



Policy on development and review of occupational qualifications, part qualifications and skills programmes

09 September 2021

Table of Contents




LIST OF ACRONYMS	4
GLOSSARY OF TERMS	5
1. OBJECTIVES OF THIS POLICY	10
2. SCOPE AND APPLICATION	10
3. POLICY CONTEXT	10
4. OCCUPATIONAL QUALIFICATIONS AND OR PART QUALIFICATIONS DESIGN FEATURES	11
5. DEVELOPMENT AND REVIEW OF OCCUPATIONAL QUALIFICATIONS AND PART QUALIFICATIONS	12
6. EVALUATION AND RECOMMENDATION OF QUALIFICATIONS AND OR PART QUALIFICATIONS TO SAQA FOR REGISTRATION	14
7. RE-REGISTRATION AND DE-REGISTRATION OF OCCUPATIONAL QUALIFICATIONS AND PART QUALIFICATIONS ON THE QQSF	14
8. SKILLS PROGRAMMES DESIGN FEATURES	15
9. DEVELOPMENT AND REVIEW OF SKILLS PROGRAMMES	15
10. EVALUATION AND APPROVAL OF SKILLS PROGRAMMES	16
11. PUBLICATION OF INFORMATION ON OCCUPATIONAL QUALIFICATIONS PART QUALIFICATIONS AND SKILLS PROGRAMMES	16
12. LEGAL REQUIREMENTS	17
13. NON-COMPLIANCE WITH POLICY	17
14. IMPLEMENTATION AND TRANSITIONAL ARRANGEMENTS	17
15. POLICY REVIEW	18

DOCUMENT CONTROL

Version and Amendment Schedule

Version	Version Date	Author	Description
1.0	September 2021	S Mkhonza	First Draft

APPROVAL BY

 _____ Chief Executive Officer: (QCTO)	 _____ Chairperson of the Council: (QCTO)	 _____ Chief Director:
Name: Mr Vijayen Naidoo	Name: Ms Sibongile Antoni	Name: Mr Thomas Lata
Date: <u>24/11/2021</u>	Date: _____	Date: 04 November 2021

LIST OF ACRONYMS

ACRONYM	DESCRIPTION
CAT	Credit Accumulation and Transfer
CHE	Council on Higher Education
DHET	Department of Higher Education and Training
EISA	External Integrated Summative Assessment
FISA	Final Supervised Assessment
GENFETQSF	General and Further Education and Training Qualifications Sub-Framework
HEQSF	Higher Education Qualifications Sub-Framework
NAMB	National Artisan Moderation Body
NEET	Not in Employment, Education or Training
NLRD	National Learners' Records Database
NQF	National Qualifications Framework
OQSF	Occupational Qualifications Sub-Framework
QAP	Quality Assurance Partner
QC	Quality Council
QCTO	Quality Council for Trades and Occupations
RPL	Recognition of Prior Learning
SAQA	South African Qualifications Authority
SDP	Skills Development Provider
SETA	Sector Education and Training Authority
Umalusi	Council for Quality Assurance in General and Further Education and Training
WIL	Work Integrated Learning

GLOSSARY OF TERMS

TERM	DESCRIPTION
Application	Means the functional combination of the practical component and the workplace component through skills learning or simulated work experience learning
Articulation	Means the process of forming systemic, specific and individual possibilities of connection between occupational qualifications and/ or part-qualifications to allow for the horizontal/lateral, vertical, lateral and diagonal movement of learners through the formal education and training system and its linkages with the world of work
Assessment	Means the process used to identify, gather and interpret information against the required competencies in a qualification or part-qualifications in order to make a judgement about a learner's achievement
Credit	Means a measure of the volume of learning required for a qualification or part-qualification, quantified as the number of notional study hours required for achieving the learning outcomes specified for the qualification or part-qualification. One (1) credit is equated to ten (10) notional hours of learning
Credit Accumulation	Means the totaling of credits required to complete a qualification or part-qualification
Credit Accumulation and Transfer (CAT)	Means the practice of accumulation credits from one or more cognate learning programmes in an institution and transferring those credits to be recognised towards a qualification/part-qualification in the same or different institution
Credit Accumulation and Transfer (CAT) system	Means an arrangement whereby the diverse features of both credit accumulation and credit transfer are combined to facilitate lifelong learning and access to the workplace
Credit matrix	Means a system in which learning outcomes can be arranged and compared in levels of increased complexity based on agreed groupings of credits, such as in modules/subjects or part-qualifications
Credit transfer	Means the vertical, horizontal or diagonal relocation of credits towards a qualification or part-qualification registered on the same or different level, registered on the same or different Sub-Framework
Comparability	Means the degree of similarity between two or more qualifications /part-qualifications in terms of purpose, level, credits, and learning outcomes in order to determine the extent of credit accumulation and transfer within or between institutions. The matching of curricular properties should be considered when comparability is determined

