



Oregon Department of Transportation

Report on DBE Goal Analysis FY 2014 and Plan to Meet Overall Goal in FY 2015

(49 CFR 26.47)

ODOT's 2014 Uniform Report of DBE Awards or Commitments and Payments (DBE Uniform Report) due June 1st shows DBE utilization of 7.8%, and the report due December 1st shows utilization of 10.1%. A review of the full federal fiscal year 2014 DBE awards and commitments data as of November 25, 2014 shows annual DBE utilization of 8.7%. This is less than the last FHWA-approved overall goal of 16.95% applicable to the agency's FHWA-funded contracting, which was approved for federal fiscal year 2013. It is also less than ODOT's proposed, but not approved, overall goal for federal fiscal years 2014 through 2016 of 12.29%. As a state highway agency, under 49 CFR 26.47(c), ODOT is required to submit the following to FHWA for approval within 90 days of the 2014 fiscal year end:

- (1) An in-detail analysis of the reasons for the difference between our overall goal and the awards and commitments for the year; and
- (2) Specific steps and milestones established to correct problems identified in our analysis that will enable ODOT to fully meet the overall goal in the new fiscal year.

I. ANALYSIS

1) ODOT's Overall DBE Goal

On March 31, 2014, ODOT submitted a proposed 12.29% goal with race-neutral and race-conscious breakout of 9.61% and 2.68% respectively to FHWA for approval. Since then ODOT's Office of Civil Rights has been working with FHWA to approve the overall goal. On December 1, 2014, FHWA notified ODOT that it should report DBE goal achievement against its FHWA-approved FFY 2013 overall goal of 16.95% with a race-neutral and race-conscious breakout of 11.5% and 5.45% respectively. Based on FHWA recommendations, ODOT will reevaluate and revise its proposed 12.29% goal calculation for FFYs 2015-2016. However, because most of ODOT's FFY 2014 contract goal setting activities and communications with stakeholders referenced ODOT's proposed FFYs 2014-2016 calculation, ODOT includes shortfall analyses against both the approved FFY 2013 goal and the proposed 2014-2016 goal in Table 4 below.

2) FFY 2014 DBE utilization – First-half, Second-half, and Combined Annual Total

Tables 1 through 3 below show Uniform Report data showing DBE utilization on ODOT’s FHWA-funded Highway Construction Projects. The race-neutral and race-conscious portions of DBE utilization are set out below each table.

- Data as of 11/25/2014 from the ODOT Civil Rights Compliance Tracking (CRCT) Database.
- Dollars shown represent only the federal share. Crediting is per DBE crediting requirements (example, 100% subcontractor, 60% supplier crediting).
- Race Neutral (RN) portion is calculated by taking total DBE RN dollars (column G) divided by Total Dollars (column A).
- Race Conscious (RC) portion is calculated by taking total DBE RC dollars (column E) divided by Total Dollars (column A).

Table 1: DBE Utilization First Half FFY 2014 (10/1/13 – 3/31/14)

	A	B	C	D	E	F	G	H	I
Awards/ Commitments	Total Dollars	Total Number	Total to DBE's (dollars) [E+G]	Total to DBE's (number) [F+H]	Total to DBE's/Race Conscious (dollars)	Total to DBE's/Race Conscious (numbers)	Total to DBE's/Race Neutral (dollars)	Total to DBE's/Race Neutral (numbers)	Percentage of total dollars to DBE's [C / A]
Prime Contracts Awarded	\$149,404,827	56	\$147,755	1			\$147,755	1	0.1%
Subcontracts Awarded/Committed	\$75,084,099	557	\$10,596,226	123	\$1,967,906	28	\$8,628,320	95	14.1%
Total			\$10,743,981	124	\$1,967,906	28	\$8,776,075	96	7.2%

RN portion = 5.9%

RC portion = 1.3%

Table 2: DBE Utilization Second Half FFY 2014 (4/1/14 – 9/30/14)

