

RULES COMMITTEE MINUTES

FISCAL YEAR 2019

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MINUTES OF THE RULES COMMITTEE MEETING HELD BY CONFERENCE CALL ON July 11, 2018

PRESENT Mary Gable Chair and Maryland Commissioner

Kathleen Berg Hawaii Commissioner

Daniel Dunham Virginia Commissioner Designee
Alex Erwin North Carolina Commissioner
Taneka Miller Vice-Chair and District of Columbia

Commissioner

Cherise Imai Executive Director Rick Masters General Counsel

Lindsey Dablow Training and Operations Associate

Richard Pryor Communications Associate

ABSENT Douglas Ragland Alabama Commissioner

Robert Staver Pennsylvania Commissioner Charles Tack for Diane Douglas Arizona Commissioner Designee

ITEM 1 - CALL TO ORDER AND WELCOME

1. Committee Chair and Maryland Commissioner, Mary Gable, called the meeting to order at 2:09 PM EST.

ITEM 2 – AGENDA AND PREVIOUS MINUTES

2. Commissioner Taneka Miller (DC) moved to approve the meeting agenda, seconded by Commissioner Kathleen Berg (HI). Motion carried. Commissioner Berg motioned to approve the April 11, 2018 minutes with revisions, seconded by Commissioner Dan Dunham (VA). Motion carried.

ITEM 3 – OLD BUSINESS

3. Unique Case Submission Form – The United States Department of Defense (DOD) Representative, Kathy Facon, requested a field be added to the Unique Case Submission Form allowing DOD to submit cases to the Commission. A motion to discuss adding DODEA to the submission form was made by Commissioner Dunham, seconded by Commissioner Berg. Commissioner Dunham supported adding DODEA because they would have access to different cases other than those the Commissioners have access to. Commissioner Berg asked if only DODEA should be added or should DOD be included so SLOs could submit cases. Executive Director Imai stated the DOD instruction document specified reference as the "DOD Representative". Originally the thought was to allow Commissioners only to submit cases to ensure they were aware of the cases or issues in their state. Commissioner Berg requested additional clarification between "Commissioner Designee" and designees who may submit cases on behalf of a Commissioner. The members agreed to include "DOD Representative (DODEA)" on the case submission form and requested National Office staff revise the form.

4. **Rules Change Proposal on Dues Increase** – ED Imai informed the committee the public notice would be released soon to make Commissioners aware of the proposed dues increase, which will be a topic at the fall Annual Business Meeting (ABM).

ITEM 4 – NEW BUSINESS

- 5. New Legal Advisories approved by EXCOM General Counsel Rick Masters presented the three advisories highlighting the Charter School Enrollment and Lottery advisory for discussion. The topic of this legal advisory could become the source for establishing a new Compact Rule if the Rules Committee decides charter schools should allow military students the opportunity to participate in lottery-style admissions outside the designated timeframe. Commissioner Berg voiced opposition to interceding into the charter school programs without discussing it with the full commission at ABM. Commissioner Miller also opposed because of the district law in D.C. stating a MIC3 rule that supersedes the district law would be controversial. Counsel Masters concluded the report stating the Compact would be within its purview to create a rule addressing Charter School Enrollment and Lottery processes for military-connected children but agreed it would be controversial. Members agreed to monitor inquiries to the National Office regarding charter schools, but to take no further action at this time.
- Rule Draft was submitted by the Compliance Committee. The proposed rule would require state councils to meet annually and submit meeting dates, agendas and minutes to the National Office for archiving. A motion to discuss the proposed rule was made by Commissioner Berg and seconded by Commissioner Daniel Dunham. Commissioner Miller asked for clarification of the current language. ED Imai stated the model language infers state councils are to meet annually but does not provide a mandate. ED Imai explained some states meet several times during the year, but others do not meet and have stated they do not plan to or feel it is necessary. Commissioner Gable informed the committee that Compliance Chair and Minnesota Commissioner Daron Korte expressed willingness to edit the proposed rule where the submission of minutes is concerned but the Compliance Committee thought requiring at least an annual meeting was in line with the Compact's language.