Curriculum	Means a statement of the training structure and expected methods of learning and teaching that underpin a qualification or part-qualification to facilitate a more general understanding of its implementation in an education system
Entry requirement	Means the minimum academic knowledge and practical competencies, and or work experience that a learner must have completed to be able to be admitted for a qualification and or part-qualification. This may include recognition of other forms of prior learning such as non-formal and informal learning and work experience deemed as comparable for entry. In the South African context, entry requirements also take into account the broad socio-political issues of access
Exit Level Outcomes	Means the knowledge, skills and attitudes that a learner should have obtained or mastered on completion of a qualification or part-qualification and against which the learner is assessed for competence
External Integrated Summative Assessment (EISA)	Means final assessment to assess the competence of a learner against the stated exit level outcomes of an occupational qualification and/or part-qualification.
Final Supervised Assessment (FSA)	Means a supervised final assessment for which assessment processes, tools, and results are recorded towards the achievement of a historically registered qualification or skills programme. The information on skills programmes includes final supervised assessments.
Learning Programme	A Learning Programme includes a learnership, an apprenticeship, a skills programme and any other prescribed learning programme which includes a structured workplace experience component. In the context of this policy Learning Programme also means a structured and purposeful set of learning experiences that lead to a qualification or part-qualification
Learnership	Means a learning programme registered with the DHET which consists of a structured learning component of a specified nature and duration, and which leads to a qualification registered on the NQF related to an occupation. A learnership is based on an agreement entered into between the learner, the institution and the employer
Level Descriptor	Means a statement describing learning achievements at a particular level of the NQF that provides a broad indication of the types of learning outcomes and assessment criteria that are appropriate to for a qualification or part-qualification at that level
Minister	Means Minister of Education, Science and Innovation
Module	Means an assessed/assessable unit of learning with a defined outcome and associated credits

National Learners' Records Database (NLRD)	Means the electronic management information system of the NQF under the authority of SAQA, which contains records of qualifications, part-qualifications, learner achievements, recognised professional bodies, professional designations and associated information such as registrations and accreditations
National Qualifications Framework (NQF)	Means the comprehensive system, approved by the Minister of Higher Education Science and Innovation Training for the classification, co-ordination, registration and publication of articulated quality-assured national qualifications and part-qualifications. The South African NQF is a single integrated system comprising three coordinated qualification sub-frameworks for General and Further Education and Training, Higher Education, and Trades and Occupations respectively.
Notional hours of learning	Means the agreed estimate of the learning time that it would take an average learner to meet the defined learning outcomes; it includes consideration of contact time, research, completion of assignments, time spent in structured learning in the workplace, individual learning, and assessment. Ten (10) notional hours equate to one (1) credit
Occupational qualification	The SDA defines an occupational qualification as "a qualification associated with a trade, occupation or profession resulting from work-based learning and consisting of knowledge unit standards, practical unit standards and work experience unit standards. In the context of this qualification an Occupational Qualification means a qualification associated with a trade, occupation or profession developed and quality assured under the auspices of the QCTO and consisting of knowledge/theory and application (practical skills/work experience/simulated work experience) components and an external integrated summative assessment
Occupational Qualifications Sub-Framework (OQSF)	Means the sub-framework of qualifications developed and managed by the Quality Council for Trades and Occupations (QCTO)
Outcomes	Means contextually demonstrated end products of specified learning process, which include knowledge, skills and values. Outcomes could be generic or specific
Part-qualification	Means an assessed unit of learning with a defined outcome that is or will be, is registered as part of a qualification on the NQF
Post-School Education and Training	Means Education and Training opportunities for people who left school as well as adults who may never have been to school but require educational opportunities
Qualification	Means a registered national qualification A registered national qualification consisting of planned combination of learning outcomes which has a defined purpose or purposes, intended to provide qualifying learners with applied competence and a basis