	A	B	C	D	E	F	G	H	I
Awards/ Commitments	Total Dollars	Total Number	Total to DBE's (dollars) [E+G]	Total to DBE's (number) [F+H]	Total to DBE's/Race Conscious (dollars)	Total to DBE's/Race Conscious (numbers)	Total to DBE's/Race Neutral (dollars)	Total to DBE's/Race Neutral (numbers)	Percentage of total dollars to DBE's [C / A]
Prime Contracts Awarded	\$174,906,467	66	\$2,417,085	3			\$2,417,085	3	1.4%
Subcontracts Awarded/Committed	\$83,593,975	706	\$15,108,838	146	\$3,222,485	24	\$11,886,353	122	18.1%
Total			\$17,525,923	149	\$3,222,485	24	\$14,303,439	125	10.0%

RN portion = 8.2%

RC portion = 1.8%

Table 3: DBE Utilization FFY 2014 Combined Annual Total (10/1/13 – 9/30/14)

	A	B	C	D	E	F	G	H	I
Awards/ Commitments	Total Dollars	Total Number	Total to DBE's (dollars) [E+G]	Total to DBE's (number) [F+H]	Total to DBE's/Race Conscious (dollars)	Total to DBE's/Race Conscious (numbers)	Total to DBE's/Race Neutral (dollars)	Total to DBE's/Race Neutral (numbers)	Percentage of total dollars to DBE's [C / A]
Prime Contracts Awarded	\$324,311,294	121	\$2,564,840	4			\$2,564,840	4	0.8%
Subcontracts Awarded/Committed	\$158,678,074	1263	\$25,705,064	269	\$5,190,391	52	\$20,514,673	217	16.2%
Total			\$28,269,904	273	\$5,190,391	52	\$23,079,513	221	8.7%

RN portion = 7.1%

RC portion = 1.6%

3) FFY 2014 DBE Shortfall Calculations

Table 4: DBE Utilization Compared to Approved & Proposed Goals

	A	B	C	D	E
	FHWA- Approved Goal FFY 2013	ODOT-Proposed Goal FFYs 2014-2016	FFY 2014 DBE Utilization	Shortfall on approved goal [A – C =]	Shortfall on proposed goal [D – A]
Overall	16.95%	12.29%	8.7%	8.25%	3.59%
RN	11.50%	9.61%	7.1%	4.40%	2.51%
RC	5.45%	2.68%	1.6%	3.85%	1.08%

4) Summary Last Five Years DBE Utilization

Table 5: FFYs 2010 - 2014 DBE Utilization

A	B	C	D	E	F	G	H	I	J	K	L
Year	DBE Goal (FHWA)	DBE Utilization	DBE Sub-contract Awards (millions)	DBE Sub Award %	Total Prime Awards	DBE Prime Awards	Total Prime Contract Awards (millions)	DBE Prime Contract Awards (millions)	DBE Prime Award %	RN %	RC %
2010	11.50%	9.6%	\$23.09	11.85%	185	5	\$358.86	\$11.24	3.13%	7.9%	1.6%
2011	11.50%	15.1%	\$16.05	16.36%	102	5	\$204.83	\$14.94	7.30%	13.1%	2.0%
2012	11.50%	10.4%	\$11.06	12.93%	117	3	\$208.08	\$10.55	5.07%	9.6%	0.8%
2013	16.95%	9.0%	\$28.45	16.80%	109	3	\$335.77	\$ 1.62	0.48%	5.1%	3.8%
2014	16.95%* *proposed 12.29%	8.7%	\$25.71	16.2%	122	4	\$324.11	\$2.56	0.8%	7.1%	1.6%

5) Reasons for the shortfall:

a) High Overall Goal Size: The 16.95% goal was too high based on an over-estimate of “potential” DBE availability. On March 31 2014, ODOT proposed an annual DBE goal for FFY 2014 – 2016 of 12.29% with a RN/RC breakout of 9.61%/2.68%. In calculating the base figure, ODOT proposed to average certified DBE availability with “potential” DBE availability based on certified MBE/WBE certification numbers. This methodology has not been approved by FHWA. FHWA and ODOT exchanged comments, questions and responses regarding the proposed goal on May 21, October 16, and October 27, 2014 and met by conference call on December 10, 2014 to discuss the proposed goal. Based on the outcome of the discussion, ODOT will need to revise its goal submission to identify and include potential DBE availability in the base figure in a different manner. Per the December 10 discussion with FHWA, ODOT’s revisions will take into account potential DBEs by estimating the rate by which DBE certifications will increase during the goal period.

