

FY 2014 BHA/CSA Annual Salary Survey, Cost Report, and Financial Status Report

To comply with regulations, you must send us three types of information: 1) a completed FY 2014 salary survey, 2) a 2014 cost report, and 3) a 2014 audited financial statement. The salary survey collects earnings data on mental health practitioners at all levels, including base salary, fringe benefits, and other kinds of compensation. It also asks for staffing information such as vacancies, separations, and tenure. The time period for which data is requested is Fiscal Year 2014 (July 1, 2013 - June 30, 2014).

Reminders

The salary survey and cost report were revised to make them more streamlined and improve their usefulness as tools for understanding the state of the industry. Changes include:

- An entry for the total number of **voluntary separations** only.
- Elimination of separate pages for full-time and part-time staff.
- A way to indicate whether an employee fills more than one job position.
- No need to calculate totals on the cost report; the spreadsheet will do this for you automatically.
- Shareholder distributions was added to the page with bonus and overtime payments.
- The definition of “fringe benefits” was changed.

The definitions and instructions below are specific to the survey and cost report. Please use them for guidance on how to complete the forms correctly. All cells of the forms must be completed. If you do not have a specific job title listed but do have a comparable position, please enter the information for that position. If you do not have a specific job title or comparable position, please fill in “0” in the corresponding cells. Submissions that are incomplete or contain erroneous entries will not be accepted and will be returned to you for completion. **Until submissions are complete, they will not be deemed in compliance.**

Note: When saving your survey and cost report, please be sure to include your agency’s name in the file name. For example: XYZ Behavioral Health Center would name their survey as XYZ OMHC survey. The cost report would be named XYZ cost report. This will help us determine who is submitting files.

Please complete and submit the salary survey and cost report forms in the required Excel Format and e-mail them, along with an electronic version (pdf) of your full, audited financial statement, to BHA by May 29, 2015. Hard copies and faxes will not be accepted. If you have additional questions or are not sure about the information being requested for a particular entry, please call or email: Jenny Howes at 410-402-8319 or dhmf.adultservices@maryland.gov.

The forms are locked to prevent changes from being made to their layout. You will only be allowed to enter data in the required fields. If you want to provide explanations, please use the “Comments” feature in Excel and insert a comment in the appropriate cell(s). Alternatively, you may add a separate sheet with your comments.

SALARY SURVEY INSTRUCTIONS

Remember to include the name of your entity, person completing the survey, a contact telephone number, and contact e-mail address at the top of each page.

DEFINITIONS

1. **Minimum Base annual salary**

The current basic annual salary that an employee expects to earn, before any payroll deductions, and exclusive of bonuses, overtime, or any other type of salary supplement. It also does not include agency fees, if any, for contract workers employed through placement agencies. Base annual salary is the amount actually paid to an employee with a given job title. **This is not a salary scale or range, but the actual salary paid to a current employee.**

2. **Minimum Base hourly wage**

The current basic hourly wage that an employee expects to earn, before any payroll deductions, and exclusive of bonuses, overtime, or any other type of wage supplement. It also does not include agency fees, if any, for contract workers employed through placement agencies. Base hourly wage is the amount actually paid to an employee with a given job title. **This is not the hourly wage scale or range, but the actual salary paid to a current employee.**

3. **Multiple Roles**

If the salary/wage reported for an employee includes compensation for the duties performed in other job positions or programs, report that here as “yes”. Specify the title(s)/program(s) and the number of hours assigned to the other position/program.

! **DO NOT** report for employees who are paid at different rates for each job title. These salaries are reported separately under the relevant job title.

4. **Discretionary Fringe Benefits**

The discretionary compensation you give to workers in addition to salary. For purposes of this survey, include only health insurance (all types), 401(k)/403(b), and pension in this amount. Enter as a percentage of annual salary. **Only enter this for those employees who are eligible to receive fringe benefits (i.e. do not factor in 0% contributions for those who are ineligible).** If the position does not receive fringe benefits, place “0” in this cell.

! **DO NOT include** the cost of sick leave, vacation leave, or bonuses in the fringe benefit amounts you report.

! **DO NOT include** mandatory employer contributions for FICA (Social Security and Medicare), FUTA/SUTA (federal/state unemployment tax), and workers compensation insurance. Fringe contributions usually amount to about 12% of salary.

