



# **NHAA Naturopathy and Western Herbal Medicine Degree**

## **Course Accreditation Standards**

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Prepared by the Examiners Subcommittee of the National Herbalists Association of Australia (NHAA), trading as the Naturopaths and Herbalists Association of Australia. April 2017.

## Preamble

Established in 1920 the National Herbalists Association of Australia (NHAA) has been setting standards in the education and practice of herbal medicine for nearly a century, being the oldest of all health professional associations in the country. In this time much has changed, including the recent adjustment of our name to the Naturopaths and Herbalists Association of Australia, an evolution that enables us to more accurately represent our wide membership - of which over 80% are clinicians who are qualified Naturopaths. The NHAA will always be at the forefront of that change, supporting and promoting herbal medicine, naturopathy and our members.

The past decade has involved dynamic changes within the education of the profession, with emergence of innovations that have changed teaching and learning, the increasing internationalisation of education and improved opportunities for research and higher learning of our modalities. The NHAA has been active to advance opportunities for Herbalists and Naturopaths throughout this period, implementing Course Accreditation Standards and advocating for the growth of higher education opportunities. This has involved ongoing participation in Industry Reference Groups, such as those held by the Community Services & Health Industry Skills Council (CS&HISC), the body that has informed the shape of the Health Training Package in Australia. As of the end of December 2015, the Advanced Diploma qualifications enter a three year teach out period.<sup>1</sup>

The transition period represents the consolidation of the Bachelor Degree as entry level for the professions of Naturopathy and Western Herbal Medicine (WHM). In collaboration with education providers, the NHAA is enthusiastic in contributing to improving graduate outcomes, professional standards and health in the community.

We look forward to building a strong and mutually beneficial relationship with your institution.

## NHAA Examiners

## About this document

The NHAA has produced these Course Accreditation Standards (CAS\_Main) to facilitate the elevation of education for the profession, assisting higher education providers with guides for curriculum design. Individual institutions, considered as distinct colleges awarding uniquely branded testamurs, can apply to have one or more relevant courses recognised by the NHAA. Successful application results in the course being granted NHAA Accreditation status, with the attendant benefits for your institution as well as your students and future graduates.

This document contains course content guidelines, procedural requirements and other information relevant to seeking and maintaining NHAA Accredited status for degree and post-graduate courses in Naturopathy and Western Herbal Medicine.

No part of this document may be reproduced in any form (other than is necessary in the process of submitting a Course Accreditation application) without prior written permission of the NHAA.

## CONTENTS

Introduction to Course Accreditation Standards .....	5
Goal of Course Accreditation Standards .....	5
Structure of Course Accreditation Standards .....	5
Understanding and Application of Key Documents .....	6
Academic requirements .....	7
Appendix A: Advantages of NHAA Accreditation .....	10
Appendix B: CAS application logistics .....	11
Appendix C: Requirements of NHAA Accreditation .....	14
Appendix D: Higher Education Provider Quality .....	16
References .....	18

# Introduction to Course Accreditation Standards

The Naturopaths and Herbalists Association of Australia (NHAA) is the peak association for Herbalists and Naturopaths in Australia. The NHAA Course Accreditation Standards (CAS) system has been developed by the Examiners of the NHAA Board and is utilised to assess and accredit professional courses in Western Herbal Medicine (WHM) and Naturopathy.

Education institutions apply for accreditation for relevant courses, and if successful, graduates of these courses are automatically eligible for full membership of the NHAA. Additionally, other benefits apply for institutions with NHAA accredited courses, including support for ongoing curriculum developments, access to NHAA Library and other education resources of the association.

## Goal of Course Accreditation Standards

The goal of NHAA Course Accreditation Standards is to facilitate the clarification and benchmarking of high quality professional education and clinical training for students of Western Herbal Medicine and Naturopathy. The maintenance of these standards ensures the ongoing quality of clinical practice, research and education in these fields of complementary health, and thus excellence in the provision of complementary healthcare to the Australian public. The NHAA standards exemplify our ongoing efforts to promote the high quality of NHAA members, ensuring sustainability and advancing the profession both within Australia and internationally via multiple engagements and advocacy efforts of the NHAA.

