5 November 1999

THE FURTHER EDUCATION FUNDING COUNCIL

CIRCULAR

Staff Individualised Record: Proposed Changes to the 1999-2000 Specification

To

Principals of colleges

Circular type

Consultation

Summary

Consultation on proposed changes to the specification of the staff individualised record to be introduced from the 1999-2000 teaching year
.

Responses are requested by 6 December 1999

Reference number 99/41

Enquiries:

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Data systems manager
Research and statistics
01203 863224
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99/41

Staff Individualised Record: Proposed Changes to the 1999-2000 Specification

Introduction

1   Changes proposed to the 1999-2000 staff individualised record (SIR) are set out for consultation in this circular. Responses are requested by 6 December 1999.

Background

2   The SIR was implemented at the request of the Department for Education and Employment (DfEE), when the sector was established in 1993-94. Previous data were limited to summary numbers by local education authority.

3   The Council first consulted colleges about the specification of the 1993-94 SIR in Circular 93/29 and published it in Circular 94/07. This specification has remained unchanged except for a small number of minor coding changes.

4   Colleges are requested to make a single full-year return with a reference date of 31 July. External institutions and higher education institutions receiving Council funds do not make an SIR return.

5   Following consultation with the data and software advisory group (DASAG) the Council decided to review the specification of the SIR to take account of:

- the government's wish to have better information about the qualifications of staff in colleges, to support a policy of ensuring staff have relevant qualifications

- a need to monitor sector staffing trends because of reported difficulties experienced by colleges in recruiting and retaining certain categories of staff

- feedback from organisations using information about staff in colleges

- experience gained by analysing SIR data.

6   The Council began a review of the specification of the SIR in April 1998. The conduct of the review is described at annex A. It contains:

- a description of the review process
- a list of organisations approached
- a summary of changes requested and the Council's response to them.

7   The staff and NILTA working group of the Council's management information committee (MIC) have surveyed volunteer colleges about the SIR collection. Preliminary analysis of the survey returns indicates that while colleges are satisfied with most aspects of the return, some colleges have identified fields which they find onerous to complete and/or they consider to be of little value. Colleges are invited in their responses to this consultation to inform the Council about any fields in the SIR where the costs of collection appear to greatly outweigh the benefits.

Proposed Changes to SIR Specification for 1999-2000

8   The Council is proposing a change to the specification of the SIR where it meets one or more of the following criteria:

a.   addresses feedback from organisations requesting information about staff in colleges;

b.   allows the Council to brief ministers on the qualifications of staff in colleges and their relevance;

c.   allows the Council to brief ministers on staff recruitment and retention.

Summary

9   It is proposed to include six new fields and extend the use of one other. The following changes are proposed to the specification of the SIR for introduction in 1999-2000:

a.   change the name of the three existing teacher training fields and add one similar new field in which to collect up to four teaching and further education (FE) related qualifications, including those monitored by the further education national training organisation (FENTO), criteria a) and b);

b.   add a one-character field to indicate staff who have achieved qualified teacher status (QTS), criteria a) and b);
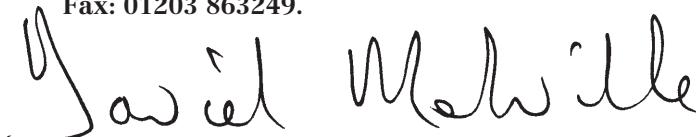
c.   ask colleges to provide information about teacher training qualifications for all teaching staff employed for 15 hours or more each year, criteria a) and b);

d.   add a new field in which to collect programme area of highest qualification for teaching staff, criteria c);

e.   add a new field in which to collect main programme area taught for teaching staff, criteria c);

f.   add a new field in which to collect broad categorisation of nature of work of non-teaching staff, criteria a) and c). In 1999-2000 colleges are invited to volunteer to pilot this collection based on a categorisation to be agreed with them. In 2000-01 all colleges would be asked to return the information based on a categorisation developed in the light of the pilot collection;

g.   add a new field in which to collect salary in bands of £1,000, criteria a) and c).

10   These changes are described in more detail in annex B. The final SIR specification for 1999-2000 will be published in the SIR support manual in February 2000. None of the additional items require colleges to have introduced new or additional data collection for the beginning of the 1999-2000 teaching year. Accordingly, subject to the outcome of this consultation, colleges are requested to make arrangements to collect the additional information to be able to supply SIR data in September 2000 including the proposed changes for 1999-2000.