! **DO NOT include** retirement plan administration costs.

5. **Full-Time Equivalent (FTE)**

The definition of FTE is the number of working hours that represents one full-time employee during a fixed time period, such as one week, one month, or one year. FTE simplifies work measurement by converting work load hours into the number of people required to complete that work.

6. **Voluntary Separations**

The permanent departure of an employee who leaves voluntarily.

! **DO NOT** include layoff, termination, promotion within the company, reorganization, or retirement.

7. **Tenure**

The length of time (in months) that a staff member with a given job title has been employed by you as of June 30, 2014.

8. **Vacant Positions**

Open, budgeted positions that you are actively trying to fill. This does not include positions that may be budgeted but that you are not hiring for because of financial or other reasons.

9. **Shareholder Distributions**

If the employee is also an owner/shareholder and receives distributions of profits in addition to a salary, report that amount on the Additional Payments tab. This is not the same as a bonus, which is additional compensation paid to non-owner employees.

10. **Position descriptions**

Job titles vary by entity. Those listed in this survey represent the job titles most commonly found in community-based mental health programs. If you use a different job title for a position that fits the responsibilities described, don't change the title on the spreadsheet, but insert the information for the corresponding position at your program on that line.

Chief Financial Officer (CFO)

This is the key person responsible for the fiscal management of the organization. The CFO reports to the Executive Director/President/CEO of the organization. Qualifications: usually requires a bachelor's degree in business administration or accounting with experience in supervision of staff. Responsibilities include: supervise all aspects of the financial functioning of the agency; hire, supervise and evaluate accounting staff; prepare and monitor annual budget; ensure timely and accurate reports to all Federal, State and local entities and the agency Board of Directors; oversee management information hardware and/or software; may also oversee facility/property needs.

Chief Operating Officer (COO)

This is generally the lead staff person managing the day-to-day operations of larger organizations as delegated by the CEO. The person holding this position reports to the Executive Director/President/CEO. Qualifications: usually requires at least a bachelor's degree and senior management experience. Responsibilities include: supervise key financial, human resource, clinical and related leadership staff; develop and carry out protocols for effective management and problem resolution processes; execute other leadership roles as delegated by the CEO.

Executive Director/Chief Executive Officer (CEO)/President

This is the key leadership position in the organization. This person reports to the Board of Directors and usually has an employment contract. Qualifications: usually requires a master's degree in mental health or related field and work experience within the mental health field including several years of supervisory experience. Responsibilities include: assess program on a routine basis; develop and implement a strategic plan for the agency; identify appropriate funding sources, among other fiduciary responsibilities; participate in community organizations; advocate for advancement of the human service delivery system; provide overall leadership within the agency and between agency and external constituencies.

Medical Director

The Medical Director is defined by COMAR as a psychiatrist who is employed by and is on site at the **OMHC** at least 20 hours per week. If employed full-time by the program, this person may also serve as program director. The medical director usually reports to the executive director. Qualifications: requires degree from an accredited medical school and licensure by the Maryland Board of Physicians. Responsibilities include: the overall responsibility for clinical services, including, at a minimum: Establishing and maintaining appropriate standards for diagnosis and

treatment, including therapeutic modalities and prescribing practices; Medical aspects of quality management; Adequate physician coverage; and Ensuring adequate clinical supervision of treatment staff.

OMHC Program Director

This person is the clinical leader, providing consultation and support to the program to ensure development, implementation, and monitoring of **OMHC** program and practice standards. The program director usually reports to the executive director. Qualifications: Requires at least a Master's degree from an accredited school, licensure for independent practice by a Maryland professional board, and senior management experience. Responsibilities include: overseeing the clinical operations of the OMHC; clinical supervision of staff; consultation with staff on emergency/crisis situations; develop, implement, and maintain policies and procedures required to meet licensing/certification standards.

Program Manager/Rehabilitation Director

This person directs and monitors the daily operations of a **PRP-related** program such as on-site rehabilitation services, vocational services, etc. The program manager/director may report to the Executive Director/President/CEO of the organization or another senior executive. Qualifications: usually requires at least a bachelor's degree in mental health or a related field, more than two (2) years experience in the mental health services delivery or related field and supervisory experience. Responsibilities include: supervise senior staff including interviewing, hiring, evaluations and scheduling; oversee quality management activities; oversee the development and implementation of client IRPs; monitor the management of crisis situations involving clients; ensure that all necessary client information is documented accurately and submitted to the appropriate staff in a timely manner; develop and monitor annual budget for program; develop and monitor program goals; assure compliance with all regulations governing the program; assure standards and regulations are maintained relating to safety and cleanliness and assure all clients' human, civil and legal rights are protected; conduct training.

