
ACEND Virtual Town Hall Meeting
July 20, 2021, 11:00 a.m. Central Time

Host: Rayane AbuSabha, PhD, RD
ACEND Executive Director
Presenter: Long Wang, PhD, RD, FAND
DPD Representative, ACEND Board



Webinar Recording Link

<https://vimeo.com/736184185>

Introduction/Announcements: Rayane AbuSabha welcomed all in attendance.

Rayane indicated the objectives for the virtual Town Hall:

- Provide ACEND update and announcements
- Discuss latest ACEND Board decisions
- Provide an overview of ACEND's webinars and trainings
- Present FEM data results
- Answer questions

Rayane began with updates from ACEND. The draft 2022 Standards Survey was opened for a second round of public comments are currently being revised. The release date is scheduled for September 1, 2021.

Rayane provided updates about decisions made by the ACEND Board. Because of the recent increase in the match rate to dietetic internships, the ACEND Board lifted the moratorium on Didactic Programs in Dietetics during its August 2020 meeting.

In October, the ACEND Board waived the substantive change fee for programs adding a graduate degree. This is to help assist programs in meeting the CDR graduate requirement. From now until December 31, 2023 the Board decided at its October 2020 meeting that it will not charge a fee to any program moving to the graduate level. Also at its October meeting, the ACEND Board made a decision to no longer use the pass rate policy as a primary factor in making accreditation decisions. This is in line with many other accreditors. Passing the RDN or NDTR exam is a very important outcome for graduates of ACEND accredited programs; however, programs will no longer be reviewed solely based on their graduates' pass rate level. There are other indicators of program quality that the Board will take into consideration to ensure a more holistic review of the quality of our programs.

To help assist programs during the COVID pandemic, during the February 2021 meeting, the ACEND Board voted to freeze its annual accreditation fee for 2022. The fee schedule has been revised and posted on the ACEND website. On it you will note that the annual accreditation fee for 2022 will not change and will be the same as this year.

The Accreditation Standards require programs to publish information about the requirements and process to become a registered dietitian nutritionist (RDN), including education, supervised practice, passage on the CDR credentialing exam, and state certification/licensure, if applicable; and how the program fits into the process. It is recommended that programs add the statement that it is ACEND's considered opinion that the program is designed to and does meet all state dietetics licensure and

ACEND Town Hall – July 2021

certification laws. This is because some states may interpret their statutes differently. This information is sent in this month's ACEND update and is posted on the ACEND Website

As ACEND has started the USDE review process, we have been in discussion with legal counsel and USDE regarding partnerships and the FG programs. We have learned that the educational institution granting the degree (college/university) must be the sponsoring institution. The supervised practice site cannot grant the degree; therefore, it cannot sponsor a program that provides a degree. For instance, Universities must sponsor the program and the program director must be a full time employee of the institution or contracted by that institution. ACEND does not get involved in the contracts between programs and program directors. ACEND has contacted all the partnerships that submitted applications

in the FEM Demonstration and we are working with these institutions to assist them in moving forward. If you have any questions do not hesitate to contact your ACEND manager.

Rayane then provided an update on the FEM demonstration program numbers:

- Cohort 1: 13 programs approved, 12 FG and 1 FB; 1 in process
- Cohort 2: 9 programs approved, 8 FG and 1 FB; 1 in process
- Cohort 3: 18 programs approved, 18 FG; 9 programs in process
- Cohort 4: 9 programs approved, 9 FG; 16 programs in process
- Cohort 5: 6 programs in training

ACEND also issued the call for applications for Cohort 6 demonstration programs. Applications for Cohort 6 are due on Monday December 6, 2021. The application to become a demonstration program can be found on the ACEND website at <https://www.eatrightpro.org/futuremodel> ACEND is accepting applications only for FG and FA programs.

ACEND has launched a series of webinars on diversity equity and inclusion. These webinars are recorded and posted on the ACEND DEI webpage <https://www.eatrightpro.org/acend/about-acend/diversity-equity-and-inclusion> The next webinar in this series is titled: *Supporting and Building Resilience in BIPOC Students and Dietetic Interns* and will describe strategies and resources that BIPOC students and interns can employ to have a positive educational experience in our nutrition and dietetics programs. This webinar is presented by Tamara Melton, co-founder of Diversify Dietetics. The webinar will take place on Tuesday September 14, 2021 from 5:00 – 6:30 pm CT to accommodate our students' and interns' schedule. All faculty and students are welcome to attend. Programs are encouraged to invite all students and interns to attend. More information about the webinar, which will be recorded, and the link to register for it are found on the ACEND DEI webpage.

