

# Program Name: Division of Non-Public Education

Measurability Assessment Conducted by Program Evaluation Division

## Overall Indicator Ratings and Table of Contents

	Overall Indicator Rating			Page Number
	Meets	Partially Meets	Does Not Meet	
1. Program does not duplicate other related programs.			✓	106
2. Program has a problem definition.		✓		107
3. Program has a logic model.		✓		108
4. Program is evidence-based.			✓	109
5. Program has conducted a scalability analysis.			✓	110
6. Program has a strategic plan.	✓			111
7. Program has performance measures.		✓		113
8. Program has a quality improvement system.		✓		115
9. Program has a risk assessment.		✓		116
10. Program has a financial forecast.		✓		117
11. Program has cost sharing documents.	✓			118
12. Program has conducted a staffing analysis.			✓	119
13. Program has an accounting system.	✓			120
14. Program is audited.		✓		121

# Division of Non-Public Education

Non-Public Education is a division within the Department of Administration.

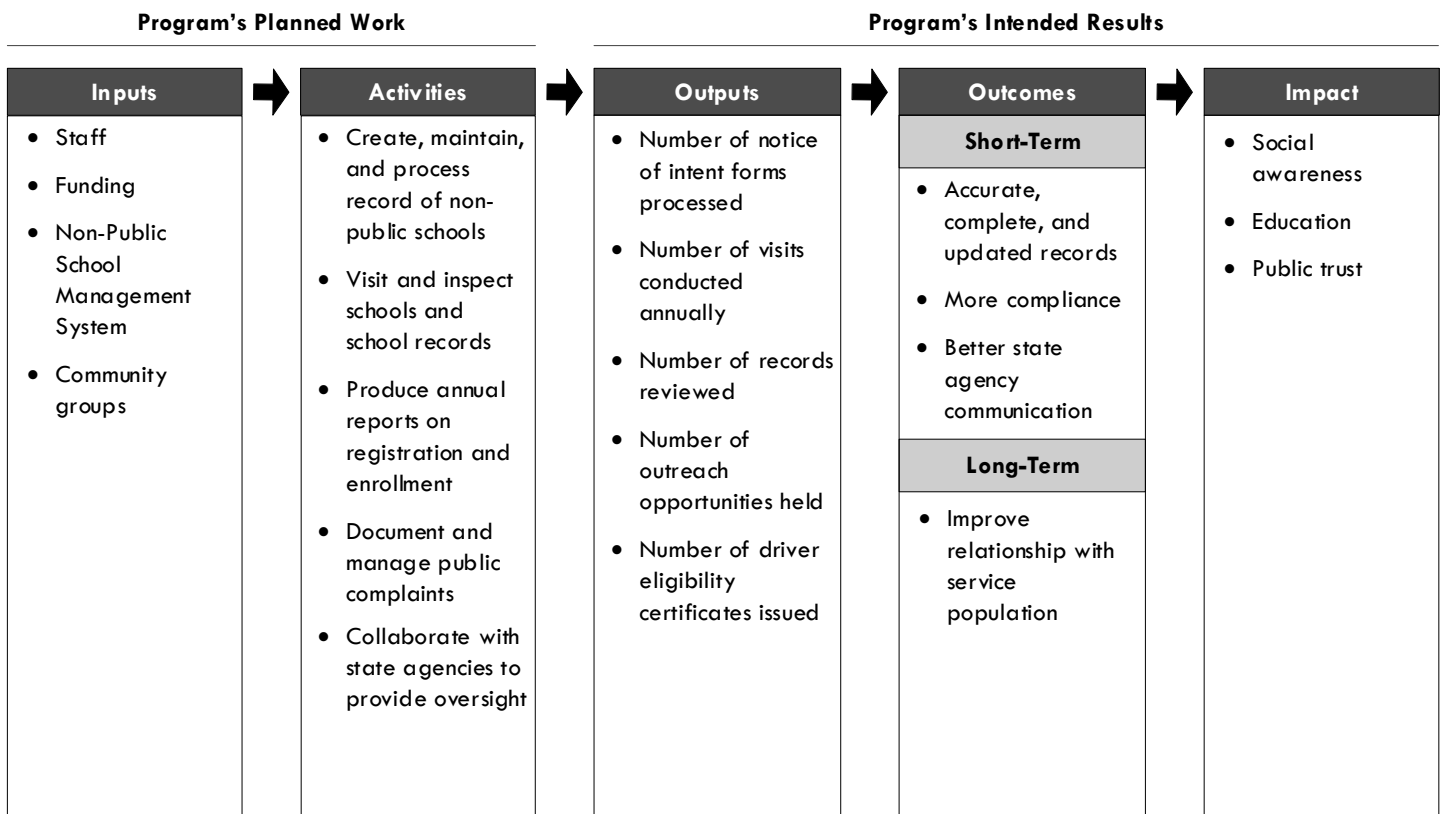
- **Mission:** To serve the non-public school community, students, and citizens of North Carolina by ensuring compliance with non-public laws in the most practical, efficient, effective, and professional manner; administer the non-public school student driver eligibility certificate program; and serve as the State informational liaison between the general public and non-public school community
- **Statutory Authority:** N.C. Gen. Stat. § 115C, Article 39
- **Service Population:** School administrators in home and private schools

