

# **Choice and Affordability Fund**

### Association of Independent Schools of Western Australia (Inc.) - Work Plan 2020-2021

#### **Summary**

During 2020 and 2021 AISWA will address the four priorities of Choice and Affordability, Transition Assistance, Strengthening outcomes for schools and educationally disadvantaged schools and students and Student well being and support. In addition, AISWA will create a reserve to respond to any applications for Special Circumstances funding that may come in and will respond to any other priorities identified by the Minister.

In the independent sector we cannot direct schools to access services and support but will provide access to all non-Government schools in the sector to the projects and services provided through the Choice and Affordability Fund. Some of the priorities, such as Transition Assistance, will be available only to those schools that are negatively impacted by the shift to the Direct Measure of Income (DMI) funding arrangements (e.g. the identified regional schools and those that would have had support through the former National Adjustment Assistance Fund) and others such as student wellbeing and support will be available to all schools.

The Choice and Affordability priority will be offered to all schools to support the choice and diversity of schools in the independent sector. Schools will be supported to review what they offer families as part of their school community and why their school should be selected for their children. Part of this will be a review of the school's business model to identify efficiencies and savings so the school is an affordable option for families.

Work on the Transition Assistance priority in 2020 and 2021 will be preparation for when the DMI Capacity to Contribute (CTC) score is used for all schools in calculating per capita payments in 2022. This is when, on current modelling, 53 schools will see their CTC score go up and thus compared to the current model will be relatively worse off. Of these 35 have an increase of 3 or more SES points. These schools will be offered support to do a forensic analysis of their finances and budget and to develop a transition plan which includes a submission for direct grant funding. The direct grant would commence in 2022 the first year of the Direct Measure of Income funding arrangements implementation for all schools.

The priority, Strengthening outcomes for schools and educationally disadvantaged schools and students, will provide groups of schools new initiatives to improve engagement of students in their learning and to support teachers in delivering strong literacy and numeracy programs to students. Initially AISWA will work with the Aboriginal Community Schools and offer support to work in partnership with their communities to strengthen their students' attendance and outcomes. In addition, a project will be offered to the Special Assistance Schools (Curriculum and Re-Engagement, CARE, schools) to enhance the engagement of students, many of whom have had quite disrupted educational journeys. AISWA will also provide schools that, from NAPLAN and other assessment results appear to be underperforming, the opportunity to join a project that analyses assessment data and uses this to inform teaching.

The priority Student wellbeing and support will initially be met by enhancing AISWA's capacity to support schools create safe and supportive environments. Through securing the services of an expert in child protection and child safety, schools will have access to enhanced support and training in this essential area.

# **Summary of budget**

Priority	Activities/Initiatives	Expenditure type	Choice and Affordability funding	
			2020	2021
	Schools are invited to join a project that	Centralised	\$20,000	\$50,000
	looks at what 'choice' in the independent	Distributed	\$0	\$0
	sector represents and how to enhance what			
	they offer in attracting families. This would			
نځ چ	include reflecting upon their business			
Choice and Affordability	model to identify the 'value for money'			
rd rd	parents get and identify ways to become			
hoi ffo	more affordable while maintaining their			
0 4	point of difference.			
	Schools undertake a forensic analysis of	Centralised	\$155,000	\$325,000
_ 0	their business model and financial data to	Distributed	\$0	\$0
Transition Assistance	identify potential savings and develop a		Of the \$155,000	Of the \$325,000
ısit sta	transition plan that reflects the reduced		\$125,000 would be	\$270,000 would be
rar	grants through the DMI SES and to ensure		to work with	to work with
- 4	financial sustainability		regional schools	regional schools
	Work with the Aboriginal Independent	Centralised	\$45,000	\$85,000
	Community Schools to engage community	Distributed	\$0	\$0
_	in the school to support improved			
<u> </u>	educational outcomes for students			
Strengthening outcomes for schools at an educational disadvantage	Work with the Curriculum and Re-	Centralised	\$25,000	\$60,000
atic	Engagement Schools to improve attendance	Distributed	\$0	\$0
duc du	and engagement of secondary disengaged			
) gc ) e (	students to improve educational outcomes	0 . 1. 1	450.000	4400 000
Strengthening schools at an disadvantage	Using analysis of NAPLAN data and WA's	Centralised	\$50,000	\$100,000
the Is a	OLNA (Online Literacy and Numeracy test	Distributed	\$0	\$0
eng lool adv	for secondary students) data identify			
Stro sch dis	underperforming schools for intensive			
	intervention to improve student outcomes  Develop robust policies and procedures for	Centralised	\$45,000	\$150,000
-	schools to use to ensure young people are		\$45,000	\$130,000
anc	provided a safe and supported learning	Distributed	\$U	ŞU
t r ng	environment including enhancing the			
dent Ilbein port	the mental health Of the young people in			
Student wellbeing and support	their care			
<u> </u>	Development of an application and review	Centralised	\$20,000	\$10,000 if needed
es	process to use upon request from schools	30	7 - 20,000	+ 10,000 ii iicaaca
jug jug	for special circumstances funding			
Special Circumstances Funding	This will be provided upon a successful	Distributed	\$200,000 will be set	\$100,000 will be
l m	submission of an application from a school		aside and not	set aside and not
Çi Çi	and while it may be from a regional a school		included in total	included in total
Special C Funding	it will not be sourced from the regional		below as the	below as the
nud in d	allocation		demand for this is	demand for this is
R J			unknown	unknown
Administrative	e costs	•	\$8,200	\$17,430
TOTAL			\$368,200	\$797,430