## Background

The NHAA Course Accreditation Standards have been developed to ensure degree programs in Western Herbal Medicine and Naturopathy adequately prepare students to commence practice as competent beginners and to reflect community expectations of education and practice. The Australian Qualifications Framework (AQF), Level 7, Bachelor Degree, provides greater scope for the development of critical thinking skills, reflective practice and competence in research skills. It encourages all graduates to be committed to their life-long learning and professional development.

NHAA acknowledges the role of the Tertiary Education Quality and Standards Agency (TEQSA) in accrediting courses and ensuring governance and quality assurance in tertiary education. The NHAA CAS does not attempt to duplicate or replace the requirements for degree accreditation as stipulated by TEQSA, it is recommended that educational institutions read the NHAA CAS alongside the TEQSA *Higher Education Standards Framework (Threshold Standards)*.

## Structure of Course Accreditation Standards

The CAS for each qualification are organised into major subject areas. Each subject area reflects a group of related concepts that maybe delivered as a single subject or across several subjects. In this way the NHAA Degree CAS system is not prescriptive in terms of actual course structure or subject names, progressing beyond the VET level qualification defined model. Institutions can choose to deliver the content and outcomes found within CAS subject areas in their own different and creative ways, provided the requirements of each subject area are fulfilled.

Electives have been included to enable individual institutions to provide their own additional point of difference and specialisation. The Electives are suggestions as skills and knowledge potentially applicable to graduates but are not essential to the qualification. Electives do not need to be chosen from those nominated in the CAS, but rather these are offered as a guide for possible options.

## Subject Area Components

The CAS expands upon each individual content domain with the following structure:

- A **Descriptor** that outlines the intent and outcomes of the subject area.
- **Delivery Methodology** specified as appropriate, for example in clinical performance, where real time face-to-face delivery and assessment is essential.
- **Hours** are projected minimum hours to ensure that the volume of learning is commensurate with the breadth and complexity of content.
- **Learning Outcomes** that identify what the student is expected to be able to do upon successful completion of the subject area.

## Understanding and Application of Key Documents

There are three key documents to be used in conjunction in the assessment and formalisation of accredited courses (available with support resources on the NHAA website via 'Education' section):

### 1. Course Accreditation Standards (CAS)

- This document provides the background and logistics to preparing and submitting for NHAA accreditation or for a reaccreditation.
- The NHAA Office and Examiners are available to assist with preparing and submitting your application.

### 2. Course Accreditation Mapping (CAM)

- **Provider Details:** informs the specifics of your institution, staff and contact details.
- Provides the Examiners of the NHAA with the relevant insight regarding relationships between your course structure and the NHAA Course Accreditation Standards.
- Supports the submission of accreditation applications, acting as a checklist in the detailing of content domains, delivery and assessment models with information related to associated teaching hours and aligned subject curricula.
- The mapping document is to clearly outline supporting documentation, such as course guides, subject outlines and marking rubrics; enabling Examiner evaluations.

### 3. Course Accreditation Agreement (CAA)

- This document indicates that the information provided by the provider is accurate and in alignment with the NHAA Course Accreditation Standards.
- The agreement document must be signed (either as witnessed original or with secure digital signature) by an authorised representative of the institution applying for Course Accreditation. The agreement is to be returned to the NHAA

Office in coordination with supporting documents and payment of Application and Accreditation Fees.

It should be noted that accreditation is course dependent. The NHAA does not accredit provider organisations overall, but rather examines and accredits individual courses on their distinct merits. Thus organisations may be required to submit several course applications individually for evaluation in order to gain accredited status course delivery via distinct college institutions. Additional information on the logistics of submitting a NHAA CAS application is provided in Appendix B of this document, detailing:

- Submitting the Application
- The Evaluation Process
- Application Outcome Notifications
- Application and Course Accreditation Fees
- Membership Process for Students and Graduates of Accredited Courses

Appendix C details requirements of NHAA Accreditation and compliance, and Appendix D outlines matters related to Higher Education Provider Quality with considerations of both TEQSA registration and items of shared interest in representing the profession.

## Academic Requirements

As the NHAA CAS does not serve to replicate TEQSA registration requirements or administer the performance of higher education providers, aspects of fundamental academic principles are not the focus here. Appendix D does elaborate on some considerations related to higher education provider quality, largely drawing from Higher Education Standards Framework and TEQSA standards.

