICAAE cannot guarantee that the systems and procedures used for the Business Chinese qualifications produce reliable results.

Non-compliances

1. ICAAE must ensure that the guidance issued to centres is clear and consistent from specification to handbook (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 38).
2. ICAAE must provide guidance on the amount of assistance that can be given to candidates with work that is due to be assessed (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 60d).
3. ICAAE must have systems in place to reassess work if the approved assessor's decisions are inconsistent (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 61g).
4. ICAAE must ensure that it has full control over the setting and evaluation of assessment tasks and mark schemes for the oral examination (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 58 a–d).
5. ICAAE must ensure that where internal assessments are to be validated for the Business Chinese qualification, there are systems in place to monitor this

requirement (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 61c).

6. ICAAE must develop and implement procedures to monitor the performance of its examiners and moderators (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 36).
7. ICAAE must ensure that its systems and procedures produce reliable results (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 56).

Observations

1. ICAAE should ensure that all recording documentation relating to candidate evidence is reviewed and reflects the requirements of its current VRQ provision.
2. Guidance documents must be reviewed, amended and checked, so that they are accurate before being issued.
3. ICAAE should review its rationale for how merit and distinction statements are assessed for all qualifications.
4. ICAAE should review the time allocations for the oral examination, so that individual candidates are not disadvantaged.

Determination and reporting of results

This is subject to *The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63–67.

Findings

1. All qualifications are pass, merit or distinction. To achieve the Business Chinese qualifications, candidates have to meet all of the specified learning outcomes and their results are recorded on a database. However, the awarding organisation does not keep any evidence of candidates' work and therefore would find it difficult to monitor provision over time and across centres. Given the small numbers of candidates at present, it was not possible for the regulators to test whether standards were comparable from year to year and across centres.
2. Awarding organisations are required to ensure that assessments are accurate and consistent, and to change decisions if required. The regulators are not confident that this requirement can be met. For example, there is no checking of the chief examiner's oral examinations and ICAAE would require an individual with expertise in Chinese to confirm the accuracy of these results before changing any decisions. In addition, grades for the ICAAE e-awards qualifications are only upgraded and not downgraded.
3. ICAAE states in the specification how each qualification will be reported and aggregated to achieve the final grade. The regulators found the variations complex, but the software programme automatically aggregates the results to determine the final grade for the ICAAE e-awards and Business Chinese qualifications.
4. Information on how the qualification will be awarded and the differentiation between grades is specified in the documentation issued to centres.

Non-compliances

1. ICAAE must have systems in place to change the decisions of approved assessors and/or examiners if applicable (*The Statutory Regulation of External Qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 64).

Observation

1. ICAAE should review the complexity of aggregating results to determine the final grade.

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