Upcoming webinars on DEI include:

- *Closing Equity Gaps in Higher Education: Lessons for Leveling the Playing Field for all Students*
 - Presented by Timothy Renick, PhD, RD and Ben Brandon, MS
 - Tuesday November 16, 2021: 11:00 am CT – 12:00 am CT
- *Supporting our LGBTQ Students and Dietetic Interns*
 - Presented by Sharon Groh-Wargo, PhD, RD
 - Tuesday February 8, 2022: 11:00 am CT – 12:30 am CT

ACEND offers several workshops and modules specifically for program directors. These workshops are designed to help dietetic education program directors learn the latest accreditation standards and specific details on how to prepare for self-study reports, program assessment reports, and site visits. The next workshop that is based on the Future Education Model Accreditation Standards will be held virtually on August 5 and 6, 2021.

New this year, and available on the ACEND website, are the online program director modules on the Future Education Model Accreditation Standards which specifically address the FEM standards, competency-based education, and how to apply to become a demonstration program. Under Training and Resources, you will also find other useful workshops including the recorded CBE workshop that is presented by ACEND consultant Leanne Worsfold, and the ACEND leadership and professional communication certificate. This certificate is intended to provide ACEND program directors with training to build their leadership skills and improve communication and management skills. It is being made available to all ACEND stakeholders (including preceptors) for purchase at a discounted price. You can register for any of these workshops and modules on the ACEND website, under Training and Resources.

ACEND would like to highlight the new toolkit from The NDEP Council: The Salary Negotiation Toolkit which is now available on the NDEP website and portal. This toolkit is intended to help nutrition and dietetics students, interns and educators prepare for successful salary negotiation. Locate the toolkit on the NDEP website <https://www.eatrightpro.org/ndep> Programs are encouraged to make use of this toolkit to assist their students in improving their negotiation skills.

Rayane encouraged participants to consider becoming a program reviewer if they are not already. ACEND needs both educators and practitioners as reviewers. Serving as a reviewer provides a great way to network with other program directors and faculty and to learn new ideas for your own program by better understanding the ACEND Standards. Program reviewers review two to three program self-study reports per year and go on site visits to those programs. They also review two to four progress reports each year as well. Program reviewers are also eligible to serve on the ACEND board. The application to become a program reviewer is posted on the ACEND website. <https://www.eatrightpro.org/acend/training-and-volunteer-opportunities/program-reviewers> ACEND is also in need of FEM program reviewers. Current program reviewers who are interested in reviewing programs under the Future Education Model Standards may contact ACEND at acend@eatright.org.

Rayane discussed communication with ACEND. ACEND will continue to issue its monthly update, typically sent on the third Tuesday of each month and posted on the ACEND website. ACEND also will continue its virtual Town Hall on a periodic basis. The next town hall is set for Tuesday, November 16 from 11:00 am – 12:00 noon central time. ACEND staff are always available to assist you and answer any questions you may have.

- 800-877-1600 x5400
- acend@eatright.org

Rayane then introduced ACEND Board member Dr. Long Wang who is a Nutrition Professor at California State University-Long Beach in Long Beach, California. She indicated that Long will provide an update on the Future Education Model data

Long noted the learning objectives for his presentation:

- Upon completion, attendees will be able
 - To describe the benefits identified by program directors of the early adopter FEM demonstration programs
 - To explore the challenges and potential solutions recommended by program directors

Long's presentation slides are included after these minutes.

Following the presentation, Rayane thanked Long and opened the Town Hall to questions and comments in the chat. These are included below.

Licensure Disclosure

Does the requirement to publish info on requirements to become an RDN apply to Diet Tech programs?

- The information to publish information on requirements to become an RDN is not required for DT programs. DT programs must have information related to Standard 9, Required Element 9.3d which is the requirements and process on how to become a nutrition and dietetics technician, registered (NDTR), including education, supervised practice, passage on the CDR credentialing exam and state certification/licensure, if applicable; and how the program fits into the process. be NDTR.

