

Charter School Application Report

Eagle Charter Schools of Nevada

Recommendation for the Resubmitted Summer 2020 Charter Application Cycle

General Information

Proposed Name	Eagle Charter Schools of Nevada
Proposed Mission	Eagle NV’s mission is to build the foundation for a promising future for all students in a rich, robust learning environment that fosters creativity and problem-solving abilities. Eagle emphasizes cognitive, social, and emotional growth by engaging children as active learners in an inclusive learning environment.
Proposed EMO	Eagle Charter Schools, Inc
Proposed Grade Configuration	Opening: Kindergarten – 5 th grade Full-Scale: Kindergarten – 8 th grade
Proposed Opening	August 2021
Proposed Location	Sahara Ave and McLeod Drive Las Vegas, NV 89104 School anticipates primarily serving 89104, 89106, 89115, 89121, 89122 zip codes.

Process/Key Dates for Eagle Charter Schools of Nevada

- April 13, 2020 – New Charter Application Training
- March 13, 2020 – Notice of Intent is received
- July 15, 2020 – Application is received
- October 1, 2020 - Capacity Interview is conducted¹
- November 6, 2020 – Application is denied by the Authority
- December 14, 2020 – Resubmitted application is received by the Authority
- January 6, 2021 – SPCSA staff discussed resubmission with the applicant team
- January 22, 2021 – Resubmission recommendation is presented to the Authority

¹ The Eagle Charter Schools of Nevada capacity Interview was conducted virtually as a result of prevailing Emergency Directives which limit capacity of gatherings, along with space limitations within the SPCSA’s offices.

Planned Enrollment Chart

	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27
K	108	108	108	108	108	108
1	108	108	108	108	108	108
2	108	108	108	108	108	108
3	108	108	108	108	108	108
4	108	108	108	108	108	108
5	108	108	108	108	108	108
6		108	108	108	108	108
7			108	108	108	108
8				108	108	108
9						
10						
11						
Total	648	756	864	972	972	972

Executive Summary, Process and Recommendation

During the November 6, 2020 Authority meeting, SPCSA staff presented the findings of the initial review committee and SPCSA staff for the Eagle Charter Schools of Nevada charter application. The initial application was found to exhibit shortcomings within four of the five components of the submitted application. The review committee and SPCSA staff found that the proposed Academic plan met the standard, but rated the Meeting the Need, Organizational, Financial and Addendum Sections as ‘Approaches the Standard’ as outlined in the charter application rubric.

A second committee comprised of SPCSA staff reviewed the resubmitted Eagle Nevada application after it was received on December 14, 2020. The review committee approached rating the resubmission with two primary concentrations:

- To determine if the applicant had corrected the original deficiencies found in the initial application; and
- To verify that the applicant’s resubmission did not change the rating of any component of the rubric that was determined to previously Meet Standard.

Upon resubmission, the review committee found that a number of deficiencies identified in the original application review had been resolved. Within the Meeting the Need section, which was previously rated as Approaches the Standard, the Committee to Form presented additional evidence that the proposed model is relevant to the specific needs of the community. It is also important to underscore that the proposed CMO has an established track record of operating schools in Washington, D.C.

Like the original application, the Academic Plan within the resubmission was also rated as Meets

the Standard. Few substantive changes were presented in this section, but additional detail and research was provided to more thoroughly describe the available supports to key student groups that persistently underperform in various academic measures, namely EL learners and students with IEPs.

The Operations Plan within the initial application was rated as Approaches the Standard. The review team determined that some concerns within the original application had been addressed through the resubmission process. The Committee to Form presented a more detailed and clear staffing plan, and also included significant evidence of community demand for the proposed educational model. Other key improvements were identified in the staffing plan, services and ongoing operations subsections. The review committee did identify a few remaining concerns, namely in the facilities, incubation year, and school leadership sections, that resulted in this section being rated as Approaches the Standard.

After resubmission, the shortcomings previously identified within the Financial plan were determined to have been addressed. The proposed CMO has a history of running financially successful schools, and the budget presented in the resubmission appears to account for all major expenditures to ensure that the academic program can be implemented as planned.

The Addendum, which is required of all applicants proposing to contract with an Educational Management Organization or Charter Management Operation, was also rated as Meets the Standard upon resubmission. Important details regarding the agreement between the local governing board and CMO were clarified, in particular the nature of funds for the critical incubation year.