### English Language Proficiency

The NHAA CAS does not specify English Language Proficiency (ELP) for either domestic or international students, acknowledging that providers may already have in place requirements for students applying from overseas.

## Course Development and Delivery

### Hours of Study

NHAA Course Accreditation Standards hours are aligned to the Australian Qualifications Framework (AQF) concept of volume of learning - in accordance with the level requirements of a Bachelor Degree, where full-time study equates to approximately 1200 hours per year, where the course is delivered over 3-4 years.

### Course Delivery Methods

The NHAA embraces innovative methods of teaching and learning, and recognises that some content presents a significant challenge in achieving suitable graduate outcomes where they are delivered outside the traditional classroom environment.

The NHAA Course Accreditation Standards acknowledge the following delivery methods:

**F2F &/or Online:** Suitable for Face-to-face &/or online only delivery.

**F2F Only:** To be delivered via face-to-face means only (can be supported by a blended delivery model with education resources supplied online) and relates to those learning areas that require face-to-face and hands on practical application of the learning outcomes; e.g. Clinical Practicum subjects.

NHAA expects that any subject offered as both face-to-face and online, that also has an online only equivalent, will have all online resources for the online subject available to the face-to-face students.

### **Assessment**

Assessments need to reflect the requirements and learning outcomes of the subject, as they align with the assessment expectations of TEQSA.

### **Lecturer Requirements**

Lecturers and facilitators assigned to deliver the content of an Accredited Course, are required to meet the criteria for Academic Qualifications as outlined by TEQSA. It is the responsibility of the educational institution to ensure compliance within this area.

NHAA require up to date position descriptions for all Academic roles within the institution, including the Clinical Supervisor.

### **Clinical Supervisor Requirements**

Clinical supervisors are expected to be accomplished in line with TEQSA's Academic Qualification requirements, and demonstrate a minimum of 5 years documented clinical experience. All clinical supervisors are required to document and maintain memberships with a relevant professional association/s, provide a current First Aid Certificate, TGA Certificate of Exemption, and evidence of professional indemnity insurance.

NHAA may request the details of participating clinics, where external clinic placements are a requirement of the course; to ensure their compliance within industry standards and deem them appropriate, supportive environments.

# References and Appendices

## Appendix A: Advantages of NHAA Accreditation

### NHAA Vision:

*"Naturopathy and Western herbal medicine for the health of Australia".*

### Our Mission:

*"To be the leading association in Australia supporting naturopaths and Western herbal medicine practitioners to deliver excellence in healthcare".*

Some of the advantages and privileges of NHAA Course Accreditation are listed below:

1. Entitles students to apply for Student Membership of the NHAA, which in turn provides them with the *Australian Journal of Herbal Medicine and Naturopathy* and various digital and social media updates.
2. Entitles Student Members to access to the NHAA Library for research purposes.
3. Enable graduates to expediently apply for Full Membership of the NHAA and the annual TGA Advertising Exemption Certificate
4. Student Award Program
  - a. One student of distinction from each class of an accredited course (as chosen by your institution) is awarded for *"Excellence in the Academic Understanding & Clinical Application of Herbal Medicine"* upon graduation.
5. Free subscription to the *Australian Journal of Herbal Medicine & Naturopathy* for your institution's library for the duration of your Course Accreditation.
6. Regular updates of our involvement, support and affiliation with the World Naturopathic Federation (WNF) via our website and e-News.
7. An issued NHAA Course Accreditation Certificate for the duration of accreditation.
8. Availability of the Examiners of the NHAA, for assistance or feedback regarding Naturopathy and WHM education standards and NHAA Course Accreditation.
9. Complimentary listing of your institution, and the accredited course(s) on the NHAA website.
10. Prospective students enquiring about courses will be provided with the names and contact details of institutions with accredited courses.
11. All information supplied by you to the NHAA will remain confidential.

