

# 2024 PREOPENING GUIDANCE

For Charter Schools Opening in Fall 2024

## WHAT IS THE PREOPENING PROCESS?

Preopening is the SUNY Charter School Institute's (the "Institute's") process to ensure new schools are prepared to welcome students and open for instruction in a timely, safe manner in compliance with all regulations and requirements.

The process requires submission of various documents, as well as an onsite visit by a member of the Institute staff, which typically happens a week to ten days before your planned opening date. Upon satisfactory completion of Preopening, the Institute will issue a "Letter to Commence Instruction," granting permission to open your school for instruction.

Note: The Institute collects all required documentation through Epicenter, which is our document and compliance website. Whoever at your charter school is responsible for document submission must have an Epicenter account. To request an Epicenter account, please email charter.epicenter@suny.edu.

## RECOMMENDED RESOURCES TO HELP YOU

Schools with the smoothest and most successful openings are typically those who remain in close contact with the Institute, ask questions, and share concerns promptly and transparently to secure appropriate resources and support. Please reach out with any questions and we can direct you to the appropriate answer or resource. Even if we don't have an answer, we can help find one or point you in the right direction. Email charter.newapp@suny.edu anytime with questions.

The Institute also strongly recommends all founding teams and founding boards review the <u>Planning Year School Board Focus Questions</u> on our website. This resource lists questions and items founders and boards should consider month-by-month during Preopening to prepare for a successful opening.

# TIMELINE AND WHAT TO EXPECT

While each individual new charter school's timeline may vary slightly depending on opening dates, the following chart outlines the general progression and timeline of the Preopening process, which begins January of the planned school opening year.

Timeframe	Action(s)
January	<ul> <li>Initial Preopening overview meeting with Institute staff</li> <li>Institute issues final Preopening guidance documents on Website</li> </ul>
January-April	<ul> <li>Institute and school staff check-in regularly to address questions and learn updates on progress</li> <li>School staff review Preopening Guidance to ensure documentation is ready and understand relevant deadlines</li> </ul>
May-July	<ul> <li>Institute contacts school staff to confirm opening date and schedule Preopening Visit</li> <li>School Staff submit documents and information</li> <li>Institute staff review and communicate any required feedback or amendments to documents provided</li> </ul>
August	<ul> <li>Institute conducts Preopening Visit</li> <li>Upon satisfactory completion of all items, Institute issues Letter to Commence Instruction</li> </ul>
Remainder of School Year	<ul> <li>If Letter to Commence Instruction identifies any outstanding areas, Institute follows up to ensure all items noted are complete within the timelines specified by the Institute</li> <li>After all items are fully complete, Institute issues formal Completion of Preopening letter to school</li> </ul>

## LIST OF SUBMISSION REQUIREMENTS

Please use the following checklists to track documents/deliverables due. A detailed description of each document/deliverable follows below. Note the group of documents in the first table is due May 1st, and an additional group of documents in the second table (next page) is due August 1st.

Item Number	Document/Deliverable	Date Due	Complete?		
1. STAFFING					
1a	School Leader Verification	May 1, 2024			
1b**	Fingerprint Policy	May 1, 2024			
2. GOVERNANC	CE CE				
2a*	Management Contract (if applicable)	May 1, 2024			
2b*	Ratified Bylaws	May 1, 2024			
3. STUDENTS W	VITH DISABILITIES				
3a*	504 Policy	May 1, 2024			
4. SCHOOL OPI	ERATIONS				
4a**	Handbooks & Other Policies	May 1, 2024			
4b**	Transportation	May 1, 2024			
4c**	Food Service	May 1, 2024			
4d.**	Mandated Reporting	May 1, 2024			
5. FINANCE		'			
5a**	Payroll	May 1, 2024			
5b**	Initial Statement Process	May 1, 2024			
6. WRITTEN AS	6. WRITTEN ASSURANCES SIGNATURE FORM				
Submit comple	eted written assurances signature form	May 1, 2024			

<sup>\*</sup>Multi-school education corporations already under SUNY authorization are not required to submit these documents unless the documents have been updated since the education corporation's last Preopening or renewal.

<sup>\*\*</sup> Multi-school education corporations already under SUNY authorization are not required to submit these documents and instead shall provide assurances via the written assurances signature form regarding these requests.