Trainings:

Is there a new director training coming up?

- ACEND is offering an FEM Program Director workshop, virtually August 5-6, 2021. Because the 2017 standards are being replaced with the 2022 Standards, ACEND is working on revising templates for the 2022 standards and expects to have a program director workshop on those standards in spring of 2022. In the meantime, ACEND will hold recorded sessions on the changes between the 2017 and 2022 standards in early fall. Stay tuned for more information.

Is registration for the FEM program director workshop Aug 5-6 closed? it is not listed on the Upcoming events page.

- You can find the FEM program director workshop on the ACEND website [here](#).

For those that became New Directors and have not yet utilized the portion of the change fee towards a new Director training, can it be used in the future program to cover 2022 standards?

- Yes, new program directors who have not yet utilized the portion of the change fee towards a new program director workshop can still use the source code for program director workshop in the spring on the 2022 standards.

Is there a timeline for when the leadership training will be available for purchase?

- The leadership training certificate is currently being updated by the Academy. We will keep programs informed about the status of the certificate as we learn more.

FEM Programs

We will begin offering our Master's Coordinated Program (currently accredited as an undergraduate CP) in Fall 2022. Would there be advantages/disadvantages to converting it to a FEM?

- The FEM is a type of CP. In the 2022 standards, the assessment of the curriculum is similar to the FEM but what separates these program types is the competencies and the performance indicators. Get together with your faculty and preceptors to talk out if you have time to develop this piece of the curriculum. Think about when you wish to start the program. The start time is not feasible if the program is planning to start Fall of 2022.

If removing DICAS match is a 'benefit' to FEM, why not also remove this requirement for DI and ISPP?

- ACEND reached out to NDEP and requested that they review the match for Dietetic Internship (DI) programs and in general because the match has not been effective over the last few years. Generally, about two-thirds match leaving one-third of the students who do not match.

ACEND Town Hall – July 2021

Additionally, one-third of the DI slots are not being filled through the match. We requested the NDEP Application Committee review the need for the match and then we can look at how to move forward.

I have some questions about the FEM data that was presented. Thanks for sharing the descriptive data from the surveys you sent out to the program directors/students. Is there a plan in the future to provide data about differences in learning outcomes or other performance indicators to compare the CBE model approach vs. the training from the 2017 standards?

- ACEND has planned to present outcome data all along, but at this time we do not have a lot of cohorts that have graduated students from programs. It is our plan to perform this analysis and to monitor diversity data. Due to small numbers, we still do not have adequate data to be able to present program outcomes. As more and more programs start to graduate students, we can collect data in our annual reports and will share it accordingly. The FEM logic model is intended to collect data on program outcomes; there are no plans to collect data on PIs since the PIs in the FEM standards are significantly different from the knowledge and competency statements in the 2017 standards. We have only had a few programs that have graduates who have taken the CDR credentialing exam and the preliminary data for the first time pass rate on the CDR exam shows graduates of FG programs earning 12 pts higher than graduates of programs following the 2017 standards. This is based on one year data and may potentially change.

What is the anticipated timeframe for widespread adoption of FEM standards for all programs? I understand these are currently being piloted; however, assuming they become the standard at some time, when can we expect that?

- The anticipated timeframe is a discussion for the Board at the July meeting. Right now, the Future Education Model Standards are a pilot and ACEND continues to make adjustments. However, the Board will be discussing the future of the standards and a timeline for when ACEND might adopt a single set of standards. ACEND believes that programs would appreciate advance notice of the timeline to assist them in planning for the future.

To follow-up on the previous question, and Rayane's reply would the board consider FEM adoption before there are significant FEM graduates and adequate outcomes data available?

- The Board is looking at all aspects of the FEM standards including outcomes data. Data will continue to be collected and analyzed to help inform Board decisions.

I am also curious about the statement on the save time/cost. Was this statement from students who were changing careers or did this include DPD students?

