

**APPLICATION FORM FOR CATEGORIES 4 and 5 ACTIVITIES
 or NON LISTED ACTIVITIES**

***This form must be completed to gain approval to keep animals on site where
 activities in Categories 4 and 5 or Non Listed Activities are undertaken.***

Under the guidelines outlined in the "The Australian Code of Practice for the Care and Use of Animals for Scientific Purposes, 8th Edition", Schools must seek approval to use animals for teaching purposes and to keep them. The aim is to ensure protection is afforded to animals in Schools and ethical practices are adhered to.

Applications for this must be submitted by the School's Animal Ethics Focus Person by the last working day of March each year. On approval applications will be valid for the period 1 May to 30 April of the following year.

Categories 4 and 5 activities require approval from the Animal Ethics Committee. Page 5 of this application requires that schools report details of activities that are within Category 2 or 3 that may be performed in conjunction with any category 4 or 5 activity.

"Species Information" sheets (pages 4-6) need to be completed for each species of animal kept on site.

Approval for agricultural / aquaculture purposes will be granted for 1 year. Breeding of large macropods is discouraged.

Please note that approval is **not required** by the Animal Ethics Committee to keep animals on site if the activities fall within Categories 1 to 3.

Refer to www.als.sa.edu.au >School Management & Governance > Animal Ethics for full list of categories and activities.

Name of School:

PIC code: (Schools require a Property Identification Code if they keep livestock e.g. horses, cattle, sheep, alpacas etc).

Address:

Postcode:

Telephone No: Fax No:

Animal Ethics Focus Person: Position Held:

Mobile Number:

Supervising Teacher: Position Held:

Mobile Number:

Sites are required to ensure an Animal Ethics Focus Person or Supervising teacher is contactable at all times.

Email:

Veterinary Surgeon:(Mandatory) Telephone No:

The Veterinarian should be aware that they have been nominated by the School. The AEC may contact the Veterinarian.

If keeping native animals, please provide name of site's native consultant.

Staff involved in this application (as named above).

Position(s)	List relevant background, qualifications & Training	Membership of relevant animal groups	Tenure at School	Permanent or Temporary Postion?
Animal Ethics Focus Person	Bachelor of Science (Animal Science) Bachelor of Education (Secondary) majoring in Agriculture	ATASA Member License for teaching, research or experimentation involving animals Permit to keep and sell schedule 6 basic protected animals - Class 1	3 rd Year	Permanent
Supervising Teacher				

Note: All Staff involved with animals and the site's Animal Ethics Focus Person must be familiar with the "Australian Code for the care and use of animals for scientific purposes 8th Edition 2013".

Prior to the use of animals, any students involved must receive age-appropriate instruction in the ethical and legal responsibilities underpinning the use of animals, as well as appropriate methods for animal care.

It is expected that the staff identified will be responsible for the welfare of the animals at all times.

The Animal Ethics Focus Person or teacher MUST submit an Adverse Events form if any adverse incidents occur.

Program Name:

Primary Science Python Program

1. Educational Outcomes

Describe how the animals will be incorporated into the curriculum.

Aim –

The science students of today are the key innovators and decision makers of tomorrow. It is these young people who will make the conservation decisions of the future, and they need to be equipped to make ethical and sustainable decisions if the global and national native fauna are to continue to exist into the future. A significant proportion of secondary students attending ~~103 in Darwin schools~~ elect out of science subjects in the senior year levels, meaning that, as a school, we are producing a minimal number of graduates who are equipped to make scientifically sound decisions into the conservation of our precious Earth. Subsequently there is a driving need to instil a passion for science and an appreciation for the diversity of life around us in younger generations, so that they may carry this enthusiasm into the more senior schooling and potentially follow a scientific study path, to the leaders of tomorrow. Furthermore, as ~~103 in Darwin schools~~ is a country school situated in a rural community in the Mid North region, snakes are a common part of many students' lives, particularly in the hot summer months. Through exposing students to the habits, behaviours, lifespan and care of snakes, and the general best practice for handling pythons, all with an attitude of respect to the animals, these students are learning both safe behaviours around venomous and non-venomous snakes and are also laying a solid foundation to build upon into their scientific careers as industry leaders in the conservation of our varied fauna populations.

