Committee	Item No.	3
Board Item	No.	

COMMITTEE/BOARD OF SUPERVISORS

AGENDA PACKET CONTENTS LIST

Committee:	City Operations & Neighborhood Se	er. Date: April 12, 2010
Board of Su	pervisors Meeting	Date
Cmte_Boa		•
	Motion Resolution Ordinance Legislative Digest Budget Analyst Report Legislative Analyst Report Introduction Form (for hearings) Department/Agency Cover Letter MOU Grant Information Form Grant Budget Subcontract Budget Contract/Agreement Award Letter Application Public Correspondence	· and/or Report
OTHER		e is needed)
		Date_April 8, 2010 Date

An asterisked item represents the cover sheet to a document that exceeds 25 pages. The complete document is in the file.



[Approving County Refugee Services Plan for FY2009-2010]

Resolution approving the City and County of San Francisco's Refugee Services

Annual Plan for Federal FY2009-2010

WHEREAS, the San Francisco Human Services Agency (Agency) has responsibility for the management and administration of Refugee Social Services and Older Refugee Discretionary Grant funds for the county including responsibility for development of the County Refugee Services Annual Plan and liaison with the State Refugee Program Bureau and the Federal Office of Refugee Resettlement, and,

WHEREAS, San Francisco is required by the State Department of Social Services to prepare a County Refugee Services Annual Plan and submit such Plan to the State and the Board of Supervisors for approval; and,

WHEREAS, The Plan describes the use of the refugee funds for the federal fiscal year beginning October 1, 2009, and certifies that the Plan meets all of the County Guidelines for Plan development and monitoring; and now therefore, be it

RESOLVED, That the County Refugee Plan for San Francisco is approved; and be it

FURTHER RESOLVED, That the Agency is authorized by the Board of Supervisors to amend the Plan as may be requested by the State Department of Social Services; and be it

FURTHER RESOLVED, That a copy of this resolution be forwarded to His Honor, the Mayor, with a request that he transmit copies to the State Department of Social Services with a request they take all action necessary to achieve the objectives of this resolution.

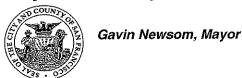
San Francisco Human Services Agency

City and County of San Francisco

Human Services Agency

Department of Human Services
Department of Aging and Adult Services

Trent Rhorer, Executive Director



March 29, 2010

Angela Calvillo, Clerk of the Board Board of Supervisors City and County of San Francisco 1 Dr. Carlton B. Goodlett Place, Room 244 San Francisco, CA 94102 – 4689

Dear Ms. Calvillo,

Attached please find an original and four copies of a proposed resolution for Board of Supervisors' approval of the County of San Francisco Refugee Services Annual Plan, as required by the State Department of Social Services. The plan was approved by the Human Services Commission on March 25, 2010.

The County Refugee Services Annual Plan for Federal Fiscal Year 2009-10 and the March 9 letter from the State is also enclosed as supporting documentation (five copies enclosed).

The following person may be contacted regarding this matter:

Hope Kamimoto
Community Services Manager
Welfare –to-Work Workforce Development Division
Phone (415) 557-5742
e-mail: hope.kamimoto@sfgov.org

I respectfully request that this item be calendared as soon as possible.

Sincerely,

Frent Rhorer
Executive Director

Human Services Agency

City and County of San Francisco

SAN FRANCISCO

2010 MAR 29 AN II: 4



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

ARNOLD SCHWARZENEGGER

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov

March 9, 2010

Mr. Trent Rhorer, Executive Director San Francisco City and County Department of Human Services P.O. Box 7988 San Francisco, CA 94120

Dear Mr. Rhorer:

This letter is to advise you that the San Francisco County Refugee Services Plan covering the period of October 1, 2009 through September 30, 2010, has been reviewed and provisionally certified. Once the San Francisco County Board of Supervisors approves the county refugee services plan, the Refugee Programs Bureau will officially certify the plan. A copy of the provisionally certified plan is enclosed for your reference.