For these reasons, in addition to those described throughout this memo, staff’s recommendation is to approve, with conditions, the charter school application for Eagle Charter Schools of Nevada.

Proposed motion: Approve the Eagle Charter Schools of Nevada charter application as resubmitted during the 2020 Summer Application Cycle, with conditions outlined below, based on a finding that the applicant now meets the requirements contained in NRS 388A.249(3).

1. Present confirmation that a facility is under lease or under contract on or before March 1, 2021, and that the Eagle Nevada board has approved a plan to ensure that the same is ready for the 2021 – 22 school year;
2. Present confirmation that Eagle Nevada has hired a school leader no later than April 1, 2021;
3. Governing Board – Ensure a fully constituted governing body made up of five qualified members meeting the requirements of NRS 388A.320 by April 1, 2021. Provide initial training for the governing body by May 1, 2021. In addition, Board Member Mallory must be replaced by March 1, 2021.
4. Provide an updated list of proposed partnerships which also includes draft Memorandums of Understanding with each identified partner, and outlines deliverables and responsibilities of each party no later than June 1, 2021; and
5. Complete the SPCSA pre-opening process for new charter schools.

All conditions must be met by the dates listed above and to staff’s satisfaction for an opening for the 2021-22 school year.

Summary of Application Section Ratings

The State Public Charter School Authority is required to assemble a team of reviewers and conduct a thorough evaluation of the application, which includes an in-person interview with the applicant designed to elicit any necessary clarification or additional information about the proposed charter school. The SPCSA is required to adhere to its policies and practices, namely the application guidance, training and rubric, regarding evaluating charter applications. Ultimately, the SPCSA must base its determination on the documented evidence collected through the application process.

Rating options for each section are Meets the Standard; Approaches the Standard; Does not Meet the Standard. These are defined as follows:

- **Meets the Standard:** The response reflects a thorough understanding of key issues. It addresses the topic with specific and accurate information that shows thorough preparation; presents a clear, realistic picture of how the school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively in a way which will result in a 4- or 5-star school.
- **Approaches the Standard:** The response meets the criteria in many respects but lacks detail and/or requires additional information in one or more areas.
- **Does Not Meet the Standard:** The response is undeveloped or incomplete; demonstrates lack of preparation; or otherwise raises substantial concerns about the viability of the plan or the applicant's ability to carry it out.

The rubric is broken into four major sections, plus an addendum, as outlined below. Detailed descriptions of each rubric item can be found in the full rubric located on the SPCSA Application website:

http://charterschools.nv.gov/OpenASchool/Application_Packet/

Summary of Application Section Ratings

Rating options for each section are Meets the Standard; Approaches the Standard; Does not Meet the Standard.

Application Section	Initial Rating	Resubmission Rating
Meeting the Need	Approaches the Standard	Meets the Standard
Mission and Vision	Meets the Standard	Meets the Standard
Targeted Plan	Approaches the Standard	Meets the Standard
Parent and Community Involvement	Does Not Meet the Standard	Approaches the Standard
Academic Plan²	Meets the Standard	Meets the Standard
Transformational Change	Meets the Standard	Meets the Standard
Curriculum & Instructional Design	Meets the Standard	Meets the Standard
Promotion & High School Graduation Requirements	Meets the Standard	Meets the Standard
Driving for Results	Meets the Standard	Meets the Standard
At-Risk Students and Special Populations	Approaches the Standard	Meets the Standard
School Structure: Culture	Meets the Standard	Meets the Standard
School Structure: Student Discipline	Meets the Standard	Meets the Standard
School Structure: Calendar and Schedule	Meets the Standard	Meets the Standard
Operations Plan	Approaches the Standard	Approaches the Standard
Board Governance	Does Not Meet the Standard	Approaches the Standard
Leadership Team	Does Not Meet the Standard	Approaches the Standard
Staffing Plan	Approaches the Standard	Meets the Standard
Human Resources	Approaches the Standard	Approaches the Standard
Student Recruitment and Enrollment	Approaches the Standard	Meets the Standard
Incubation Year Development	Does Not Meet the Standard	Approaches the Standard
Services	Does Not Meet the Standard	Meets the Standard
Facilities	Does Not Meet the Standard	Approaches the Standard
Ongoing Operations	Meets the Standard	Meets the Standard
Financial Plan	Approaches the Standard	Meets the Standard
Addendum	Approaches the Standard	Meets the Standard
Leadership For Expansion	Meets the Standard	Meets the Standard
Scale Strategy	Approaches the Standard	Meets the Standard
School Management Contracts	Approaches the Standard	Meets the Standard

² The Eagle Charter Schools of Nevada proposal did not contemplate Distance Education or Pre-Kindergarten. Therefore, the corresponding sections of the rubric were not scored.