## Fiscal Snapshot

	FY 2016–17	FY 2017–18	FY 2018–19
Total Requirements	\$442,174	\$449,770	\$449,770
Total Receipts	-	-	-
Appropriation	\$442,174	\$449,770	\$449,770
Total Positions	5.75	5.75	5.75

Source: Program Evaluation Division based on OSBM's 2015–17 and 2017–19 Certified Budgets.

## Logic Model Created by PED



Source: Program Evaluation Division based on information from the Division of Non-Public Education.

# Program Name: Division of Non-Public Education

## Indicators of a Clear and Unique Mission

Key Elements of Indicator 1: Avoids Duplication	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
1.1 Program has an inventory that identifies other current programs active in the policy area that address the same goal.			✓
1.2 Inventory demonstrates how the examined program is unique from the other related programs.			✓
1.3 Inventory identifies the purpose of each program.			✓
1.4 Inventory identifies the services, products, or functions each program is providing.			✓
1.5 Inventory identifies the target population served by each program.			✓
1.6 Inventory identifies how the program coordinates with other related programs to avoid wasteful competition and duplication.			✓
1.7 Inventory is updated periodically.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>1. Program does not duplicate other related programs.</b>			✓

Description: Although the Division of Non-Public Education has a description of its own program, it does not have a program inventory that identifies other current programs active in the policy area that address the same goal. Therefore, the Division cannot demonstrate how it is unique from other related programs. The Division provided no documentation of coordination efforts. Without an inventory, the Division cannot be sure it avoids wasteful competition and duplication.

Suggestions: The Division should conduct a scan of the public sector (both internal and external to its agency) and the nonprofit and private sector to identify any programs that are active in its policy area. For example, this scan could identify programs that monitor and maintain listings of North Carolina public schools and programs that administer student driver programs for public schools in North Carolina. Then, the Division should create an inventory that identifies other current programs active in the policy area that address the same goal as the Division. The inventory should identify the purpose of each program; the services, products, or functions each program is providing; and the target population served by each program. The Division should include itself in the inventory so that it is clear which services the Division provides that no other programs provide. The inventory should demonstrate how the Division is unique from related programs and how it coordinates with those programs to avoid wasteful competition and duplication. The Division should update the program inventory periodically.