On the Steps/Action and Milestones Table, see:

- Step 1 –Adjustment Overall Goal

b) A&E Data Reporting: As has been previously identified, ODOT is currently unable to report A&E and related services contracting award data in its DBE Uniform Report. This means that the 8.7% DBE achievement level in 2014 only reflects *highway construction contracting*, while the 16.95% approved goal and even the proposed 12.29% goal were calculated to include projected DBE participation in *A&E and related services contracting*.

On the Steps/Action and Milestones Table, see:

- Step 3(b) - Enhanced Forecasting/Tracking/Reporting

c) DBE Subcontractor Participation: DBE subcontractor participation – both race-conscious and race-neutral – needs to be higher to meet the overall goal. ODOT’s USDOT-approved [2013 - 2015 DBE program waiver](#), which limits race-conscious participation to African American and Subcontinent Asian American- owned DBEs on ODOT construction contracts, makes it difficult to set as many and high enough DBE contract goals to meet the race-conscious portion of the goal. This is due to limited relative availability of African American and Subcontinent Asian American owned firms to meet assigned contract goals, particularly outside of the Portland metropolitan area. However, ODOT has identified several activities in the Steps and Milestones section below to work on managing these challenges.

On the Steps/Action and Milestones Table, see:

- Step 2 – Contract goal setting to be reconciled against DBE Goal Forecasting Report
- Step 3 - Enhanced Forecasting/Tracking & Reporting

- Step 4 – Communication with Prime Contractors
- Step 6 – Removing a DBE Subcontracting Barrier
- Step 7 – Continuous Monitoring of RC and RN Utilization

d) DBE prime participation: The number and, more critically, the dollar value of DBE prime awards was still down significantly in 2014 at 0.8% of all awards compared to 3%-7% in the 2012, 2011, and 2010 (see above, *Table 5: FFYs 2010-2014 DBE Participation*, pg. 3).

- 8 DBE firms bid as primes, submitting a total of 34 bids out of the 690 total bids submitted on FHWA-funded highway construction projects.
- 3 of the 8 prime DBE bidders were awarded 4 contracts out of the total 122 contracts awarded during the reporting period.
- **Total DBE Prime Awards:** \$2.56 million DBE Prime Awards / \$324.11 million Total Awards = **0.8%**

On the Steps/Action and Milestones Table, see:

- Step 5 – Strategies to Boost DBE Prime Participation

II. SPECIFIC STEPS & MILESTONES

See appended Table 6 - *Steps and Milestones to Meet Goal in FFY 2015*.

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Table 6 - Steps and Milestones to Meet Goal in FFY 2015

	Step/Action from FFY 2014 Plan	FFY 2015 Update	Milestones	Notes / Progress
1.	<p>Adjust Overall Goal: In summary, ODOT identified that because a high overall goal was one of the reasons for the shortfall in 2013, we planned to propose a lower overall DBE goal for FFYs 2014 – 2016. The key reasons for proposing a lower goal related to how potential DBE availability is taken into account in establishing the base figure and which business categories would be included in calculating the overall goal.</p>	<p>On March 31 2014, ODOT proposed an annual DBE goal for FFY 2014 – 2016 of 12.29% with a RN/RC breakout of 9.61%/2.68%. In calculating the base figure, ODOT proposed to average certified DBE availability with “potential” DBE availability based on certified MBE/WBE certification numbers. FHWA and ODOT exchanged comments, questions and responses regarding the proposed goal on May 21, October 16, and October 27, 2014 and met by conference call on December 10, 2014 to discuss the proposed goal. Based on the outcome of the discussion, ODOT will need to revise its goal submission to identify and include potential DBE availability in the base figure in a different manner.</p>	<ul style="list-style-type: none"> a) ODOT-submission of a revised overall goal that more accurately takes into account potential DBE availability in ODOT’s relevant market. b) FHWA-approval of an overall goal. c) ODOT implementation and communication to stakeholders of the approved overall goal for FFYs 2015 and 2016. 	<p>ODOT will be revising the proposed overall goal per the December 10, 2014 discussions with FHWA. The revisions will take into account potential DBEs by estimating the rate by which DBE certifications will increase during the goal period. ODOT has already gathered the last 5 years’ data needed to estimate certification trend rates.</p> <p>We anticipate submitting a revised report to FHWA by the end of <u>January 2015</u>.</p>
2.	<p>Contract Goal Setting: In late FFY 2012 and throughout 2013, ODOT began setting higher contract goals to assist the agency in meeting its overall DBE goal of 16.95% for FFY 2013. Given the shortfall in 2013, even with a more moderate overall goal planned for 2014 – 2016, ODOT will continue to set higher contract goals on eligible projects for FFY 2014.</p>	<p>Contract goal setting to be reconciled against DBE Goal Forecasting Report.</p> <p>By July 1, 2014 OCR developed and began using a DBE Goal Planning forecast worksheet for statewide highway construction projects to help identify which projects would need to be assigned contract goals and what size goals would be needed to meet the RC portion of the overall goal.</p> <p>The DBE Goal Planning forecast is only a <i>forecast</i>, not an assigned goal, which means that the actual, detailed project information will still be reviewed at the 90% Plans, Specs, and Estimate phase. ODOT will only assign the forecasted goal if the project’s size, location, schedule and eligible DBE availability in the</p>	<p>See Step 3 and Milestones under Step 3(a) on goal forecasting.</p>	<p>We have now been using the DBE Goal Planning forecast worksheet for approximately 6 months, and it has helped with looking ahead at the overall goal setting picture.</p> <p>One trend the forecast helped identify is that many recent and upcoming projects are falling below ODOT’s \$1 million threshold for assigning DBE goals on construction contracts. We can now see which projects need to</p>