Rehabilitation Specialist

This person oversees rehabilitation activities implemented by direct care staff in a **PRP-related** program as outlined by IRPs or ITRPs and may report to another senior manager. Qualifications: requires 1) a bachelor's degree in mental health or a related field, or 2) certification by the U.S. Psychiatric Rehabilitation Association or the Commission on Rehabilitation Counselor Certification. Responsibilities include: develop and assure that rehabilitation services meet the needs of consumers served; oversee the daily program of rehabilitation services; educate direct care staff on how to provide rehabilitation services that correlate with the goals identified in consumers' IRPs or ITRPs; develop functional assessments and environmentally specific skill development plans; plan, facilitate, and evaluate the effectiveness of skill groups and activities; plan services with individual clients e.g. as part of a community support team; maintain and monitor clients' use of medication utilizing the medication monitoring system; provide ongoing support, counseling and crisis intervention; write monthly progress notes and reviews of clients as required; and assure standards and regulations are maintained relating to service delivery and safety and assure clients' rights are protected.

Rehabilitation Counselor/Direct Care Staff/Vocational Counselor

These staff members provide direct rehabilitation services (vocational, PRP) and other supports to clients participating in a **PRP-related** program. They may report to a program supervisor (or, in smaller programs, a senior manager). Qualifications: requires at minimum, a high school diploma or equivalency and 40 hours of PRP training before independently providing PRP services. Responsibilities may include: provide direct services to clients; develop functional assessments and environmentally specific skill development plans; plan, facilitate, and evaluate the effectiveness of skill groups and activities; plan services with individual clients e.g. as part of a community support

team; maintain and monitor clients' use of medication utilizing the medication monitoring system; implement client IRPs; provide ongoing support, counseling and crisis intervention; provide opportunities for community integration and outreach services to clients; write monthly progress notes and reviews of clients as required; and assure standards and regulations are maintained relating to service delivery and safety and assure clients' rights are protected.

Senior Supervisor

This person supervises front-line staff in a **PRP-related** program, serves as support team leader, and otherwise assists the Manager in the development of the program in accordance with agency goals and consumer needs. The senior supervisor usually reports to the Program Director.

Qualifications: usually requires at least a bachelor's degree in mental health or related field plus one year supervisory experience including interviewing, selection, and performance evaluations.

Responsibilities include: supervise direct care staff; oversee client activities; manage program activities; and ensure standards and regulations are maintained relating to service delivery, staff training and safety; and assure client rights are protected.

LINE-BY-LINE INSTRUCTIONS OMHC and PRP Surveys

NOTE: The salary survey form has two tabs: Employee Details and Additional Payments. Both tabs must be fully completed.

ATTENTION MULTI-STATE & MULTI-MISSION ENTITIES! If your entity is a *multi-state operation*, report the salary of the CEO, CFO, and COO of your *Maryland site(s) only*. If your entity's *mission includes sectors beyond the provision of mental health care*, report the salary of the CEO, CFO, and COO for your *Maryland mental health operation only*. If it is not possible to segregate out Maryland-only and mental health-only staff, report the information you have available *but please note this in your comments*.

Page One: Employee Details

Enter the name of your entity, person completing the survey, a contact telephone number, contact e-mail address, and annual number of clients at the top of the page in the space provided.

Column B. Minimum Base Annual Salary. For each business line, enter the lowest base annual salary (see definitions) you actually paid to an employee with this job title on June 30, 2014. Remember: this is the basic annual salary before payroll deductions and exclusive of supplements such as overtime.

TIP – Fill in salary information ONLY for employees hired on a salary basis! For employees hired on an hourly wage, place a “0” in the salary column.

TIP – For employees hired through a placement agency: DO NOT consider in your determination of “minimum” or include in the reported amount that portion of wages that represents the agency fee. **ONLY** use the base salary that the employee expects to receive.

TIP – If you only have one employee in a job title, then that employee’s base annual salary is the minimum base annual salary for the job title.