- This statement came from a program director who completed the survey, specifically who mentioned that the program did a 3+2 model and this shortened the whole process for a student from 6 years to 5 years. The survey revealed that approximately half of the students had a DPD verification statement so some DPD students may see time saving benefit, but for those without the DPD, this could present time saving benefit. As for cost, because it is a master's degree program, they can apply for financial aid versus if they were in a stand-alone program. The program director from Hunter (a cohort 1 program) presented at FNCE 2020 that the program saved students half a year in schooling which is half a year in tuition and this gains them half a year more to work. Saving time and cost are consistent themes that we hear from some FG programs.

What strategies are FEMs using (e.g., the reference to 1/2 semester time savings at Hunter) to save students time?

- FEM models are integrated with both didactic and SEL in one program. Programs such as Hunter, which had a MS/DPD program that was 2 years in length and DI (9 months), have found that by integrating the program they have reduced the time it takes for students in the program to complete the DPD plus DI from 3 years to 2½ years.

Is there any data on the percent of students who prefer FEM over traditional master's + internship programs?

- In 2021 the NDEP Council gathered data from 506 DPD students and graduates eligible to apply for internships/supervised practice programs for the 2021 Spring match. Results indicate that students were in favor of the graduate degree. 69% of students who responded to the survey indicated that the ability of the program to offer a master's degree was important in their decision to apply to the program. Perhaps in this survey, NDEP can ask students more specifically about the type of program they prefer. Unfortunately, we have heard that some students are getting matched to internship programs and dropping the internship to enroll in an FG program. The reasons are not fully known. Anecdotally, ACEND has also heard that when an FG and a CP or DI are in the same department, students do seem to prefer the FG program.

Similar to the previous question, what statistical methods will be used to determine if CBE is a better education model vs the current models that require the Masters (e.g., MS/DI and CPGs)?

- ACEND will be looking at program outcomes including program completion data, CDR pass rate data, and employer data.

If DPD is not required for FEM, what type of assurance do we have that RDNs from these programs have the same depth of understanding re: sciences (in particular) as those completing DPD requirements?

- The competencies and performance indicators required by the FEM programs include the core foundational knowledge that is required by DPD students; however, this knowledge is required at the graduate level. Thus, the RDNs from these programs are equipped to have the same depth or higher than those who have graduated from a DPD program. Many of the FEM programs do expect prerequisites for the students so that they can step into graduate courses such as chemistry, organic chemistry, biochemistry and basic nutrition. The number and type of prerequisites vary by program depending on whether they require a DPD verification statement or not.

Is there any concern from leadership that the FEM will eliminate the demand for DPD programs? If not, could you provide clarity of why leadership thinks that demand will still exist. Thank you!

- DPD programs provide many of our program types with students including DI, FG and CP programs. The Board believes that DPD programs are valuable and the demand for these programs still exist. DPD credentials remain extremely valuable. DPD qualifications are written in many governmental and community positions and DPD graduates secure positions and advance to graduate schools. A number of FG programs still require the DPD verification statement.

What is the impact of FEM on class size?

ACEND Town Hall – July 2021

- FEM programs have maximum enrollments based on resources available. ACEND has seen similar maximum enrollments from FEM programs as from those in the 2017 standard programs ranging from small numbers to larger numbers depending on the location and type of institution.

The time spent in clinical rotations for FEM is very intensive in order to meet the competencies. Given the shortage of clinical rotation sites, how does the proliferation of FEMs impact availability of clinical sites for DIs and ISPPs?

- FEM programs use competency-based education to meet competencies in an integrated model. The competencies are spread out across the curriculum so that students may be able to perform lower levels of the Miller's pyramid in the classroom or using alternate experiences such as simulations. The student's time in clinical settings is not much different from that of students in DI or ISPP programs and there may be some flexibility in the structure due to the ability of the programs to stretch out assessment across the entire curriculum.

Town Halls

Can town halls be scheduled for longer than an hour to allow more time to answer the questions? :-)

- The November town hall is 1.5 hours and should allow for more time for question and answer period. ACEND will consider increasing the time for the town halls as we encourage and appreciate the information sharing with our programs.

The next Town Hall is scheduled for Tuesday, November 16, 2021, 11 am -12:30 pm CT.

Rayane and Long thanked everyone (172 participants) for their discussion on the Town Hall. The call ended at 12:00 pm CT.