Responses

11   Institutions are invited to comment on the proposals described in this circular by photocopying the form at annex C, completing it and returning it by 6 December 1999 to:

Michelle Yeomans
Research and statistics
The Further Education Funding Council
Cheylesmore House
Quinton Road
Coventry
CV1 2WT
Fax: 01203 863249.

Conduct of the SIR Review

SIR Review Working Group

1   A working group, the SIR review working group, was established by inviting a representative from each of five colleges which make timely SIR returns. The colleges were chosen to ensure a variety of college types and sizes were represented. The members of the group and its terms of reference are attached at appendix 1 to this annex.

2   The Council is grateful to the working group for its advice about changes it considered to the SIR. The group met twice. At the first meeting the main business was reviewing the existing SIR. At the second it was reviewing requests for new information.

Organisations Consulted

3   The following organisations were approached during the review and invited to comment on the SIR:

- The Association of Colleges (AoC)
- The Association of Principals of Colleges (APC)
- the Association for College Management (ACM)
- the Council's inspectorate
- DfEE
- FENTO
- the National Association of Teachers in Further and Higher Education (NATFHE)
- the responsive college unit
- the sixth form colleges' employers' forum limited (SFCEF)
- UNISON.

4   The following organisations requested changes to the SIR to make the data it collects more useful to them:

- AoC
- APC
- Council's inspectorate
- DfEE
- FENTO
- NATFHE
- UNISON.

Requests for new information

5   The organisations shown in brackets requested the following changes to the specification of the SIR in their responses:

a.   identify teaching staff employed through an agency (DfEE);

b.   collect subject area of highest qualification for teaching staff (DfEE, FENTO and the inspectorate);

c.   collect information about qualifications identified by FENTO as relevant to staff in further education (DfEE, FENTO and the inspectorate);

d.   collect subject areas taught for teaching staff (AoC, DfEE, FENTO and the inspectorate);

e.   collect nature of work for support and other non-teaching staff (AoC, DfEE, FENTO, and the inspectorate);

f.   collect job title (NATFHE); similar information would be available by collecting nature of work;

g.   identify relevancy of qualifications to work undertaken; (DfEE, FENTO and the inspectorate). This need was also commented on by APC. The main focus of the requests was about teaching staff, with some requests to identify college managers and accountants;

h.   identify teaching staff new to FE (DfEE);

i.   collect salary information (AoC, NATFHE and UNISON);

j.   collect information on starters and leavers (AoC);

k.   collect contracted class contact hours (NATFHE);

l.   collect QTS (DfEE); as a result of work undertaken after the review was completed;

m.   collect teacher training qualifications for all teaching staff (DfEE); as a result of work undertaken after the review was completed.

The requests to be able to identify staff with qualifications relevant to their work closely link to requests for information about subject areas taught by teaching staff, nature of work of support and other non-teaching staff, and the qualifications of staff. A summary of the requests received as a result of the review and the Council's response to them is attached at appendix 2 to this annex.

SIR Review Working Group

Membership

Nina Ashurst*	Doncaster College
Peter Ashton	FEFC (chair)
Vicky Fagg	The College of North West London
Barrie King	Barnfield College
Hazel Marshall	Ridge Danyers College
Gary Perkins	FEFC
Christine Walker	Peterborough Regional College
Michelle Yeomans†	FEFC

*Chair †Meeting secretary

Terms of Reference

i.   advise the Council about the ease of collection and preparation of the data requested in the existing staff individualised record (SIR)

ii.   make recommendations to the Council about any changes to the specification of the SIR which would be helpful to colleges

iii.   advise the Council about any changes to the SIR which are proposed as a result of the review.

Summary of Requests to Change the Specification of the SIR and the Council's Response