	Step/Action from FFY 2014 Plan	FFY 2015 Update	Milestones	Notes / Progress
		<p>types of work on the project will support the forecasted goal. As contract goals are assigned, they will be reconciled against the forecast report to help with better, future forecasting.</p> <p>See also, Step 3(a) below on Enhanced Forecasting/Tracking & Reporting for more details.</p>		<p>assigned higher goals to make up the difference.</p>
3.	<p>Enhanced Forecasting/Tracking:</p> <p>a) <u>Forecasting</u> – As a pilot initiative, OCR will be developing a forecast and achievement tracking tool for future analysis to help avoid shortfalls to the extent possible and to provide shortfall analysis in future years when needed. This tool will facilitate OCR’s monthly monitoring of the DBE participation data included in the DBE Uniform Report and will perform a similar function to the tool demonstrated during the FHWA shortfall analysis training session, but will be tailored to work with ODOT processes.</p>	<p>Enhanced Forecasting/Tracking & Reporting:</p> <p><u>3(a) Forecasting</u></p> <p>In July 2014 OCR began using a DBE Goal Planning forecast worksheet (Construction) with fixed project data for temporary use. The report currently targets a 2.68% RC portion per the 3/31/14 proposed goal.*</p> <p>During FFY 2014 OCR also began working on the following <u>Next Steps</u>:</p> <ol style="list-style-type: none"> 1) Develop a DBE Goals Forecasting report & Actual Goals Set report (Construction) with <i>live project data</i> for long-term, more accurate use. 2) Schedule meetings with Area Managers in each of ODOT’s 5 Regions to collaboratively and more accurately forecast DBE goal sizes on each Region’s projects to assist with meeting the RC portion of the overall goal. Continue to meet on a periodic basis to update the forecast report (quarterly, semi-annually, or annually to be determined depending upon how quickly the live forecast becomes out of date). <p>*Note: The RC participation forecast will be adjusted based on an FHWA-approved goal.</p>	<p><u>3(a) Forecasting (Next Steps)</u></p> <ol style="list-style-type: none"> 1) Complete the live data forecasting reports; train OCR staff; begin using the reports to forecast DBE contract goals; and reconcile actual goals against forecast goals. 2) Meet with Area Managers in each region to forecast sufficient DBE goal sizes on each Region’s projects to assist with meeting the RC portion of the statewide overall goal. 	<p><u>3(a) Forecasting (Next Steps)</u></p> <ol style="list-style-type: none"> 1) Live DBE Goals Forecast & Actual Goals project reports are 95% complete. Training of OCR staff and testing of reports is estimated to take place by the end of <u>February 2015</u>. 2) We estimate that an Area Managers meeting schedule will be in place by the end of <u>April 2015</u> and that the first series of meetings will take place by the end of <u>July 2015</u>.

