

FAIR FUNDING CONSULTATION SPRING TERM 2017
PROPOSALS FOR A NEW SINGLE FUNDING FORMULA (SFF) FOR EARLY YEARS
(EY) FROM APRIL 2017
FOR FUNDING OF THE FREE ENTITLEMENT FOR 2, 3 AND 4 YEAR OLDS

CONSULTEES WERE REQUESTED TO CONSIDER THE FOLLOWING QUESTIONS
AND COMMENTS RECEIVED ARE AS FOLLOWS: -

2 YEAR OLD FUNDING

Consultation Question 1

Do you support the increase in the hourly rate for 2 year olds from £5.00 to £5.20 from April 2017?

Private

Yes – but the rate is still far below a reasonable rate. Simple mathematics should dictate that as the staff to child ratio for 2 year olds is double that of 3 and 4 year olds the funding should be double.

Yes – more support is needed for younger children; many have poor attention concerns.

Yes – This will help support the increased costs of working that PVI settings will have with the annual increase of National Living Wage and National Minimum Wage in April 2017 (same comment from 3 providers).

Yes – need to support the increased costs of settings, such as workplace pensions, minimum wage increases and unable to reclaim Statutory Sick Pay. This is more in-keeping with costs of caring for 2 year old child and increasing paperwork for this group.

Voluntary

No – currently charging a rate of £5.25 for 2 year olds to continue to provide the high quality and outstanding care and education for the children. This will be constantly reviewed in view of ever changing financial demands

Childminder

No – believe £5.00 is a reasonable amount to pay for the care of those that are eligible to claim this funding and it should stay in place to ensure all children are eligible for the same levels of care as any other child in the community. No child should be left out or treated differently just because of circumstances out of their control. The extra should be put on top of the rate being paid for the 3 and 4 year old funding.

Other Consultees

Yes – for local purposes, the more money the better. However, in terms of the national policy itself: -

- Deprivation only funding is wrong and denying any funding to 60% of the 2 year old population is discrimination.
- The national single rate hides the utter inconsistency in education funding across phases.
- Removing the deprivation rate defined for 3 and 4 year olds of £2.13 from the £5.20 base rate and you get £3.07, which less than the £3.53 base rate for 3 and 4 year olds who need a lower staff: pupil ratio.
- The LAs response should be much more than just take the money and be quiet.
- There should be much greater transparency on how funds to develop 2 year old capacity have been and will be spent.

Yes – any increase is welcomed but is this going to increase every year? If not, this is not going to help sustainability with costs increasing.

3 & 4 YEAR OLD FUNDING

Consultation Question 2

Do you support moving from the existing local EYSFF to a new local EYSFF with a Single Basic Hourly Rate from April 2017?

Maintained

No – does this take into account the needs of different settings in offering quality provision to all children? Believe that a move from April 2017 gives little time to implement all planning including admission policies, financial arrangements, staffing and communication to parents.

Private

Yes – a much fairer system but it should be introduced in September in line with the new 30 hours funding as should all these changes.

Yes – but currently run on a ratio of 1:3 in order to provide quality childcare. This has implications for how hourly rates are set for parents and the amount received in funding will have to be topped up if there is a shortfall.

Yes – the existing EYSFF is long overdue a review and is unfair to many providers in both the school and PVI sectors.

Yes – support the ideology of all providers being paid the same locally, although it is a shame that this is not reflected nationally (same comments from 3 providers).

Yes – definitely, always felt it unfair that different providers receive different amounts to care for the same children.

Voluntary

Yes – only if the single basic hourly rate does not include the Early Years Pupil Premium (EYPP).

Yes – this seems a much fairer way of distributing funds.

Childminder

Unsure – a single hourly rate keeps things simple but will it have an effect?

Other Consultees

Yes – better to go with the single rate proposed rather than continue with the multiple rates of the past where the basis for the different rates is far from clear/fair. However, there are concerns on: -

- The government approach being simplistic.
- A single rate does not reflect significant differences in the cost base of the different providers: staff: pupil ratios, staff qualifications, rates, etc.
- The way the government uses different formula components to create a compound rate for each LA is simply wrong.
- There are no strategies to ensure funds follow SEND pupils that require them.
- The 60% uplift in funding for deprived 3 and 4 year olds (75% with EYPP added) has no scientific basis.
- It does provide the government with an excuse and justification to leave the disproportionately high funding with urban areas compared with rural areas.