# Original Allocations adjusted to show the 2020 and 2021 fund deferrals of regional and the balance of CAF

-	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	2029
Regional Transition Assistance	918,575	949,806	982,100	1,015,492	1,050,018	1,085,718	1,122,634	1,160,802	1,200,270	1,241,078
Balance	3,403,801	3,519,530	3,639,194	3,762,928	3,890,866	4,023,156	4,159,944	4,301,382	4,447,628	4,598,848
NGRB's estimated funding allocation as advised by the department	4,322,376	4,469,336	4,621,294	4,778,420	4,940,884	5,108,874	5,282,578	5,462,184	5,647,898	5,839,926
Deferred Regional Expenditure	793,575	679,806								
Deferred remaining expenditure profile	3,160,601	2,992,100								
Regional Expenditure accounting for deferral	125,000	270,000	1,166,273	1,199,665	1,234,191	1,269,891	1,306,807	1,344,975	1,384,443	1,425,248
Estimated Expenditure of balance after deferral	243,200	527,430	4,408,282	4,532,016	4,659,954	4,792,244	4,929,032	5,070,470	5,216,716	5,367,933
Total estimated expenditure profile	368,200	797,430	5,574,555	5,731,681	5,894,145	6,062,135	6,235,839	6,415,445	6,601,159	6,793,181

The deferred expenditure will be equally distributed across the years 2022 to 2029 while maintaining separation of Regional funds

# The Association of Independent Schools of Western Australia – Work plan 2020-2021

#### Initiative/activity: Choice and Affordability

Schools are invited to join a project that looks at what 'choice' in the independent sector represents and how to enhance what they offer in attracting families. This would include reflecting upon their business model to identify the 'value for money' parents get and identify ways to become more affordable while maintaining their point of difference.

Initially this project would be open to all schools, other than the zero Capacity to Contribute schools. The funding would be used centrally to provide specialised services to participating schools that would support schools unpacking what their mission really means and what they offer families through this mission. This would be done using the services of the Innovation Unit as they would workshop what a school 'is' and how they can forefront why they should be the school of choice. In some cases, this may result in a new Mission statement and possibly a new Strategic Plan and an update of how they present themselves to prospective parents by making their point of difference very clear.

As well as being clear about why parents choose this school, the school will also be supported to analyse their business model. Schools have various business models in how they cost their services from 'all inclusive' fees through a range of models to a base fee and then additional charges for co-curricular offerings, camps, excursions etc.

As part of this project schools would survey parents to identify what services are really valued. As a result of COVID 19, a number of schools have reviewed fee structures with the view of maintaining their enrolments and are aware that many families could be finding paying fees increasingly difficult.

Schools are keen to remain affordable to families but must also not change their 'brand' significantly or they risk losing enrolments, so very important to be clear about what families value and why they chose that particular school. A close review of their business model, and this would include staffing and student teacher ratios, is hoped to produce some savings which can be passed onto families.