# Program Name: Division of Non-Public Education

## Indicators of a Clear and Unique Mission (continued)

Key Elements of Indicator 2: Problem Definition	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
2.1 Problem definition is based on supportive evidence that clearly describes the nature and extent of the problem facing the individuals the program serves.		✓	
2.2 Problem definition identifies the major factors contributing to the problem.			✓
2.3 Problem definition identifies current gaps in services or programs.			✓
2.4 If program is based on a “promising approach” or “best practice,” problem definition provides a rationale for the transferability of the approach to the population the program serves. <i>If program is not based on a “promising approach” or “best practice,” enter N/A.</i>	N/A		
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>2. Program has a problem definition.</b>		✓	

Description: The Division of Non-Public Education has a problem definition based on supportive evidence that

- students attending and/or graduating from non-public schools require documentation that their school was a legal school in North Carolina to attend college, enlist in the military, and secure employment and
- the number of private schools and home schools is on the rise.

However, the problem definition is not based on supportive evidence that explains why non-public schools need to be monitored and regulated. In addition, the problem definition does not identify major factors contributing to the problem or current gaps in services or programs.

Suggestions: The Division should create a problem definition, in one document, that addresses all of the problems it is meant to address, including problems that arise when non-public schools are not monitored and regulated (e.g., students do not receive an adequate education). The problem definition should identify the major factors contributing to all of the problems the Division is intended to address, and the problem definition should identify current gaps in all of the Division’s services.

# Program Name: Division of Non-Public Education

## Indicators of a Clear and Unique Mission (continued)

Key Elements of Indicator 3: Logic Model	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
3.1 Logic model includes specified inputs.	✓		
3.2 Logic model includes specified activities.	✓		
3.3 Logic model includes specified outputs.	✓		
3.4 Logic model includes specified short-term and long-term outcomes.	✓		
3.5 Logic model includes specified impacts.	✓		
3.6 The logic model has been shared with program staff and key stakeholders.			✓
3.7 The logic model is updated periodically.		✓	
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>3. Program has a logic model.</b>		✓	

Description: The Division of Non-Public Education has a logic model that includes specified inputs such as staff, funding, and community groups. The logic model includes specified activities such as creating and maintaining a record of non-public schools, producing annual reports, and collaborating with state agencies for oversight. The logic model includes specified outputs such as the number of notice of intent forms processed, number of visits conducted annually, and number of records reviewed. The logic model includes specified short-term outcomes (e.g., accurate, complete, and updated records) and long-term outcomes (e.g., improve relationship with service population). The logic model includes specified impacts such as public trust. The Division did not provide documentation demonstrating it shares its logic model with staff and key stakeholders. The Division is in the process of updating its logic model.

Suggestions: The Division should share its logic model with staff and key stakeholders. Once the Division's logic model is updated, the document should include when it was last updated. In addition, the Division's logic model could be strengthened in the following ways:

- phrase outcomes in terms of the direction of change expected (e.g., increased, decreased), and
- differentiate long-term outcomes from impacts.

# Program Name: Division of Non-Public Education

## Indicators of a Focus on Results

Key Elements of Indicator 4: Evidence-Based	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
4.1 Program can demonstrate that its outcomes in North Carolina have been tested by a rigorous impact evaluation or that it uses a design that has been tested and found to be successful through multiple rigorous impact evaluations in other jurisdictions.			✓
Overall Indicator Rating			
	Meets	Partially Meets	Does Not Meet
<b>4. Program is evidence-based.</b>			✓
<p>Description: Although the Division of Non-Public Education provided a North Carolina Accountability Report (2011) and a stakeholder survey (2009), these efforts are not impact evaluations. Therefore, the Division did not provide documentation demonstrating its outcomes in North Carolina have been tested by a rigorous impact evaluation or that it uses a design that has been tested and found to be successful through multiple rigorous impact evaluations in other jurisdictions.</p>			
<p>Suggestions: The Division should identify the primary services it offers, and each service should be subject to an impact evaluation. Impact evaluations determine the extent to which a program produces desired outcomes and intended improvements in the social conditions it was intended to ameliorate. Impact evaluations produce an estimate of the net effects of a program—the changes brought about by the intervention above and beyond those resulting from other processes and events affecting the targeted social conditions.</p>			