Commissioner Miller asked if the intent of the proposed rule was to verify that state councils and commissioners are working to help military families and address their issues. Commissioner Berg expressed concern with dictating how Commissioners and state councils conduct business within their states. ED Imai explained the Compliance Committee respected the autonomy of the states but felt it was not unreasonable to ask the states to organize one meeting a year to demonstrate they are coordinating with the military reps and there is an avenue to address concerns. Commissioner Miller interjected the important issue is the state addressing the needs of the military families and holding a meeting is not indicative of that. Commissioner Dunham supported Commissioner Miller's statement and concluded the lack of support for military-connected children would be reported to the National Office and addressed as a compliance issue. Chair Gable asked of the committee would like to discuss this issue at the ABM because the member's questions were valid. A motion was made by Commissioner Berg to table the proposed rule change indefinitely and was seconded by Commissioner Miller.

7. **Promulgation of Rules and Rules Guide** – ED Imai stated the Promulgation of Rules and Rules Guide draft would be emailed to the committee members to obtain their feedback. The proposed process is meant to clarify how rules are submitted to the committee and the timeline for submitting rules proposals. This document will be discussed at the August Rules Committee meeting. [OPEN]



ITEM 5 – ADJOURNMENT

With no further business to discuss, Chair Gable adjourned the meeting at 3:05 PM EST.

Respectfully submitted by:

Lindsey Dablow Training and Operations Associate

Next Meeting - Wednesday, August 15, 2018 at 2:00 PM EST.

RULES COMMITTEE MINUTES

August 8. 2018

PRESENT Mary Gable Maryland Commissioner Chair

Kathleen Berg Hawaii Commissioner
Daniel Dunham Virginia Commissioner

Alex Erwin North Carolina Commissioner

Douglas Ragland Alabama Commissioner

Cherise Imai MIC3 Executive Director

Rick Masters General Counsel

Lindsey Dablow Training and Operations Associate Secretary

Richard Pryor Communications Associate

EXCUSED Taneka Miller District of Columbia Commissioner Vice Chair

ABSENT Robert Staver Pennsylvania Commissioner

Charles Tack Arizona Commissioner Designee

GUEST Daron Korte Minnesota Commissioner & Compliance

Committee Chair

ITEM 1 - CALL TO ORDER AND WELCOME

1. Committee Chair and Maryland Commissioner, Mary Gable, called the meeting to order at 2:04 PM EST.

ITEM 2 – AGENDA AND PREVIOUS MINUTES

2. Commissioner Kathleen Berg (HI) motioned to approve the agenda as amended, seconded by Commissioner Daniel Dunham (VA). Motion carried. Commissioner Dunham motioned to approve the July 11, 2018 minutes as submitted, seconded by Commissioner Berg. Motion carried.

ITEM 3 - OLD BUSINESS

3. **Rules Change Proposal on State Council Annual Meetings** – Chair Gable introduced invited guest Compliance Committee Chair Commissioner Daron Korte (MN) and asked him to provide the Rules Committee with background information and insight into the intent of the proposed Rules change.

Commissioner Berg made a motion to untable the proposed rules change regarding State Council Annual Meetings, seconded by Commissioner Dunham. Commissioner Korte explained the previous Compliance Chair Commissioner Pete LuPiba (OH) and Vice Chair Commissioner Laura Anastasio (CT) along with the full Compliance Committee explored the purpose and intent of Article VIII "State Coordination" within the Model Compact Language (MCL). This led to the development of the State Coordination Policy. The policy's purpose was

to ensure the work Article VIII requires, council meetings, membership, and administration and management of the state's participation in the compact, was occurring.

After the State Coordination Policy took effect, discussion focused on the effectiveness of the State Councils in carrying out the requirements of Article VIII. Commissioner Korte confirmed the State Council language within the MCL is vague.

Each member state shall, through the creation of a State Council or use of an existing body or board, provide for the coordination among its agencies of government, local education agencies and military installations concerning the state's participation in, and compliance with, this compact and Interstate Commission activities. (Article VIII, para.1)

The Compliance Committee, aligned with MIC3's Strategic Plan, began gathering information concerning the frequency of State Council meetings and membership. A majority of member states were holding and reporting State Council meetings, but there were seven states that had not reported a meeting of their Councils for the previous two fiscal years. At least one state reported it had not met, nor did it intend to. The Compliance Committee was concerned if the purpose of the State Council is to provide coordination among different agencies of government, local education agencies, and military installations regarding the Compact it seems it would be difficult to do that without having the council meet at least once per year. Commissioner Korte insisted the Compliance Committee does not wish to dictate how councils meet, whether in person or virtually, but felt it was important for the coordination of activities for the council to meet on an annual basis. No authority is provided within the current Rules to enforce or move forward requiring an annual meeting to perform those duties entailed under the Compact for state coordination.

