## CONNECTICUT BOARD OF REGENTS FOR HIGHER EDUCATION
### Connecticut State Colleges & Universities

**APPLICATION FOR MODIFICATION OF ACCREDITED PROGRAM**

### SECTION 1: GENERAL INFORMATION

<table>
<thead>
<tr>
<th>Institution: CCSU</th>
<th>Date of Submission to CSCU Office of the Provost:</th>
</tr>
</thead>
</table>

**Most Recent NEASC Institutional Accreditation Action and Date:** Approved 2018

**Original Program Characteristics**

**CIP Code No.: 13.1401**

**Title of CIP Code:** Teaching English as a Second or Foreign Language/ESL Language Instructor

**Name of Program:** Teaching English to Speakers of Other Languages (TESOL)

**Degree:** Master of Science

**Certificate:** (specify type and level)

**Date Program was Initiated:** 1960s or 70s

**Modality of Program:** X On ground Online Combined

If "Combined", % of fully online courses?

**Total # Cr the Institution Requires to Award the Credential (i.e. include program credits, GenEd, other):** 36

**Original Program Credit Distribution**

<table>
<thead>
<tr>
<th># Cr in Program Core Courses:</th>
<th># Cr of Electives in the Field:</th>
<th># Cr of Free Electives:</th>
<th># Cr Special Requirements (include internship, etc.):</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>9</td>
<td>0</td>
<td>3</td>
</tr>
</tbody>
</table>

**Total # Cr in the Program (sum of all #Cr above):** 36

From "Total # Cr in the Program" above, enter #Cr that are part of/belong in an already approved program(s) at the institution: 36

**Type of Program Modification Approval Being Sought (mark all that apply):**

- Licensure and Accreditation (specify whether New Certificate, Minor, Option, Concentration, or Other)
- X Significant Modification of Courses/Course Substitutions*
  - Offering of Program at Off-Campus Location (specify new location)
  - Offering of Program Using an Alternate Modality (e.g. from on ground to online)
- X Change of Degree Title or Program Title

**Modified Program Characteristics**

**Name of Program:** Applied Linguistics

**Degree:** Master of Arts

**Certificate1:** (specify type and level)

**Program Initiation Date:** Fall 2019

**Modality of Program:** X On ground Online Combined

If "Combined", % of fully online courses?

**Total # Cr the Institution Requires to Award the Credential (i.e. include program credits, GenEd, other):** 30-36

**Modified Program Credit Distribution**

<table>
<thead>
<tr>
<th># Cr in Program Core Courses:</th>
<th># Cr of Electives in the Field:</th>
<th># Cr of Free Electives:</th>
<th># Cr Special Requirements (include internship, etc.):</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>12-18</td>
<td>0</td>
<td>3</td>
</tr>
</tbody>
</table>

**Total # Cr in the Program (sum of all #Cr above):** 30-36

From "Total # Cr in the Program" above, enter #Cr that are part of/belong in an already approved program(s) at the institution: 30-36

**Other:** Proposing two tracks: Teaching English to Speakers of Other Languages (TESOL) and Language Policy and Planning (LPP)

**Significant** is defined as "more than 15 credits in a previously approved undergraduate degree program or more than 12 credits in a previously approved graduate degree program.

1. If creating a Certificate program from existing courses belonging to a previously approved baccalaureate/associate degree program, enter information about that program in the "Original Program" section.

---

**Notes regarding Application:**

Log of Steps Toward Approval:

Date of Approval:
SECTION 1: GENERAL INFORMATION  (continued)

If program modification is concurrent with discontinuation of related program(s), please list for such program(s):

Program Discontinued: n/a  CIP:  OHE#:  Accreditation Date:
Phase Out Period  Date of Program Termination

Institution’s Unit (e.g. School of Business) and Location (e.g. main campus) Offering the Program: College of Liberal Arts and Social Sciences, main CCSU campus