Item Number	Document/Deliverable	Date Due	Complete?
1. STAFFING			
1c	Fingerprint Clearance Records	August 1, 2024	
1d	Teacher Cert. & Experience Roster/ Staff Directory	August 1, 2024	
1e	Teacher Certification Records	August 1, 2024	
3. STUDENTS V			
3b	Serving Students with Disabilities	August 1, 2024	
4. SCHOOL OPE	RATIONS		
4e	Enrollment	August 1, 2024	
4f	School Nurse	August 1, 2024	
4g	SAVE Plan/Safety	August 1, 2024	

## DESCRIPTION AND EXPLANATION OF REQUIRED SUBMISSIONS

Please review the following descriptions. Email charter.newapp@suny.edu if you have any questions.

#### 1. STAFFING

### a. School Leader Verification (due May 1st)

Please add the school leader's name, email address, phone number, and title directly in Epicenter, then complete the assigned verification to confirm this information has been added to Epicenter. This video contains detailed instructions on how to add/update contacts in Epicenter.

#### What to Submit:

Each education corporation is responsible for reviewing and updating its listed contacts directly in Epicenter four times per year. You will receive a task in your Epicenter queue to verify this has been completed. In lieu of a specific submission for this requirement, each school must update their contacts and submit the verification in Epicenter when this is complete.

## b. Fingerprint Policy (due May 1st)

Please submit the school's fingerprint policy. The policy must cover all personnel (including cafeteria, maintenance, office, transportation staff, contracted staff, etc.) regardless of whether they are employed directly by the education corporation or contracted through a provider. The policy should implement a fingerprint/MorphoTrust - IDEMIA identification consistent with New York State Education Department ("NYSED") regulations and the charter agreement. For more information, please see NYSED's Office of Educator Integrity guidance. Please note the charter agreement requires at least two staff members to verify the clearance of each new employee/ contractor hired by the education corporation prior to official start of employment.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these documents and instead shall provide assurances via the written assurances signature form regarding these requests.

## What to Submit:

Submit the policy in Epicenter as a Microsoft Word file or Adobe Acrobat file.

## c. Fingerprint Clearance Records (due August 1st)

All school employees (and in some cases non-employees) including, but not limited to, teachers, administrative staff members, and non-instructional staff members (e.g., custodians, food service workers, security personnel, transportation providers, contracted providers, etc.) must have a criminal history background check conducted by the NYSED Office of School Personnel Review and Accountability ("OSPRA"). The Institute cannot accept third party background checks. Please see NYSED's guidance for more information.

For NYSED to conduct the background check, the school must send employees to a third-party vendor (MorphoTrust/IDEMIA) for fingerprinting with the results sent to NYSED. This requires the school to register with TEACH through OSPRA in advance.

<u>Contact information for OSPRA is available on NYSED's website.</u>. All schools must provide the Institute with scanned copies of the fingerprint-supported background check certificates provided by NYSED for your school or printouts from the TEACH System for each employee or other person listed on the Staff Directory.

In the case of a person who has been hand scanned but is not yet cleared for employment by NYSED, the school must provide the Institute with documentary evidence that the school has followed the statutory procedures for an emergency conditional appointment, which includes <u>all of the following documentation</u>:

- Proof of fingerprinting or prior NYSED or NYCDOE clearance;
- Proof of Emergency Conditional or Conditional Appointment including a signed statement regarding criminal record;
- An approved resolution from the education corporation board of trustees to extend such clearance to the employee(s), and if more than 20 business days have elapsed, an approved extension; AND,
- A supervision policy for such employee(s) approved by the board of trustees.

NOTE: For security purposes, please be sure to redact all parts of employees' social security numbers and dates of birth prior to submission.

## What to Submit:

Please submit a single, merged Microsoft Word\* file or Adobe\* Acrobat file containing all staff fingerprint clearance records named: 1c – Fingerprint Clearance Records.

## d. Teacher Certification & Experience Roster/Staff Directory (due August 1st)

Complete and submit the "Teacher Certification Staff List Template" <u>available under "Pre-</u>Visit Templates" on the Institute's website.