Yes – if done fairly for providers of all types of setting.

Consultation Question 3

Do you support the majority of the funding being allocated through the required Single Basic Hourly Rate?

Childminders

Yes – with regards to figures and hourly rates for childminders.

Private

Yes – will mean an increase in the amount of funding currently received.

Yes – saves completing additional paperwork for children.

Yes – feel this is fairest for settings as it supports all children and all settings equally to the maximum and not just a specific few, which may occur with the introduction of specific metrics (same comments from 2 providers).

Yes – seems fairest way to allocate the money available (same comments from 2 providers).

Voluntary

Yes – providing only 5% retained and not 7% for 2017/18.

Other Consultees

Yes – the majority of funding goes through the rates currently. Even if there is a way to channel funds to Deprivation, Low Cost High Incidence (LCHI) SEND and English as an

Additional Language (EAL) as suggested by the national allocation, the base rate will still be the largest source of funds for providers.

Yes – if done fairly for providers of all types of setting.

Consultation Question 4

Do you support the estimated Single Basic Hourly Rate to be set using the most up to date pupil numbers (currently estimated between £4.00 to £4.10)?

Private

Yes – the current estimate is acceptable for 2017. However, it needs to be increased every year to reflect the increase in national minimum wage, utilities, training costs, etc.

Yes – as before any rise is welcome as currently receive £3.86 but it is still too low to enable settings to pay staff a reasonable wage.

Yes – the figure does need to be closer to the £4.10 based on monies to be received by the LA.

Yes – reasonable amount and greater than the amount currently received. Would be less likely to support this if an increase in pupil numbers meant that the Single Basic Hourly Rate fell below these figures.

Yes – the more money the better to ensure nurseries are financially viable.

Yes – funding should be passed to the front line, strip out supplements and include in the base rate.

Yes – but echoing other providers the estimated £4.00 to £4.10 is still not a fair rate.

No – this amount is still well below our nursery hourly rate. Therefore, will continue to subsidise the 15 hours and the extra 15 hours by a great deal; this leads to higher nursery rates for younger children.

No – this still remains low due to the private daily hourly rate of £5.00, so there will still be a funding gap, which will be greater once the 30 hours come into force.

No – there has not been enough consultation with the PVI sector on these proposals (2 providers).

No – a better understanding required by the LA and for them to understand the pressures on the sector in order that can all work together to achieve what is national policy might have been useful. Some more modelling would have been useful also.

No – would disagree with moving any of the SEND Funding from the High Needs block. The needs in this area are rising daily and now is the opportunity to add to the overall funding in this area by retaining the spend from the HN block and adding additional funds from the new EY Block Funding – thereby raising total spend and passing as much over to providers for specific children's needs. Looking at Table 6 and noting the

comments on central retention would advocate that a figure of £4.15 with a 2.6% central retention is appropriate (same comments from 2 providers).

No – still not enough to reflect costs of quality care.

No – would have liked to see the SEND pot increased with all the extra children who will need support coming into nurseries.

No – this is not enough; needs to be a higher rate for nurseries to be financially sustainable.

Voluntary

Yes – seems a fair rate to roll out the extended hours with but must be reviewed regularly to maintain this.

Yes – still not sufficient, but it is a huge improvement on what is currently received.

Yes – but feel that this rate is too low to provide the high quality care and education to the children providers are expected to deliver.

Childminder

No – do not believe this is a fair amount to be paid to any local childminder's; if providers were allowed to ask parent to 'top up' as parent's would be willing to do, then yes. The £4.10 is not justifiable at all – how can anyone put a price on care that is lower than the minimum/living wage. The rate should match the amount payable for the 2 year old care.

Other Consultees

Yes – this is considerably more than currently allocated to all providers except for the Maintained Nursery School. The impact on this provider seems to only be mitigated by a lump sum and an assurance of funds during this Parliament; this is a concern.

Yes – the allocation from the DfE will be based on the January census from the previous year and then adjusted for January census of the current year once analysed, just as with current funding. However: -

- The determination of the hourly rate is not just about pupil numbers so should make provision for deprivation, LCHI SEN and EAL to reflect the national formula.
- The hourly rate will be what is left after those provisions and any central services.
- Need to resist the temptation to confuse High Needs provision with general SEND provision in EY – even though the government is using HN proxies in the EY formula and providing additional HN funds for EY.