	for further learning and which has been assessed in terms of exit level outcomes, registered on the National Qualifications Framework and certified and awarded by a recognized body
Quality Council (QC)	Means one of the three councils tasked with developing and managing one of the Sub-Frameworks of the NQF in order to ensure that agreed quality standards are met. These Quality Councils are Umalusi for the GENFETQSF; the CHE for the HEQSF; and the QCTO for the OQSF
Quality Council for Trades and Occupations (QCTO)	Means the Quality Council for Trades and Occupations established in terms of the NQF Act No. 67 of 2008, which is mandated to achieve the objectives of the NQF and to develop and manage the OQSF
Recognition of Prior Learning (RPL)	Means the principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed for the purposes of alternative access and admission, recognition and certification, or further learning and development
Sector Education and Training Authority (SETA)	Means a body established in terms of the Skills Development Act, No. 97 of 1998 to develop and implement sector skills plans and promote learning programmes, including workplace learning
Skills Programme	Chapter 5 of the SDA defines a skills programme as “a skills programme that is occupationally based and when completed will constitute/contribute a credit towards a qualification registered on the NQF.
Skills Development Provider	Means a legally established institution (public or private) that has been recognised, usually for a particular period, by a QC or its appointed agent, as having the capacity to offer a qualification or part-qualification registered on the NQF at the required standard
South African Qualifications Authority (SAQA)	Means the statutory authority, established in terms of the repealed SAQA Act, No. 58 of 1995 and continuing in terms of the NQF Act, No. 67 of 2008, which oversees the further development and implementation of the NQF, the achievement of the objectives of the NQF and the co-ordination of the three sub-frameworks
Simulated work experience	The Means a learning achieved through exposure and interactions gained through a simulated workplace environment that a learner has to complete towards a qualification or part-qualification registered on the OQSF.
Sub-Framework of the NQF	Means one of three coordinated qualifications sub-frameworks which make up the South African NQF as a single integrated system, namely: The General and Further Education and Training Qualifications Sub-Framework (GEFETQSF), the Higher Education Qualifications Sub-Framework (HEQSF), and the Occupational Qualifications Sub-Framework (OQSF)
Trade	Means an occupation for which an artisan qualification is required as stipulated in the Skills Development Act, 1998 (Act No. 97 of 1998)

Work Experience

Means an exposure and interactions gained through being in the work place being in the workplace

DRAFT

1. OBJECTIVES OF THIS POLICY

1.1 The policy is designed to facilitate:

- 1.1.1 Development, approval and review of occupational qualifications and part qualifications and skills programmes for the Occupational Qualifications Sub-Framework (OQSF).
- 1.1.2 Recommendation of occupational qualifications and part qualifications to the South African Qualifications Authority (SAQA) for registration or deactivation on the National Qualifications Framework.
- 1.1.3 Approval and recording of skills programmes for the Occupational Qualifications Sub-Framework (OQSF).

2. SCOPE AND APPLICATION

2.1 This policy applies to development, review, and approval of occupational qualifications, part qualifications and skills programmes for the occupational qualifications Sub Framework.

3. POLICY CONTEXT

3.1 This policy must be read together with the following policies:

- 3.1.1 Determination of the Sub Frameworks that comprise the National Qualifications Framework, Government Gazette 44031 of 24 December 2020.
- 3.1.2 Revised OQSF Policy as published by the QCTO, Government Gazette? of ? July 2021.
- 3.1.3 SAQA Policy and Criteria for the registration of qualifications and part qualifications on the National Qualifications Framework, (As amended, 2020).
- 3.1.4 SAQA Level Descriptors for the South African Qualifications Framework.
- 3.1.5 SAQA National Policy and Criteria for Implementation of Recognition of Prior Learning.
- 3.1.6 SAQA Policy and Criteria for Credit Accumulation and Transfer within then National Qualifications Framework.
- 3.1.7 Other applicable policies.