## Appendix B: CAS application logistics

### Submitting the application

Your completed application must contain the following in order for your application to be processed:

- A fully completed Curriculum Mapping document, including:
  - Name and contact details for an appropriate NHAA liaison at your institution.
  - Name, qualifications and contact details of the head of faculty for the course, and the primary supervisor of the Naturopathy and WHM clinic on campus.
- A Course Accreditation Agreement signed by a suitable representative of your institution.
- Digital versions of:
  - Current prospectus (or draft prospectus if applicable).
  - Overall course outline detailing structure of subjects.
  - Subject outlines detailing internal subject code, prerequisites and corequisites, learning objectives/outcomes, assessment type and/or marking rubric, delivery method, and total hours of study
    - Possibly specifies actual class contact and details inclusion of all self-directed study included (may be detailed elsewhere in course outline documentation).
- Payment for Application Fee(s) and Accreditation Fee(s).

Applications which are not complete cannot be evaluated, incomplete submissions will delay the assessment of the application with subsequent requests for additional documentation.

### The Evaluation Process

The evaluation of applications is conducted by the Examiners, a subcommittee of the elected members of the Board of the NHAA who are mainly responsible for educational and membership standards. Upon receipt of your completed application, supplied documents are bundled and distributed onto the Examiners to commence review, original copies are retained and archived at the NHAA Office.

A Contact Examiner will be appointed for your application, who will be responsible for directing the Examiners in the process of evaluating the application and determining its suitability for Accreditation. If necessary, the Contact Examiner may contact you to clarify points, or request further documentation to support your application.

Submissions are accepted at any time of the year and application processing can take up to four weeks. In regard to reaccreditations, it is advised to be in communication with the NHAA at least three months leading up to your expiry date - this ensures that accurate advice can be provided in preparing for application and estimating projected workload. It is advised that reaccreditation applications are submitted six to eight weeks in advance of expiry dates.

## **Application outcome notifications**

### **Successful Application**

If your application is successful, you will be notified in writing by the Contact Examiner, and you will be sent a Final Report on Application for Course Accreditation. Successful Course Accreditations are effective from the date this course in its current form commenced.

With successful Course Accreditation, a package containing your NHAA Certificate of Course Accreditation, and a USB with other useful material will be sent to you. Along with these, NHAA Student Information Packs will be sent to your institution for free (every year), which provide students with information on the NHAA, Student Membership, and other items of interest. If more Student Information Packs are required at any time, please contact the NHAA Office.

Course Accreditation is valid for a period of four (4) years from the date of commencement (unless otherwise stipulated). At the end of this period it will be necessary to apply in full for continued Accreditation, due to the potential for changes to your course and/or changes in the NHAA Curriculum. This involves the same process as the initial application for Course Accreditation, including the same documentation requirements, Application and Accreditation Fees, and timeframes.

### **Unsuccessful Application**

If your application is unsuccessful, you will be notified in writing by the Contact Examiner at the end of the evaluation period. Included with this letter will be an Interim Report on Application for Course Accreditation which will detail both strengths and deficiencies in your application, and suggestions on how deficiencies may be corrected.

At this point you have a four (4) week period in which to submit any requested additional information or resubmit your entire application, as directed in the Interim Report. No additional fees will be charged for re-evaluation at this point. Extensions on this four-week period will only be granted under extenuating circumstances and only after communication with and agreement from the Contact Examiner for your Application.

If the additional information/resubmission satisfies the requirements, your application will be deemed successful (see Successful Application above).

If your resubmission is not received within the four-week deadline set by the Examiners, and no alternative arrangements have been agreed upon with the Contact Examiner, then the application will be closed, and a Final report on Application for Course Accreditation will be issued. Your Accreditation Fee will be refunded in this instance. If your institution wishes to pursue NHAA Course Accreditation in the future, a new application must be made, including payment of a new Application Fee and Accreditation Fee.

## Application and Course Accreditation fees

The fee structure for course accreditation involves a two-step process as listed below. These are accurate at the time of publishing and may be subject to change in relation to annual review by the Board of NHAA. Appropriate invoices can be issued to support the course application for your institution.

1. Accreditation Application Fee - \$250.00 (a single fee paid for an accreditation period)
  - This fee is payable upon application for Course Accreditation, and covers administrative costs of the application and evaluation process.
  - This fee is non-refundable regardless of the success of the application.
  - The fee covers the assessment of individual courses, as registered (or to be registered) on the TEQSA National Register. A single assessment may serve to inform multiple Course Accreditations, in consideration of various corporate structures and institutions.
  