Meeting the Need Section

As previously noted, the initial application was rated as 'Approaches the Standard'. Previous strengths were determined to have remained in place upon resubmission, and are detailed again below.

A few noteworthy enhancements were included in the resubmission. The Committee to Form presented significantly more evidence of demand for the school. Additionally, the resubmission presents additional detail regarding how the model will meet the specific needs of the community, and why the proposed approaches are credible and can be successful. The application still lacks established, concrete examples of partnerships in the community as the resubmission notes that only outreach has occurred to date. Nevertheless, this section was rated as 'Meets the Standard'.

Areas of Strength

- The Committee to Form and written application describe a clear and compelling mission statement that ties to performance goals and proposed instructional strategies while aiming to improve students' long-term quality of life. The Committee to Form commits to academic and whole child growth, active learning, and serving all students. The proposed academic goals, focused on reducing the achievement gap by demonstrating 1.5+ years of growth and outperforming the comparative district by 20%, also align to the mission and reiterate a responsibility to assist students even if they enter behind grade level. Key components of the model are described and instructional strategies such as small groups, independent learning activities and creative and imaginative learning opportunities, aim to meet students where they enter the school.
- Within this section and throughout the narrative, the applicant team makes a clear, compelling case that the targeted region has a need for a high-quality school, noting that the majority of residents are low-income. Additionally, zero elementary or middle schools in the targeted zip codes are designated as high-performing according to the Nevada School Performance Framework (NSPF). This appears to be aligned to the Geographic Need of the SPCSA Academic and Demographic Needs Assessment.
- The resubmission provides adequate evidence of demand by prospective students and families, presenting approximately 500 intent to enroll/interest forms. The Committee to Form noted that these were gathered by outreach efforts in the local community.

Areas of Concern

- The application identifies a limited number of partner organizations, few of which are local, community-based partners that would help to meet the needs of the target population. No evidence is provided that these prospective partners are established, or that there are specific accountabilities for both parties. This omission raises some questions about the involvement of potential partners in the development of application.
- The resubmission includes a survey for prospective parents, but questions remain regarding how this information helped inform the final proposal.

Academic Section

The initial rating for this section of the application was rated as 'Meets the Standard', and as such, few substantive changes were made within the resubmission.

The review committee identified many strengths within the written application, which were supplemented during the capacity interview. The proposed academic program, a replication from established Eagle Charter Schools in Washington, DC, includes detailed descriptions, appropriate performance goals for student growth, and curricula that are aligned to NVACS. Additionally, there are students supports described within the application to develop a positive culture at the school. Professional development strategies are outlined, and these are tied directly to the instructional model.

In the resubmission, some additional information was added regarding the supports for EL students. Like the initial application, the review committee rated this section of the resubmission as 'Meets the Standard'.

Areas of Strength

- The proposed academic program has been successfully implemented in Washington, D.C. for pre-kindergarten to 3rd grade students. In 2019, the Washington, D.C. schools were classified as Tier 1, the highest rating possible. Despite some concerns that the projected demographic in Nevada would be different, especially in terms of EL students, this demonstrates that the educational strategies outlined in the application have been successful. Additionally, the key distinguishing features of the current model, such as rigorous and aligned curriculum, extensive professional development, and social and emotional learning opportunities, would not be compromised.
- A list of curricula is provided for several content areas within the application. Proposed core curriculum and resources for ELA (Journeys, Collections, AIMSweb, Fast for Word for Reading Intervention), and math (Eureka math) are aligned with Nevada Academic Content Standards (NVACS).
- The written application describes clear structures to support students that are at-risk, and promotion standards are clearly defined. A School Success Team (SST) will be established and convened well in advance of any retention decisions, and criteria impacting final promotion decisions are outlined.
- Performance goals outlined within the application are ambitious. Growth goals are established as 1.5 years for students who do not meet or exceed grade-level performance. These set a high-bar and can lead to a 4- or 5-star rating for the school under the NSPF.
- Eagle proposes a multi-faceted approach to establish a culture of high expectations with students, families, teachers, and staff. The school plans to implement Responsive Classroom and Positive Behavioral Interventions and Supports (PBIS) to build social skills and classroom cooperation as well as incorporate a 30-minute SEL lesson on a weekly basis. Initial culture communication will begin through home visits and orientations for students and families. These plans are appropriate, concrete and can lead to a strong student culture among staff, students and parents.
- Professional development is outlined within the application and includes an emphasis on differentiation strategies and the use of student performance data. The application goes on to