We value your commitment in assisting refugees to become self-sufficient and thank you for your continued support. Any questions regarding this matter may be directed to Mr. Nathan Morris, Program Analyst, Refugee Programs Bureau, at (916) 653-8545 or Nathan.Morris@dss.ca.gov.

Sincerely.

VENUS GARTH, Chief

Henus Barth

Child Care and Refugee Programs Branch

Enclosure

C:

Robert Hays

Eva Iraheta

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City and County of San Francisco

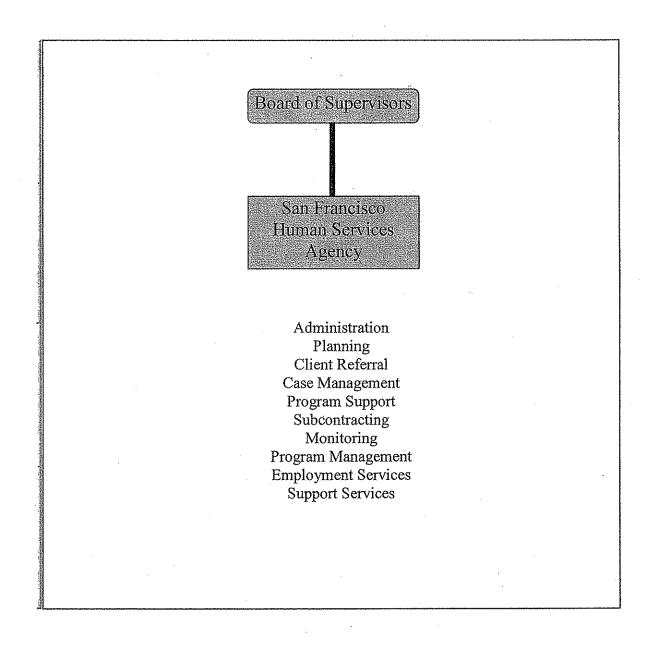
COUNTY REFUGEE SERVICES ANNUAL PLAN

Federal Fiscal Year 2009 – 2010

REFUGEE COUNTY SERVICES PLAN TABLE OF CONTENTS

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I. COUNTY REFUGEE PROGRAM ADMINISTRATION



II. DESCRIPTION OF THE COUNTY'S REFUGEE PROGRAMS

A. Funding Sources

The FFY 20009-10 formula Refugee Social Services (RSS) allocation funds for the City and County of San Francisco is \$133,203.00

RSS FUNDING SUMMARY	RSS	Percent
Employment Services	\$74,727	56%
Language Assistance Services		
Work-Related Acculturation		
Job Readiness		
Job Development Assistance		
Job Retention		
Career Advancement		****
Vocational Training	\$38,496	29%
Language Assistance Services		
Work-Related Acculturation		
Job Readiness		
Job Development Assistance		1
Job Retention		
Career Advancement		
Subtotal	\$113,223	85%
County Administration	\$19,980	15%
TOTAL FFY 2009-10 RSS ALLOCATION	\$133,203	100%

The FFY 2009-10 Older Refugee Discretionary Grant (ORDG) allocation for the City and County of San Francisco is \$19,646.00

Older Refugee Discretionary	Older	Percent
FUNDING SUMMARY	Refugee	
Case Management	\$12,770	65.6%
Citizenship Assistance Services	\$6,697	34.4%
Total	\$19,467	100%

B. General Program Description

The Refugee Social Services (RSS) funds will be used to assist refugees and asylees receiving Refugee Cash Assistance to achieve economic self-sufficiency. Services using RSS funds are offered to RCA clients for 8 months maximum. The funds will support services that will aid refugees in obtaining and maintaining employment, developing work related skills and earning a wage with benefits where possible. Refugee women will have equal opportunity to participate in all employment services.