# Program Name: Division of Non-Public Education

## Indicators of a Focus on Results (continued)

Key Elements of Indicator 5: Scalability Analysis	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
5.1 Scalability documents determine whether the program has robust evidence of its effectiveness.			✓
5.2 Scalability documents determine whether the program has the potential for substantially expanded reach and system adoption.			✓
5.3 Scalability documents determine whether an expanded program is acceptable to target groups and settings.			✓
5.4 Scalability documents determine whether an expanded program can be delivered at an acceptable cost.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>5. Program has conducted a scalability analysis.</b>			✓
<p>Description: Although the Division of Non-Public Education is a statewide program established in statute, it could still conduct a scalability analysis to determine whether it could have a greater impact if it had more resources such as more staff or newer technology. Although the Division did provide information on the increasing number of home schools and the growing demands for registration, the provided documentation does not demonstrate it has conducted a scalability analysis.</p>			
<p>Suggestions: The Division should conduct a scalability analysis to determine whether it has robust evidence of its effectiveness and has the potential for substantially expanded reach and system adoption. The scalability analysis should determine whether an expanded program would be acceptable to target groups and settings and could be delivered at an acceptable cost.</p>			

# Program Name: Division of Non-Public Education

## Indicators of a Focus on Results (continued)

Key Elements of Indicator 6: Strategic Plan	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
6.1 Strategic plan includes a mission statement.	✓		
6.2 Strategic plan includes a vision statement.	✓		
6.3 Strategic plan includes a values statement.	✓		
6.4 Strategic plan includes identified goals.	✓		
6.5 Strategic plan includes identified objectives.	✓		
6.6 Strategic plan includes performance measures.	✓		
6.7 Strategic plan is updated periodically.	✓		
Overall Indicator Rating	Meets	Partially Meets	Does Not Meet
	✓		

### 6. Program has a strategic plan.

Description: The Division of Non-Public Education's strategic plan includes a mission statement: "to serve the non-public school community, its students, and the citizens of North Carolina by ensuring compliance with North Carolina's non-public laws in the most practical, efficient, effective, and professional manner; administering the non-public school student driver eligibility certificate program; and serving as the State of North Carolina informational liaison office between the general public and the non-public school community." The strategic plan includes a vision statement: "to use innovative technology in conjunction with human relations to provide effective oversight of non-public schools while becoming a valuable resource for non-public schools and non-public students in North Carolina."

The Division shares the Department-wide values statement: "quality, safety and health, accountability, continuous improvement and development, innovation and creativity, customer service, diversity and inclusion, excellence, and integrity." In addition, the Division's strategic plan includes a division-specific values statement: "The Division of Non-Public Education will accomplish its mission of serving, supporting, monitoring and regulating non-public schools with excellence and integrity in customer relations, data management, clear communication, the efficient use of tax payer resources and consistent evaluation of results and processes." The strategic plan includes the following goals:

- convert most of its routine business services to an interactive, automated, online environment;
- change the way it manages and uses the talents of its staff to encourage a culture of excellence and personal development;
- increase communication and clarify information flowing from the division to the non-public community by developing relationships with stakeholders and using a variety of media and intentional outreach programs;
- enhance its visibility and relationships in the home school community by increasing the number of one-on-one meetings with home school administrators each year throughout North Carolina and speaking with more community groups to inform interested citizens regarding home school requirements;
- enhance its visibility and relationships in the conventional school community by increasing the number of one-on-one meetings with important stakeholders and provide a more comprehensive flow of information to non-public schools from other state agencies;



## Program Name: Division of Non-Public Education

---

- increase collaboration with other state agencies that intersect or serve non-public schools to provide more efficient and effective oversight and support; and
- increase voluntary compliance and departmental oversight of all non-public schools to increase the reliability and accuracy of statistical data maintained by the Division in order to improve public trust.

The strategic plan includes the following objectives:

- provide more paperless business services;
- increase the number of Home School Record Review meetings;
- increase the number of conventional school inspections per year;
- improve the process of issuing and revoking student Driving Eligibility Certificates;
- increase reliability of non-public metrics through more intentional accountability measures, targeted home school data initiatives, and enhanced communication; and
- increase collaborative relationships with community stakeholders and other state agencies relevant to the non-public customer base.