Other Program Accreditation:
- If seeking specialized/professional/other accreditation, name of agency and intended year of review:  n/a
- If program prepares graduates eligibility to state/professional license, please identify:  n/a
(As applicable, the documentation in this request should addresses the standards of the identified accrediting body or licensing agency)

Institutional Contact for this Proposal: Dr. Matthew Ciscel  Title: Professor  Tel.: 860-832-2749  e- mail: ciscelm@ccsu.edu

SECTION 2: BACKGROUND, RATIONALE AND NATURE OF MODIFICATION

(Please Complete Sections as Applicable)

Background and Rationale  (Please provide the context for and need for the proposed modification, and the relationship to the originally approved program)

Compared to other TESOL Master’s programs, ours has long had a comparatively thorough theoretical base (more linguistic, cognitive, and social theory). Because of this, we have decided (and the CCSU curricular process has fully approved) to change our program name to Applied Linguistics, which is a term that overlaps considerably with TESOL but also highlights a more technical and theoretical approach to language teacher training than one finds in many programs called TESOL. Similarly, we feel that the change from MS to MA is justified by the character of the training that we provide within the College of Liberal Arts and Social Sciences, approaching language teaching as an art more than a science.

Given that “Applied Linguistics” is a broader designator than “TESOL” we propose two tracks: (1) TESOL and (2) language policy and planning (LPP). We retain the TESOL track because the name is familiar to many of our potential students. Further, our current TESOL program continues to draw substantial numbers of students as the impact of globalization (in all its forms) on our State grows and as the population of non-native English speakers continues to increase in local schools and communities. The TESOL track remains largely unchanged in its required courses (36 credits) and focus on preparing TESOL teachers.

We propose the language policy and planning (LPP) track to address a gap in policy and administrative understanding of applied linguistic issues in the State and across the United States. This subfield of applied linguistics applies linguistic theory and modeling to the areas of institutional management, educational policy, law, and globalization. The LPP track will prepare students for administrative roles in public, non-profit, and private institutions that operate across multilingual and socially complex contexts. Like the existing interdisciplinary program in International Studies at CCSU, this track in the Applied Linguistics MA will require 30 credits, including a thesis, which will demonstrate student skills in research and policy-making. Aside from splitting one existing course (LING 515, Intro to Sociolinguistics) into two courses (the core LING 515, Language Policy and Planning, and an irregular elective LING 516 Variation and Discourse), there are no new courses required to develop this track. Instead, coursework is drawn from existing LING, education policy, and political science offerings. Other changes in the proposed curriculum reflect updates to course numbering, titles, and descriptions.

The new track in LPP will provide a specialized path for those who plan to work productively with English-language learner populations and in organizations with a global orientation. The LPP track will appeal to school administrators, government
policy makers, students aspiring to jobs in international organizations, and managers from multinational enterprises of all sorts.

As applicable, please describe:

- How does the program address CT workforce needs and/or the wellbeing of CT society/communities? (Succinctly present as much factual evidence and evaluation of stated needs as possible)

The State of Connecticut has been identified recently by several measures for having one of the worst achievement gaps in the US between native and non-native speakers of English in our public school systems. Thus, we have an opportunity—and an obligation—to nurture and realize the educational and workforce potential of a growing demographic in the State (English learners or emergent bilinguals). Our TESOL program has long aimed to address this need by training ESOL teachers both in classroom strategies and in the foundations of multilingualism, second language acquisition theory, and the structure and function of human language. The modifications proposed here will improve the quality of our program by adding a policy-focused track to our already excellent teacher-training track.

- How does the program make use of the strengths of the institution (e.g. curriculum, faculty, resources) and of its distinctive character and/or location?

CCSU is well situated to grow its applied linguistics program because it is already the strongest such program in the State, being the only public institution in CT that offers initial TESOL teacher certification for public schools (post-bacc) alongside a rigorous Master’s program. In addition, we have a core of four tenure-track faculty in applied linguistics, plus an additional five full-time faculty working in related fields in other departments (Modern Languages, Literacy Instruction, Psychological Science, and Educational Policy Studies). In addition, CCSU’s element of distinction for international education and Master’s program in International Studies provide opportunities for convergent events and shared resources.