Welcome to the ACEND Virtual Town Hall





Rayane AbuSabha,
PhD, RD
ACEND Executive
Director

Objectives



- Provide ACEND update and announcements
- Discuss latest ACEND Board decisions
- Provide overview of ACEND's webinars and trainings
- Present FEM data results
- Answer questions

ACEND Updates and Announcements



2022 Accreditation Standards



- Second round of public comments
- Standards are currently being revised
- Release date is September 1, 2021

Recent ACEND Board Decisions



- Lifted the moratorium on Didactic Programs in Dietetics (August 2020)
- Waived the substantive change fee for programs adding a graduate degree (October 2020)
- Removed the current Pass Rate Policy from the P&P Manual to allow for a more holistic approach to reviewing programs (October 2020)
- Froze the ACEND annual accreditation fee for 2022. The 2022 annual fee will be the same as 2021. (February 2021)

USDE Requirements for Disclosing Licensure Information to Students



- Program must publish on their Website information about the requirements and process to become an RDN
- **Add the statement:**

It is ACEND's considered opinion that the program is designed to and does meet all state dietetics licensure and certification laws

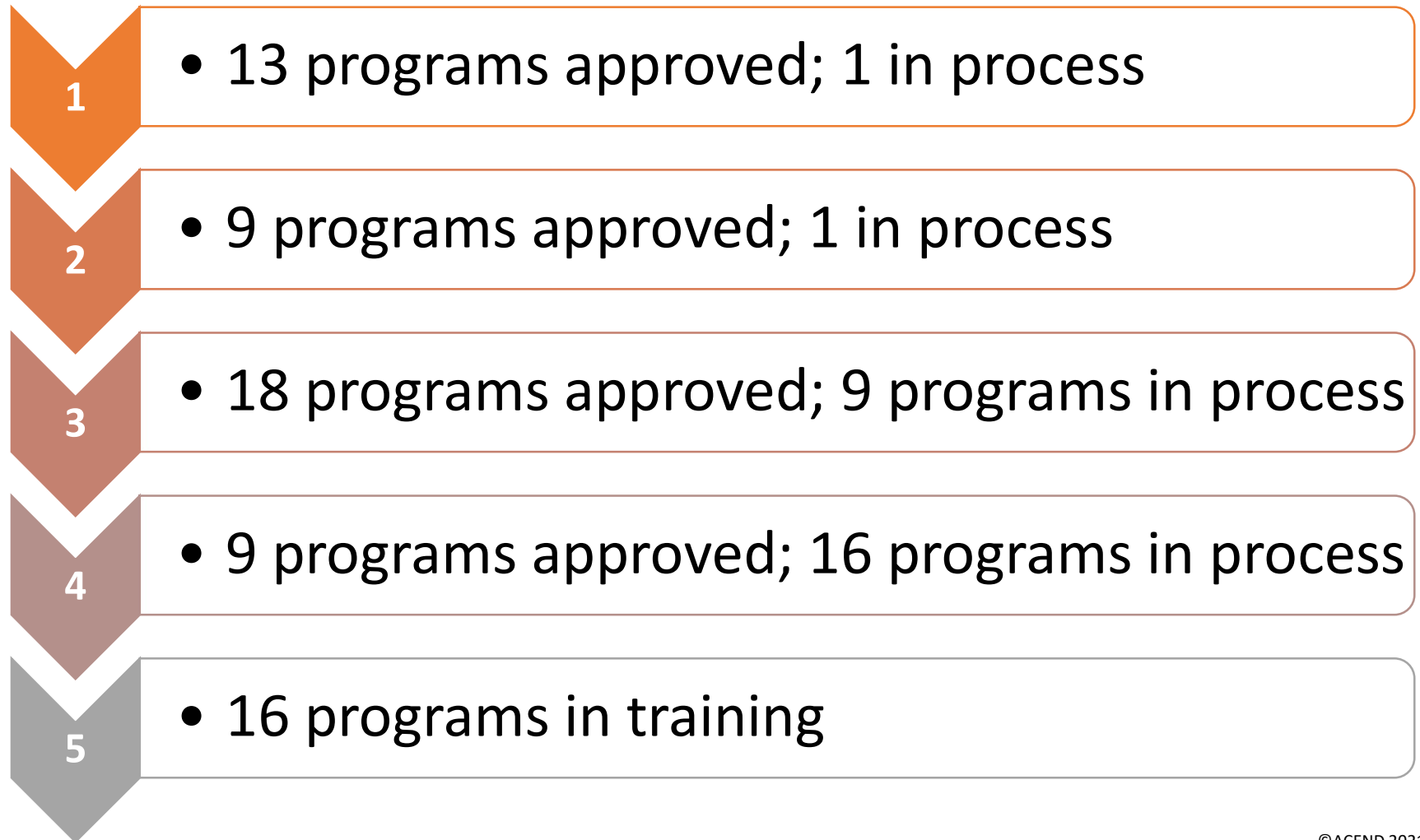
Recent ACEND Decisions: FEM Demonstration