The Compliance Committee purposed the attached Rules change which requires adding the definition of a "State Council". The proposed Rules change would require State Councils to meet once per year and the meeting dates, agenda, and minutes be provided to the National Office (NO).

Section "b" was developed because at least one state council delegates its duties to the State Education Agency. This section asks those states to provide information on how they are fulfilling the coordination requirement existing in Article VIII of the Compact.

Commissioner Korte stressed the State Council Annual Meeting Rule Draft is a draft and open to editing and change depending on the thoughts and feedback of the full Commission, but the Compliance Committee wanted to propose the Rules change so the discussion could take place.

Commissioner Berg asked if the MCL places a definite duty on the NO to monitor and be responsible for states executing the Rules outlined in the Compact. Is there another driver in the Compact Language that would support the NO collecting and retaining data on each state to insure they are performing their duty? General Counsel Rick Masters responded the statute vests the oversight authority to the Executive Committee (EXCOM). He clarified the duty is placed on the EXCOM and they delegate it to the NO to monitor and report back. Commissioner Berg explained the state legislature and departments of education are a Commissioner's constituency, and at the last meeting the Rules committee was hesitant to dictate a rule of this nature, unless there are issues being brought to the attention of the NO.

Commissioner Berg recommended providing a legal rationale that includes text from the MCL to validate the proposed Rules change.

Commissioner Korte confirmed the MCL outlines the Interstate Commission's authority to collect data:

The Interstate Commission shall collect standardized data concerning the educational transition of the children of military families under this compact as directed through its rules which shall specify the data to be collected, the means of collection and data exchange and reporting requirements. Such methods of data collection, exchange and reporting shall, in so far as is reasonably possible, conform to current technology and coordinate its information functions with the appropriate custodian of records as identified in the bylaws and rules. (Article IX, Section I)

The language requires the Commission to collect standardize data concerning the educational transition of military families under the Compact through the Rules which will determine the data to be collected. The intent of the proposed Rule was not to dictate but to determine if coordination is taking place in those states that are not meeting and if not what could be done to assist them. This could be part of the conversation at the Annual Business Meeting.

Commissioner Korte discussed feedback the NO has received from individuals and organizations within the states that are not holding State Council meetings detailing the lack of support and effectiveness of the Compact. Executive Director Cherise Imai gave an overview of the amount and type of complaints the NO has received related to this topic. Commissioner Douglas Ragland (AL) voiced his support of the rule based on the issues he encountered when he was appointed.

Chair Gable stated requiring the date and agenda of the council meeting to demonstrate compliance was one thing but cautioned against requiring the Councils to provide minutes because they may not require minutes be taken. The Chair stated this was an area the proposed Rules language could be softened if the Rules Committee so desired.

The Chair reminded the Committee Members several years ago the Commission had the discussion about data collection and at the time the Commission did not feel it had the ability to collect data. Chair Gable asked if in the absence of data is holding a State Council meeting a demonstration of what is outlined in Article IX, Section I of the Model Language? Commissioner Berg responded Article IX would not work to support the proposal because the Commission in 2010 voted against compelling the states to collect data on the application of the IC. Commissioner Berg supported developing a legal rationale outlining the duty of the EXCOM and their role related to recording the compliance of member states in applying the Compact.

Commissioner Korte offered, in collaboration with Counsel Masters, to develop and distribute a rationale based on the MCL for the proposed rule change requiring annual state council meetings. Rules Committee members supported the development of the rationale for the proposed rule and discussed the role of their own state council.

The motion to approve the Rules Change Proposal on State Council Annual Meetings was unanimously approved. Motion carried. Chair Gable asked Commissioner Korte and Counsel Masters to share the rationale with the Rules Committee once it is completed. [OPEN]

4. **FY2018 National Office Case/Inquiry Report** – ED Imai presented the Case/Inquiry Report for FY18, which reflects only those cases received at the NO. The NO received a total of 31 cases, mainly from Compact Commissioners, School Liaison Officers, or from the state. More than half the cases referred were not Compact related but Commissioners did assist to resolve them. The majority of cases deals with Course Placement which mirrored FY17.