Information Requested	Case for Additional Information	Other Considerations re Need for Data	Solutions Considered	Feasibility of Collecting	Cost of Collection to Colleges	Council's Proposal
a. Identify teaching staff employed through an agency	Requested by DfEE	This is information which ministers would expect the Council to collect	A1. Add a new code to the terms of employment field	Information readily available	Low cost	The change has been implemented for 1998-99
	DfEE wishes to be in a position to answer questions from ministers about changes in employment patterns					
	The Council is likely to use the information					
b. Collect subject area of main qualification for teaching staff	Requested by DfEE, FENTO and inspectorate	The government is likely to wish to measure changes in the levels of skills of teaching staff in FE	B1. Collect programme area of main teaching qualification for teaching staff	Would require some rough judgements about programme area	Low cost exercise in the first year with simple maintenance in subsequent years	Implement solution B1 in 1999-2000
	DfEE wishes to monitor how well qualified staff in FE are to teach. The government has said it wishes to have a skilled FE workforce	HESA collect similar information for HE staff	B2. Collect two or more programme areas of main teaching qualification for teaching staff	Would require more judgements about programme area without any appreciable advantage over the first proposal	Low cost exercise in the first year with simple maintenance in subsequent years	
	FENTO wishes to monitor the relevancy of qualifications held by teaching staff to the subjects they teach					
	Inspectorate wishes to monitor relevancy in a similar way to FENTO					

Information Requested	Case for Additional Information	Other Considerations re Need for Data	Solutions Considered	Feasibility of Collecting	Cost of Collection to Colleges	Council's Proposal
c. Collect qualifications identified by FENTO as relevant to staff in further education	Requested by DfEE, FENTO and inspectorate	The government is likely to expect the Council to monitor the uptake of these qualifications	C1. Collect up to a maximum (3) number of qualifications identified by FENTO for each member of staff using existing record structure	Would need a medium size exercise in first year and subsequent years to collect data	Medium cost and would need regular updating	Implement solution C1 in 1999-2000
	DfEE wishes to monitor uptake of FENTO qualifications. Also part of monitoring the skill level of staff in FE	HESA do not collect this data for HE staff	C2. Collect all qualifications identified by FENTO for each member of staff using revised record structure with qualification data set	Would need a medium size exercise in first year to collect data and in subsequent years to maintain them	Medium cost initial data collection and continuing maintenance. To handle an unlimited number of qualifications would be likely to require a costly change to college's personnel system	
	FENTO wishes to monitor uptake of FENTO qualifications					
	Inspectorate wishes to monitor uptake of FENTO qualifications					
d. Collect subject area taught for teaching staff	Requested by DfEE, AoC, FENTO and inspectorate	HESA collects primary cost centre. There are 40 cost centres for academic staff	D1. Collect main programme area taught for teaching staff	Would require some rough judgements about programme area and main area for some teaching staff	Low cost exercise in the first year with simple maintenance in subsequent years	Implement solution D1 in 1999-2000
	Needed in order to monitor relevancy of qualifications to subject taught		D2. Collect two or more programme areas taught and apportion teaching time spent on each for teaching staff	Would require lots of judgements about programme area and proportion of time spent. Likely to give a spurious appearance of accuracy	Medium cost exercise in first year with similar maintenance costs in following years	

Information Requested	Case for Additional Information	Other Considerations re Need for Data	Solutions Considered	Feasibility of Collecting	Cost of Collection to Colleges	Council's Proposal
e. Collect nature of work for support and other non-teaching staff	Requested by DfEE, AoC, FENTO and inspectorate	FENTO has offered to assist the Council in development of the categorisation	E1. Add a new field in which to collect nature of work and adopt and/or adapt an existing simple categorisation	Easy to collect but would require rough judgements	Medium cost exercise in first year. In subsequent years update for new staff and those who have changed their role	Implement solution E1 as a pilot collection in 1999-2000. Add a new field and adopt or develop a simple categorisation, pilot it with volunteers in 1999-2000 with a view to consulting on its implementation in 2000-01
	All wish to monitor qualifications held by non-teaching staff and their relevancy to work undertaken	HESA collects seven non-academic cost centres. This is not the same as information requested	E2. Add a new field in which to collect nature of work and/or adapt an existing complex categorisation	Easy to collect but would still require some judgements	Medium cost exercise in first year. In subsequent years update for new staff and those who have changed their role	
					There is a need to balance the desires of data users for a detailed and complex categorisation and the cost of collecting the information to colleges	
f. Collect job title	Requested by NATFHE	Job titles are individual to colleges. They would not form a basis on which meaningful analysis could be undertaken	F1. Add a 30 character field in which to collect job title	Easy to collect	Low cost in first year and in subsequent years lower cost maintenance for new staff and staff with changed job	No change
	NATFHE wishes to monitor recruitment and retention by work undertaken	HESA does not collect this information for staff in HE				Instead use nature of work as described in section e)
		The same job title can be used for vastly different roles in different organisations and the same role may have different job titles in different organisations.				