- **New Information on FEM Partnerships Demonstration Programs:**

- After discussions with legal counsel and USDE, ACEND has updated the partnership guidelines to align with USDE requirements. The educational institution granting the degree (college/university) must be the sponsoring institution and house the program.

FEM Standards Demonstration Programs



FEM Standards Demonstration Programs

Accepting Applications for FG and FA Programs



Cohort 5 2nd Call

- Applications were due Monday May 3, 2021
- Applications received and are under review

Cohort 6 2nd Call

- Applications due Monday Dec 6, 2021
- Posted on the ACEND website:
<https://www.eatrightpro.org/futuremodel>

Diversity, Equity and Inclusion ACEND Webinars

www.eatrightpro.org/ACENDforDEI



- ACEND Series of Webinars on DEI
 - *Supporting and Building Resilience in BIPOC Students and Dietetic Interns*
 - Presented by Tamara Melton, Diversify Dietetics
 - Tuesday September 14, 2021: 5:00 pm CT – 6:30 pm CT
 - Faculty and students/interns are invited!
 - To register, go to: www.eatrightpro.org/acendfordei

Diversity, Equity and Inclusion ACEND Webinars

www.eatrightpro.org/ACENDforDEI



- Upcoming ACEND Webinars on DEI
 - *Closing Equity Gaps in Higher Education: Lessons for Leveling the Playing Field for all Students*
 - Presented by Timothy Renick, PhD, RD and Ben Brandon, MS
 - Tuesday November 16, 2021: 11:00 am CT – 12:30 pm CT
 - *Supporting our LGBTQ Students and Dietetic Interns*
 - Presented by Sharon Groh-Wargo, PhD, RD
 - Tuesday February 8, 2022: 11:00 am CT – 12:30 pm CT

Diversity, Equity and Inclusion: DI Programs

www.eatrightpro.org/ACENDforDEI



- Diversity in DI programs increased by 8 percentage points in 2020:
 - 21% URM in 2019
 - 29% URM in 2020



G. Latorre, Unsplash.com

Program Director Workshops and Online Modules

Recorded Workshops and Modules



- **FEM Program Director Workshop Virtual**
 - August 5-6, 2021
- **NEW! FEM Program Director Online Modules (8 CEUs)**
- **CBE Workshop – presented by Leanne Worsfold (5 CEUs)**

Training and Volunteer Opportunities

ACEND provides opportunities for both accreditation and dietetics and nutrition professionals to expand their knowledge with professional development resources.

- Preceptors and Mentors
- Program Reviewers
- Training and Resources
- Dietetics Preceptor Training Program



New NDEP Toolkit: Salary Negotiation

Nutrition and Dietetic Educators and Preceptors

Academy of Nutrition
and Dietetics



Topics

- About NDEP +
- NDEP Member Resources -
 - NDEP Portal and EML
 - NDEP-Line Newsletter
 - NDEP Documents
 - NDEP Meetings
- Preceptor Resources +

NDEP Documents

NDEP Resources

Salary Negotiation Toolkit

Authors: Meredith G. Wagner, PhD, RD, LRD, FAND and Shontarius D. Aikens, PhD

The ability to negotiate salary is a key skill needed to support nutrition and dietetics professionals as they seek out and obtain employment to ensure they are appropriately compensated for the value they add to the employer. Use of this toolkit is intended to help nutrition and dietetics students, interns, and educators prepare for and achieve successful salary negotiation. More specifically, this toolkit is designed to:

- Provide information on negotiation principles
- Allow nutrition and dietetics students, interns, and educators to apply their knowledge of salary negotiation and assess their understanding using real-world case studies and quizzes
- Highlight additional, credible resources pertaining to salary negotiation

Documents

- [Toolkit](#)
- [Case Studies](#)

Locate the toolkit on the NDEP website:

<https://www.eatrightpro.org/ndep/member-resources/documents>

ACEND Program Reviewers



- **Great Opportunity!**
 - Networking
 - Benefit to learn from others
 - Learn standards
- **Responsibilities:**
 - Review self-study reports and go on site visits (2-3/year), review Progress Reports (2-4/year)
- **Application on ACEND website**
www.eatright.org/acend

**ACEND Reviewer
Recruiter**

**Accreditation Council
for Education in
Nutrition and Dietetics**

the accrediting agency for the
eat right. Academy of Nutrition
and Dietetics

Ask me how!

**FEM
Reviewers
Needed**

Communication from ACEND



- **ACEND Update**

- Monthly update from ACEND posted on the website

- **Virtual Town Hall**

- Next town hall: Tuesday, November 16, 11:00 am – 12:00 noon CT
- Directions for joining on the ACEND website

- **ACEND Staff**

- 800-877-1600 x5400
- acend@eatright.org



Long Wang,
PhD, RD, FAND
ACEND Board

Future Education Model: A Survey of Program Directors of New FG Program

Long Wang, PhD, RD, FAND

ACEND Board



Learning Objectives

- Upon completion, attendees will be able
 - To describe the benefits identified by program directors of the early adopter FEM demonstration programs
 - To explore the challenges and potential solutions recommended by program directors

Program Director Survey in Fall 2020

- Directors of 20 newly accredited FG programs were surveyed in Fall 2020
- Half of the programs (10/20, 50%) had a total of 130 students enrolled (range: 2 – 32)
 - More than 40% (56/130, 43.1%) did not have DPD verification statements
 - Approximately one-third received CBE training (45/130, 34.6%)
- Half of the programs (10/20, 50%) were planning to enroll their first cohorts in 2021

Results

- CBE training
 - Most programs offered training to faculty, preceptors, and students
 - Formats: in-person, online modules, webinars, written documents

Benefits

- Consistent with survey data collected in 2019, CBE was identified as the most significant benefit for implementing the FEM Standards. The reasons are:
 - being a leader in the field
 - advancing dietetic education with the “advanced competencies”
 - streamlining the curriculum,
 - meeting the profession’s needs with more opportunities for experiential learning, and
 - removing the barrier of the dietetic internship match.

Benefits

- To the profession
 - “Advance our field”
 - Higher degree for RD's to come in line with other professions
 - FEM more closely mimic other health professions
 - “Commitment to being leaders in Dietetics Education”
 - “The level of competencies/PIs makes the education very comprehensive”
 - Recognition as a national model

Benefits

- To the program/institution
 - “First nutrition program at the university”
 - Increased interest from students and faculty
 - Access to more facilities and non-RD preceptors
 - “Marketing tool”

Benefits

- To the students
 - Moving to the SEL model, easier for students
 - SEL optimal for student learning
 - Streamlining the process to become RD
 - Accelerated program
 - Saving time and cost (BS+MS structure)
 - Benefits to non-DPD students and second-career
 - puts graduates better on par with other healthcare professional program grads

Challenges

- The significant time invested to develop an FG program
- Lack of understanding of CBE and of FEM among DPD students and FG program preceptors (both RDs and non-RDs), and administrators
- Finding clinical sites
- COVID
 - Experiential learning placement
 - Faculty picking up more hours

Overcoming Challenges

- Communication: ask questions, network, clear messages
- Continued education
- Info sessions/Open houses
- “Took advantage of ACEND Resources/NDEP for alternate experiences”
- Seek support from administrators
- Work with institution’s Assessment Coordinator
- “No rest”

Selected Recommendations

- Recognize it is a process to develop an FG program
- Ensure adequate resources and support: staffing, admin support, protected time
- Train preceptors on CBE and FEM
- Educate colleagues from other health professions
- Schedule site visit early (to allow adequate time for recruiting of the first cohort)
- Utilize resources and materials from ACEND and NDEP
- Be persistent, creative, patient, and positive