- Please describe any transfer agreements with CSCU institutions that will become instituted as a result of the approval of this program (Please highlight details in the Quality Assessment portion of this application, as appropriate) n/a

- Please indicate what similar programs exist in other institutions within the CSCU System, and how unnecessary duplication is being avoided.

No other CSCU campus has an applied linguistics program similar to the one proposed here. SCSU does have a Master’s program in TESOL that is considerably more focused on classroom strategies. No other institution has a program that provides initial State teacher certification in TESOL nor an applied linguistics focus with a track in LPP.

- Please provide a description/analysis of employment prospects for graduates of this proposed program

The TESOL track will continue to produce well-trained teachers of English to emergent bilinguals. When these graduates have or obtain State teacher certification, they are hired quickly, since this is a high-need and growing teaching area in Connecticut school districts. Others find employment teaching ESOL in higher education, adult education programs, private language schools, and in teaching positions literally all over the world. The LPP track will appeal to school administrators, government policy makers, students aspiring to jobs in international organizations, and managers from multinational enterprises of all sorts. Positions in this area are available, for example, at the United Nations in NY, the Center for Applied Linguistics in Washington, DC, and many other locations around the world. In addition, this specialization would benefit school principals, district administrators, and others who make policies that impact educational practice.

Description of Modification (Please provide a summary of the modifications to curriculum, admissions or graduation requirements, mode of delivery, etc., and concisely describe how the institution will support these changes.)

The modification has two parts. The first is the change in title and program type. The existing MS in TESOL will become an MA in Applied Linguistics. The second is the creation of a two-track system in the degree, with the TESOL track involving no significant modification from the existing program and a new Language Policy and Planning (LPP) track being added.
The LPP track involves significant modification because it will share only 15 core credits with the TESOL track. Instead of the classroom methods courses in the TESOL track, students in the LPP track will take 15 credits of courses focused on sociolinguistics, educational policy, and social and legal theory, leading to a thesis capstone project. Aside from one new graduate course (dividing our LING 515 into 515 and 516, as described above), the courses in this track will be drawn from existing courses in Linguistics, Educational Policy Studies, and International Studies.

**Description of Resources Needed** (As appropriate please summarize faculty and administrative resources, library holdings, specialized equipment, etc. Details to be provided in the next section, as appropriate)

No new resources are needed for this modification. If the new program attracts substantial numbers of new students, adjunct faculty (drawn most likely from our outstanding Master’s alumni) might be hired to cover one or two undergraduate survey linguistics courses. However, if enrollments track in the manner we expect them to (as indicated in the pro forma budget below), we have the capacity to absorb expected enrollment without requiring additional resources.

**Previous Three Years Enrollment and Completion for the Program being Modified**

These numbers do not include the handful of students each in our post-bacc teacher certification program (GradCert) and graduate short certificate program (OCP) each semester, some of whom will re-enroll in the MS-TESOL once finished with their current program.

<table>
<thead>
<tr>
<th>ACTUAL Enrollment</th>
<th>Fall Term, Year <em>16</em></th>
<th>Fall Term, Year <em>17</em></th>
<th>Fall Term, Year <em>18</em></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Time</td>
<td>Part Time</td>
<td>Full Time</td>
</tr>
<tr>
<td>Transfers In</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>New Students</td>
<td>1</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Returning Students</td>
<td>15</td>
<td>17</td>
<td>7</td>
</tr>
<tr>
<td><strong>ACTUAL Headcount Enrollment</strong></td>
<td>16</td>
<td>22</td>
<td>9</td>
</tr>
<tr>
<td>Fall FTE accounted for by Program Majors</td>
<td>28</td>
<td>22</td>
<td>14</td>
</tr>
<tr>
<td><strong>Size of Credentialed Group(s) for Given Year</strong></td>
<td>38</td>
<td>30</td>
<td>19</td>
</tr>
</tbody>
</table>

**Course and Capstone Requirements:**

This program offers two tracks: TESOL or LPP. For the capstone, the TESOL track allows two options, Plan A (36 credits, including a thesis) or Plan B (36 credits, plus a comprehensive examination), while the LPP track allows only one option, Plan A (30 credits, including a thesis).