Information Requested	Case for Additional Information	Other Considerations re Need for Data	Solutions Considered	Feasibility of Collecting	Cost of Collection to Colleges	Council's Proposal
g. identify relevancy of qualifications	Requested by DfEE, FENTO and inspectorate	HESA does not specifically collect relevancy of qualifications for HE staff	G1. The package of changes b), c), d), e)	See notes on changes b), c), d), e)	As a package these changes add up to medium increase in the burden of collection	Implement package of changes in 1999-2000
	See changes b), c), d), e)					
h. Identify teaching staff new to FE	Requested by DfEE	Colleges already return the date of appointment at the college but there are some problems with quality	H1. Add a field for date started in FE. Detailed advice would be needed about staff returning to FE after unemployment, a time in industry or raising children		Low cost exercise in the first year with maintenance in subsequent years	Implement solution H3. No change to specification. Provide further advice about completing date of appointment and monitor data received. Further advice was provided in 1998-99 support manual
	To monitor the flow of new staff into FE sector and identify their qualifications. Further analysis for teaching staff would identify flow by programme area taught	The value of the additional information may not justify the cost of its collection	H2. Add a field to indicate a member of staff new to FE. This would require a detailed definition of new to FE and colleges would need to review and reset the code each year		Low cost exercise for all staff in the first year with maintenance for new staff in subsequent years	
		HESA collects similar information to the Council for academic staff only in its date entered current service field	H3. Do not change specification. Instead provide further advice about completing the existing date of appointment field			

Information Requested	*Case for Additional Information*	*Other Considerations re Need for Data*	*Solutions Considered*	*Feasibility of Collecting*	*Cost of Collection to Colleges*	*Council's Proposal*
i. Salary information including salary, scale progression, salary band and whether an award has been paid in last year	Requested by AoC, NATFHE and UNISON. Also TAC staffing subgroup interested	HESA already collects salary for HE staff	I1. Collect salary only	Simple as data exist in payroll system	Low	Implement proposal I1 in 1999-2000. Salary would be collected in bands of £1000
	To inform pay negotiations	Colleges may not wish to share this information with staff representative bodies	I2. Collect salary and other information	The other information may be difficult to collect (and interpret) given the wide variety of pay arrangements for staff in colleges	Medium and would need maintaining each year	
	To identify the cost and effect of proposed pay awards	HESA also collects grade structure and salary point information in five extra fields				
	To monitor salary by type of work					

Information Requested	Case for Additional Information	Other Considerations re Need for Data	Solutions Considered	Feasibility of Collecting	Cost of Collection to Colleges	Council's Proposal
j. Collect information on starters and leavers, for example subject area taught and subject of qualification	Requested by AoC	Staff new to a college and those who leave are already identified	Addressed by changes b), c), d), and e)			No change specifically to address this request
	To inform human resource strategy planning	HESA collects date left and destination on leaving for HE staff. It collects date entered current employment for new staff				
k. Collect contracted class contact hours	Requested by NATFHE. To inform pay negotiations	HESA does not collect this information for HE staff	K1. Add a new field in which to collect contracted class contact hours for teaching staff	Easy where a member of teaching staff has a contract which specifies class contact hours. It is likely many teaching staff do not and so the information would be incomplete	Low for staff concerned	No change

Proposed Changes to the SIR to be Introduced from 1999-2000

Introduction

1   This annex sets out proposed changes to the SIR to be introduced with effect from the data collection in respect of the 1999-2000 teaching year requested by 4 September 2000. They would apply subsequent years.

Proposed Changes to Qualification Information Collected

Background

2   For 1998-99 the Council asked colleges to return the following information about staff qualifications:

- for all staff — highest qualification, in field 06 (2 digits)
- for all staff — teacher training qualifications, in three fields 08, 09 and 10 (each of 2 digits)
- for teaching staff — training to teach students with learning difficulties and/or disabilities, field 11 (1 digit).

Need for information about qualifications

3   The Council and DfEE wish to be able to identify all staff with qualified teacher status (QTS). From the information it collected in 1998-99, the Council is able to identify only some staff with QTS. It also wishes to collect the teaching qualifications of all teaching staff and up to three qualifications identified by FENTO as relevant to other staff in further education. To do this it proposes to:

- add a one-character field in which to collect QTS
- rename the three teacher training fields as teaching and FE qualification fields and add a fourth to them

- request these four fields for all teaching staff employed for 15 hours or more each year and for all other staff employed for 25% or more of full-time.