Example: You have five employees with the job title “Social Worker, LCSW-C” in your program. Employee 1 is paid a base annual salary of \$45,000. Employee 2 is paid a base annual salary of \$50,000. Employee 3 is also paid a base annual salary of \$50,000. Employee 4 is paid a base annual salary of \$55,000. Employee 5 is paid a base annual salary of \$60,000. Enter “\$45,000” in Column B for this job title as this is the minimum salary paid for the position.

Column C. Maximum Base Annual Salary. For each business line, enter the highest base annual salary (see definitions) you actually paid to an employee with this job title on June 30, 2014. Remember: this is the basic annual salary before payroll deductions and exclusive of supplements such as overtime.

TIP – Fill in salary information ONLY for employees hired on a salary basis! For employees hired on an hourly wage, place a “0” in the salary column.

TIP – For employees hired through a placement agency: DO NOT consider in your determination of “maximum” or include in the reported amount that portion of wages that represents the agency fee. **ONLY** use the base salary that the employee expects to receive.

TIP – If you only have one employee in a job title, then the maximum base annual salary will be the same number as that entered in the minimum base annual salary column for the job title.

Example: You have five employees with the job title “Social Worker-LCSW-C” in your program. Employee 1 is paid a base annual salary of \$45,000. Employee 2 is paid a base annual salary of \$50,000. Employee 3 is also paid a base annual salary of \$50,000. Employee 4 is paid a base annual salary of \$55,000. Employee 5 is paid a base annual salary of \$60,000. Enter “60,000” in Column C for this job title as this is the maximum salary paid for the position.

Column D. Mean Base Annual Salary. Enter the mean (average) base annual salary of all employees with this job title on June 30, 2014. To calculate the mean, take the total base annual salaries you actually paid to all full-time employees with this job title (remember: this is before payroll deductions and does not include bonuses, overtime, or other supplements) and divide it by the number of employees with this job title.

TIP – Fill in salary information ONLY for employees hired on a salary basis! For employees hired on an hourly wage, place “0” in the salary column.

TIP – If you only have one employee in a job title, then the minimum, maximum, and mean base annual salary columns will all be the same number.

Example: You have five employees with the job title “Social Worker-LCSW-C” in your program. Employee 1 is paid a base annual salary of \$45,000. Employee 2 is paid a base annual salary of \$50,000. Employee 3 is also paid a base annual salary of \$50,000. Employee 4 is paid a base annual salary of \$55,000. Employee 5 is paid a base annual salary of \$60,000. Add their base annual salaries together: \$45,000 + \$50,000 + \$50,000 + \$55,000 + \$60,000 = \$260,000. Divide the total (\$260,000) by the number of employees (5) to get the mean base annual salary: $\$260,000 / 5 = \$52,000$. Enter “\$52,000” in Column D as this is the mean of all salaries for this job title.

Column E. Multiple Roles. If an employee works in more than one position or program and is paid a flat salary/hourly wage, enter “yes” in this cell and specify the position title and number of hours worked/week in this other role.

Example: If a medical director works 32 hours/week in that position and another 8 hours/week as an Adult Psychiatrist and receives a flat salary of \$150,000 per year, you must enter “yes” in this field and indicate “Adult Psychiatrist, 8 hours/week”.

If a program director works 20 hours/week for an annual salary of \$80,000 and 20 hours/week as an LCSW-C seeing clients for \$25/hour, you report these amounts separately. You would enter “no” in this field and report the program director salary on that line and the LCSW-C wage on that line.

Column F. Minimum Base Hourly Wage. For each business line, enter the lowest base hourly wage (see definitions) you actually paid to an employee with this job title on June 30, 2014. Remember: this is the basic hourly wage before payroll deductions and exclusive of wage supplements such as overtime.

TIP – Fill in wage information ONLY for employees hired on an hourly wage basis!

For salaried employees, place “0” in the wage column.

TIP – For employees hired through a placement agency: DO NOT consider in your determination of “minimum” or include in the reported amount that portion of wages that represents the agency fee. **ONLY** use the base hourly wage that the employee expects to receive in hand.