Significance- Snakes and Pythons in Australia

Australia is the home to approximately 140 species of land snakes, some of which are equipped with venom more toxic than any other snakes in the world. Whilst in Australia, the number of deaths as a result of snake bite is significantly less than those that occur in other areas of the world, when bites do occur, the extent of injury is significant. Hence the understanding of snake behaviour, and snake bite first aid is imperative in rural Australian communities. However the most powerful tool in avoiding snake bit is the knowledge that most snakes would rather slither away from humans than fight them. "Snakes don't perceive humans as food and they don't aggressively bite things out of malice. Their venom is used to subdue prey that would otherwise be impossible for a snake to eat...if their only escape route is past a human with a shovel, then they are likely to react in the only way they can." Dion Wedd, curator of the Territory Wildlife Park NT. Furthermore the International Union for the Conservation of Nature (IUCN) have declared 7 species of Australian reptile to be critically endangered. Hence it is imperative that the decision makers and conservationists of tomorrow understand the value of these species and their need for protection, care and respect.

Expected Benefits –

It is expected that as a student moves through the primary science course from their foundation year to year 6, they will be given the opportunity to explore the value of Australian native animals, with a particular focus on reptile species. Students will be provided with opportunities to develop practical skills in how to interact with snakes in a wild situation, and the best practice for handling reptiles in a safe and respectful manner.

Procedures to be used –

Throughout the seven year program currently offered at ~~103 in Darwin schools~~ students will participate in basic best practice animal handling for the python, and will be provided with the opportunity to watch the processes involved in feeding snakes and the snakes methods for shedding skin.

2. Species of Animal(s)

Please identify the species and explain why its use is necessary, and the number of animals involved, as described in question 1.

The ~~103 in Darwin schools~~ primary science department owns one Darwin Python. This number of pythons have been selected due to the size of the vivarium available, and that curriculum requirements can be met with one python. The Darwin python has been chosen as the primary science native reptile, following extensive research, due to them not requiring any specialist care, being suitable for beginner snake owners and as they have a more gregarious nature and docility towards people than many of the other Australian python species.

3. Replacement, Reduction & Refinement (see Australian Code Section 1, 1.18-1.32)

a) Please indicate how the benefits of the program outweigh the welfare cost to the animal(s)?

The welfare cost associated for a python within the primary science python program include exposure to people on a daily basis which may result in some level of distress, and the completion of routine husbandry tasks including feeding and cage cleaning. These practices, whilst potentially mildly distress to the python have significant health and welfare benefits for the python for the duration of their lives. By incorporating the primary science python program into the science department at ~~103 in Darwin schools~~, not only does the welfare of the students improve as they gain a greater understanding for safe interactions with snakes in the wild, the students are exposed to a possible source of fear, which allows them to act logically in a situation of threat in their daily lives, and also gives them an appreciation for a poorly understood and misjudged class of Australian natives.

b) What controls will exist to reduce the impact on the animal(s)?

Effect of each procedure

Feeding of a python

This procedure will result in the python being exposed to human's presence every 10 days. This could cause some level of distress to the python.

Regular cleaning of vivarium

Completed weekly, this activity involves removing excreta from the vivarium. Once a term the vivarium is emptied, cleaned and rearranged. This results in python being caught and placed in a carry container, which can be distressing to python.

Regular cleaning of water bowl to ensure clean fresh water is available at all times

Completed every two days, or more frequently if necessary, this procedure involves washing out the water bowl to remove debris and any algae build up on the bowl, and replacing with fresh water. This results in python interacting with people which may be distressing to the python.

Basic animal health checks through the simple observation and handling of the python

This activity is completed daily, and exposes the python to the presence of humans. This could cause some distress to the python.

Gentling, training and handling

This occurs daily within a class setting for a maximum of 20 minutes per day. This activity involves catching the snake, and handling the python with the students being involved in touching the python. The daily process of gentling, handling and training of the python may cause some level of distress.