# Relevant national/local priority:

The national priority is the Choice and Affordability of Independent schools and support for the very diverse schools in the Independent sector that provide families that choice. From a local perspective State Governments have always supported Independent Schools and have always appreciated the range of schools in the sector that meet the needs of many different groups in society and the desire by many any families to have a faith based education. In addition to faith based schools it is the Independent sector that provides schools with different educational philosophies such as Steiner and Montessori.

Indicative budget	Expected outcomes	Indicators of success
Choice and Affordability Funding: 2020: \$20,000 2021: \$50,000	<ul> <li>Participating Schools have a clear statement and presentation of what their school offers and their point of difference</li> <li>Participating Schools have a business model that suits their operations and is accepted and valued by their clientele</li> <li>Potential Independent school families have a process to use in selecting a school</li> </ul>	<ul> <li>During 2020 and 2021 at least 10 schools participate in this project and of those at least 3 from regional areas</li> <li>All participating schools have a clear statement of what they represent and provide to families in terms of choice</li> <li>All participating schools have reviewed their business model and modified it as appropriate to ensure they continue to be affordable while maintaining their point of difference</li> </ul>

# Initiative/Activity: Transition Assistance

Schools undertake a forensic analysis of their business model and financial data to identify potential savings and develop a transition plan that reflects the reduced grants through the DMI SES and to ensure financial sustainability.

The initial target group will be regional and metropolitan schools that have a Direct Measure of Income CTC that is at least 3 points higher than their 2011 or 2016 SES and have a growth rate of less than 2% during the period 2020 through 2029. All 10 schools identified as having been eligible for National Adjustment Assistance Fund (NAAF) fall within this group, however not all may need assistance and that need would be assessed on a case by case basis. None of the NAAF schools are identified for funding assistance until at least 2022. It also includes the nine regional schools identified as meeting the regional assistance criteria. These schools were identified as having

- an ARIA greater than zero,
- a Direct Measure of Income CTC change of 3 or more points from either the 2011 or 2016 SES CTC score,
- receive less funding in any year from 2020 to 2029 under the DMI arrangements than under 2019 indexed Schooling Resource Standard
- have an average fee level of less than \$20,000.

The work with schools will commence with the forensic financial analysis and the development of a transition plan to ensure financial sustainability. The transition plan will include an application for direct grant assistance. The criteria that will be used to assess these applications and the size of the grant will include:

- the size of the school
- the financial need of the school based on the quantum of the increase in their Direct Measure of Income CTC over the 2011 or 2016 CTC, expected annual growth (whether small positive or negative indexation), debt per student, and other relevant financial ratios.
- the school community and the capacity of that community to contribute additional fees
- the transition plan developed and the 'reasonableness' of that plan

The work in 2020 and 2021 will be done centrally by financial specialists assisting business managers with a forensic analysis of the school's finances and the current financial modelling used by the school. Key to this analysis is identifying potential cost savings and efficiencies so that the school can continue to be financially sustainable where the growth in Commonwealth grants is very low, and in a number of cases, negative.

The work in 2020 and 2021 will see schools having at least two scenarios to evaluate and then the development of a transition plan to ensure the school continues to operate within a reduced funding regime. Part of that plan will be a submission to access funds through CAF to enable a gentler transition to the lower funding model. The funds in CAF are very low compared to the current estimated loss in the WA Independent sector due to the move to Direct Measure of Income funding arrangements, so grants will be a relatively a small contribution to the easing of the transition, so it is essential the school identify savings. Where some schools see a loss of about \$3,000 per student during this period that amount cannot be made up in fees particularly as some of the schools are low fee schools.

Once the analysis and planning are completed a submission for funding can be developed based on a formula which looks at amount of loss compared to current funding levels, size of schools and the Capacity of the school to source funding from other sources.

# Relevant national/local priority:

The Choice and Affordability Fund was established to ensure all schools impacted negatively by the move to the Direct Method of Income SES either through very low growth or negative growth of their Commonwealth grants. This Transition Assistance will assist schools in planning for the new funding model and limited grants to schools will ease the rate of transition to the new model.