state the teachers will be observed on an informal basis daily, and classrooms will be videotaped for teacher reflection to help ensure quality teaching practices are implemented. Additionally, Professional Learning Communities (PLCs) to assist instructional staff as well as to provide time to review and discuss student data. These plans tie directly to the instructional methods outlined while also supporting teacher growth.

Areas of Concern

None

Operations Section

This section of the initial application was rated as ‘Approaches the Standard’. A number of strengths were identified, including that the proposed governing board seeks to contract with a Charter Management Organization (CMO) Eagle Charter Schools, which has shown a true dedication to serving at-risk students who need and is seeking to develop successful schools outside of Washington D.C. This was made clear during the capacity interview as both the Committee to Form and CMO representatives are mission-aligned, focused on creating high-quality seats for students. The review committee determined that these strengths remained in place upon resubmission.

Upon resubmission, the Committee to Form provided some additional information and evidence that enhanced this section. Namely, the resubmission provided adequate evidence that there is sufficient demand for the school in the targeted community as well as clarity around the proposed staffing plan, which features a robust number of employees to ensure adequate services for at-risk student populations.

Despite these strengths, the review committee and SPCSA staff identified a number of concerns that remained in the resubmission. The review committee has lingering questions about the current capacity of the proposed board, which is not fully constituted although a timebound plan is presented. Additionally, there are some concerns about the execution of the incubation year plan as a Principal has yet to be identified.

Overall, this section of the resubmission was rated as ‘Approaches the Standard’, although the review committee finds that these deficiencies can be addressed through conditions as outlined on page 5.

Areas of Strength

- The Committee to Form proposes to partner with a CMO comprised of staff with significant experience working with the Washington, D.C.-based Eagle Academy schools.
- The Committee to Form’s hiring plan supports its mission and vision, and includes posting, screening, telephone interviews, lesson demonstration, team interview, background and reference check and finally if applicable an offer letter. Additionally, the application offers competitive salaries for teachers and staff.
- The applicant proposes using Carver Governance training and will complete 10 additional hours of training throughout the year. The Board will also refer to the “User’s Guide to Fiscal Oversight” produced by the National Charter School Resource Center to provide a reference of strong governance best practices and additional checklists to ensure sufficient goals, policies, and procedures are in place.
- The application lays out plans for frequent monitoring, evaluations, data analysis, and communication between the principal and the instructional staff. In addition, the application indicates that professional development will be structured to improve performance.
- The resubmission provides adequate evidence of demand by prospective students and families, presenting approximately 500 intent to enroll/interest forms. The Committee to Form noted that these were gathered by outreach efforts in the local community.

Areas of Concern

- The proposed board does not include anyone with a strong finance or legal background. A clear plan to fill at least one board member vacancy is provided, but additional evidence is needed to ensure that the board is well-rounded and has complementary skills so as to execute on its fiduciary responsibilities.
- The applicant has not identified a school leader, and acknowledged that this will likely be a thorough search requiring time and capacity in the weeks ahead. Given that the proposed school would open in less than a year and be translated from a model that is based on the east coast, there are significant concerns about whether a school leaders would be selected and fully prepared to launch the school by the fall of 2021.
- During the incubation year, the proposed COO would split her time between Washington, D.C. and Nevada and is projected to work 25% on the launch of the proposed Nevada school. Additionally, the principal, once selected would also be working part time, at approximately 25% until July 1, 2020. Given the substantial work to launch the school, meet all incubation year milestones, and enroll nearly 700 students, this raises some questions about sufficient staff capacity.
- The application does not provide a comprehensive and detailed leadership development plan. Given that the proposal is to replicate existing schools across the country, substantial professional development is likely necessary to ensure fidelity to the model. More information could have been included in the resubmission so as to ensure a concrete plan is fully established.