	Step/Action from FFY 2014 Plan	FFY 2015 Update	Milestones	Notes / Progress
	<p>b) <u>A&E Reporting</u> – ODOT continues to work in developing reporting capacity and aligning business processes with respect to reporting DBE participation for A&E and related services contracting.</p>	<p><u>3(b) A&E Reporting</u> In 2014, ODOT and OCR increased its ability to track and report on A&E and related contracting data. As of December 2014 OCR has developed the following <i>draft</i> reports: (1) A&E DBE Goal Setting, (2) DBE Tracking Report on Contracts/WOCs (for A&E), and (3) Uniform Report of DBE for A&E contracts (Awards/Commitments section only). These reports will help us identify apparent gaps in data collection processes and where our businesses processes need to be re-aligned to enable more streamlined reporting on A&E subcontractor award and payment data.</p> <p>3(c) DBE Participation Reporting - See Step 4(a) below.</p>	<p><u>3(b) A&E Reporting</u> 1) Convene a subcommittee or work group with procurement and contract administrator staff to review the draft A&E reports and to develop more streamlined data collection, data entry, and reporting processes. 2) Refine the draft A&E reports into final or working reports, as appropriate. 3) Combine A&E contract award data with Construction contract award data in the DBE Uniform Report.</p> <p>3(c) DBE Participation Reporting – See Milestone 4(a) below.</p>	<p><u>3(b) A&E Reporting</u> OCR estimates that we can begin work on this by the end of <u>March 2014</u>. It will likely take several months to discuss, re-align and document revised business processes.</p> <p>As previously noted during a June 11, 2013 meeting with FHWA, to fully develop and implement these processes may take several (3 – 5) years. ODOT will continue to update FHWA as the agency makes progress.</p>
4.	<p>Communication with Prime Contractors: In 2012 and 2013, ODOT communicated to the prime contracting community (both construction and A&E) that due to the higher overall goal of 16.95%, primes should expect to see higher DBE contract goals than in recent years. We also communicated that DBE utilization should be occurring on a race-neutral basis as well.</p> <p>We will continue to assign higher DBE goals on eligible contracts and communicate this to</p>	<p>Regular Reporting/Communication with Industry Stakeholders on DBE & Small Business Programs: Again in 2014, ODOT continued to communicate with the contracting community (prime and sub, construction and A&E) about ODOT’s proposed overall goal and DBE contract goals.</p> <p>Additionally, in 2014 ODOT implemented several new communication activities with the construction and A&E industry stakeholder</p>	<p>a) Finalize DBE Participation Report – Construction for use at industry stakeholder meetings and for internal monitoring of DBE participation levels (RC and RN).</p> <p>b) Post DBE Participation Report to OCR website on periodic (likely</p>	<p>For (a) and (b) OCR estimates that a finalized version of the DBE Participation Report will be completed and ready for posting on the OCR website by the end of <u>March 2015</u>.</p> <p>Regarding (c), the WSBAC committee members have been invited to participate</p>

	Step/Action from FFY 2014 Plan	FFY 2015 Update	Milestones	Notes / Progress
	<p>prime contractors in 2014. (See, ODOT's DBE Program Frequently Asked Questions, information on DBE Goals, pgs. 7-9.)</p>	<p>groups that we plan to refine and continue in 2015:</p> <ul style="list-style-type: none"> a) Developed a <i>draft</i> DBE Participation Update report (construction) to share with industry stakeholders and for internal monitoring purposes (RC and RN participation). b) Added a standing agenda item to the <i>monthly</i> ODOT Industry Leadership Team meetings: Overall DBE Goal Achievement and Participation Update. c) Added a standing agenda item to the <i>bi-monthly</i> ODOT – ACEC Liaison meetings – DBE / Small Business Programs Update. d) Collaborated with FHWA-Oregon Division to jointly convene a Workforce & Small Business Advisory Committee. 	<ul style="list-style-type: none"> quarterly or semi-annual) basis. c) Convene additional Workforce & Small Business Advisory Committee (WSBAC) meetings. 	<p>as members of the 2016 Disparity Study External Stakeholders Group, which includes approximately 4 to 5 meetings <u>between December 2014 and January 2016</u>.</p>
5.	<p>Strategies to Boost DBE Prime Participation:</p> <ul style="list-style-type: none"> a) Continued Outreach to DBE Primes – In 2015, as in 2013 and 2014, OCR will continue to provide DBEs with information on Upcoming Projects at: http://www.odot.state.or.us/ffp/cs/civilrights/ and encourage DBE prime participation via email and project announcements at monthly OAME meetings. b) DBE Business Development Program – In 2014 ODOT is planning is to target DBE primes for participation in the new DBE Business Development Program being established with Oregon Small Business Development Center Network (OSBDCN). This new program is the basis for our proposal to utilize the FFYs 2013 and 2014 federal DBE Supportive Services funds 	<p>ODOT will continue to implement the activities set out in Step 5(a) through (c) of the 2014 plan.</p> <p>d) Additionally, ODOT has contracted with Keen Independent Research to conduct ODOT's 2016 disparity study. Through the disparity study stakeholder surveys and in-depth interviews, ODOT expects to learn more information about the challenges DBEs face with respect to competing for prime work. ODOT will carefully evaluate any recommendations related to removing contracting barriers to participation for DBEs (and other businesses) or other race-neutral measures that may increase DBE prime participation on ODOT projects.</p>	<p>5(d)(1) Publication of Disparity Study Report - Recommendations on challenges for DBE primes (estimated <u>January 2016</u>).</p>	<p>Note on (b): Despite focused efforts to recruit DBE primes into the DBE Business Development Boot Camp series, DBE subcontractors were more interested and had more time available to participate in the program.</p>