Example: You have five employees with the job title “direct care staff” in your program. Employee 1 is paid a base wage of \$8.75/hour. Employee 2 is paid a base wage of \$9.50/hour. Employee 3 is also paid a base wage of \$9.50/hour. Employee 4 is paid a base wage of \$10.00/hour. Employee 5 is paid a base wage of \$10.25/hour. Enter “\$8.75” in Column E as this is the minimum hourly wage paid for this job title.

Column G. Maximum Base Hourly Wage. For each business line, enter the highest base hourly wage (see definitions) you actually paid to an employee with this job title on June 30, 2014. Remember: this is the basic hourly wage before payroll deductions and exclusive of wage supplements such as overtime.

TIP – Fill in wage information ONLY for employees hired on an hourly wage basis!

For salaried employees, place “0” in the wage column.

TIP – For employees hired through a placement agency: DO NOT consider in your determination of “maximum” or include in the reported amount that portion of wages that represents the agency fee. **ONLY** use the base hourly wage that the employee expects to receive.

Example: You have five employees with the job title “direct care staff” in your program. Employee 1 is paid a base wage of \$8.75/hour. Employee 2 is paid a base wage of \$9.50/hour. Employee 3 is also paid a base wage of \$9.50/hour. Employee 4 is paid a base wage of \$10.00/hour. Employee 5 is paid a base wage of \$10.25/hour. Enter “\$10.25” in Column F as this is the maximum wage paid for this job title.

Column H. Mean Base Hourly Wage. For each business line, enter the mean (average) base hourly wage of employees with this job title on June 30, 2014. To calculate the mean, take the total base hourly wages you actually paid to all employees with this job title (remember: this is before payroll deductions and does not include bonuses, overtime or other supplements) and divide it by the number of employees with this job title.

TIP – Fill in wage information ONLY for employees hired on an hourly wage basis!
For salaried employees, place “0” in the wage column.

TIP – If you only have one employee in a job title, then the minimum, maximum, and mean base hourly wage columns will all be the same number.

Example: You have five employees with the job title “direct care staff” in your program. Employee 1 is paid a base wage of \$8.75/hour. Employee 2 is paid a base wage of \$9.50/hour. Employee 3 is also paid a base wage of \$9.50/hour. Employee 4 is paid a base wage of \$10.00/hour. Employee 5 is paid a base wage of \$10.25/hour. Add their base hourly wages together: $\$8.75 + \$9.50 + \$9.50 + \$10.00 + \$10.25 = \48 . Divide the total (\$48.00) by the number of employees (5) to get the mean base hourly wage: $\$48 / 5 = \9.60 . Enter “\$9.60” in Column G as this is the mean wage for this job title.

Column I. Number of Employees with Job Title. Enter the actual number of employees with this job title (or in a comparable job position if you do not use this title) on June 30, 2014—that is, at the end of the fiscal year. This number changes over the course of the year because of separations, creation of new positions, etc. For this reason, we ask that you report the number of employees at the end of the fiscal year. It is possible to have a job title with “0” employees if the position was newly created in FY 2014 or it was an existing position that was vacant.

Column J. Mean No. Hours Worked per Week per Employee. Enter the mean (average) number of hours worked per week for all employees with this job title over the course of FY 2014. To calculate the mean, take the total number of hours worked by all employees with this job title, and divide it by the number of employees with this job title in, and divide the result by 52.

TIP – If you only have only one employee in a job title, the mean hours worked will be the number of hours worked per week for that employee.

Example: You have five employees with the job title “direct care staff” in your program over the course of FY 2014. Employee 1 worked 1,664 hours. Employee 2 worked 1,872 hours. Employee 3 also worked 1,872 hours. Employee 4 worked 2,340 hours. Employee 5 worked 2,080 hours. Add their hours together: $1,664 + 1,872 + 1,872 + 2,340 + 2,080 = 9,828$. Divide the total (9,828) by the number of employees (5): $9,828 / 5 = 1,965.6$. Divide the result (1,965.6) by 52: $1,965.6 / 52 = 37.8$. Enter “37.8” in Column H as this is the mean number of hours worked per week for this job title.

Column K. No. of FTE’s. Add up the number of regular hours that all employees with a given job title are expected to work per week. Divide by 40. Enter the number. For example you have three LCSW-Cs: one works 40-hours/week, one works 38 hours/week, and one works 20 hours/week. $40+38+20 = 98$. Divide 98 by 40 = 2.45 FTEs.