Add a qualified teacher status field

4   The Council proposes to add a new one-character field, the qualified teacher status field, in which to collect whether a member of staff has QTS.

5   Colleges would be asked to complete the qualified teacher status field for staff providing teaching and promoting learning. They would if they wished also provide it for staff not providing teaching and promoting learning.

6   The list of codes proposed is:

Code   Description

1   Member of staff has qualified teacher status

2   Member of staff does not have qualified teacher status

8   Not applicable (use only for staff not providing teaching and learning)

9   College has been unable to establish whether member of staff has qualified teacher status (use for teaching staff only).

Rename the three teacher training fields and add one field

7   In order to monitor teaching qualifications and other qualifications of interest to FENTO the Council proposes to:

a.   rename the teacher training fields, fields 08, 09 and 10, as teaching and FE qualification fields;

b.   add one extra teaching and FE qualification field to give a total of four such fields;

c.   extend the codes used in the fields to include qualifications of interest to FENTO;

d.   ask colleges to return data in these four fields for all teaching staff employed for 15 hours or more each year and for all other staff employed for 25% or more of full-time.

8   The proposed list of codes is attached at appendix 1 to this annex.

Programme area of highest qualification for teaching staff

9   To allow it to monitor the relevance of qualifications to teaching, the Council proposes to add a new two-digit field, a programme area of highest qualification field, to the SIR for 1999-2000 in which to collect programme area of highest qualification for teaching staff.

10   The Council would ask colleges to complete the programme area of highest qualification field for all teaching staff. Where the subject of the highest qualification is wider than one programme area, colleges would be asked to identify the programme area of the subject which comprised most of the qualification. Where it is not clear which subject contributes most to the highest qualification or where the subject divides equally between more than one programme area, colleges would be asked to use their judgement and to favour the programme area which is most relevant to the subject taught by the member of staff.

11   For a member of teaching staff with a highest qualification below HND/HNC level, colleges would not be asked to indicate the programme area of the highest qualification. They would instead return a code to indicate the highest qualification was below this level.

12   The list of codes proposed for use in the programme area of highest qualification field are:

01   sciences

02   agriculture

03   construction

04   engineering

05   business

06   hotel and catering

07   health and community care

08   art and design

09   humanities

10   basic education

80   member of staff providing teaching and promoting learning with highest qualification with a level lower than HND/HNC

99   not a member of staff providing teaching and promoting learning.

Programme area of main subject taught

13   To allow it to monitor the relevance of qualifications to teaching the Council proposes to add a new two-digit field, a programme area of main subject taught field, to the SIR for 1999-2000 in which to collect programme area of main subject taught for teaching staff. The field would be completed only for staff providing teaching and promoting learning.

14   The main subject taught is the one which a member of staff spends most time teaching. Where the main subject taught is wider than one programme area, colleges would be asked to use their judgement in assigning a programme area.

15   The list of codes proposed for use in the programme area of main subject taught field are:

01   sciences

02   agriculture

03   construction

04   engineering

05   business

06   hotel and catering

07   health and community care

08   art and design

09   humanities

10   basic education

99   not a member of staff providing teaching and promoting learning.

Category of work for non-teaching staff

16   To allow it to monitor changes in non-teaching staff employed in the sector and identify recruitment and training needs, the Council proposes to add a two-digit field, the category of work field, to the SIR for 1999-2000 in which to collect category of work for non-teaching staff.

17   A list of proposed codes is attached at appendix 2 to this annex. This list is based on the categories used by the Sixth Form Colleges' Employers' Forum Limited (SFCEF) in its annual survey of staff. Colleges are invited to pilot completion of the category of work field using these codes in 1999-2000. In the light of this pilot implementation, the codes would be reviewed for 2000-01 and all colleges asked to complete the field for members of staff not providing teaching and promoting learning.

18   Institutions wishing to take part in the pilot collection of categories of work in 1999-2000 are asked to indicate this on the response form at annex C to this circular.

Annual rate of pay field

19   The Council proposes to add a new two-digit field, the annual rate of pay field, to the SIR for 1999-2000 in which to collect annual rate of pay for all staff in bands of £1,000.