The employment services funds will be used to provide Skills Training/Vocational Training and English Language Training (ELT) to enable refugees to obtain jobs and attain economic self-sufficiency as soon as possible. A concurrent job readiness / job search activity is embedded in the ELT program as part of the programs work-first model.

Any funds that may be unspent from previous years, as well as any new receipt of refugee funds for the period covered by the County Plan, will be used to increase employment services of the various program components of the County Plan.

The Older Refugee Discretionary Grant (ORDG) funds will provide supportive and social services for up to 50 disadvantaged refugees seniors aged 60 and above with the goal of helping older refugees access existing mainstream resources and / or obtain citizenship assistance services to increase their level of self-sufficiency and independence and integration into the community. Service providers will provide linguistically and culturally-accessible services to San Francisco's refugee population. To meet target objectives, the San Francisco Workforce Development Division is collaborating with the San Francisco's Department on Aging and using the funds to augment an existing contract serving Older Refugees.

The augmentation will expand services to procure additional citizenship and naturalization services for older refugees.

The program goals will also be achieved by augmenting existing contracts with CBO partners to increase capacity with existing services and by further developing working relationships with the State Agency on Aging, San Francisco Commission on Aging, and county health and social service providers. The department has established linkages with the Department of Public Health, the Department of Aging, Immigrant Rights Commission and San Francisco City College to strengthen coordination in service delivery. By way of example, the Department of Public Health (DPH) works with a coalition of refugee and asylee service providers including the International Rescue Committee.

C. RCA Compliance

San Francisco County assures that the provision of activities and services to mandatory and voluntary RCA recipients, funded by the ORR monies and allocated by CDSS, will be in accordance with RCA (including those regarding program participation flow, good cause determination, sanctioning, and supportive services) specified in the Manual of Policy and Procedure Sections 42-700 and 69-200, respectively, and other applicable RCA policy guidance issued by CDSS, which specify the following activities:

- 1. Verification/documentation of refugee/asylee status;
- 2. Determination of eligibility for refugee-funded services;
- 3. Assessment of the refugee's employment, training, English language and supportive services needs;
- 4. Development of a refugee family self-sufficiency/employability plan that meets the requirements of section 400.79 of the federal refugee regulations, which stipulate that the plan must:
 - a. Be designed to lead to the earliest possible employment.
 - b. Contain a definite short and long term employment goal, attainable in the shortest time period consistent with the employability of the refugee in relation to job openings in the area.
 - c. A description of the services to be provided including supportive services;
 - d. A description of the job activities to be undertaken by the refugee to achieve the employment goal;
- 5. Referral of all non-exempt RCA applicants and recipients for participation in available/appropriate employment and training programs; and
- 6. Tracking/ reporting client progress (including non-participation/cooperation) to the Human Services Agency Eligibility Worker.

Referral and Participation

Human Service Agency Intake Eligibility Workers will identify refugees who apply and are found eligible for RCA, and will refer them to the Personal Assisted Employment Services (PAES) Unit for mandatory employment services. Both HSA Eligibility worker and PAES Employment Specialist will inform participants of their rights and responsibilities regarding participation requirements and consequences of any failure to participate.

D. County Planning Process

Effective October 1, 2006 the San Francisco Human Services Agency (Agency) assumed direct responsibility for the management and administration of Refugee Social Services (RSS) funds for the county including responsibility for all central intake functions, the development of the county plan and liaison with the State Refugee Program Bureau and the Federal Office of Refugee Resettlement (ORR). The Agency attends public meeting with key stakeholders and is an active member of the San Francisco Coalition for Asylees, Immigrants and Refugees Services (SFCAIR) to solicit input on refugee needs and service strategies with representatives from community- based organizations serving refugees.