For training purposes the NO looks at "not applicable" case topics to determine trends for future training. The MIC3 Case and Inquiry Report is scrubbed for identifiers and is available in the Commissioner Only portion of MIC3's website. All cases are tracked until they are resolved.

ITEM 4 – NEW BUSINESS

5. **Promulgation of Rules and Rules Guide** – ED Imai explained the Compact does not currently have a formal process for proposing a new rule or rule change. The draft document provided to the Members has been adapted from the Interstate Compact for Juveniles (ICJ) and is a starting point for the Committee's discussion. The document contains a draft Rule Proposal Template to assist individuals who are developing rule language so it will accurately communicate the intent of the proposal.

Some language was heldover from the ICJ form and Members suggested editing the document to reflect MIC3's Mission. Commissioner Berg suggested some changes in the wording under "Justification" to reflect the role of rules in the compact. Chair Gable asked if the reference throughout the document to "regional group of states" was from the original ICJ document, and ED Imai clarified that terminology was taken from the Compact Rules, Sec. 2.101, subsection (b) (3). The Chair asked for additional comments from the Committee Members, and there being none, the Chair expressed an interest in additional discussion at the September Rules Committee meeting. The Rules Committee agreed to continue discussion at its next meeting to allow NO staff time to edit and compile additional documents related to the topic and to allow additional time for Rules Committee members to review. [OPEN]

ITEM 5 – ADJOURNMENT

With no further business to discuss, Chair Gable adjourned the meeting at 3:03 PM EDT.

Respectfully submitted by:

Lindsey Dablow Training and Operations Associate, Secretary

Next Meeting - Wednesday, September 5, 2018 at 2:00 PM EST.

RULES COMMITTEE MINUTES

September 5. 2018

PRESENT Mary Gable Maryland Commissioner Chair

Taneka Miller District of Columbia Commissioner Vice Chair

Taneka Miller District of Columbia Commissioner Kathleen Berg Hawaii Commissioner

Daniel Dunham Virginia Commissioner Designee

Douglas Ragland Alabama Commissioner

Cherise Imai MIC3 Executive Director

Lindsey Dablow Training and Operations Associate Secretary

Richard Pryor Communications Associate

EXCUSED Alex Erwin North Carolina Commissioner

ABSENT Robert Staver Pennsylvania Commissioner

Charles Tack Arizona Commissioner Designee

Rick Masters General Counsel

ITEM 1 - CALL TO ORDER AND WELCOME

1. Committee Chair and Maryland Commissioner, Mary Gable, called the meeting to order at 2:02 PM EST.

ITEM 2 - AGENDA AND MINUTES

2. Commissioner Taneka Miller (DC) motioned to approve the agenda as amended, seconded by Commissioner Designee Daniel Dunham (VA). Motion carried. Commissioner Kathleen Berg (HI) motioned to approve the August 8, 2018 minutes as submitted, seconded by Commissioner Miller. Motion carried.

ITEM 3 - OLD BUSINESS

3. **FY2018 National Office Case/Inquiry Report** – Executive Director Cherise Imai presented the National Office Case/Inquiry Report. This document will be reviewed during Rules Committee meetings as new cases are submitted. The document is housed on MIC3's website. Within the past two months roughly 18 cases were submitted which was the total number of case submitted in FY17. Chair Gable suggested adding "FY2019" to the header of the document. Commissioner Berg stated the increase in cases could be attributed to the National Office and the Commission's outreach efforts. [OPEN]

ITEM 4 - NEW BUSINESS

4. **Promulgation of Rules and Rules Guide** – Chair Gable directed Members to review the edited MIC3 Promulgation of Rules document and opened the floor for discussion. Commissioner Berg expressed her gratitude for the inclusion of the Rules language and asked for clarification on Section 2.102 *Adoption of rules*, subsubsection 3 use of the term "regional group of states." Originally the Compact language was modeled after the Council of State

Government which refers to regional grouping of states, but for some time now MIC3 has placed states into Tier Groups based on the number of active duty military residing in a state.