## What to Submit:

Excel<sup>®</sup> file named: 1d – Teacher Certification Roster/Staff Directory

## e. Teacher Certification Records (due August 1st)

Lead teachers must either be New York State certified or meet the requirements outlined in Education Law § 2854(3) (a-1), which stipulates a charter school may employ non-certified teachers up to 30% of the teaching staff <u>or</u> five teachers (whichever is less), **plus** an additional five teachers, **plus** an additional five teachers of math, science, computer science, technology, or career/technical education (up to a maximum total of 15). Non-certified teachers **must** meet at least one of the following criteria:

- Have at least three years of classroom teaching experience at the elementary or secondary level;
- Be a tenured or tenure-track college professor;
- Have two years' satisfactory experience through Teach for America; or,
- Have exceptional business, professional, artistic, athletic, or military experience.

For the Institute to determine teacher qualifications, all schools must provide the following for each lead teacher identified in the teacher roster:

- For certified teachers, scanned copies of TEACH certification records or NYSED teaching certificates; or,
- For non-certified teachers, appropriate proof of compliance with the requirements of the criteria listed above (e.g., a resume showing teaching or TFA experience).

NOTE: For information security purposes, please be sure to redact all parts of teachers' social security numbers and dates of birth prior to submission.

## What to Submit:

Please submit a single, merged Microsoft Word® file or Adobe® Acrobat file named: 1e – Teacher Certification Records containing all teacher certification records.

## 2. GOVERNANCE

#### a. Management Contract (due May 1st)

Provide a copy of the management contract, signed by representatives of the management entity and board of trustees, if applicable.

Note: Multi-school education corporations already under SUNY authorization are not required to submit this document unless the documents have been updated since the education corporation's last Preopening or renewal.

#### What to Submit:

Microsoft Word<sup>®</sup> file or Adobe<sup>®</sup> Acrobat file named: 2a – Management Contract

## b. Ratified Bylaws (due May 1st)

Provide a copy of the ratified by-laws or a board resolution approving the by-laws on file (if the board has not amended the by-laws from the charter application).

Note: Multi-school education corporations already under SUNY authorization are not required to submit this document unless the documents have been updated since the education corporation's last Preopening or renewal.

#### What to Submit:

Microsoft Word file or Adobe Acrobat file named: 2b – By-laws

## 3. STUDENTS WITH DISABILITIES

## a. 504 Policy (due May 1st)

Provide a copy of the 504 Policy includes:

- Identification, evaluation, and reevaluation procedures;
- Placement procedures;
- Formation of a 504 team;
- Designation of a responsible employee to coordinate 504 efforts; and,
- A system of procedural safeguards for parents including notice, records review, hearing, appeal, and prompt and equitable complaint resolution in compliance with federal regulations (34 C.F.R. § 104 et seq.).

Note: Multi-school education corporations already under SUNY authorization are not required to submit this document unless the documents have been updated since the education corporation's last Preopening or renewal.

## What to Submit:

Microsoft Word file or Adobe Acrobat file named: 3a – 504 Policy

#### b. Serving Students with Disabilities (due August 1st)

Provide a summary of admitted students with disabilities who have an individualized education program ("IEP") and description of how the school will serve them in accordance with their IEP including:

- A roster of admitted students with IEPs and any information related to their settings and any known related services; and,
- Written documentation the school has contacted the district CSE seeking records of each incoming student known to have a disability.

## What to Submit:

Microsoft Word<sup>®</sup> file or Adobe<sup>®</sup> Acrobat file named: 3b – Serving Students with Disabilities

## 4. SCHOOL OPERATIONS

## a. Handbooks and Other Policies (due May 1st)

Submit all handbooks or other documents including policies relating to:

- Discipline;
- Complaints;
- The Family Educational Rights and Privacy Act ("FERPA");
- Health Policy;
- NY Freedom of Information Law ("FOIL"); and,
- NY Open Meetings Law.

For the school's health policy, include the procedures for storage and administration of prescription and non-prescription medications to students, and for the provision of required health services. The policy should also address the accessibility, storage, and maintenance of student health records to be maintained separately from the student education record.

Guidance on each topic is available on the Institute's website in the compliance section.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these documents and instead shall provide assurances via the written assurances signature form regarding these requests.