20   Colleges would be asked to indicate the annual rate of pay of all members of staff:

- at 31 July 1999 for staff in employment on that date
- at the date of leaving for staff who have left the college
- at the end of contract for fixed-term, casual and teaching staff employed through an agency.

21   The proposed codes are as follows:

Code	Description
01	£0 to £1,999
02	£2,000 to £2,999
03	£3,000 to £3,999

through to:

74	£74,000 to £74,999
75	£75,000 or more.

Teaching and FE Qualification Fields: Proposed Codes

Code	Description
	teaching qualifications requested for all teaching staff and which may be optionally provided for non-teaching staff
01	BEd/BA/BSc with concurrent qualified teacher status (QTS)
02	Certificate of Education
03	City and Guild G730
04	PGCE
05	TDLB
	qualifications requested for non-teaching staff who work for 25% or more of full-time
51	qualification at NVQ level 3 related to the non-teaching member of staff's main role
52	professional qualification at NVQ level 4 or above related to the non-teaching member of staff's main role
	other codes for all staff
97	no further qualification on the above list
98	none
99	not known

Category of Work for Non-teaching Staff: Proposed Codes

Code	Description
	Managers
1	College Administrator/Manager
2	Centre (sub-college) Administrator/Manager
3	Finance Administrator/Manager (Bursar)
4	Librarian
5	Marketing Administrator/Manager
6	Computer/Database Manager
7	Estate/Site Manager
8	Other Administrator/Manager

	Administrative and Professional Staff
21	Careers Officer
22	Student Co-ordinator
23	Admissions Co-ordinator
24	Examinations Co-ordinator
25	Sports Centre Manager
26	Finance Officer
27	Personnel Officer
28	Adult Education Administrator
29	Assistant Librarian
30	Office Manager
31	Principal's Secretary/Personal Assistant
32	Other Administrative/Professional Staff

	Technical Staff
41	Computer/Database Officer
42	Computer Technician
43	Reprographics Manager
44	Senior Laboratory/Workshop Technician
45	Laboratory/Workshop Technician
46	Arts Technician
47	Audio/Video Technician
48	Other Technical Staff
49	Learning Support Technician

	Word Processing, Clerical and Secretarial Staff
61	Word Processor Operator/Clerical Assistant
62	Administrative Assistant
63	Secretary
64	Receptionist/Telephonist Finance Assistant
66	Personnel Assistant
67	Library Assistant
68	Exams Assistant
69	Admissions Assistant
70	Reprographics Assistant
71	Other Clerical/Secretarial Staff

	Service Staff
81	Caretaker
82	Site Assistant
83	Security Officer
84	Maintenance Staff (for example, Electrician, Plumber)
85	Learning Support Assistant
86	Nurse (including Nursery Nurse)
87	Nursery/Crèche Assistant
88	Catering Manager
89	Catering Assistant
90	Gardener/Groundsperson
91	Cleaner
92	Other Service Staff

Consultation

Reference Circular 99/41

***Please photocopy, complete and return to Michelle Yeomans at the
Council's Coventry office no later than 6 December 1999.***

Institution name
_____

Contact (*please print*)
_____

Signature
_____

Telephone number
_____

Proposed change to SIR in 1999-2000	**Agree**	**Disagree**	**Comments**
1 The Council's proposal to add a field in which to collect qualified teacher status, paragraphs 4 to 6 of annex B, is supported	❑	❑	
2 The Council's proposal to rename the three teaching training fields and add one such new field, paragraphs 7 and 8 of annex B, is supported	❑	❑	
3 The Council's proposal to add a field in which to collect the programme area of highest qualification for teaching staff, paragraphs 9 to 12 of annex B, is supported	❑	❑	
4 The Council's proposal to add one new field in which to collect the programme area of the main subject taught for teaching staff, paragraphs 13 to 15 of annex B, is supported	❑	❑	

Proposed change to SIR in 1999-2000	Agree	Disagree	Comments
5 The Council's proposal to add a new field in which to collect category of work for non-teaching staff, paragraphs 16 to 18 of annex B, is supported	❑	❑	
6 The Council's proposal to add a new field in which to collect annual rate of pay, paragraphs 19 to 20 of annex B, is supported	❑	❑	
7 Colleges are also invited to inform the Council about any fields in the SIR for 1998-99 where the cost of collection appears to significantly outweigh the benefit. To do so they may write below or send a separate list or letter in which they list the fields and for each explain what their concern is about that field.	❑	❑	