The strategic plan includes performance measures, which are discussed in Indicator 7.

The Division updates its strategic plan every two years in accordance with biennium budgets.

---

Suggestions: None.

---

# Program Name: Division of Non-Public Education

## Indicators of a Focus on Results (continued)

Key Elements of Indicator 7: Performance Measurement	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
7.1 Performance measures assess key inputs.		✓	
7.2 Performance measures assess key outputs.	✓		
7.3 Performance measures assess efficiency/process.	✓		
7.4 Performance measures assess quality.			✓
7.5 Performance measures assess key outcomes.	✓		
7.6 Program has a defined method for collecting performance data.			✓
7.7 Program has a standard format for reporting performance data.			✓
7.8 Program validates performance measures periodically.			✓
7.9 Performance measures are regularly reported to managers, staff, and key stakeholders.			✓
7.10 Performance measures provide the level and type of data needed to conduct a rigorous evaluation of program impacts.	✓		
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>7. Program has performance measures.</b>		✓	

Description: The Division of Non-Public Education has performance measures that assess key outputs, such as number of non-public school visits per year and number of stakeholder and collaborative meetings held per year. The Division has performance measures that assess efficiency/process (e.g., percentage of complaints about schools resolved within 25 days of receipt). In addition, the Division has performance measures that assess key outcomes, such as non-public students obtaining a driver's permit in a timely fashion. Therefore, the Division has performance measures that provide the level and type of data needed to conduct a rigorous evaluation of program impacts.

Although the Division has performance measures that assess key inputs, such as staff, the Division did not provide documentation demonstrating it has performance measures for other key inputs, such as funding and community groups. The Division did not provide documentation demonstrating it has performance measures that assess quality.

In addition, the Division did not provide documentation demonstrating that it has a defined method for collecting performance data, has a standard format for reporting performance data, validates performance measures periodically, or regularly reports its performance measures to managers, staff, and key stakeholders.

Suggestions: The Division of Non-Public Education should have performance measures that assess all of its key inputs, such as funding and community groups. The Division should have performance measures that assess quality (i.e., the degree to which services are delivered in accordance with pre-determined standards and/or whether customers are satisfied with the services they receive).

The Division should develop a defined method for collecting performance data that explains what it is going to collect and how (e.g., who will be surveyed and how often). The Division should develop a standard format for reporting performance data. In addition, the Division should periodically validate the information that is being reported by reviewing data collection protocols and comparing reported information to a sample of source data. The Division also should ensure that performance

# **Program Name: Division of Non-Public Education**

---

data are regularly reported to managers, staff, and key stakeholders in formats that are user-friendly and meet their information needs.

---

# Program Name: Division of Non-Public Education

## Indicators of a Focus on Results (continued)

Key Elements of Indicator 8: Quality Improvement System	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
8.1 Quality improvement system sets objectives, which have indicators, targets, and dates.		✓	
8.2 Objectives are consistent with those set by the program's strategic plan and are updated annually.		✓	
8.3 Quality improvement system monitors progress towards objectives through an action plan and milestones.			✓
8.4 Program takes remedial action if there is a performance shortfall.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>8. Program has a quality improvement system.</b>		✓	

Description: The Division of Non-Public Education provided documentation demonstrating it is in the process of developing a quality improvement system that will have objectives with indicators, targets, and dates, such as

- percentage of new home school Notice of Intent forms processed within three days of receipt (baseline is 85%),
- number of non-public school visits conducted (target is 50% of currently operating schools), and
- percentage of complaints about schools resolved within 25 days of receipt (baseline is 80%).

Because the Division is in the process of updating its strategic plan, the Division also is in the process of making its quality improvement system's objectives consistent with its strategic plan's objectives.