#### What to Submit:

Microsoft Word® file(s) or Adobe® Acrobat file(s) named: 4a – Handbooks & Other Policies

## b. Transportation (due May 1st)

Provide evidence appropriate provisions have been made for student transportation, if any. If applicable, provide a copy of the school's agreement with the provider of supplemental transportation services. Copies of fingerprint/hand scan supported background checks for employees of supplemental transportation services provider should be included with 1e – Fingerprint Clearance Records.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these documents and instead shall provide assurances via the written assurances signature form regarding these requests.

## What to Submit:

Microsoft Word file or Adobe Acrobat file named: 4b – Transportation

## c. Food Service (due May 1st)

Provide evidence appropriate provisions have been made for food service in the form of a copy of the school's agreement with the food service provider, if applicable. Provide copies of fingerprint/scan supported background checks for employees of the food service

provider, if applicable, with 1e – Fingerprint Clearance Records.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these documents and instead shall provide assurances via the written assurances signature form regarding these requests.

#### What to Submit:

Microsoft Word file or Adobe Acrobat file named: 4c – Food Service

## d. Mandated Reporting (due May 1st)

Provide evidence the school has developed required policies related to Mandated Reporter Child Abuse policies. Please see the <u>Guide to Child Abuse Reporting</u> for additional information.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these documents and instead shall provide assurances via the written assurances signature form regarding these requests.

#### What to Submit:

Microsoft Word® file or Adobe® Acrobat file named: 4d- Mandated Reporting

## e. Enrollment (due August 1st)

Provide a current summary of school enrollment statistics per grade including the number of currently enrolled students and number of students on the waiting list.

## What to Submit:

Microsoft Word or Excel file(s) or Adobe Acrobat file(s) named: 4e - Enrollment

## f. School Nurse (due August 1st)

Provide documentation of the school's relationship with a registered nurse ("RN"), a licensed practical nurse ("LPN") supervised by a RN, and/or a physician. This may be documentation from the district or a separate employment agreement.

## What to Submit:

Microsoft Word file or Adobe Acrobat file named: 4f – School Nurse

## g. SAVE Plan/Safety (due August 1st)

Provide evidence written plans are in place for:

- Fire drills;
- Lockdown drills;
- the provision for emergency remote instruction; and,
- Emergency evacuation including safety plans in accordance with Project SAVE including a copy of the school's <u>draft</u> SAVE plan.

For more information regarding the required elements of SAVE plans please visit <u>the SAVE</u> plan page of the NYSED website.

## What to Submit:

Microsoft Word® file(s) or Adobe® Acrobat file(s) named: 4g – Safety

## 5. FINANCE

## a. Payroll (due May 1st)

Provide evidence the school has established a payroll system and, if offered, properly allows employees to consent to a 12-month payroll. Note schools may submit one copy of the contract if it covers all schools. Also, the school may submit one copy of the deduction policy, and if it was covered by the Initial Statement or related assurance, a copy is not required.

Provide a copy of a contract with a payroll company or documentation of employment of or contract with persons to handle payroll.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these materials and can provide written assurance via the Written Assurances Signature Form.

#### What to Submit:

Microsoft Word file or Adobe Acrobat file named: 5a – Payroll

## b. Initial Statement Process (due May 1st)

Provide confirmation the Initial Statement process required in the Charter Agreement is complete including all follow-up steps. If not complete, provide a report by the independent accountant of the status of the process including the status of the independent accountant's report including any required follow-up and the timeframe therefore in accordance with the Charter Agreement.

If the school is an additional school of an education corporation already operating one or more schools, the education corporation's treasurer, or an employee specifically authorized by the board, may certify similar financial controls to the ones in the other schools of the education corporation have been instituted for the school.

Note: Multi-school education corporations already under SUNY authorization are not required to submit these materials and can provide written assurance via the Written Assurances Signature Form.

## What to Submit:

Submit a Microsoft Word file or Adobe Acrobat file named: 5b - Initial Statement Process

## 6. WRITTEN ASSURANCES

Please provide all the following written assurances via the Written Assurances Signature Form. The Written Assurances Signature Form (found on the <u>Institute's Compliance Webpage in the Preopening section</u>) must be signed. The assurances are as follows:

#### Governance

The education corporation provides a media notice regarding each board meeting in accordance with the Open Meetings Law, and the education corporation posts information regarding board meetings on its website in accordance with the Open Meetings Law. More information is available at the Institute's website in the Governance section.