4. OCCUPATIONAL QUALIFICATIONS AND OR PART QUALIFICATIONS DESIGN FEATURES

- 4.1 Occupational qualifications and part-qualifications may be designed to consist of two key components, viz. knowledge/theory and application.
- 4.2 For certain categories of occupational qualifications and part-qualifications as specified by industry, the key components may be specified as knowledge/theory, practical and compulsory work experience.
- 4.3 Occupational qualifications must use the nomenclature as provided for in the Ministerial Determination on the sub frameworks that make up the NQF (Government Gazette No. 44031).
- 4.4 The occupational qualifications must meet minimum requirements as stipulated below:

No.	Type	NQF Level	Percentage (%) of credits at the level of a qualification	Minimum credits
A.	General Occupational Certificate	1	60	120
B.	Elementary Occupational Certificate	2	60	120
C.	Intermediate Occupational Certificate	3	60	120
D.	National Occupational Certificate	4	60	120
E.	Higher Occupational Certificate	5	60	120
F.	Advanced Occupational Certificate	6	60	120
G.	Occupational Diploma	6	60	360
H.	Advanced Occupational Diploma	7	60	120
I.	Specialised Occupational Diploma	8	60	120

- 4.5 An occupational qualification must contain between 5% and 10% of soft skills which may include inter alia personal development, self-learning, workplace preparation, personal finance management, basic entrepreneurship or emotional intelligence, etc.
- 4.6 Part qualifications must consist of a minimum of 30 credits and may be registered at any level of the OQSF.

4.7 Part-Qualifications must be less than 120 credits and may be registered at any level of the OQSF.

5. DEVELOPMENT AND REVIEW OF OCCUPATIONAL QUALIFICATIONS AND PART QUALIFICATIONS

5.1 The development or review of an occupational qualification and or part qualification must be preceded by an application in a prescribed format for approval by the QCTO.

5.2 The development or review of occupational qualifications and part qualification must address national skills development needs linked to strategic drivers that support inclusive growth and development for the post school education and training.

5.3 The development and or review of occupational qualifications and or part qualifications must be facilitated by a competent subject matter expert who has undergone necessary training.

5.4 Approved applications for the development and review of occupational qualifications or part qualifications must follow the prescribed qualifications development stages as outlined below:

5.4.1 Scoping

5.4.2 Profiling

5.4.3 Curriculum Specifications development

5.4.4 Qualification Assessment Addendum development

5.4.5 Qualifications document development

5.4.6 Final Verification

5.5 The above mentioned qualifications development stages include prescribed reporting to the QCTO at the end of each stage:

5.5.1 Scoping Report;

5.5.2 Profiling Report;

5.5.3 Curriculum Specification Development Report;

5.5.4 Qualifications Assessment Addendum Development Report;

5.5.5 Qualifications Development Report;

5.5.6 Final Verification Report

5.6 Each occupational qualification and or part qualifications developed or reviewed must contain the following three documents in the QCTO prescribed template:

5.6.1 Qualification document

5.6.2 Curriculum document

5.6.3 Qualification Assessment Addendum document

- 5.7 The Qualification Document contains the following key design features per qualifications or part qualifications as required by the SAQA Policy and Criteria for the registration of qualifications and part qualifications:
- 5.7.1 Sub Framework where the qualification or part qualification will be registered
 - 5.7.2 Organising Field and Sub Field where qualification or part qualification belongs
 - 5.7.3 Qualification Title
 - 5.7.4 Qualifications Type
 - 5.7.5 Qualification Descriptor
 - 5.7.6 NQF Level
 - 5.7.7 Credits
 - 5.7.8 Purpose
 - 5.7.9 Rationale
 - 5.7.10 Entry Requirements
 - 5.7.11 Recognition of Prior Learning (RPL)
 - 5.7.12 Rules of combination
 - 5.7.13 Exit Level Outcomes
 - 5.7.14 Associated Assessment Criteria
 - 5.7.15 Integrated Assessment
 - 5.7.16 International Comparability
 - 5.7.17 Articulation
- 5.8 The Curriculum Document contain the following key design features as required by the QCTO.
- 5.8.1 Section 1 – Curriculum Summary
 - 5.8.2 Section 2 – Occupational Profile
 - 5.8.3 Section 3 - Curriculum Component Specifications (e.g. Knowledge/Theory and Application or Knowledge/Theory; Practical Skills; and Compulsory Work Experience) including Skills Development Accreditation requirements.
 - 5.8.4 Section 4 – Statement of Work Experience (in cases where compulsory work experience is applicable) Including work place approval requirements.
- 5.9 The Qualification Assessment Addenda Document must comply with the following:
- 5.9.1 The QCTO Assessment Unit facilitates the development of the QAS Addenda document with SME experts.
 - 5.9.2 Assessment Instruments are set according to the qualification assessment strategy, and in particular, the Assessment Grid (Blueprint) found in the QAS Addendum
 - 5.9.3 The QAS Addenda must:
 - 5.9.3.1 Ensure that an assessment strategy is outlined for both internal and External assessment for the qualification and or part qualification.
 - 5.9.3.2 Contain an Assessment Grid (Blueprint) which enables the development of assessment instruments according to the qualification assessment strategy.
 - 5.9.3.3 Assurance that all Exit Level Outcomes have been assessed.
 - 5.9.3.4 Use of variety of methodology and cognitive abilities.