Yes – any increase is welcomed but it is still not enough to cover costs and guarantee sustainability given that it is fixed for several years.

Consultation Question 5

Do you support centrally retaining a share of the EY DSG in line with DfE constraints to support the functions detailed (Table 4)?

Maintained

Yes – whilst wanting as much as possible to be passed on to providers appreciate that there has to be some retention to support those functions tabled.

Unsure – it is difficult to make an educated guess in relation to the function costs detailed in section 4 and therefore whether the share being retained is adequate or excessive. However, agree that there is no other option but for a share to be retained for these functions but cannot comment as to whether the amount being kept is accurate.

Private

Yes – however feel do not have enough knowledge and information to give a qualified answer. For example do not know how these costs relate to previous years, what the costs are for the commissioned activities and whether the vastly reduced service they now offer will be the same, or reduced further.

Yes – feel this is needed to continue with the support currently received.

Yes – but do not fully understand all the information detailed in the consultation paper.

Yes – can see why it is necessary with the extra duties required by the LA.

No – table 4 identifies central retention of nearly 5%. The issues to consider include: -

- As current central costs are allocated from elsewhere in the DSG to then jump to taking 5% of the allocation from central government is not acceptable in times when providers are having to close their doors due to unsustainability.
- Current central spend is £350k then increasing this to £900k is just wrong.
- Why is there a need for an £180k EY Contingency – does this exist at the moment? If not then why bring it in? If it does then surely it is carried forward each year?
- Increase costs of working of £120k – to implement a system that is not required is ridiculous.
- The idea that of completing a monthly return to make a monthly payment is ill conceived – many other LA's are already doing monthly payments – but still have this based on an estimate and one headcount per term.
- You would be further increasing administration time for settings in doing monthly returns and this takes time away from providing for the children. More consultation about this needs to take place; the spend on this can be reduced.
- Family Support and Information – the support side can be worked with Parenting/children's centre services and need not be a direct responsibility; the information system being asked for should not cost as much as £100k to re-introduce.
- More consultation to help the LA keep these costs within reason would be beneficial (same comments from 2 providers).

No – any SEND funding should be ring fenced and any underspend carried forward to subsequent years. This should be open, transparent and subject to appeal.

No – concerned that if such a large amount is held back it could be deemed to be not needed in the first place. Further concerns on the effect on quality provision.

Unsure – some of the proposed retention costs do look high and limited information is provided.

Childminders

Yes – feel it is important to retain a % to fund needed areas and services to narrow the gap for vulnerable children.

Other Consultees

Yes – only if any surplus funds at the end of the financial year would be allocated to the providers.

No – issues to consider include: -

- In the current EYSFF, £324k is retained for 'Support & Training for Providers' and £35k for 'Support to PVI Settings and Inclusion supplement' relating to 2 year olds – there has never been any analysis of this.
- For central spend to increase from about £360k to £900k is simply unacceptable, particularly since reporting on existing spend to stakeholders is so minimal.
- A cost of £120k for various new business services needs close scrutiny. Most of the money in the system relates to 3 and 4 year olds where presumably business support already exists, surely within the £324k.
- If much of this new proposed cost comes as result of implementing the extended hours, then these costs should be recorded separately against the £4.2m new money, that way this will show the true cost of this new facility.
- If some of these 'new' services were previously covered by ESG, then that part of the ESG that was previously accrued by EY should be transferred into EY and not the Schools Block.
- There is no money in the EYNFF for Family Support Information services and well-funded LAs may be able to offer such services from their network of state-funded children's centres, but low funded areas like WCC have no such facilities.
- One area where additional contingency could be considered is for additional factors e.g. the existing deprivation factor should be extended to use the new funding, but EAL provision is unclear.

Unsure – SEND funding is grossly underfunded but money from other areas should be used for this. Support as long as the retained money is used wisely and not at the cost of providers sustainability and needs of children. A lot of services have been withdrawn in the past with the expectation that providers will pay for it otherwise they will lose funding as they will be seen as not being inclusive.

Consultation Question 6

Do you support the only supplement being the mandatory one for deprivation based upon on the current model and funding level?