Column L. Discretionary Fringe Benefits (as a % of Salary). Remember: “fringe benefits” means the discretionary compensation you give to employees in addition to wages. **It does not include FICA, FUTA/SUTA, worker’s compensation, or any other mandatory employer contributions; nor does it include vacation, sick leave, bonuses, or other wage enhancements.** For each job title, perform the following calculation:

Divide: Total dollar amount of employer-paid contributions for fringe benefits for all employees with this job title for the fiscal year

By: Total amount of actual salary payment to all employees with this job title for the fiscal year.

Round the result up to the nearest hundredth and enter as a percentage (whole number) in Column I.

Example: The total amount of salary paid to all psychiatric nurse practitioners in FY 2013 was \$201,080. The total amount of employer contributions for fringe benefits (as defined) for all psychiatric nurse practitioners was \$24,100.

$$24,100 / 201,080 = .1198 = .12 \text{ (rounded) or } \mathbf{12\%}$$

Enter "12" in Column L.

Column M. No. of Voluntary Separations. For each job title, add up the number of voluntary separations over the course of FY 2014 (cut-off date is June 30, 2014) and enter that number in this column.

Column N. Average Tenure in Months. For each job title, enter the average (mean) number of months that employees were with you over the course of FY 2014, using June 30, 2014 as the cut-off date. Calculate this by taking the total number of months that all employees with this job title in a given business line and dividing by the number of employees.

Example: You have three professional counselors - LCPC in your program. Counselor 1 was hired in January 2014 and so on June 30, 2014 was with you for 6 months.

Counselor 2 was hired in July 2013 and so on June 20, 2014 was with your entity for 12 months. Counselor 3 was hired in August 2010 and so on June 30, 2014 was with your entity for 47 months. Add the total number of months of that all these employees worked for you: $6 + 12 + 47 = 65$ months. Divide the total (65) by the number of employees (3): $65 / 3 = 21.66$. Round up to the nearest whole number and enter "22" in Column N for professional counselor- LCPC .

Column O. No. of Vacant Positions. For each job title, enter the number of open, budgeted positions *for which you were actively recruiting* on June 30, 2014. Do not include positions that you were not seeking to fill for budgetary or other reasons. Remember: this is not vacancy rate—it is simply the number of open positions.

Page Two: Additional Payments – Bonuses, Overtime, Shareholder Distributions

Enter the name of your entity, person completing the survey, a contact telephone number, and a contact e-mail address at the top of the page in the spaces provided.

For each job title, enter the total FY 2014 dollar amount (rounded up to the nearest whole dollar) of bonus payments, overtime paid to all (full-time and part-time) direct service staff, and shareholder distributions paid to all employee owners. If you did not pay bonuses, overtime wages, or shareholder distributions to employees in certain categories, enter "0" in the appropriate cell.

The "Total" column will automatically adjust as you enter data.

Cost Report Instructions

NOTE: The cost report form has four tabs: Cover Page, BHA, Non-BHA, and Tie-Out. All four tabs must be fully completed.

- After completing the Provider Name on the Cover Page tab, this information will auto-fill on the BHA, Non-BHA, and Tie-Out tabs.
- After selecting the end date for the reporting period on the Cover Page tab, this information will auto-fill on the BHA, Non-BHA, and Tie-Out tabs.
- Fill in all cells. If an item does not pertain to your agency, enter "0" in that cell.
- All totals should reconcile with total expenses on your audited financial statement.
- Use the "Non-BHA Funding Sources" section to classify all costs not specific to BHA funds.
- Try to match your expenses as near as possible to the State of Maryland Department of Budget and Management (DBM) classifications on the Cost Report. In those instances that are not clearly matched, use your best judgment or enter in "Other Expenditures".
- If you do not track direct and indirect costs, allocate based on your best assumptions.
- The Total Columns are programmed to add up automatically.
- The "Tie-Out" tab will automatically add information from the BHA and Non-BHA tabs.
- You will need to fill in the information on the "Total Revenue" portion at the bottom of the Tie-Out tab. If you do not receive "BHA Other" or "Non-BHA" funds, place a "0" in these cells. The Payer Mix percentage will automatically be calculated and the Grand Total must equal 100%.
- Please recheck your Cost Report before submission to insure that all information is filled in. Any missing information will result in having the form returned for completion.