- 5.9.3.5 Provide sufficient guidance to examiners/developers of the assessment instruments.
- 5.9.3.6 Enables development of assessment questions/tasks for different types of assessment, based on the qualification level and content.
- 5.9.3.7 Enable moderators to pre-moderate assessment instruments to be used in the EISA
- 5.9.3.8 To outline assessment in an integrated manner.
- 5.9.3.9 To outline assessment of competency in the required occupation or trade tasks.
- 5.9.3.10 To ensure the intended standard of the EISA has been met in the assessment instruments.

6. EVALUATION AND RECOMMENDATION OF QUALIFICATIONS AND OR PART QUALIFICATIONS TO SAQA FOR REGISTRATION

- 6.1 The QCTO will evaluate occupational qualifications and or part qualifications intended to be recommended to SAQA for registration on the NQF in collaboration with Quality Partners.
- 6.2 The QCTO will publish qualifications and part qualifications for public comments for a minimum of 21 days.
- 6.3 Qualifications and or part qualifications that are regarded as classified will not be published for comments.
- 6.4 The QCTO will manage public comments inputs in consultation with relevant Quality Partners.
- 6.5 The QCTO Council will approve qualifications and part qualifications after public and recommend them to SAQA for registration.
- 6.6 The QCTO will recommend qualifications to SAQA for registration on the NQF.
- 6.7 The QCTO will respond to SAQAs feedback to enable the registration of occupational qualifications and or part qualifications.
- 6.8 Qualifications and part qualifications on the OQSF will be recommended for registration for period of 5 years.

7. RE-REGISTRATION AND DE-REGISTRATION OF OCCUPATIONAL QUALIFICATIONS AND PART QUALIFICATIONS ON THE OQSF

- 7.1 SAQA will, in writing, notify the QCTO of qualifications and part qualifications that are about to expire, and advise that the review be done and recommended the qualifications and part qualifications that must be re-registered or deregistered.
- 7.2 The QCTO will consult with Quality Partners to review qualifications and part qualifications that are about to expire.

- 7.3 The QCTO will recommend to SAQA qualifications and part qualifications for re-registration or de-registration on the OQSF.
- 7.4 The conditions to deactivate a registered occupational qualification or part qualifications includes but not limited to the following:
- 7.4.1 If a registered qualification or part qualifications is replaced by a new or revised qualification or part qualification.
 - 7.4.2 If a registered qualification or part qualifications does not comply with the SAQA policy and criteria for registration of qualifications and part qualifications on the NQF.
 - 7.4.3 If a registered qualification or part qualifications does not have accredited skills development providers within the registration period.
 - 7.4.4 If a registered qualification or part qualifications had no learner enrolments within the registration period.

8. SKILLS PROGRAMMES DESIGN FEATURES

- 8.1 Skills Programmes must address national skills development needs that are linked to national strategic initiatives aimed at developing skills to support an inclusive growth and development for the South African economy.
- 8.2 A skills programme may be designed to consists of two key components, viz. knowledge/theory and application.
- 8.3 The minimum duration of a skills programme is two weeks (with a minimum of 8 credits).
- 8.4 The maximum duration of a skills programmes is fifteen weeks (with a maximum of 60 credits).
- 8.5 Skills programmes must form part of a learning pathway towards a registered full qualification or part qualification.
- 8.6 A Skills programme must be pegged at NQF levels 1-8 on the OQSF.
- 8.7 A total of 60% of the credits must be at the exit NQF level outcome of a skills programme.