# Serving Students with Disabilities

- The school has hired an appropriately certified students with disabilities coordinator for programs serving students with disabilities in accordance with Exhibit C of the Charter Agreement, Assurances Regarding Students with Disabilities.
- The school is able to serve the students or has/will contact the CSE within 10 days to provide services to students with disabilities.
- Copies of student IEPs will be distributed to classroom teachers and are stored in lockable storage containers or password protected electronic storage systems.

## Operations

- The school will implement a school calendar and class schedules provides a minimum of 180 instructional days and 900 (K-6)/990(7-12) instructional hours, as per NYSED guidance.
- The school has distributed handbooks, policies, calendars, and class schedules to students and families/guardians, or will distribute them within 10 days of the first day of classes.
  - 1. Provide handbooks or other documents to students and families/guardians include policies relating to:
    - Discipline;
    - Complaints;
    - The Family Educational Rights and Privacy Act ("FERPA");
    - Health Policy:
    - NY Freedom of Information Law ("FOIL"); and,
    - NY Open Meetings Law.
- The school has requested or received each student's prior school records.
- Each student has proper immunization and health records on file, and students who have not been immunized or exempted will be barred from school after 14 days. (Note state law no longer permits religious exemptions. More information is available at <a href="NYSED's website">NYSED's website</a>.
- The board has developed and adopted both a comprehensive district-wide school safety plan and a building-level emergency response plan ("SAVE Plans") in accordance with Education Law section 2801-a. With respect to the district-wide school safety plan, the board:
  - o has/will convene make a copy of the draft plan available for public comment at least 30 days prior to adoption by the board;
  - o hold a hearing to meet with required groups (parents and teachers) prior to adoption of the plan;
  - o adopt a final SAVE plan; and,
  - o send the final SAVE plan to NYSED, and revise the plan as directed by NYSED.

- With respect to the building-level emergency response plan, the school has filed it with the appropriate local law enforcement agency and with the N.Y. State Police within 30 days of its adoption by the board.
- The school has adopted policies and procedures for annual school safety training for staff and students including annual staff training on the emergency response plan in accordance with Education Law § 2801(2)(h).
- The school has provided written materials to mandated reporters explaining the requirement and the school has conducted or will conduct annual training.
- The school has made appropriate provisions for student transportation.
- The school has made appropriate provisions for student food service.
- The school has an established fingerprint policy t covers all personnel (including cafeteria, maintenance, office, transportation staff, etc.) regardless of whether they are employed directly by the education corporation.

#### Finance

- An accounting system with internal controls and fiscal policies is in place for the school, and those policies are the same as other schools with the Education Corporation, as applicable.
- The school has established a payroll system and, if offered, properly allows employees to consent to a 12-month payroll.
- The Initial Statement process in the Charter Agreement is complete including all follow-up steps.

#### What to Submit:

Submit an Adobe® Acrobat file named: 6 – Written Assurances Signature Form

# PART II: PREOPENING FACILITY PHYSICAL PLANT CHECKLIST

The Institute checks the completion of the following items during the Preopening Visit, typically conducted within 10 business days of the school's first day of instruction. The Institute also conducts this physical plant check at charter renewal. A full explanation of each item/deliverable is included following the checklist below.

Item	Action	Notes	Complete		
<b>Family Educational Rights</b>	Family Educational Rights and Privacy Act ("FERPA")				
1. Student Files	Ensure the school has a locked or password protected storage unit to store physical or electronic student files. (Note: These files should be stored separately from student health files.)				
2. Student File Access Logs	Ensure the school has a log or record of all individuals or organizations that have requested access to or accessed student files including the reason for such access. (Note: Certain school personnel whose names are kept on a list are exempt from this requirement.)				
FERPA Staff Access     List	Ensure the school has a list of school personnel who have access to student files.				
4. FERPA Record List	Ensure the school has a FERPA list of records typically found in student files.				