Suggestions: The Division should continue developing its quality improvement system. When the Division's strategic plan is updated, the Division should ensure its quality improvement system's objectives are consistent with its strategic plan's objectives, and it should update the quality improvement system's objectives annually. Progress towards objectives should be monitored through an action plan and milestones. The Division should take remedial action if there is a performance shortfall.

# Program Name: Division of Non-Public Education

## Indicators of Sound Financial Management

Key Elements of Indicator 9: Risk Assessment	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
9.1 Risk profile identifies inherent risks, assesses the likelihood and impact of inherent risks, determines risk tolerance, and examines the suitability of existing controls and prioritizes residual risks.		✓	
9.2 Mitigation strategy identifies who is responsible for risk management activities, determines what control activities the program is using, establishes when the program is implementing activities, and determines where the program is focusing its activities.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>9. Program has a risk assessment.</b>		✓	

Description: In accordance with N.C. Gen. Stat. §143D-7, the Department of Administration certifies to the State Controller that it performs an annual review of its system of internal control. The Department has designed internal controls to provide reasonable assurance regarding the reliability of financial reporting; compliance with certain provisions of law, regulations, contracts, and grant agreements; and the efficiency and effectiveness of its operations. Although the Division of Non-Public Education provided an early version of a risk assessment that identifies its inherent risks and prioritizes residual risks, the present version is not a risk profile that also assesses the likelihood and impact of inherent risks, determines risk tolerance, or examines the suitability of existing controls.

Suggestions: The Division should expand upon the early version of its risk assessment by creating a risk profile that also assesses the likelihood and impact of inherent risks, determines risk tolerance, and examines the suitability of existing controls. In addition, Division should create a mitigation strategy that identifies who is responsible for risk management activities, determines what control activities the program is using, establishes when the program is implementing activities, and determines where the program is focusing its activities.

# Program Name: Division of Non-Public Education

## Indicators of Sound Financial Management (continued)

Key Elements of Indicator 10: Financial Forecast	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
10.1 Financial forecast is conducted at least annually.	✓		
10.2 Financial forecast projects revenues and expenditures for at least 5 years.		✓	
10.3 Financial forecast breaks down projections into revenue and expenditure categories.	✓		
10.4 Financial forecast is based on a basic model of forecasting.	✓		
10.5 Financial forecast attempts to explain trends by discussing why revenue and expenditures are expected to increase or decrease.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>10. Program has a financial forecast.</b>		✓	

Description: The Division of Non-Public Education follows the biennial budget preparation instructions from the Office of State Budget and Management to develop its financial forecast, and therefore the forecast is reviewed annually and breaks down projections into revenue and expenditure categories. Although the Office of State Budget and Management's budget development process requires the Division to conduct two years of financial forecasting, the Division did not provide documentation demonstrating it projects revenues and expenditures for at least five years. The financial forecast is based on a basic model of forecasting; it uses extrapolation by reviewing historical revenue and expenditure data to predict the future by projecting the trend forward subject to the restrictions required by the Office of State Budget and Management. The Division did not provide documentation demonstrating its financial forecast attempts to explain trends by discussing why revenues and expenditures are expected to increase or decrease.

Suggestions: During the budget development process, the Division should build in a long-term focus by including revenue and expenditure projections for at least five years in its annual plan. The forecasts should attempt to explain the trends they reveal by discussing why revenue and expenditures are expected to increase or decrease.

# Program Name: Division of Non-Public Education

## Indicators of Sound Financial Management (continued)

Key Elements of Indicator 11: Cost Sharing	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
11.1 If program does not require cost sharing, documents include a description of why program does not require cost sharing. <i>If program does require cost sharing, enter N/A.</i>	✓		
11.2 If program does require cost sharing, documents include a description of cost sharing requirements. <i>If program does not require cost sharing, enter N/A.</i>	N/A		
11.3 If program does require cost sharing, documents describe the method used to set charges. <i>If program does not require cost sharing, enter N/A.</i>	N/A		
11.4 If program does require cost sharing, documents review cost sharing levels and recommend modifications as appropriate. <i>If program does not require cost sharing, enter N/A.</i>	N/A		
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>11. Program has cost sharing documents.</b>	✓		
Description: The Division of Non-Public Education does not require program participants to pay for its services.			
Suggestions: None.			