Maintained

Yes – agree that deprivation should be mandatory, but would hope that supplements would be considered for the other areas in Table 5.

Private

Yes – cannot see in the guidance what the current level of deprivation support is but as it is mandatory it has to be included. Early Years Pupil Premium (EYPP) also provides for this and so there is a double benefit for deprived families and agree with the LA view on keeping this reasonably low and encouraging families to apply for the EYPP (same comments from 2 providers).

Yes – if funding meets the childcare costs then providers will be creative in ways to accept more funded only hours or 30 hours enhanced funded children.

Yes – these children need any additional support that can be provided.

Yes – will get 2 lots of funding for the children who really need it which is good in the long run.

No – the current SEND funding is woefully inadequate in assisting settings to meet the needs of all children. Although appreciate there is to be a significant rise in the level of funding, there are also significant increases in the cost providers face, such as the living wage, pension contributions, to name just two. When you look at the descriptions of the support rightly expected to be given to children, particularly those at GR3 and GR4, the contribution given is not sufficient to be able to meet those needs.

Other Consultees

Yes – not all settings will benefit from the other criteria so it is better not done as a blanket supplement.

No – there could be consideration of: -

- The existing deprivation factor being extended and some thought should be given to how pupil eligibility is calculated and then who is qualified to deliver such significant extra care.
- The EAL provision within the EYNFF for WCC is so pitiful that even if needy children are identified in their settings, the money that follows the child will not enable any worthwhile service to be provided locally.
- For EAL this resource could be added to the de-delegated schools' funds to allow EY providers access to the central service. Alternatively, if not practical then the money should be used to support the EY part of the GRT service which is either covered by schools currently or not funded at all.
- No attempt should be made to cover those supplements the government allows but for which provides no funding e.g. sparsity and flexibility are two factors that the LA should continue to lobby government to support with money.

Consultation Question 7

Do you support the minor element of funding for SEND GR1 to be designated as low cost to be part of the new Single Basic Hourly Rate?

Maintained School

Yes – recognising the importance of early intervention, how would providers fund additional support for a child with significant SEND?

No – because this puts pressure on inclusive settings who will meet the needs. There is experience of settings who move children on rather than meet the needs and such children end up being concentrated in the settings that will meet the needs. Do not think it is fair in schools, so cannot agree with it for nurseries either. Should be based on pupil need, which would incentivise inclusion.

Private

Yes – an outstanding setting should give this support as part of its normal care package.

Yes – if the funding rate is closer to £4.10.

Yes – agree that with an increased rate closer to £4.15 it is acceptable to include the GR1 within the base rate, especially as it is relative low numbers (same comments from 2 providers).

Yes – provided it is not the lower rate of £4.00 it needs to be at least £4.10 to be workable.

Yes – but only when the single basic hourly rate is a fair one.

No – this needs to be allocated separately, so that the funds can be distributed to the individual child and spent/audited accordingly.

No – this level of funding is too low at present.

Voluntary

Yes – although may not class a child as officially having a GR1 every child has a weak area that could benefit from a little more adult time. Increasing the basic rate for all children can ease the overall financial situation of a setting and allow funding more staff, which is the best resource available.

No – because it has not been incorporated in the Single Basic Hourly Rate amount.

No – not every child needs to be on GR1 but when required need assurance that those children will get it, so that they can be fully supported.

Childminders

Yes – agree as long as the additional funding is in place for GR2-4.

Yes – do not think this will have a massive impact on those claiming – should the question be about GR3/GR4 would most certainly disagree as it would put disadvantaged children's education and future prospects at risk.

Other Consultees

No – if SEND GR1 does not actually involve support for a diagnosed disability, then special factors should not be added into the basic hourly rate. That just means that pupils that need support do not get enough and providers that do not have to provide extra care are paid more for basic provision.

Consultation Question 8

Do you support, apart from GR1, the continuation of the remaining existing arrangements for the funding of SEND through the Local Inclusion Fund in the new local EYSFF?

Maintained

Yes – the current SEND arrangements have proven vital in supporting Early Intervention for our pupils. This is particularly the case with children at GR2 and above where often their needs require additional staffing to support the delivery of intervention and or the child's access to the setting. In some cases this funding has enable the child to be fully supported through Nursery and thus ensured their level of need is truly identified before they move into Reception main stream or otherwise.