Minimise adverse impact on animals

In order to minimise the adverse impact on the python, students will be instructed on the appropriate ways to approach a snake in captivity, move around and treat a python. These behaviours will be closely monitored by the teacher, and exclusion from interactions with python will occur if students don't behave in accordance with their instructions. More invasive practices such as health checks will be carried out by experienced personnel in order to minimise the animal's distress and discomfort. Following invasive activities such as vivarium cleaning, feeding etc. the python will be left in peace to recover, and will be monitored from a distance to ensure they can regain calm and rest. Students will be shown correct best practice methods for touching pythons, and will become familiar with any and all measurements to be taken when interacting with snakes in a wild setting as well as in captivity.

Impact be monitored, assessed and managed

The impact of all procedures will be monitored throughout the procedure, by both those carrying out the procedure and the supervising teacher. If at any time during the procedure, animals display uncharacteristic signs of distress or discomfort for said activity, the procedure will be abandoned, and the practices will be reassessed to determine the cause for the heightened response.

Procedures to identify and respond to unforeseen complications

Unforeseen complications may be identified by the supervising teacher. Any such complications during any procedure will result in the cessation of the activity, the assessment of the situation and an appropriate response. Where ever necessary the school veterinarian will be contacted immediately and veterinary care will be provided to the stock.

c) Describe how, using animals, achieves better educational outcomes than using non-animal alternatives. eg. DVD, Internet, Audio Visual etc.

Whilst non-animal alternatives such as video clips, models, documents, diagrams and news articles are utilised wherever possible, the use of animals in an environmental science setting enables students to receive an authentic and holistic science education, where they are provided with the opportunity to encounter native fauna in a safe environment. By incorporating the [REDACTED] primary science python program into the science program, students living in rural communities are equipped with skills that will reduce the risk of snake bite and equip them to deal with a snake bite incident if one should occur.

4. Source of Animals

Detail where the animal(s) will come from and how it/they will be transported to the School site.

The python is purchased through Gully Reptile Centa, Modbury, Adelaide. Python will transported via road in a ventilated carry box.

Gully Reptile Centa – (08) 8264 9455

5. Fate of Animal

Describe the fate of animal(s) at the end of the project eg: kept indefinitely, re-homed or agricultural procedure.

Python will be kept indefinitely for continued use in learning opportunities as foundational members of the [REDACTED] primary science python program. If necessary, the python will be rehomed with the animal ethics person.

6. Applicant's certification:

I/We certify that this animal/these animals will be kept in accordance with the *South Australian Animal Welfare Act 1985 (The Act)* and the *Australian Code for the care and use of animals for scientific purposes 8th Edition, 2013 (The Code)*. I/we acknowledge that I/we have read *The Code* and that I/we accept responsibility for the ethical implementation of the proposal(s) according to the principles contained in *The Code*.

Animal Ethics Focus Person

Name:

Signature:

Date:

6/3/2017

7. Principal / Director's certification:

I am satisfied that the applicant(s) has/have the technical competence required to carry out the project described with minimum distress to the animals. I believe this work meets the requirements of *The Act*, *The Code* and its regulations. I have read this application and I am satisfied that this work is of sufficient educational merit. Sufficient and adequate resources will be available to provide appropriate care for all animals.

Principal/Director

Name:

Signature:

Date:

6/3/2017

Copies of the above *The Code* and *The Act* are available to be downloaded at: www.ais.sa.edu.au > School Management & Governance > Animal Ethics under General Information.

Office Use Only

Date application received by NGS Animal Ethics Committee: _____

Date Approved:

Approval Number:

Date Approval Letter sent:

Post

Email

Applications forms should be received by the AEC 31 March of the application year:

For 2015 and 2016:

NGS Animal Ethics Committee

Catholic Education Office

116 George Street, THEBARTON SA 5031

Website: <http://online.cesanel.adl.catholic.edu.au> > Teaching & Learning > Animal Ethics

Animal Ethics Executive Officer ☎ 8301 6830

For 2017 and 2018:

NGS Animal Ethics Committee

Association of Independent Schools of SA Inc

301 Unley Road, MALVERN SA 5061

Website: <http://www.ais.sa.edu.au> > School Management & Governance > Animal Ethics

Animal Ethics Executive Officer ☎ 8179 1421

SPECIES INFORMATION – TO BE COMPLETED FOR EACH SPECIES OF ANIMAL KEPT (PAGES 4-6)

SCHOOL NAME:

[Redacted School Name]

Commencing date and conclusion date of animal use. Please note, applications must be submitted PRIOR to keeping animals.