2. Accreditation Fee - \$750.00 (equating to \$250.00 per annum of an accreditation, may be pro rata)
  - Covers the four (4) years of Course Accreditation, and is payable upon submission of an application for Course Accreditation.
  - Course Accreditation is valid for a period of up to four years (unless otherwise stipulated). At the end of this period, it will be necessary to apply for reaccreditation.
  - The accreditation fee applies to individual instances of the course (regardless of the number of campuses either locally or nationally); or for each institution that offers the course, regardless of whether the institutions operate within a single corporate entity.
  - In the case of unsuccessful applications, accreditation fees will be repaid in full at the point of notification by the NHAA.
  - The accreditation fee covers administrative costs related to the maintenance and publishing of Course Accreditations. It contributes to the administration of various reporting requirements of the NHAA, both during the period of accreditation and in subsequent years as the association is required to fulfill in ongoing support matters.

## Membership process for graduates of accredited courses

Final year students of accredited courses are provided free Student Membership in their final year of studies. Graduates of education programs which have been awarded NHAA Course Accreditation are entitled to apply directly for Full Membership of the NHAA as Naturopaths and/or Medical Herbalists. Submission of their academic records, qualifications, and other standard items with their completed membership form and fee are all that is required. NHAA policy states that members are encouraged to use one of the following titles as relevant: Naturopath, Herbalist, Medical Herbalist or Phytotherapist.

As Full Members, graduates are entitled to the usual recognition and privileges of membership of a professional association, including TGA Advertising Certificate of Exemption. In addition, Full Members have voting rights, and are supported in various ways by the Association, such as

through government representation, continuing education resources, professional journal, professional indemnity insurance opportunities, and various health fund rebates.

## **Appendix C: Requirements of NHAA Accreditation**

There are standard requirements of Course Accreditation status, as outlined below:

1. NHAA Course Accreditation is valid only for the course that was submitted for accreditation.
2. Courses with different qualification titles, and/or different content/delivery methods, must be submitted as separate applications for Course Accreditation. However, it is permissible to deliver the same accredited course to more than one group of students without requiring separate applications.
3. NHAA Course Accreditation is valid for a period of four years from the date of issue, as indicated on the NHAA Course Accreditation Certificate. For continued Accreditation, a new application with full supporting documentation must be made before the due date.
4. The NHAA Certificate of Course Accreditation (which is valid only for the years indicated) must be displayed either in the location where the course is delivered, in your institution's main offices or be published with public accessibility on website, for the accreditation period.
5. Any other use of, or improper use of the NHAA Certificate of Course Accreditation constitutes a violation of these Requirements, and may result in cancellation of course accreditation and possible legal action.
6. The NHAA Certificate of Course Accreditation remains the property of the National Herbalists Association of Australia, and must be returned if Course Accreditation is suspended or cancelled.
7. At no time can your institution advertise or otherwise give the impression that NHAA Accreditation applies to the institution - NHAA Course Accreditation applies only to individual courses which have successfully passed the application process.
8. Significant alteration of course content or structure should be notified to the NHAA within 3 months of the commencement of delivery of the altered course. Significant alteration may require your institution to reapply for course accreditation.

9. The NHAA reserves the right to randomly audit institutions in regard to these Requirements and the delivery of the course which is accredited. Audits may take the form of requests for documentation, or personal visits from NHAA Board Members in an official capacity.
  
10. NHAA Student Information Packs must be made clearly available to all students throughout the duration of their training. This can be via physical displays accessible to students on campus and/or by relevant links to NHAA website (cannot be hosted on institutions website.)

## Compliance with NHAA Accreditation

The suspension or cancellation of NHAA Accreditation of a course is regarded as an extreme measure, and only occurs as a last resort. If complaints are received by the NHAA, or if the NHAA has other reason to believe there may be a problem in regard to adherence with defined aspects of NHAA Course Accreditation, the NHAA may contact the training provider and detail the nature of the problem, and seek clarification of the issue.

If a problem is found to still exist, the NHAA will enter into negotiations with the training provider to find a resolution. It is only if a resolution cannot be found, and the Requirements of Accreditation still cannot be met (or there remain other significant reasons why the NHAA cannot maintain accreditation of the course), that suspension or cancellation of NHAA Accreditation may occur.