Private

Yes – do support but settings need more SEND support from Babcock to deal with the additional paperwork. The current support is abysmal and settings should not have to pay for visits from the Inclusion Officers for advice. These children are the ones who need the most support – Early Identification is being failed in this County.

Yes – but believe the funding of SEND is deeply inadequate. Would prefer to have slightly less single basic rate per child and to have a larger fund to support inclusion.

No – re-iterate that should retain the £0.5m from High Needs Block and then use the £150k proposed in table 4 to increase rates for support on GR 2, 3 and 4 (would need to see figures to offer a better opinion) – giving a central retention of the £0.56m i.e. 2.6% - leaving £60k to implement the other requirements (same comments from 2 providers).

No – should be retained locally and realistic SEND funding allocated case by case.

Voluntary

Yes – however concern is how this is monitored with very little support now being available from Early Years Support Staff.

Childminders

Yes – as long as this stays the same rate.

Yes – the current funding should stay.

Other Consultees

No – issues for consideration included: -

- The Local Inclusion Fund (LIF) is currently implemented under the £0.5m in High Needs Block and should remain. There is no HN funding in the EYNFF, nor should there be.
- The new Disability Access Fund is a proxy for LCHI SEN and High Cost Low Incidence (HCLI) SEND in EY – this must continue to be met from the HN block where appropriate expertise exists to deliver and coordinate services.

- If the HN block is under pressure, then Government should fund it properly based on national standards for the various categories of need. It will be far easier to argue for funds for disadvantaged pupils if all the funding is in one place rather than having it spread across general funding in different phases of education.

Other Comments

Maintained

When is the information about eligibility for parents made public? Is this related to joint income? How will parents inform the setting of their income and how is this going to be administered?

If working parents are eligible and take up the 30 hours of free child care, will there be enough places for all 3 and 4 year olds?

If, across the county more places are required are there enough qualified staff who can be employed to work in these settings?

Will changes in funding affect the ability for settings to employ high quality staffing e.g. teachers?

What administrative support will be available from the LA before and during the proposed changes?

Private

Sure most responses will comment in the inadequate level of funding and understand this is controlled by Government and not the LA but these concerns should be passed on.

As a provider working in a domestic premises setting, the implications for such settings have been largely overlooked. Almost all of the parents who bring their children to the setting will qualify for the additional 30 hours and so provision will need to be made for that. Not aware, however, of any support available to extend or improve premises as the grants available recently were not open to private residential settings.

Confirmation of the actual hourly rate needs to be given as soon as possible as admissions process for many settings will begin next month.

Uncertainty hindering planning for improvements as well as salary reviews which is having a detrimental effect on staff morale.

In 2010/11 settings suffered a 10% reduction in the funded hourly rate of £3.84 (private). Current hourly rate has not risen to this level and taking into account our setting will no longer invoice many hours (over 15) at our hourly rate, £4.00/£4.10 may not represent an increase overall.

It is noted that the increase is considered to be a significant one and indeed, taken at face value it is. However it should be pointed out that the current rate is actually lower than that paid in 2008 to 2013 when a higher rate was paid for those children accessing more than 12½ funded hours per week. This highlights the significant lack of adequate

annual increase in the funding rate over the past 5/6 years, a situation that cannot persist with the increasing pressures being placed on providers.

The estimated rate of £4.00 to £4.10 is still less than fair and therefore will need an annual increase that reflects reality.

As Childcare providers, all following the same guidelines feel that it is only fair that all receive the same amount. All should be offering an outstanding care/education package, and this should reflect in an equal amount paid to each provider.

Would have liked to have seen a less complicated consultation and both Warwickshire and Birmingham explained things in a much more simple way to providers and also helped many more consultative groups – with schools, nursery classes and PVI all attending and contributing (same comments from 2 providers).

Have answered these questions to the best of current ability on a subject thought to be understood fairly well. Would not be surprised if there is a low response from settings as the questions feel overly complex – it could have been explained much more clearly, particularly at Provider Briefings just attended. This was the perfect opportunity to explain and receive feedback.

Very confusing to read took a long time around the jargon.

Voluntary

A positive step in the right direction for us as a small rural setting. Of course not everyone will be in the same situation.