Commencement Date:

6/3/2017

Conclusion Date:

Indefinitely

SPECIES INFORMATION Please be specific when completing sections 1-4

Type of Species to be kept:

Snake

Number of Animals:

1

1. Housing – Supporting photographs are mandatory.

Type:

Isolation
The python will be kept in isolation, as they are a solitary species

Shelter
Shelter is provided to the python in the form of a glass vivarium, which includes a rock hide along with other vivarium objects.

Bedding
The base of the vivarium is filled with Cyprus mulch or aspen shavings, this allows the python to burrow and dig around in the mulch. This also allows humidity to be maintained.

Hiding areas
The python is provided with a variety of hiding areas including a hiding rock, a hollow under the water bowl, artificial vegetation, and a log.

Environmental enrichment
Environmental enrichment is provided to the python through rearranging the vivarium once a term. Gentle handling and supervised exploration is also provided to the python as a form of enrichment.

Temperature and lighting needs
The air temperature in the vivarium is supplied through a heat lamp which is controlled by a thermostat. The air temperature is maintained between 26-28°C. The heat lamp is dimmed to allow the python approximately 13 hours of darkness, depending on the season.

Duration held
Python will be kept indefinitely.

Size

600x600x400mm

(eg. aviary, hutch, aquariums) Please include size of area, type and height of fencing as relevant. Please define shelter type for larger animals.

Location:

The python is housed in a vivarium which is kept in the Primary Science room, out of direct sunlight, and not directly in the line of any air conditioning or heating units. This location allows close supervision of students near the vivarium, and a more stable internal environment, resulting in a more peaceful, quiet and comfortable location.

(eg. outside garden/paddocks/shed)

Cleaning schedule:

The vivarium is spot cleaned weekly to remove excreta, and the water bowl is cleaned every two days or more frequently as necessary. The vivarium is emptied and cleaned, replacing bedding and rearranging environment once a term.

(eg. weekly, end of term, daily removal of excreta)

2. Feeding

Feed Type:

The python is fed one killed and thawed adult rat every 10 days. This will change as the python grows and its feed requirements change. Killed frozen rats are stored in a sole purpose freezer in the primary science room, and are thawed and warmed in the room prior to being fed to the python.

(eg. seed, fruit, commercial preparations, flakes, hay pellets)

Feeder Type:

Python is fed in a feeding container and the rat is delivered with the assistance of feeding tongs.

(eg. hopper, open bowl)

Water

Water is provided in a flat, shallow water bowl.

(eg. sipper, bowl)

3. Security

Eg. mesh fence, locked gate video surveillance, physical surveillance

The vivarium is fitted with a lock, and the key is stored in a secure place near the teacher's desk. This location is not known by students.

4. Care – Please indicate the names of those responsible for the care of animals. NOTE: Animals MUST be checked on a DAILY BASIS.

	Frequency			Name	On-site *If off-site, see note below
	Feeding	Watering	Checking		
WEEKDAYS	Every 10 days	Every 2 days	1-2	[Redacted] Primary Science Teacher [Redacted] – Currently completing a course in herpetology [Redacted] Principal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
WEEKENDS		Every 2 days	1	[Redacted] Primary Science Teacher [Redacted] – Currently completing a course in herpetology [Redacted] Principal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
HOLIDAYS		Every 2 days	1	[Redacted] Primary Science Teacher [Redacted] – Currently completing a course in herpetology Python and vivarium will be moved to Primary Science Teacher's home during holidays, where it will continue to be cared for and handled by its regular handler.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Have the carers identified been advised of their responsibilities?

Yes No

Do they have access to SOP's and emergency numbers?

Yes No

5. Standard Operating Procedures (SOP)

Please indicate which AEC SOPs provide the guidelines for this procedure (Quote number).

AEC SOP No 08
SOP for Snake

Should any other SOP be implemented, please attach a copy to this application.

Should an approved AEC SOP not be available, please describe in detail, the management and care of each animal. Attach additional pages if necessary.