	Step/Action from FFY 2014 Plan	FFY 2015 Update	Milestones	Notes / Progress
	<p>from FHWA. Dubbed “DBE Boot Camp,” it will be an eight-week intensive business assessment and training course open to Oregon certified DBE firms (both primes and subcontractors) followed by a year of monthly business advising services.</p> <p>c) Oregon Small Business Initiative (OSBI) – Through the OSBI partnership ODOT has with OAME and AGC, a strategy for boosting DBE prime success will be developed as part of the OSBI Work Plan.</p>			
6.	<p>Removing a DBE Subcontracting Barrier: In summary, OCR indicated it had been working with the Construction Contracts Unit, the Specifications Unit, and an industry subcommittee to reduce administrative barriers from DBE participation in smaller “specialty” work opportunities.</p> <p>The subcommittee was developing a process that would allow <u>non-committed</u> DBEs to participate on projects as suppliers, truckers, and specialty contractors without going through the full subcontract and DBE Work Plan Form 3A approval process, just like any other (non-DBE) business. Internally, ODOT would continue to monitor these DBE participants for program compliance by using our Commercially Useful Function Review (Form-3B) process.</p>	See Notes/Progress.	See Notes/Progress.	<p>The subcommittee completed its work on this project in <u>August 2014</u>. The boilerplate Special Provisions sections 160, 170, and 180 and the DBE Supplemental Required Contract Provisions were updated to implement the process changes effective on projects schedule to bid on or <u>after October 23, 2014</u>.</p> <ul style="list-style-type: none"> - Special Provisions: http://www.oregon.gov/ODOT/HWY/SPECS/Pages/2008_updates.aspx - DBE Provisions: http://www.oregon.gov/ODOT/HWY/SPECS/Pages/manuals_forms_etc.aspx#Publications
7.	<p>Continuous Monitoring of Race Conscious Measures: In the event it appears ODOT is exceeding its goal as a result of the above-</p>	<p>Continuous Monitoring of Race Conscious and Race Neutral Utilization: ODOT will implement the steps outlined above to</p>	a) Monthly Monitoring: As in prior years, OCR will continue to	On-going.

	Step/Action from FFY 2014 Plan	FFY 2015 Update	Milestones	Notes / Progress
	<p>identified steps, we will reevaluate average goal sizes and the number of contracts to which goals should be applied to ensure that the overall goal is being met to the maximum extent possible by race-neutral measures.</p>	<p>increase race-conscious measures on ODOT projects to enable ODOT to meet its overall goal. ODOT will also closely monitor both race-conscious and race-neutral participation on ODOT projects and adjust goal setting practices to meet the overall goal through race-neutral measures to the maximum extent possible. See Steps 2, 3(a) and (c), and 4(a) above.</p>	<p>monitor DBE utilization monthly in 2015.</p> <p>b) Semi-Annual Report: As in prior years, OCR will review the semi-annual DBE Uniform Report for DBE utilization for FFY 2014.</p> <p>See also 3(a) and 4(a) above.</p>	