It is widely recognized that employment services, language assistance services and supportive services are keys to self-sufficiency for the refugee population. According to information gleaned from past refugee community meetings, the two greatest needs for refugees, aside from housing, are English literacy and work experience in the United States. San Francisco County will provide English skills training, work-related acculturation, job readiness training, vocational training, job development assistance, job retention / career advancement services and will continue to collaborate with social service agencies serving refugee populations to provide access to community resources.

The unemployment rate in the San Francisco was 10.1 percent in August 2009, up from 9.8 percent in June 2009 (EDD – LMI). As of October 2009, the state Employment Development Department (EDD) reported a 9.7 percent unemployment rate for the City / County of San Francisco. For the same period, EDD reports the number of unemployed in San Francisco increased by 3,300 from 40,800 to 44,100 in June while the number of employed fell by 1,300 (from 407,100 to 405,800) as the labor force increased by 1,900 (from 448,000 to 449,900), a net loss of 5,100 over the past three months. The 9.8% unemployment rate for San Francisco in June represents a new 25 year high.

All clients participating in refugee employment services are eligible for a wide array of wrap around employment and training services provided by internal agency staff or contracted community based agencies. These services include English language training, vocational / career assessment and counseling services, job training and job placement and job retention services. Refugee clients also have access to wrap-around case management services offered by the Department of Human Services by one of our contracted community based training service providers. Refugee clients also have access to the City's workforce development system including its workforce centers located throughout the city and can receive services on a referral or drop-in basis.

To help our refugee clients with their job search activities we have changed and added new operational procedures at out workforce centers and are putting more focus on the individual job seeker rather than employers. All of our community based refugee services providers are required to assist clients register for employment services at our workforce centers so that they can take advantage of the vast array of targeted employment services offered there such as employer recruitments, job / hiring fairs; seminars and workshops.

The proposed vocational trainings: Certified Nurse Assistant, Home Health Aid, General Office Clerk, Cook or Commercial driver relates to San Francisco labor market based on the state Employment Development Department 2006 – 2016 Occupations with the Most Job Openings report. Personal and Home Care Aides rank 5th on the report, General Office Clerk is 9th, Food Preparation workers 14th and Restaurant cooks 16th. The Employment Service component which includes ELT and Job Search places participant in occupations as Retail Salespersons, waiters/waitresses, cashiers, counter attendants, customer service representative, receptionist and information clerks which rank within the first 30 occupation on the report.

The City and County of San Francisco Department of Human Services plays a key role in developing and managing employment, training and workforce development services for San Francisco residents. The Department contracts with many community organizations so that employment services are accessible and fulfill specific local employment needs. By partnering with local and national agencies, educational institutions and corporations, the Department's employment programs create greater economic opportunities for San Franciscans.

III. DESCRIPTION OF SERVICE COMPONENTS

A. BRIEF DESCRIPTION OF REFUGEE SOCIAL SERVICES (RSS) COMPONENT

Employment Services (ES)/English Language Training (ELT)

The employment services activities are directed toward job placement. ELT will run concurrently with Employment Services. The component will include the employment activities listed below, if needed and if sufficient funds are available:

- Education in English proficiency for refugees who are not sufficiently competent to understand, speak, read, or write English language to allow employment commensurate with the employment goals.
- Job readiness activities designed to ensure that the refugee is familiar with general workplace behavior/attitudes necessary to compete successfully in the labor market;
- Group/individual job search, including counseling, information on worker rights, work-related acculturation, and job seeking skills training;
- Job development/placement.

Vocational Training

The program covers general job skills and career guidance to ensure success in achieving short-term employment and self-sufficiency. Supportive services and case management are

provided to help address barriers to employment. The component will include the employment activities listed below, if needed and if sufficient funds are available:

- Education in English proficiency for refugees who are not sufficiently competent to understand, speak, read, or write English language to allow employment commensurate with the employment goals.
- Job readiness activities designed to ensure that the refugee is familiar with general workplace behavior/attitudes necessary to compete successfully in the labor market;
- Group/individual job search, including counseling, information on worker rights, work-related acculturation, and job seeking skills training;
- Unpaid internship/work experience and
- Job development/placement.