**Applied Linguistics Core (required for either track)**

- LING 500 Linguistic Analysis 3
- LING 507 L2 Acquisition Theory 3
- LING 512 Syntactic Theory 3
- LING 513 Phonological Theory 3
- LING 515 Language Policy and Planning 3
  Total Credit Hours: 15
Track in Teaching English to Speakers of Other Languages (TESOL)

Students must complete the Applied Linguistics Core, plus another 21 credits, including:

- LING 506 Methods in TESOL I 3
- LING 535 L2 Testing 3
- LING 596 Methods in TESOL II 3
- LING 598 Research in Applied Ling 3

Total Credit Hours: 12

One TESOL Elective, from the following:

- LING 514 Variation and Discourse 3
- LING 530 Topics in Applied Linguistics 3
- LING 531 English Historical Linguistics 3
- LING 533 L2 Composition 3
- LING 537 Adv Issues in Multilingualism 3
- LING 538 Methods in L2 Content 3
- LING 550 Internship in Applied Linguistics 3
- LLA 515 Literacy Instruction for the EL 3

Total Credit Hours: 3

One Education Elective, from the following:

- EPS 500 Contemporary Educational Issues 3
- EPS 516 School and Society 3
- EPS 524 Foundations of Contemporary Theories of Curriculum 3
- EPS 525 History of American Education 3
- EPS 528 Comparative and International Education 3
- EPS 538 The Politics of Education 3
- EPS 583 Sociological Foundations of Education 3

Total Credit Hours: 3

Capstone, either Plan A or Plan B, as follows:

- LING 599 Thesis 3

or
Comprehensive Exam
and
One additional TESOL Elective course, or as approved by advisor 3
Total Credit Hours: 3

**Track in Language Policy and Planning (LPP)**

Students must complete the Applied Linguistics Core, plus another 15 credits, including TWO LPP electives from the following:

<table>
<thead>
<tr>
<th>Course Code</th>
<th>Course Title</th>
<th>Credit Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>LING 506</td>
<td>Methods in TESOL I</td>
<td>3</td>
</tr>
<tr>
<td>LING 514</td>
<td>Variation and Discourse</td>
<td>3</td>
</tr>
<tr>
<td>LING 530</td>
<td>Topics in Applied Linguistics</td>
<td>3</td>
</tr>
<tr>
<td>LING 531</td>
<td>English Historical Linguistics</td>
<td>3</td>
</tr>
<tr>
<td>LING 537</td>
<td>Adv Issues in Multilingualism</td>
<td>3</td>
</tr>
<tr>
<td>LING 550</td>
<td>Internship in Applied Ling</td>
<td>3</td>
</tr>
</tbody>
</table>

Total Credit Hours: 6

Plus, one general policy elective from the following (or as approved by the advisor):

<table>
<thead>
<tr>
<th>Course Code</th>
<th>Course Title</th>
<th>Credit Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPS 525</td>
<td>History of American Education</td>
<td>3</td>
</tr>
<tr>
<td>EPS 528</td>
<td>Comparative and International</td>
<td>3</td>
</tr>
<tr>
<td>EPS 538</td>
<td>The Politics of Education</td>
<td>3</td>
</tr>
<tr>
<td>EPS 583</td>
<td>Sociological Foundations of Education</td>
<td>3</td>
</tr>
<tr>
<td>PS 501</td>
<td>Adv Studies in International Law</td>
<td>3</td>
</tr>
</tbody>
</table>

Total Credit Hours: 3

Capstone (Plan A only), as follows:

<table>
<thead>
<tr>
<th>Course Code</th>
<th>Course Title</th>
<th>Credit Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>LING 598</td>
<td>Research in Applied Linguistics</td>
<td>3</td>
</tr>
<tr>
<td>LING 599</td>
<td>Thesis</td>
<td>3</td>
</tr>
</tbody>
</table>

Total Credit Hours: 6

**Additional Information** (for both tracks)

All planned programs and course sequences should be approved by a TESOL advisor prior to registration. Degree candidates must file a planned program before completing 16 credits of graduate course work.
Students in the TESOL track may elect Plan A only with the approval of an advisor and second reader in the program. Plan A students take LING 598 first and then LING 599 while writing the thesis. The Graduate Studies Office provides a useful Handbook about Thesis preparation and formatting.