# Program Name: Division of Non-Public Education

## Indicators of Sound Financial Management (continued)

Key Elements of Indicator 12: Staffing Analysis	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
12.1 Staffing analysis measures caseload and workload.			✓
12.2 Staffing analysis identifies trends and establishes internal benchmarks for efficient operations.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>12. Program has conducted a staffing analysis.</b>			✓

Description: The Department of Administration is participating in the Office of State Human Resources's Statewide Compensation System Project, which reviewed job descriptions to streamline job classifications, but this project is not a staffing analysis with measures of caseload and workload. Therefore, the Division of Non-Public Education did not provide documentation demonstrating it has conducted a staffing analysis that measures caseload and workload or that identifies trends and establishes internal benchmarks for efficient operations.

Suggestions: The Division should conduct a staffing analysis to determine if its staffing levels are appropriate based on the volume of work it is required to perform. The staffing analysis should measure caseload (i.e., the number of cases that staff are assigned in a given time period) and workload (i.e., the amount of work required to manage assigned cases or perform certain tasks). The staffing analysis should identify trends and establish internal benchmarks for efficient operations by using historical data analysis, benchmarking, or business process mapping.



# Program Name: Division of Non-Public Education

## Indicators of Sound Financial Management (continued)

Key Elements of Indicator 13: Accounting System	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
13.1 Accounting system includes assets, liabilities, fund equity and other credits, revenues, and expenditures.	✓		
13.2 Accounting system tracks financial information on a cash and accrual basis.	✓		
13.3 Accounting system is capable of producing financial statements required by the Governmental Accounting Standards Board.	✓		
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>13. Program has an accounting system.</b>	✓		
<p>Description: The Division of Non-Public Education uses the North Carolina Accounting System. Therefore, its accounting system includes assets, liabilities, fund equity and other credits, revenues, and expenditures; tracks financial information on a cash and accrual basis; and is capable of producing financial statements required by the Governmental Accounting Standards Board.</p>			
<p>Suggestions: None.</p>			

# Program Name: Division of Non-Public Education

## Indicators of Sound Financial Management (continued)

Key Elements of Indicator 14: Audit	Key Element Ratings		
	Meets	Partially Meets	Does Not Meet
14.1 Audit documents include a description of audit requirements.	✓		
14.2 Audit documents demonstrate accessibility of persons involved with the program; books, records, reports, vouchers, correspondence, files, personnel files, investments, and any other documentation of the program; and property, equipment, and facilities of the program.	✓		
14.3 Program maintains a record of prior audits, examinations, and evaluations.			✓
14.4 Program maintains a record of corrective actions taken in response to audit findings and recommendations.			✓
	Overall Indicator Rating		
	Meets	Partially Meets	Does Not Meet
<b>14. Program is audited.</b>		✓	

Description: The Division of Non-Public Education has audit documents that include a description of audit requirements and that demonstrate accessibility of persons, documents, and property. In accordance with N.C. Gen. Stat. §143-746, the Department of Administration has an internal auditing program that audits the agency's major systems and controls periodically. The Department's internal auditor works in conjunction with the Secretary and senior staff to determine the audit schedule and reports findings to the Secretary and responsible managers for action. In addition, the Department complies with the Office of the State Auditor as required. However, the Division did not provide documentation demonstrating it maintains a record of prior audits, examinations, and evaluations. Also, the Division did not provide documentation demonstrating it maintains a record of corrective actions taken in response to audit findings and recommendations.

Suggestions: The Division should maintain a record of prior audits, examinations, and evaluations by listing key aspects of them (e.g., subject of audit, date completed, major findings) in a separate document from the audits themselves. The Division should maintain a record of corrective actions taken in response to audit findings and recommendations. The corrective actions could be listed in the separate document mentioned above.