During the vocational training program, an unpaid off site internship is offered when acceptable skills are demonstrated. The participant will have the opportunity to work part-time at a San Francisco business.

B. BRIEF DESCRIPTION OF OLDER REFUGEE DISCRETIONARY GRANT (ORDG) COMPONENT

Case management

Culturally appropriate case management services and direct assistance for seniors experiencing adjustment problems or problems functioning in the community - includes needs assessment, care planning, referrals to other community resources, and follow up.

Citizenship Assistance & Naturalization Services

Provide education and preparation services to elderly refugees and asylees with 42 hours of Citizenship classes, where they learn basics of the US History and Government structure. They are introduced to 100 questions for Naturalization test. In addition, participants are provided with one-to-one assistance, which included information and discussion of such topics as naturalization eligibility and process, mock interviews, medical waivers for naturalization interview, and eligibility for SSI. Provide consultation to older refugees to expedite the naturalization process and also to direct clients to alternate benefits they can rely on until they become naturalized.

IV. BUDGETS

A. REFUGEE SOCIAL SERVICES

FFY 2009-2010 RSS BUDGET

FFY 2008-2009 RSS FORMULA CARRYOVER

<u>ITEM</u>	<u>AMOUNT</u>		
Employment Services Vocational Training	\$10,545.00 \$ 8,628.31		
TOTAL FFY 2008-09 RSS CARRYOVER	\$ 19,173.31		

FFY 2009-10 RSS FORMULA ALLOCATION

<u>ITEM</u>	AMOUNT
Employment Services Vocational Training	\$74,727 \$38,496

TOTAL FFY 2009-10 RSS ALLOCATION \$113,223

TOTAL RSS FFY 2010 \$132, 396

B. OLDER REFUGEE DISCRETIONARY GRANT

FFY 2009-10 ORDG BUDGET

FFY 2008-09 ORDG FORMULA CARRYOVER

ITEM	<u>AMOUNT</u>
Case Management	\$ 2,842.00
Citizenship Assistance Services	\$ 1,490.89

TOTAL FFY 2008-09 ORDG CARRYOVER \$ 4,332.89

FFY 2009-10 ORDG FORMULA ALLOCATION

ITEM	<u>AMOUNT</u>
Case Management	\$ 12,709.00
Citizenship Assistance Services	\$ 6,758.00

TOTAL FFY 2009-10 ORDG ALLOCATION \$19,467.00

V. ANNUAL SERVICES PLAN

See attachment

VI. ANNUAL OUTCOME GOAL PLAN

See attachment

VII. APPENDICES

A. COUNTY PROCUREMENT PROCESS

The Agency will utilize its existing Individual Referral (IR) model to procure employment and training services from state and / or county approved vendors. The IR is a method for procuring and paying for employment and training services on a per person basis. The IR model promotes maximum customer choice by enabling customers to select training providers from the State Eligible Training Provider List (ETPL) and / or providers accredited by the Bureau of Private postsecondary Vocational Education (BPPVE) or other county approved vendors. San Francisco County offers a wide range of pre-employment services in-house for RCA eligible participants. These services are provided by the staff of the Department's Workforce Development Division (WDD) include but are not limited to: vocational assessment / career counseling, job readiness training, job development / placement, career advancement / retention services.

B. COUNTY MONITORING PROCESS

Monitoring Responsibility

The responsibility for the monitoring of programmatic function will reside with the Workforce Development Division (WDD), the employment services component of the San Francisco Human Services Agency. Agency staff will annually provide one comprehensive monitoring review for each program year of the refugee employment service providers; to include on-site visits and review of participant files and back-up documentation. The on site monitoring review will be completed no later than six months from the beginning of the program year. Providers are required to monitor participant progress and attendance and submit monthly reports to the WDD. The agency staff from the Department of Contracts will monitor fiscal compliance. Eligibility staff of the Human Services Agency will maintain eligibility documentation. The WDD will conduct at least one annual on-site monitoring review of service providers. Visits will include program monitoring and participant file review. A written review will be submitted to CDSS no later than 45 days from the completion date of the review.