Commissioner Berg questioned the two-year timeline for adopting Rules proposed in the document and found in Section 2.102, subsection (b) of the Rules language that states "The Rules Committee shall prepare a final draft of the proposed rule(s) or amendments for consideration by the Commission no later than the next annual meeting falling in an odd-numbered year." Chair Gable questioned if the Committee should clarify subsection (b) to reflect when a rule can be brought before the full commission for a vote. ED Imai informed Members that General Counsel has spoken to this. The change can be made to the Rules language through a proposed Rule Change. The "regional group of states" is taken directly from our language so General Counsel advised a notation be made reflecting the use of Tier Groups but did not advise deleting the phrase in favor of Tier Groups. General Counsel also stated a Rules Change could be voted on before the full Compact in any year not just odd-numbered years.

Chair Gable asked ED Imai to clarify if the language in the Rules could be edited without a proposed Rule Change being drafted. ED Imai responded General Counsel Masters said a Rule Change should be made if the Rule language is being quoted directly. The Rules Committee through discussion expressed support for editing and cleaning the language present in the current Rules after the Annual Business Meeting (ABM).

Commissioner Miller interjected the fact that each Committee Member has interpreted the Rules language differently indicates a need for clarification. Commissioner Douglas Ragland (AL) provided his understanding of the Rules language and asked the other Members if the odd-numbered year was when it is voted on or if that is when it is enacted. Chair Gable asked ED Imai to discuss the concerns and questions raised by the Rules Committee with General Counsel Rick Masters and provide his feedback to the Committee before further development of the MIC3 Promulgation of Rules process.

Commissioner Miller closed the discussion stating the subsection of the Rules language was meant to allow notice so a robust discussion involving the full commission could take place and proposed changes to the Rules, especially controversial proposals, warrant notice and a full discussion. Commissioner Miller suggested as the committee moves forward and considers changes to the current language the Committee keep something in place that allows time for the full Commission to participate in the discussion. [OPEN]

5. **Rules Change Proposal on State Council Annual Meetings** – The legal rationale prepared by General Counsel Rick Masters and Compliance Chair Daron Korte (MN) was emailed during the meeting due to when it was received by the National Office.

Several Members raised questions about the language contained in the final paragraph of the legal rationale. ED Imai confirmed Rules Committee Members would be allowed to offer input that would be provided to General Counsel Rick Masters for approval.

The Chair closed the discussion asking the Members to review the legal rationale and provide feedback or proposed language changes to the Committee Secretary for General

September 5, 2018

Counsel Masters to review. ED Imai reminded Members the public notice for the Proposed Rules Change along with the legal rationale would need to be posted by September 17, 2018 to meet the 30-day notice requirements outlined in the Compact's bylaws. Commissioner Miller asked if there would be an opportunity to provide feedback or suggested changes to the proposed Rule at ABM and ED Imai responded in the affirmative. Once the public notice is posted any feedback received prior to the ABM will be provided to the full Commission at the meeting.

ITEM 4 - NEW BUSINESS

6. **MIC3 – Unique Case Submission-** Chair Gable reminded Members the Committee decided two meetings ago to allow DOD Representatives to submit cases. ED Imai asked the Rules Committee to review the submittals and determine next steps regarding how the cases would be used in the future. The original intent was to use the cases for training.

The National Office is aware of two other Compacts that publish the cases or spotlight a case on a monthly basis. Should MIC3 choose to do something similar Rules will need to review the cases and scrub them for identifying information. Commissioner Berg voiced support for using cases as a learning tool featuring them in the newsletters and asked where the cases are published and who has access to them? ED Imai explained the Rules Committee was the only group to preview the cases and until they were cleaned up and next steps decided it should only live in the Commissioner Portal.

ED Imai asked the Members to read through the cases for clarity and comprehension. Commissioner Miller and Chair Gable volunteered to proof the cases and provide editing marks for the National Office to scrub the case files. The Rules Committee decided to review and edit the cases. The scrubbed cases will be added to the agenda for the next meeting on October 3, 2018. [OPEN]

ITEM 5 – ADJOURNMENT

With no further business to discuss, Chair Gable adjourned the meeting at 3:09 PM EDT.