Suspension or cancellation of NHAA Course Accreditation will be immediately indicated on the NHAA website. All rights to the use and display of the NHAA name, NHAA logo and NHAA Course Accredited status will be suspended. The right to display the NHAA Course Accreditation Certificate will be revoked. All literature and advertising (in any form) which contain statements of your Course Accreditation with the NHAA may no longer be used, including public access via an institutions website or student access via Learning Management Systems. Failure to comply with these requirements may result in legal action.

## Appendix D: Higher Education Provider Quality

Higher education providers who deliver courses which are accredited by the NHAA are obliged to adhere with TEQSA registration and corporate governance requirements at all times. Provider organisations are expected to be proactive in maintaining adherence with registration standards of the Higher Education Standards Framework, with consideration of the *Higher Education Standards Framework (Threshold Standards) 2015* (new HES Framework) and transition arrangements coming into place 1 January 2017. Links to relevant TEQSA information are supplied at the end of this document.

All institutions are expected to be able to meet, or be implementing methods to meet these standards upon submitting an application for NHAA Course Accreditation, and may be required to provide documentation to the NHAA regarding this if requested to do so. These considerations support the many current and future reporting obligations of the association, performed on behalf of both members and the industry more broadly under the current self-regulatory model. The NHAA operates with the understanding that our accredited course providers:

1. Keep written policies and procedures for ensuring education delivery, clinical training and assessment are consistent with its described course(s) and the intent of the described course(s).
2. Inform the NHAA at the earliest opportunity of any significant changes in relation to course(s) as listed on the National Register, or of any other matters impacting on its course(s) as accredited.
3. Maintain organisational charts and statements of roles and duties for all staff, both academic and administrative.
4. Have documented and publically accessible policies and procedures for dealing with customer complaints, grievances and appeals in a constructive and timely manner, which include:
  - Each complaint, grievance, appeal and its outcome is recorded.
  - Each appeal is heard by an independent person or panel.
  - Each appellant has an opportunity to formally present their case and is given a written statement of the appeal outcome(s), including reasons for the decision.
5. Have agreements with any other providers of training/education/assessment, which relate to the course(s) delivered, highlighted to the NHAA in applications or ASAP as later implemented.
6. Have procedures to collect and analyse client and staff feedback in relation to their satisfaction with provision of educational and other services.
7. Develop and implement procedures to review policies and procedures in relation to such feedback.
8. Develop and implement policies and procedures related to continuous quality improvement in relation to services provided.
9. Comply with relevant State or Territory laws including Commonwealth or State/Territory legislation on:

- Workplace Health and Safety.
  - Workplace harassment, victimisation, and bullying.
  - Anti-discrimination, including equal opportunity, racial vilification, and disability discrimination.
10. Staff are provided with information about legislation which affects their duties, and clients are provided with information or sources of such information that significantly affects their participation in education.
  11. Ensure that it has all the necessary insurance, with certificates of currency, which cover aspects of its business, including workers compensation, public liability, professional indemnity, and building and contents insurance.
  12. Possess effective financial management procedures, which include accurate bookkeeping, systems for the protection of fees paid in advance, and fair and reasonable refund policies.
  13. Have accurate and secure records management procedures, including retention, archiving and retrieval of student records including academic results for a period of 30 years, and securing of confidential information in accordance with National Privacy Principles.
  14. Maintain up-to-date records of academic staff qualifications and experience.
  15. Maintain proper version tracking control procedures for all documents relevant to the provision of education.
  16. Disseminate clear and accurate information to each client, prior to enrolment, about:
    - Student selection, enrolment and induction/orientation procedures.
    - Course information, including content and outcomes.
    - Fees and charges, including refund policies and exemptions (where applicable).
    - Appeals, complaints and grievance procedures.
    - Disciplinary procedures.
    - Recognition of prior learning and existing credit arrangements.
  17. Implement effective procedures for the recruitment, induction and ongoing development, and performance monitoring of each member of its staff who is involved in the provision of education, assessment, or client service.
  18. Ensure that assessments are reliable, valid and fair within the context of the element(s) being assessed, and incorporate appeal mechanisms.
  19. Ensure that marketing and advertising of their institution and education services are ethical and accurate, and do not involve the improper use of information obtained from other persons or organisations.

20. Are committed to graduate outcomes, the high-quality of practitioners entering the community and the reputation of the Western Herbal Medicine and Naturopathy profession.

## References

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