Monitoring Frequency and Methodology

Monitoring of service providers' performance occurs each month with review and comparison of actual program accomplishments (as documented with verified enrollment, job entry, and follow-up reports which appear on monthly statistical reports). A formal annual on-site visits by WDD Refugee Coordinator responsible for refugee programs. In addition, informal contacts (telephone or in person) with service providers usually occur weekly or sometimes even daily. These contacts are designed to provide service providers with feedback on observed activities and to notify staff of any areas where deficiencies may exist.

VIII. RSS REQUIRED ASSURANCES

Required Assurances for RSS funded Services:

San Francisco County assures that:

- "That the planning process was developed through a planning process that involves representatives the private sector employers, affected public agencies including the CWD, leaders of the refugee/entrant community-based organizations, voluntary resettlement agencies, refugees from the impacted communities and other public officials associated with social services and employment agencies that serve refugees."
- "That continuation of existing components will be in accordance with CDSS guidelines."
- "That all requested salaries and fringe benefits for county administration and for services the county is proposing to deliver directly reflect the current county wage and benefit scales."
- ♦ "That the county will comply with all statistical/fiscal reporting requirements on a timely basis."
- "That RSS services will be provided in accordance with individual employability plans for each refugee and that such employability plans shall be, where applicable, part of a family self-sufficiency plan."
- "That all services will be provided by qualified providers (public or private non-profit or for-profit agencies or individuals) in accordance with state and federal regulations, policies and guidelines."
- ♦ "That the county will establish client priorities for RSS funded services in accordance with 45 CFR 400.147."
- ♦ "RSS services will be limited to refuges who have been in the U.S. 8 months or less."
- "That the county will take into account the reception and placement services provided by resettlement agencies in order to assure the provision of seamless services that are not duplicated."
- "That to the maximum extent feasible RSS funded services must be provided in a manner that includes the use of bilingual/bicultural women on service agency staffs to ensure adequate service access by refugee women."
- ◊ "That to the maximum extent feasible RSS funded services must be provided in a manner that is
 culturally and linguistically compatible with a refugee's language and cultural background."

♦ "That nonexempt RCA client will be required to participate in employment services within 30 days from receipt of aid."

X. BOARD OF SUPERVISOR RESOLUTION

Board of Supervisor's approval of the County Plan will be sent when received.

70/28/00			Annual Service Plan	vice Plan	Origin	Original (X) Re	Revision ()
1	8				Time F From:	Time Period Covered by Plan From: 10/01/09 To: 09/30	ed by Plan To: 09/30/10
County: Sail raines	1	Contracted		Program	Participants		Tune of Agency
Contracted or State-provided	as s	Amount by Funding Source	Total	012 Months	13 - 60 Months	Over 60 Months	and Percent of Funds
	SS	74,727	24	24			8,001
Employment	TAP						
	SS						八本子子 人名西西里
	TA ₀						
	Other				神 では、 これの からない ないのか かっぱん かんしゅう かんしょう かんしゅう かんしゅ かんしゅう かんしゅ かんしゅ かんしゅ かんしゅ かんしゅ かんしゅ かんしゅ かんしゅ		F. 13%, G 87%
		38,496	10	0			
OJT/Skills	TAP						
raining	Other						
	SS						
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Other	SS	J Kilder					
(Employment)		000 077	40	40			
Subtotal	*****	113,223	2	2			
Non-Employment	SS TAP						
- Account	SS	19,980					
County Admin (15% Admin Max)	TAP						
	SS	133,203					
Grand Total	TAP						
	Office						

*Type of Agency: A. State/ County, B. Mutual Assistance Association, C. Voluntary Agency, D. Community College, E. Adult Basic Education, F. Other Non-Profit Organization, G. <u>Private for profit agency</u>. The total percentage for each individual service (i.e., Employment, ELT, etc.) under Type of Agency and Percent of Funds must equal 100%.