Respectfully submitted by:

Lindsey Dablow Training and Operations Associate, Secretary

Next Meeting - Wednesday, October 3, 2018 at 2:00 PM EST.

Chair

RULES COMMITTEE MINUTES

May 14, 2019

PRESENT Mary Gable Maryland Commissioner

Kathleen Berg Hawaii Commissioner

Daniel Dunham Virginia Commissioner Designee

Deanna McLaughlin Tennessee Commissioner

Taneka Miller District of Columbia Commissioner

Douglas Ragland Alabama Commissioner

Cherise Imai MIC3 Executive Director

Lindsey Dablow Training and Operations Associate Secretary

EXCUSED Alex Erwin North Carolina Commissioner

ITEM 1 - CALL TO ORDER AND WELCOME

1. Committee Chair and Maryland Commissioner, Mary Gable, called the meeting to order at 2:02 PM EDT.

ITEM 2 - AGENDA AND MINUTES

2. Commissioner Deanna McLaughlin (TN) motioned to approve the agenda, seconded by Commissioner Kathy Berg (HI). Motion carried. Commissioner Kathleen Berg (HI) motioned to approve the September 5, 2018 minutes as amended, seconded by Commissioner Douglas Ragland (AL). Motion carried.

Meeting notes from the Rules Committee meeting on February 19, 2019 were included for the Members awareness. A majority of the Rules Committee Members were unable to attend the February meeting, notes were based on the discussion of those Members present.

ITEM 3 - REPORTS

3. **Executive Committee** – In April the Executive Committee (EXCOM) met in Lexington, Kentucky to work with consultant Brian Riggs to develop the Commission's FY20-FY22 Strategic Plan. More information pertaining to the Strategic Plan will be released after the EXCOM's May meeting.

Commissioner Berg asked how many times the EXCOM meets in-person and what effect, if any, that had on the Commission's budget. Executive Director Cherise Imai stated that the past few years the EXCOM has held two in-person retreats, not including the Annual Business Meeting (ABM) in October. The April Retreat has been held annually for years but the November Retreat that was held in 2018 to onboard new Standing Committee Chairs was a recent development. The November Retreat is subject to the Commission's annual elections and call of the Chair but will be included in future budget planning.

ITEM 4 - OLD BUSINESS

4. **FY18 National Office Case/Inquiry Report** – MIC3 Training and Operations Associate Lindsey Dablow updated the Members on cases received at the National Office. A total of 31 cases were received in FY18. As of this meeting the National Office has received a total of 72 cases. Ms. Dablow emphasized questions regarding Compact related cases typically deal with Applicability, Graduation, and Course Placement.

Commissioner Berg stated the increase in cases might reflect a growing knowledge of the Compact's existence among military-connected families. She requested the brief during ABM include a comparison between FY18 and FY19. [OPEN]

- 5. **Unique Case Submissions** Chair Gable updated Members on the status of the unique case submissions. Currently four cases are featured on the Commissioner Only Portal under Cases. For submissions requiring clarification the National Office has requested additional information from the submitter. As that information is received the National Office will edit the cases and load those meeting the Committee's criteria onto the Portal. [OPEN]
- 6. **Promulgation of Rules and Rules Guide** Chair Gable thanked Commissioner Berg for her work editing the document. The EXCOM reviewed the document at their April meeting and made a few revisions. The Rules Committee Members re-inserted #3 on Page 2 of the document.
 - "3. Any regional group of States as may be subsequently recognized by the Commission may propose rules or rules amendments by a majority vote of members of that region."

The Committee also requested language from the Compact Rules Chapter 200, Section 2.102 (b) be included "to ensure that proposed Rules are acted upon within two years of its submission." Those two changes will be made, and a final document will be sent to the Members for their review and electronic approval. [OPEN]

ITEM 4 - OTHER BUSINESS AND ANNOUNCEMENTS

6. **Items for the Executive Committee –** There being no comments from the Committee Members for the Executive Committee Chair Gable thanked everyone for their diligence to the tasks at hand.

ITEM 5 – ADJOURNMENT

Chair Gable adjourned the meeting at 3:07 PM EDT.

Respectfully submitted by:

Lindsey Dablow Training and Operations Associate, Secretary

Next Meeting - Tuesday, July 16, 2019 at 2:00 PM ET.