Financial Section

The financial section of the initial application was rated as 'Approaches the Standard'. After a review of the resubmission, the review committee found that the strengths identified in the first submission remained. These are detailed below.

The financial plan presented appears to account for all major expenditures and generally aligns with the narrative. The resubmission provided additional detail and clarity around the proposed facility as well as the contingency plan. Furthermore, various line items were clarified in the resubmission such as the student fee line item, which captures non-federal meal and before and after-care revenues. Due to these enhancements, and despite a concern about the limited level of financial expertise on the proposed board, the review committee rated the financial section within the resubmission as 'Meets the Standard'.

Areas of Strength

- The narrative provides evidence that there would be financial control systems and policies in place to ensure that only allowable expenses would be made.
- The proposed Educational Services Agreement includes a significant funding commitment to help ensure that essential services can be funded appropriately, and that the Committee to Form could implement their plans immediately if authorized.
- In General, the financial plan and budgeting priorities align to the proposed model. Key staffing and programming elements appear to be captured within the budget and anticipated costs are reasonable.

Areas of Concern

- As previously stated, the proposed governing board does not have an individual with significant financial expertise. A prospective board member has been identified, and the board provided a timeline to potentially formally add this individual to the current governing body. Nevertheless, some lingering questions remain about the board's current ability to adequately oversee the financial state of the school.

Addendum

The addendum section is required for those applications that seek to contract with a CMO or EMO or are applying for sponsorship directly. Because Eagle Academy of Nevada contemplates contracting with a CMO, this component of the application was required.

After reviewing the resubmission, the review committee was able to confirm that their strengths identified in the original submission remained. Those are listed below again for reference, and include the experience of Eagle Charter Schools, Inc. of operating successful schools in Washington D.C.

The resubmission presented two additional improvements. The Committee to Form provides a clear scale plan, and the draft contract between the local board and CMO now clarifies the nature of the incubation year funds, noting that these dollars are not a loan for the local school, but a reserve fund to be used until the start of the first year of operations.

Due to these improvements, the review team finds that this section 'Meets the Standard' as set forth in the application rubric.

Areas of Strength

- This school is a replication of a high performing school. It is also clear the applicant understands the need to have high performing schools in Nevada. The applicant was also transparent with regard to their plans for opening one school in Nevada and this thoughtful approach showed their understanding that capacity and strategy go hand in hand.
- The applicant included a draft services agreement with their charter application. The draft services agreement lays out the responsibilities of both the school and the CMO and no inappropriate terms were included.

Areas of Concern

None

Capacity Interview Summary

Based on the independent and collective review of the application, the review committee conducted a virtual capacity interview of the applicant to assess the capacity to execute the application’s overall plan. The capacity interview for Eagle Charter Schools of Nevada was conducted on Thursday, October 1, and lasted approximately 120-minutes. All members of the Committee to Form attended the interview. Additionally, two representatives from Eagle Charter Schools, Inc the proposed Charter Management Organization (CMO), and one application consultant, attended the capacity interview. Questions during the capacity interview focused primarily on these areas:

Board Governance	Community Partnerships
Leadership Team	Curriculum & Instructional Design
School Management Contracts	At-Risk Students & Special Populations
Facilities	Staffing Plan
Parent and Community Engagement	

Lastly, the capacity interview included a scenario-based question that probed the Committee to Form’s capacity to develop a plan in response to data.

Meet and Confer

The Eagle Nevada Committee to Form met with SPCSA staff to discuss the deficiencies on December 2, 2020 prior to their resubmission on December 14, 2020. During this meeting, the applicant team asked a number of questions and sought clarity about identified deficiencies.

District Input

Per Assembly Bill 462 (2019), the SPCSA solicited input from the Clark County School District regarding this application.³ The timeline regarding this request for input is below and the response provided by the Clark County School district is attached.