ANNUAL OUTCOME GOAL PLAN 2010 PERFORMANCE GOALS AND ACTUALS

State or County:		San I	Francisco C	ounty, C	A.	
	FY 2009 GC)AL	FY 2009 ACT	TUAL	FY 2010 GO	AL
1. Caseload TANF Recipients RCA Recipients No Federal Cash Assistance Total	0 60 0		78		40	
2. Entered Employment Full Time Part Time Total	18 18 36	50% 50% 60%	13 6 19	68% 32% 24%	12 8 20	60% 40% 50%
2a. TANF Recipients Ent Full Time Part Time Total	0 0 0	0%	<u>0</u> 0	0%	0 0 0	0%
2b. RCA Recipients Ente Full Time Part Time Total	18 18 36	50% 50% 100%	15 6. 19	68% 32% 100%	12. 8 20	60% 40% 100%
2c. No Federal Cash As Full Time Part Time Total	0	ed Employ	ment 0 0 0 0	0%	0	0%
Cash Assistance Reci	pients Placed	In Emplo	yment 19		20	
3. Federal Cash Assistan TANF Recipient RCA Recipient Tota	5 <u>0</u> 5 <u>1</u>	0% 100% 3%	0 1:	0% 100% 5%	1	0% 100% 5%
4. Federal Cash Assistan TANF Recipient RCA Recipient Tota	s 0 s 15	s 0% 100% 42 %	0 0	0%	5 5	0% 100% 25%
5. Entered Full Time Em TANF Recipien RCA Recipien No Federal Cash Assistan	ts <u>0</u> ts <u>13</u> ce <u>0</u>	0% 100% 0% 72%	th Benefits 0 5 0 5 5	0% 100% 0% 38%	0 6 9	0% 100% 0% 50%

ANNUAL OUTCOME GOAL PLAN FY 2010

PERFORMANCE GOALS AND ACTUALS

State or County:		Sai	n Francis	co Count	y, CA	
	FY 2009 Goa	ıl'	FY 2009	Actual		FY 2010 Goal
6. Average Hourly Wage	of Refugees \$ 11.75	-	II Time Em	ployment 12.75	**************************************	\$ 11.75
7. 90-Day Retention Rate						
Percentage	80%		88 i	9/0		80%
7a. 90-Day Retention I	Rate Calculator Unduplicated # of Retentions	Unduplicated of Entered Employmen	#	calculated unduplicat total und employme	by divi ed number o uplicated nu	Retention Rate is ding the total of retentions by the amber of entered by of the previous current CY.
8. Office of Refugee Res	settlement Fur	nding				
		FY 2009	Actual	FY 2010	Proposed	
Social Services Formula Funding Targeted Assistance Formula Funding Discretionary Grant Funding		\$	245,049	\$	182,396	
Total Liquidated Funding		\$	245,049	\$	132,396	
Cost per Entered Employment		\$	12,897.32	\$	6,619.80	
Agency Point of Contact Please provide the name, title and contact information for the agency staff person best equipped to respond to questions regarding your Annual Outcome Goal Plan submission.		First and Last Name Eva Iraheta Telephone Number 415-557-5638		Email	County Coo neta@sfga	
Deadline for submission The completed FY 2010 Annual Outcome Goal Plan: Performance Goals and Actuals and Performance Narrative should be submitted via email to Nathan.Morris@dss.ca.gov by October 30, 2009.						
For Office of Refugee Re Submission type: Initial	settlement use	only: Statu		ubmitted: red In p	rocess - clanifi	Cation needed