9. DEVELOPMENT AND REVIEW OF SKILLS PROGRAMMES

- 9.1 The development or review of skills programmes must be done in accordance with QCTO prescribed format.
- 9.2 The development or review of a skills programme must address national skills development needs linked to strategic drivers that support inclusive growth and development for the post school education and training.

9.3 Skills Programmes developed or reviewed must contain the following two documents in the QCTO prescribed template:

9.3.1 Skills Programme document

9.3.2 Skills Programme Curriculum document

9.4 The skills programme document must contain the following key design features as prescribed by the QCTO:

9.4.1 Skills Programme Title

9.4.2 Skills Programme Descriptor

9.4.3 NQF Level

9.4.4 Credits

9.4.5 Purpose

9.4.6 Rationale

9.4.7 Registered qualifications related to the Skills Programme for which CAT will apply

9.4.8 Entry Requirements

9.4.9 Recognition of Prior Learning (RPL)

9.4.10 Rules of combination

9.4.11 Exit Level Outcomes & Associated Assessment Criteria

9.4.12 Assessment

9.4.13 Further Learning opportunities

9.5 The Skills Programme Curriculum document must contain the following key design features as prescribed by the QCTO:

9.5.1 Section 1 – Curriculum Summary

9.5.2 Section 2 – Skills Programme Profile

9.5.3 Section 3 – Skills Programme Curriculum Component Specifications (e.g. Knowledge/Theory and Application) including Skills Development Accreditation requirements.

9.6 The conditions to deactivate a skills programme may include but not limited to the following:

9.6.1 A skills programme is replaced by new or revised skills programme

9.6.2 A skills programme does not have accredited skills development providers to offer it within its approval lifespan period

9.6.3 A skills programme does not have learner enrolments within its approval lifespan period .

10. EVALUATION AND APPROVAL OF SKILLS PROGRAMMES

10.1 The QCTO will evaluate a skills programme for approval if it meets approval requirement.

10.2 Approved skills programme will have a lifespan of 5 years.

11. PUBLICATION OF INFORMATION ON OCCUPATIONAL QUALIFICATIONS PART QUALIFICATIONS AND SKILLS PROGRAMMES

- 11.1 The QCTO will publish information on occupational qualifications and part qualifications and skills programmes on the QQSF.
- 11.2 The QCTO will ensure that information on occupational qualifications and part qualifications is consistent with information on the NQF
- 11.3 Information on qualifications and part qualifications and skills programmes, unless prohibited by law, must be accurate and transparent and be made available to the public.
- 11.4 Occupational qualifications, part qualifications and skills programmes information will be displayed on the QCTO website.
- 11.5 Learnerships may be registered against occupational qualifications registered on the QQSF.

12. LEGAL REQUIREMENTS

- 12.1 Registered occupational qualifications stipulate legal requirements for compliance with legislation relating to specific occupations.

13. NON-COMPLIANCE WITH POLICY

- 13.1 Non-compliance with the provisions of this policy shall be dealt with in accordance with the QCTO's disciplinary process.

14. IMPLEMENTATION AND TRANSITIONAL ARRANGEMENTS

- 14.1 This policy comes into effect from the date when it is approved by Council.
- 14.2 The following transitional arrangements are provided for:
 - 14.2.1 For a period of 6 months from the date of approval by Council the following transitional arrangements will apply:
 - 14.2.2 Qualifications and part qualifications that are at an advanced stage of development or review may be concluded and submitted to the QCTO for evaluation within six (6) months from the date of publication of this policy. Such qualifications will be considered as part of transitional arrangements and will be processed based on the previous requirements.
 - 14.2.3 All qualifications and part qualifications received as part of transitional arrangements will be processed based on the previous requirements.
 - 14.2.4 Occupational qualifications and part qualifications that were registered as occupational certificates will be realigned to the new requirements before their registration end date come to an end.
 - 14.2.5 Occupational qualifications that are at an early stage of development or review are to be realigned to the new requirements. Such qualifications

expected to meet requirements of this policy upon their submission to QCTO for evaluation.

14.2.6 All new qualifications development and review are to be aligned to the new requirements as stipulated in this policy.

15. POLICY REVIEW

15.1 This policy will be reviewed every two years or when necessary.

DRAFT