- August 26, 2020 – Memo sent to CCSD soliciting input.
- September 28, 2020 – Written input provided from CCSD to SPCSA.
- November 10, 2020 – Written notification from the SPCSA to CCSD regarding the denial of the original Eagle Nevada charter application.
- December 28, 2020 – Written notification from SPCSA to CCSD confirming that the Eagle Nevada resubmission had been received. The SPCSA outlined a tentative timeline for possible action on the Eagle Nevada resubmitted application.

³ Assembly Bill 462 (2019) section 6.3, subsection 1, paragraph (d): “The proposed sponsor of a charter school shall, in reviewing an application to form a charter school...If the proposed sponsor is not the board of trustees of a school district, solicit input from the board of trustees of the school district in which the proposed charter school will be located.”

Appendix (Rubric Detail)

The information below indicates *rubric criteria that the applicant did not substantially meet*.

Meeting the Need

- **Parent and Community Involvement**
 - *Demonstrates clear evidence of the involvement of parents, neighborhood, and/or community members representative of target population in the development of the plan.*
 - *Identifies specific partnerships which are shown to be relevant to the needs of the target population, including partners located in the community that the applicant intends to serve.*
 - *Partnerships are evidenced by specific letters of commitment outlining the accountabilities of both parties and clear, measurable, time-specific deliverables from the partner which are clearly relevant to the needs of the target population.*

Operations Plan

- **Board Governance**
 - *Clear delineation of authority and working relationship between the governing body and school staff.*
 - *Demonstrates that the membership of the governing body will contribute the wide range of relevant knowledge, skills, and commitment needed to oversee a successful charter school, including but not limited to educational, financial, accounting, legal, and community experience and expertise, as well as special skill set to reflect school-specific programs, if applicable (e.g., STEM, fine arts, blended learning, alternative programs, etc.)*
 - *Qualifications and experience levels of governing body members with accounting and finance experience significantly exceeds the statutory minimum requirements and demonstrates a proven track record of successful management or oversight of a multi- million-dollar entity.*
 - *Qualifications and experience levels of governing body members with legal experience significantly exceeds the statutory minimum requirements and demonstrates a proven track record of successful management or oversight of complex, high risk/high profile legal matters.*
 - *Qualifications and experience levels of governing body members with human resources experience significantly exceeds the statutory minimum requirements and demonstrates proven track record of successful management or oversight of a human resource function or process in a mid- sized to large employer with staffing levels equivalent to those of the school at full capacity.*
 - *Qualifications and experience levels of governing body members who are licensed Nevada educators significantly exceeds the statutory minimum requirements and demonstrates proven track record of significant academic gains in the classroom (for classroom teacher) or school level (for an administrator) in schools which serve populations similar to the target population.*
- **Leadership Team**
 - *Provides a comprehensive plan for coaching and support for school leadership*
- **Human Resources**
 - *Articulates process for recruiting and hiring high quality teachers and leaders.*
 - *Essential functions and processes, including background checks, payroll, benefits, and employee relations, are accounted for.*
- **Incubation Year Development**

- *Outlines comprehensive leadership development plans that include training aligned with incubation year goals as well as stated academic goals (these may be either designed by or outsourced by the operator)*
- *The staffing outlined for Year 0 will enable the school to reach its Year 0 milestones and goals*
- **Facilities**
 - *Identifies a viable educational facility or facilities that meets the needs of the students and accommodates the programmatic and operational needs of the school(s) over the charter term as described throughout the application—OR—outlines in detail the plan and timeline to identify and secure facilities as needed*
 - *If a facility has not yet been identified*
 - *Description of anticipated facilities needs including evidence that the facility will be appropriate for the educational program of the school and adequate for the projected student enrollment*
 - *Inclusion of costs associated with the anticipated facilities needs in the budget including renovation, rent, utilities, insurance, and maintenance.*
 - *Evidence to indicate that facilities-related budget assumptions are realistic based on anticipated location, size, etc.*
 - *Assurance that the proposed location will be in compliance with applicable building codes, health, and safety laws, and with the requirements of the American with Disabilities Act (ADA).*
 - *Plan for finding a location including a proposed schedule for doing so.*
 - *A clear, time bound plan to engage with local jurisdiction(s) and municipalities.*

Financial Plan

- *There is appropriate segregation of financial duties which align to organizational chart and job descriptions.*
 - *Discloses and addresses any potential conflicts of interest (real or perceived)*