5. FERPA Laws Posting	Ensure the FERPA policy notice is posted or easily accessible (e.g., in a handbook) in the school's main office or other clearly accessible public area.	
Freedom of Information L	aw ("FOIL")	
<ol> <li>FOIL Notice Posting</li> <li>List of FOIL Records</li> </ol>	Ensure the FOIL notice is posted at a designated school facility (e.g., in a copy of the handbook in the main office) and on the website. (See the Institute's updated Guide to FOIL on the Institute's website for more information).  Check if the school has a list by subject matter of all the records in its possession (not just those subject to FOIL disclosure). The list must be updated annually, dated, and have a link to the website of the committee on open government.	
Students With Disabilities	("CMDe")	
	Ensure the school has a roster of	
Roster of Students     with IEPs	students with IEPs and where is its kept.	

2. IEP Storage	Check where physical and/or electronic IEPs are kept (whether physical or electronic) and ensure locations are locked and/or password protected.	
3. SWDs Discipline Policy	Ask school leader about the SWDs discipline policy and how staff will be trained on the policy (e.g., how does the school know if a student to be disciplined has a disability?).	
Student Health		
Nurse     Accommodations	Check Nurse's space for the following:  Locked office Locked storage unit(s) for medications Locked refrigerator Locked student health records stored separately from other student records Appropriate disposal for sharps	

2. Defibrillator	Ensure there is a working defibrillator in the school is properly charged and someone at the school is trained to use it.  Ask if the school has sports teams travel by bus, in which case the school should have another defibrillator.	
Facility Fixtures		
1. School Sign	Ensure the school has a clear, visible sign upon entering.	

2. Disability Accessibility	Look for signs (elevator, ramp, etc.) of accommodation for people with disabilities. If the building is not required to be accessible to people with disabilities, ask for the school's procedures for accommodating a student with a physical disability.	
3. Religious Symbols	Ask if the facility has any religious symbols, signs, or representations cannot be reasonably covered or removed.	

Required Postings	Required Postings			
Flu Educational     Posting	Ensure the school has the required flu educational materials posted throughout the school building. (Note: More information is available at the NY DOH website.)			
Child Abuse or     Neglect Reporting     Information	Ensure the school has posted in the main office in English and Spanish the toll-free telephone number (1-800-342-3720) operated by OCFS to receive reports of child abuse or neglect and the following website address to access the OCFS website: ocfs.ny.gov/main/cps/			
3. State and Federal Employment Laws	Ensure the state and federal employment laws are posted in an area staff can readily access/review them.			
4. Complaint Policy	Ensure the school has a complaint policy posted and/or easily accessible (e.g., in a handbook) in the main office.			

Safety and Security		
School Entrance     Security	Ensure school doors lock or there is security personnel/process upon entering the building.	
2. Exits and Stairwells	Ensure there are fire exit signs around the building and fire stairwells are not blocked.	
3. Safe Schools Against Violence in Education ("SAVE") Plan	Ask school leader/operations coordinator where the school's SAVE plans are located (there are two levels of plans: district and building). (Note: co-located schools may not yet have a finalized SAVE plan, but they should have a draft.)  Review the SAVE plan for inclusion of an Emergency Remote Instruction Plan (new requirement for the 2023-24 school year). More information on emergency remote instruction plans may be found on the New York State Education Department website	
4. Fire Extinguishers	Ensure hallways/rooms have extinguishers with inspection tags are not expired.	
5. Custodian Closet	Ensure all custodial closets are locked.	

6. Chemical Storage/Gas	<ul> <li>Ensure science or cleaning chemicals are stored in lockable areas.</li> <li>Chemistry labs using chemicals should have a wash station/shower.</li> <li>Gas lines should have a cut-off valve so tabletop gas cannot be turned on.</li> </ul>	
Safety and Security (cont.)		
7. Kitchen/Cafeteria Safety	If the school will serve food, check the facility has both food/beverage coolers and heaters in the kitchen/cafeteria area and/or the equipment necessary to prepare and serve food.	
8. Breaker/Fuse Boxes	Ensure breaker/fuse boxes are locked or in locked rooms.	
9. Window Guards	If the school will serve students under the age of 6, check to ensure classrooms for these students have operable window stops or gates.	
10. Petty Cash	Ask where the school stores its petty cash and/or credit card used for this purpose. Ask about controls for access to petty cash/credit card. Ensure petty cash/credit card it is in a lockable unit.	



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