Indicative budget	Expected outcomes	Indicators of success
Transition Assistance: 2020: \$155,000 2021: \$325,000	<ul> <li>A model for the forensic analysis of a school's business model and financial data is developed</li> <li>Schools have a number of scenarios to evaluate the best transition path</li> <li>A process for developing transition plans is produced for use by schools</li> <li>Schools submit funding applications to assist with transition to a sustainable future</li> </ul>	<ul> <li>A forensic analysis model is produced for use by the identified schools should they require that assistance</li> <li>All participating schools have at least two scenarios to evaluate the best way forward to transition to the new model</li> <li>All participating schools have a transition plan as a result of this process</li> <li>Submissions for funding assistance are received from participating schools</li> <li>Submissions are evaluated and schools informed of result and receive additional funding</li> </ul>

#### Initiative/activity: Strengthening outcomes for schools at an educational disadvantage

This project will work with **Aboriginal Independent Community Schools** to engage community in the school to support improved educational outcomes for students.

"All Aboriginal and Torres Strait Islander young peoples must be empowered to achieve their full learning potential, shape their own futures, and embrace their cultures, languages and identities as Australia's First Nations peoples." Alice Springs (Mparntwe) Education Declaration 2019

Advocating for Indigenous voice in education is now a case of urgency. This initiative is targeting leadership engagement and skills development both at the school board and school level, including engagement of senior students in leadership initiatives.

The essential focus on two -way learning for the empowerment of school board members in making their voices heard and acted upon would be facilitated through:

- Empowering community mentors in guiding 'the right way', and cultural understandings.
- Framing 'school board' language and concepts through the application of culturally significant metaphors, e.g. Turtle Steps, has generated an agentive narrative.
- Facing learning challenges and a deep commitment by all parties to two-way learning by providing multiple opportunities for learning in local languages and English.

An information day for all 14 Aboriginal Independent Community Schools (Principal and 2 Board Members) will be conducted where they will see and hear about one community's journey to create a clearly articulated vision and business plan. The business plan sets out clear priorities and learning targets with ongoing review of student progress, school board effectiveness, and accountability procedures to monitor progress against student outcomes.

In order to capitalise on the hopes and desires of people from remote Aboriginal communities, schools will be invited to submit an expression of interest. Selected schools (to a maximum of 4) will be supported through the process to facilitate and increase opportunities for 'voice' and skill development of school boards through systematic and scaffolded teaching, positive motivations and access to 'experts'.

Indicative budget	Expected outcomes	Indicators of success
Strengthening outcomes for schools at an educational disadvantage: Aboriginal Schools 2020: \$45,000 2021: \$85,000	<ul> <li>Participating schools will develop a case for change and will express interest through a formal application process.</li> <li>The schools governing body, with support, will develop its knowledge, expertise and decision-making skills to drive positive change in the school and community</li> <li>The school board will develop strategic intent in order to identify sustainable employment opportunities for students.</li> <li>High student engagement in place based learning (on country)</li> </ul>	<ul> <li>Attendance at Information session</li> <li>2020/21 AISWA will facilitate a trial with up to 4 schools.</li> <li>Improved skills and competencies for school board members through targeted support.</li> <li>All school stakeholders will be involved in shared decision making in implementing a case for change.</li> <li>Students will be engaged in entrepreneurial activities relevant to culture and contemporary work worlds.</li> </ul>

The second project as part of this priority will work with the **Curriculum and Re-Engagement Schools** to improve the attendance and engagement of secondary disengaged students and should lead to improved educational outcomes. Some students have difficulty learning or even just being in class. The Grattan Institute has highlighted the issue of student engagement as being of concern. In low socio-economic areas this issue is often particularly marked. Research shows that creativity might be able to help ease or eliminate the difficulty of not engaging, or, for those engaged students increase their achievement.

To Increase attendance and engagement creative learning strategies will be implemented through the establishment of meaningful partnerships between teachers, creative (arts) practitioners, children and young people. This will complement school strategies for raising attainment, improving well-being and supporting inclusion.

The partnerships will address a priority learning area—mathematics, HASS or science—and employ creative ways of teaching the curriculum. Through these partnerships it is hoped to transform the learning experience of children and young people and to prepare them for the opportunities and careers of the twenty-first century.