As a small setting that runs out of a village hall, increasing hours to try and accommodate the additional 15 hours of funding is not currently possible (currently open 3 days – 18 hours). This is causing some concern, as there is a possibility that parents will move their children to providers that are able to provide this. Will only know the impact once the increased provision is up and running, which is causing some uncertainty as to the future viability of the Preschool – a valuable asset to the community that has been running for many years. Hoping the impact will be minimal.

Welcome the new funding rates as this would benefit with an increase in our funded entitlement. This is a fairer option bringing all Providers in line with each other.

Eager to find out more information as soon as possible with regard to implementing the 30 hour entitlement, as there are concerns how this will be done particularly in the time scales given and all the associations with this.

Businesses are under severe financial pressure as a result of increased staff training costs, auto pension enrolment and annual minimum wage increases. Funding rates need to take into account these continuing financial responsibilities.

Childminders

Some of the questions are a little complex. There is no continuity across the board this should be national and all providers paid the same and children treated the same no matter where they live – it creates a divide.

Other Consultees

In terms of the single basic hourly rate: -

- It is pleasing to see the rates being increased for the majority of providers. A single rate is fairer. As expressed earlier a concern about the only Nursery School in Worcestershire as it will potentially see a cut in funding.
- Any increases are welcome but the fact they are to be frozen over the next few years is detrimental to the sustainability of childcare providers. Although this is a Central Government decision it is not fair they are not prepared to meet the true costs.

In terms of Commissioning Groups and Service Providers: -

- There needs to be a clear firewall between them.
- The commissioning group needs to consult far more widely and openly, treating the service provider as just one of many stakeholders.
- Where the service provider has a clear vested interest in providing more services, it is vital that other voices are heard on whether or not those services are required or are the best use of limited funds.

For central administration: -

- For an increasingly complex formula, then the accountability under the various headings needs to undergo a sea-change in attitude.
- The LA needs to help to ensure its efficient allocation to pupils according to need.
- The LA needs to provide at least half yearly detailed reports on expenditure against plan and the ongoing effectiveness of the service.

For the 30-hour entitlement for some eligible working parents there are many questions about this including: -

- Will entitlement will have a much higher proportion amongst deprived households than the universal entitlement but the government will only provide the same basic funding?
- Is there an expectation that deprivation care will be provided for the additional hours?
- If so, even if the full £4.30 provided by government is passed on to providers, it falls short of the £5.66 required to provide care for deprived pupils.
- Does the eligibility checking have to be provided locally?
- Do we try to target such central cost to the additional hour funding?
- Do we have a separate rate for the extra hours compared to the universal entitlement?
- Many providers are charging a premium for additional hours as the way to balance the losses made on providing the universal entitlement – so, can providers still charge premium rates to those not eligible?

For specialist funding: -

- Who gets special factor funding?
- Who has the relevant training to deliver the additional care?
- It is not enough to put extra money into the system without ensuring that the system is capable of using the resources to good effect.

On wider funding and service considerations: -

- There is no clarity on where the services to EY outside of the DSG come from.

- The opportunity of a National Funding Formula for education, covering all phases, has been missed – Education services that should serve all phases are being withdrawn or included in general funding such as the Schools Block where their benefit will be limited and their efficiency less than optimal.
- The most obvious service, High Needs, remains but lacks national standards.
- Services like LAC and Safeguarding are either funded in diverse ways or badly funded if at all; clearly these services apply just as much to EY as to schools.
- School Improvement is clearly vital to the schools' sector, so why is there no EY improvement and 'Education Improvement' for all phases where the service providers are the best organisations in their phase?
- EAL and GRT are poorly understood and existing services will be compromised without funding support.
- Coherent education services will not just support all phases efficiently; they will provide continuity between settings, phases and even counties for some of the most vulnerable pupils as they move through the system.
- Historically, the operation of EY within the LA has been far too secretive. The EY strategy is only seen when it is published in key documents like the EY Proforma, by central government, months after it has come into effect. There needs to be a wide-ranging discussion about basic EY funding, the special factors beyond that (all relevant factors to a rural county, not just the ones recognised by government), staff training/ standards and staff: pupil ratios in the various types of provider.
- This consultation is a valuable first step and hope that many responders will take advantage of the open comments sections to discuss issues around the questions and not just provide the yes/no answers. The LA must continue to encourage and facilitate open debate.
- Providers need to have figures confirmed quickly to be able to plan for the changes.