Plan B students take one additional elective course from the TESOL Elective list above. Comprehensive Exams involve five questions, which are scored up to 20 points each. A student must earn a minimum of 80 points total on the five questions in order to pass the exam. If a student fails, the entire exam must be retaken. The exam is offered only twice per year and can be attempted only three times.

It is expected that a degree candidate will have control of the English language beyond mere communicative adequacy. It shall be the joint decision of the TESOL faculty whether a degree candidate's control of spoken and/or written English is appropriate to the profession. The faculty will recommend various remedies for any candidate whose proficiency in Standard English is deemed deficient.

### Curriculum Details for a Program Modification (to be used as appropriate for specific modification request)

<table>
<thead>
<tr>
<th>Course Number and Name</th>
<th>L.O. #</th>
<th>Pre-Requisite</th>
<th>Cr Hrs</th>
<th>Course Number and Name</th>
<th>L.O. #</th>
<th>Cr Hrs</th>
</tr>
</thead>
<tbody>
<tr>
<td>LING 500 Ling Analysis</td>
<td>1</td>
<td>n/a</td>
<td>3</td>
<td>LING 506 Methods in TESOL I</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>LING 507 Sec Lang Acquisition Theory</td>
<td>2</td>
<td>n/a</td>
<td>3</td>
<td>LING 535 Sec Lang Testing</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>LING 512 Syntactic Theory</td>
<td>1</td>
<td>LING500</td>
<td>3</td>
<td>LING 596 Methods in TESOL II</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>LING 513 Phonological Theory</td>
<td>1</td>
<td>LING500</td>
<td>3</td>
<td>LING 598 Research in App Ling</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>LING 515 Language Policy and Planning</td>
<td>3</td>
<td>n/a</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Core Course Prerequisites

<table>
<thead>
<tr>
<th>Elective Courses in the Field</th>
</tr>
</thead>
<tbody>
<tr>
<td>See TESOL track listing above</td>
</tr>
<tr>
<td>See LPP track listing above</td>
</tr>
</tbody>
</table>

### Total Other Credits Required to Issue Modified Credential

### Learning Outcomes - L.O.

1. Analyze and interpret linguistic phenomena using current linguistic theory
2. Analyze and interpret linguistic phenomena using current theory of second language acquisition
3. Produce effective materials relevant to the practice of applied linguistics (lesson plans and/or policy position papers)
4. TESOL track: Design, implement, and assess lessons and curricula in TESOL using best practices
5. LPP track: Design, implement, and assess institutional language policies based on current research and theory

---

2 Details of course changes for Community College institutions should be provided with enough detail to introduce necessary changes in the centralized programmatic database for that system.

3 Make any detailed annotations for individual courses as needed to understand the curricular modifications taking place.
SECTION 3: RESOURCE AND FINANCIAL CONSIDERATIONS

Two-Year Cost Effectiveness and Availability of Adequate Resources

(Please complete the Pro-Forma Budget – Projected Revenues and Expenditures on the following page. Provide any necessary annotations for the Pro-Forma Budget and other commentary regarding the cost effectiveness and availability of adequate resources for the proposed modification below: Summary: NO NEW RESOURCES

1. We expect modest, but steady increases in enrollments over the next 3 years. We anticipate 6 FT and 16 PT students in Fall 2019; 8 FT and 20 PT students in Fall 2020; and 11 FT and 23 PT students in Fall 2021.