Indicative budget	Expected outcomes	Indicators of success
Strengthening outcomes for schools at an educational disadvantage: CARE Schools 2020: \$25,000 2021: \$60,000	<ul> <li>Participating schools will develop a case for implementation and will express interest through a formal application process.</li> <li>Schools will develop an ethnographic approach with students to determine the co-designed curriculum implementation.</li> <li>School based project managers will support the program implementation to ensure high participation.</li> </ul>	<ul> <li>2020/21 will implement a trial of up to 6 schools with cohorts of educationally disadvantaged students.</li> <li>All participating schools will develop exhibition style assessment of the learning of the student cohort.</li> <li>Project managers will develop case studies to share with other like schools.</li> </ul>

The third project as part of this priority will be looking at underperforming schools in the **National Assessment Program for Literacy and Numeracy (NAPLAN)**. Although ACARA, through NAPLAN, has an 'Exemption' clause for students with a prescribed disability, the set of assessment papers actually allow for tracking of students who may, for any reason, be at or below minimal standard in their learning.

Each of the four assessments (Years 3, 5, 7 and 9) across Numeracy and Reading in particular, cover the approximately 150 content descriptions in each learning area from the Foundation Year (Pre-primary) to Year 10 of the general curriculum.

The project will identify the learning needs for students based on misconceptions in Mathematics or specific areas of English development. The assessment analysis will also check against a progression of skills from the early years. The students identified at or below minimal standard with a view to establishing Individual education programs based upon their knowledge and understanding. Using the *Valuate* platform (AISWA's NAPLAN analysis tool) for the online performance of students, the item descriptors will then form the basis of specific learning plans for the identified students.

The aim will be to implement professional learning to use *Valuate* to establish the progression of learning of every student who completes more than one assessment paper in each 'Learning Area'. The data for each student will then be diagnosed and each item analysed to clarify the learning requirements.

Indicative budget	Expected outcomes	Indicators of success
Indicative budget  Strengthening outcomes for schools at an educational disadvantage:  Analysis of data 2020: \$50,000 2021: \$100,000	<ul> <li>Identify the learning needs for students based on misconceptions in Mathematics or specific areas of English development.</li> <li>Use the assessment analysis to check against a progression of skills from the early years.</li> <li>Develop the meta-thinking for each child to assist with item descriptor progression.</li> <li>Each child to establish their zone of proximal development.</li> <li>Identify those students at or below minimal standard with a view to establishing Individual education programs based upon their knowledge and understanding.</li> <li>Use the data to plan a program which differentiates the learning for each individual</li> <li>Use the data to make the learning visible for both students and parents</li> </ul>	<ul> <li>Twenty schools, that have opted to have the NAPLAN assessment Online, will participate in targeted professional learning using Valuate.</li> <li>Participants will be supported to develop learning opportunities for the at-risk students in years 3, 5, 7 &amp; 9.</li> <li>Samples of work plans and data on student gain will be shared.</li> </ul>
	<ul> <li>Development of learning plans for each student.</li> </ul>	

#### Relevant national/local priority:

Catering for all students in supporting educational outcomes is a national and state priority. There are groups of schools that support students with greater needs due to their educational disadvantage. Both state and national governments have catering for Aboriginal students as a priority as agreed by the Alice Springs (Mparntwe) Education Declaration 2019.

The students in the CARE schools have had very challenging education journeys and the state government has recognised some of these students when they raised the school leaving age to 17 over 10 years ago therefore previously completely disengaged students are now required to attend school and often require a lot of additional support to do so and remain engaged.

For all students, participation and success is a national and state priority and analysing data to improve student learning journeys should result in improved outcomes for these students.

#### Initiative/activity: Student wellbeing and support

This project would utilise the expertise of a Child Protection/Child Safety specific trained AISWA staff member to have responsibility for Child Protection within the existing Inclusive Education team and to keep the team updated on Child Protection matters, to ensure the team can support schools in this area.

This staff member would support schools to assist them in creating and implementing a child safe organisation and in fulfilling the requirements under State *Registration Standards and other Requirements for Non-Government Schools* Standard 10 (Child Abuse Prevention) through:

- Having access to an AISWA staff member for support in the areas of Child Abuse, Grooming and Mandatory Reporting
- Having available child safe programs and training for all staff to ensure opportunity for the safety for all students
- Updating schools with Child Protection information / changes
- To support schools (School leaders and Mandatory Reporters) in the Mandatory Reporting process and other forms of abuse reporting procedures including following policies and procedures of Independent Schools
- Provide guidelines on Policies, procedures and practices that relate to Child Protection

#### Relevant national/local priority:

Creating safe and supportive learning environments for young people is recognised as essential by both state and federal governments. Following the Royal Commission into Child Sexual Abuse and the release of the National Principles for Child Safe Organisations schools have been working hard to ensure each child in their care is safe and empowered to express concerns should they have them. At the state level the school registration Standard 10 is devoted to child safety and child protection.