*Off-site care: Students must not be allowed to take animals home unless there is a clear, written undertaking from a parent or guardian that the animals will be cared for adequately and responsibly. Full care details are to be provided to the carer, including an emergency contact phone number and the veterinarian's contact details.

Audio Visual materials should be used, where possible, to demonstrate and supplement the activities as identified below.

Students can undertake CATEGORY 2/3 ACTIVITIES under direct supervision of appropriately qualified teacher(s). These should be listed for each species when performed in conjunction with CATEGORY 4/5 ACTIVITIES.

Category 2 Activities		
	Teacher(s) demonstrates procedure ONLY	Student(s) participate/assist in procedure
<i>Approval by the Principal is required and should be undertaken in accordance with a Standard Operating Procedure endorsed by the AEC.</i>		
Care for Animals on loan from the Nature Education Centre.	<input type="checkbox"/>	<input type="checkbox"/>
Observation of particular animal behaviours, e.g. oestrus, parturition.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
School performance by outside agencies that have animals as part of their exhibits.	<input type="checkbox"/>	<input type="checkbox"/>
Breeding of mice or other appropriate animal in the classroom.	<input type="checkbox"/>	<input type="checkbox"/>
The appropriate care of classroom pets.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Familiarisation activities.	<input type="checkbox"/>	<input type="checkbox"/>
Administering water orally as a treatment.	<input type="checkbox"/>	<input type="checkbox"/>
Collection of wool, milk, faeces or urine samples (non-invasive).	<input type="checkbox"/>	<input type="checkbox"/>
Administering a topical treatment to the udder.	<input type="checkbox"/>	<input type="checkbox"/>
Coat care and grooming.	<input type="checkbox"/>	<input type="checkbox"/>
Tail tagging.	<input type="checkbox"/>	<input type="checkbox"/>
Non-invasive measurement of body weight, body condition by visual assessment or condition scoring, growth, body proportions, pulse or blood flow, respiration, skin temperature (non-invasive), age by dentition, scrotum and testicles (palpation).	<input type="checkbox"/>	<input type="checkbox"/>
Mustering, drafting (in crush or bailhead), capture, restraint and handling of non-free-living domesticated animals (grooming or holding an animal, collecting a milk sample, non-invasive measurements, leading or riding an appropriately trained animal).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Organisations bringing animals to School (eg. Delta Society programs, RSPCA or PetPep).	<input type="checkbox"/>	<input type="checkbox"/>

Category 3 Activities		
	Teacher(s) demonstrates procedure ONLY	Student(s) participate/assist in procedure
<i>Approval by the Principal is required and should be undertaken in accordance with a Standard Operating Procedure endorsed by the AEC.</i>		
Measurement of mild dietary effects.	<input type="checkbox"/>	<input type="checkbox"/>
Taming/gentling.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Training for competition or showing.	<input type="checkbox"/>	<input type="checkbox"/>
Tethering animals.	<input type="checkbox"/>	<input type="checkbox"/>
Collection of saliva.	<input type="checkbox"/>	<input type="checkbox"/>
Administering topical treatment by backline, spray or dip.	<input type="checkbox"/>	<input type="checkbox"/>
Administering drench or capsules orally.	<input type="checkbox"/>	<input type="checkbox"/>
Coat clipping.	<input type="checkbox"/>	<input type="checkbox"/>
Shearing of sheep or goats.	<input type="checkbox"/>	<input type="checkbox"/>
Dagging.	<input type="checkbox"/>	<input type="checkbox"/>
Milking.	<input type="checkbox"/>	<input type="checkbox"/>
Putting nose clips on cattle.	<input type="checkbox"/>	<input type="checkbox"/>
Loading and unloading animal onto transporters.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Showing animals at School or away.	<input type="checkbox"/>	<input type="checkbox"/>
Foot bathing.	<input type="checkbox"/>	<input type="checkbox"/>
Flystrike treatment.	<input type="checkbox"/>	<input type="checkbox"/>
Jetting animals.	<input type="checkbox"/>	<input type="checkbox"/>
Using sire harness.	<input type="checkbox"/>	<input type="checkbox"/>
Restraining with ropes.	<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy detection by external ultrasound.	<input type="checkbox"/>	<input type="checkbox"/>
Applying heat detection devices, e.g. Kamars	<input type="checkbox"/>	<input type="checkbox"/>

Students cannot perform the procedures below but can assist.