2. Tuition reflects 2018-19 current tuition costs for in-state CT residents ($5917.50 per semester); it does not include any other general, online or university fees nor assumes tuition increases for 2019-22. We estimate that our part-time students will take, on average, 5 credits each Fall. Values reflect the incremental increase in tuition with the expected enrollment growth described above.

3. A faculty member administers the program and receives 3 credits of reassignment per semester. The cost reflects 12.5% of the faculty member’s base salary plus 71% in estimated fringe. Further, the increase across 3 years reflects the 3.7% contractual increase in salary through AY2020 as reflected in Articles 12.3 and 12.4 of the AAUP Contract.

4. Currently, full-time faculty teach 45 credits per academic year within the program. Across the next 3 years, we expect the number of credits offered by full-time faculty to remain the same. We scaled the salary of each faculty member teaching in the program to the number of credits they teach and divided by 2 to obtain the Fall semester cost. Further, we scaled salary further because courses taught within the program are taken by students outside of the program. In Fall 2018, 105 student credit hours were generated by students enrolled in the program. However, the faculty taught 231 total student credit hours in program courses. Thus, the true cost of faculty teaching within the program was scaled to the student credit hours expected for program candidates as a function of total student credit hours expected. The scaling rates projected for the next 3 years are .50, .57, and .61, respectively. We estimated fringe at 71% of base salary for long-standing faculty members at 55% for mid-career faculty, and 45% for early-career faculty members (post 2011). The increase across years also factors in a 3.7% change in salary through AY2020 as reflected in Articles 12.3 and 12.4 of the AAUP Contract. (Note: Faculty members teaching within the program and/or their ranks may change within 3 years.)

5. The Department Secretary clerically supports the operations of the MS program. We estimate that 5% of her time is spent in direct support. The estimates below include 5% of base salary and fringe (found at transparency.ct.gov) and the increases reflect the 3.5% expected contractual increases set to take place in July 2019.
**PRO FORMA Budget** - Projected Revenues and Expenditures
(Whole Dollars Only)

<table>
<thead>
<tr>
<th>PROJECTED Program Revenue$</th>
<th>Fall 2019</th>
<th>Fall 2020</th>
<th>Fall 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuition (do not include internal transfers)$</td>
<td>$103,816</td>
<td>$133,868</td>
<td>$168,701</td>
</tr>
<tr>
<td>Program-Specific Fees</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td>Other Revenue (Annotate in narrative)</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td><strong>Total Estimated Program Revenue</strong></td>
<td><strong>$103,816</strong></td>
<td><strong>$133,868</strong></td>
<td><strong>$168,701</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PROJECTED Program Expenditures*</th>
<th>Fall 2019</th>
<th>Fall 2020</th>
<th>Fall 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration (Chair or Coordinator)$</td>
<td>$18,100</td>
<td>$18,770</td>
<td>$18,770</td>
</tr>
<tr>
<td>Faculty (Full-time, total for program)$</td>
<td>$60,538</td>
<td>$73,595</td>
<td>$79,112</td>
</tr>
<tr>
<td>Faculty (Part-time, total for program)</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td>Support Staff$</td>
<td>$1,870</td>
<td>$1,936</td>
<td>$2,003</td>
</tr>
<tr>
<td>Library Resources Program</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td>Equipment (List as needed)</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td>Other (e.g. student services)</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td>Estimated Indirect Costs (e.g. student services, operations, maintenance)</td>
<td>$ -</td>
<td>$ -</td>
<td>$ -</td>
</tr>
<tr>
<td><strong>Total Estimated Program Expenditures</strong></td>
<td><strong>$80,509</strong></td>
<td><strong>$94,300</strong></td>
<td><strong>$99,885</strong></td>
</tr>
</tbody>
</table>

*Note: Capital outlay costs, institutional spending for research and services, etc. can be excluded.

This PRO FORMA Budget provides reasonable assurance that the proposed program modification can be established and is sustainable. Some assumptions and/or formulaic methodology may be used and annotated in narrative on page 4 of Application.