Indicative budget	Expected outcomes	Indicators of success
Indicative budget  Student Well Being and Support: 2020: \$45,000 2021: \$150,000	<ul> <li>Professional Learning and consultation in implementing National Principals of Child Safe organisations. Full day Professional Learning in "Child Safe Independent Schools" – Implementing the National Principals for Child Safe Organisations from an Independent School perspective.</li> <li>Schools aware of resources and staff available to further assist in this implementation (e-learning modules etc)</li> <li>Provision of training and support in</li> <li>Staff Code of Conduct</li> <li>Mandatory Reporting, Grooming and all forms of child abuse</li> <li>The law with respect to Mandatory Reporting of Child Sexual Abuse for governing body members and regular volunteers</li> <li>Full day training in the Keeping Safe: Child Protection Curriculum</li> <li>Provide opportunities for schools to engage in Keeping Safe: Child Protection Curriculum Train the Trainer by inviting interstate – South Australia Keeping Safe trainers</li> <li>Schools are informed of updates in the area of Child Protection through newsletters, reviewing training information, updating AISWA Policy &amp; Procedures Guidelines</li> </ul>	<ul> <li>Engagement by schools in the professional learning and specific school consultation with consultants</li> <li>Resources links within Professional Learning, newsletter articles etc.</li> <li>Engagement by schools in both centralised and school based the professional learning and specific school consultation with consultants</li> <li>Increased demand for training and services</li> <li>Approximately 80% of Independent schools engaged in training on Mandatory Reporting, Grooming and all forms of child abuse</li> <li>Engagement in Inclusive Education newsletters, Facebook and direct email groups</li> <li>Creation of an email group of those staff in schools that are responsible for Child Protection for the purposes of effective updates and information.</li> <li>Increased timely updates of AISWA Guidelines to Policies and</li> </ul>
	<ul> <li>Regular reviews of AISWA Guidelines to Policies and Procedures that relate to Child Protection and safety such as: Bullying and Harassment, Child Protection, Staff Code of Conduct etc.</li> </ul>	Procedures that relate to Child Protection

# **Initiative/activity: Special Circumstances Funding**

This priority will be met by providing a process whereby schools can apply to access support in special circumstances. Initially \$200,000 will be set aside in 2020 for this priority and another \$100,000 in 2021 with the capacity to be topped up dependent upon demand for assistance. AISWA will develop an application and approval process that will be made available to schools to access on an as needed basis. This activity will support schools and students impacted by special circumstances or in priority areas such as rural, regional and remote locations and areas affected by drought or other natural disasters.

Special Circumstances Assistance will be provided for schools in situations that satisfy all of the following criteria:

#### unexpected

Could not have been reasonably foreseen.

#### causing severe financial difficulty

 Where a school faces a real prospect of having to cease a large part of its educational activities or significantly lower its educational services.

#### short term

 Schools should be able to overcome their financial difficulty and resume operations and must provide a five-year business and recovery plan.

#### a special need

Schools have exhausted all other options to remedy the financial situation of the school.

The nature of support to a school experiencing special circumstances will vary by the type of circumstance. Schools can experience financial stress as a result of a range of events: a natural disaster like floods or fires, a sudden loss of a significant number of enrolments, loss of a number of long serving staff with significant entitlements owing, etc. All these result in financial stress and as well as providing direct financial support to the school if the criteria are met, AISWA would offer support to the school to revisit their business model to cater for the circumstances and budget for their new financial situation.

Indicative budget	Expected outcomes	Indicators of success
Special Circumstances Funding 2020: \$20,000 2021: \$10,000	<ul> <li>A school in special circumstances applies for special assistance</li> <li>If the application is approved the school receives financial assistance</li> </ul>	Schools successfully access this priority when a special circumstance arises
2020: \$200,000 if needed		
2021: \$100,000 if needed		