Category 4 Activities		Teacher(s) demonstrates procedure ONLY	Student(s) participate but do not perform procedures
Approval by the AEC is required for these activities to be undertaken. Many of these procedures have the potential to be painful or distressing to the animal.			
Breaking in cattle or horses.	<input type="checkbox"/>	<input type="checkbox"/>	
Administering intraruminal, subcutaneous, intramuscular or intravenous injections.	<input type="checkbox"/>	<input type="checkbox"/>	
Administering winged capsules orally.	<input type="checkbox"/>	<input type="checkbox"/>	
Inserting intravenous injections e.g. CIDRs or intrauterine pessaries.	<input type="checkbox"/>	<input type="checkbox"/>	
Ear marking / tagging of livestock.	<input type="checkbox"/>	<input type="checkbox"/>	
Tattooing.	<input type="checkbox"/>	<input type="checkbox"/>	
Shearing of Alpacas and Llamas.	<input type="checkbox"/>	<input type="checkbox"/>	
Crutching.	<input type="checkbox"/>	<input type="checkbox"/>	
Castration of lambs using RING.	<input type="checkbox"/>	<input type="checkbox"/>	
Castration of lambs using KNIFE.	<input type="checkbox"/>	<input type="checkbox"/>	
Castration of calves using RING.	<input type="checkbox"/>	<input type="checkbox"/>	
Castration of calves using KNIFE.	<input type="checkbox"/>	<input type="checkbox"/>	
Tail docking of lambs.	<input type="checkbox"/>	<input type="checkbox"/>	
Tail docking of piglets by knife.	<input type="checkbox"/>	<input type="checkbox"/>	
Tooth trimming / removal in piglets.	<input type="checkbox"/>	<input type="checkbox"/>	
Beak trimming.	<input type="checkbox"/>	<input type="checkbox"/>	
Oestrus synchronisation.	<input type="checkbox"/>	<input type="checkbox"/>	
Microchip tagging.	<input type="checkbox"/>	<input type="checkbox"/>	
Dehorning cattle under six months of age.	<input type="checkbox"/>	<input type="checkbox"/>	
Detusking boars	<input type="checkbox"/>	<input type="checkbox"/>	
Debudding calves and kids.	<input type="checkbox"/>	<input type="checkbox"/>	
Horn tipping.	<input type="checkbox"/>	<input type="checkbox"/>	
Euthanasing of aquaculture species.	<input type="checkbox"/>	<input type="checkbox"/>	
Hoof paring: sheep and goats.	<input type="checkbox"/>	<input type="checkbox"/>	

Category 5 Activities	Teacher(s) / qualified person demonstrates procedure ONLY
Approval by the AEC is required for these activities to be undertaken. Many of these procedures have the potential to be painful or distressing to the animal.	
Collection of faeces, ruminal fluid or blood (invasive).	<input type="checkbox"/>
Nose ringing.	<input type="checkbox"/>
Freeze branding/Hot branding of cattle or horses	<input type="checkbox"/>
Artificial insemination.	<input type="checkbox"/>
Semen collection.	<input type="checkbox"/>
Hoof trimming: cattle.	<input type="checkbox"/>
Embryo collection and transfer	<input type="checkbox"/>

PROHIBITED PROCEDURES

The following procedures MUST NOT be undertaken in Schools unless undertaken by a Veterinarian / qualified operator:

- ◆ Pregnancy detection by rectal palpation
- ◆ Performance of surgical procedures without anaesthesia, other than in the conduct of normal animal husbandry operations.
- ◆ The surgical opening of any body cavity (e.g. cattle spaying)
- ◆ Demonstration of correct & safe technique for mulesing sheep.

The AEC should be advised if any of the above procedures are performed. A Veterinarian/qualified operator certificate should be provided to the AEC.

Name	List relevant background, qualifications & training and/or industry experience of all individuals performing the activities identified in CATEGORIES 2/3/4/5 (Attach additional pages if required)
[REDACTED]	Bachelor of Science (Animal Science)

Please describe any other procedures that have not already been identified: Provide specific details. (Attach additional information if necessary)