



Dear Colleague

AMENDMENT NO. 150 TO THE STATEMENT OF DENTAL REMUNERATION

Ventilation Allowance (Determination X)

Summary

1. This letter advises NHS Boards and Practitioner Services of the publication of an amendment to the Statement of Dental Remuneration (SDR), Amendment No. 150, which takes effect from 6 July 2021.

2. In particular the Amendment introduces a new ventilation allowance for dental practices. Funding has been made available from the Scottish Government to NHS Boards to be disbursed to dental practices that meet the conditions of entitlement for the new allowance.

Action for NHS Boards

3. NHS Boards should ensure they are familiar with the Memorandum to this letter, and in particular the requirement to have the necessary arrangements in place to manage the administration and payment of the ventilation allowance to qualifying dental practices.

6 July 2021

Addresses

For action

Chief Executives, NHS Boards

For information

Chief Executive,
NHS National Services Scotland

Chief Executive,
NHS Education for Scotland

Directors of Dentistry

Director, Practitioner Services

Enquiries to:

Dentistry and Optometry Division
1st Floor East Rear
St Andrew's House
EDINBURGH
EH1 3DG

NHSgeneraldentalservicesmailbox@gov.scot

4. Whilst it is appreciated that Boards will need some time to put a process in place locally, it is expected that the details of their process should be communicated to practices by no later than 27 July.

5. NHS Boards should ensure they urgently issue the Memorandum to this letter to all dentists and dental bodies corporate on their dental list.

Claims for Ventilation Allowance

6. A standard form will be provided to Heath Boards which they can use as a basis for the application process for dental practices. Practices can make a single, retrospective claim related to the installation of ventilation equipment. Claims can only be accepted for expenditure occurred during the period 1 April 2020 to 31 March 2022.

7. For practices that make a claim, NHS Boards need to ensure receipts are provided with the claim. Claims must only be paid subject to the necessary declarations being completed (see Memorandum at paragraph 5). **Where the amount receipted is less than the maximum ventilation allowance (as calculated for the practice in question) only the actual receipted value shall be paid.**

8. NHS Boards do have the discretion to consider other equivalent evidence if receipts are not available.

Validation of Ventilation Equipment

9. It is the responsibility of the dental practice to ensure that the equipment meets the required specifications and they will be required to confirm this on the application form.

10. The funding is being made available for air extraction equipment (air scrubbers and similar equipment that conditions or recycles the air within a space can only be claimed where the practice is unable to fit air extraction equipment). A practice can claim for equipment that conditions or recycles the air within a space, but only where it is not possible to install air extraction equipment. Practices should have a discussion with their NHS Board before purchasing air scrubbers or other pieces of equipment that recycle air within a space.

Allocation of funding to NHS Boards

11. NHS Boards will receive an NRAC allocation. A reconciliation exercise will take place at the end of the financial year.

Yours sincerely,



TOM FERRIS
Chief Dental Officer

**DENTISTS/DENTAL BODIES CORPORATE
NATIONAL HEALTH SERVICE
GENERAL DENTAL SERVICES**

AMENDMENT NO. 150 TO THE STATEMENT OF DENTAL REMUNERATION

Contents:

This Memorandum contains details of the following:

- i. **FUNDING SUPPORT FOR VENTILATION EQUIPMENT IN DENTAL PRACTICES**
- ii. **CONSEQUENTIAL CHANGES TO STATEMENT OF DENTAL REMUNERATION**

- i. **FUNDING SUPPORT FOR VENTILATION EQUIPMENT IN DENTAL PRACTICES**

Background

1. The CDO wrote to dentists on 31 March 2021, CDO (2021)(3), with an invitation to participate in a Scottish Government survey on ventilation in practice. We are able to report there were 712 final responses, a response rate of 65% of all practices. The respondents were representative of the total practice population. Key findings from the survey are:

- Around 90% of all treatment rooms are currently in use, with two-thirds ventilated to the appropriate standard;
- 43% of respondents intimated they had already made upgrades to their ventilation capacity;
- The amount of money spent varied, but a typical response was between £500 and £1,000.

A full report of the survey findings, may be viewed at:

<http://www.scottishdental.org/wp-content/uploads/2021/07/OFFICIAL-Report-Ventilation-in-Dental-Surgeries-in-Scotland-EXTERNAL-DOCUMENT-V4-FINAL.pdf>

2. The CDO letter also acknowledged the disproportionate impact that the Covid pandemic has had on dental practice, because of the associated risk of transmission with aerosol generating procedures (AGPs). The extant Infection Prevention and Control (IPC) Guidance, published by Public Health England and endorsed by the four-country CDOs, recognises that improved ventilation can substantially reduce fallow time between AGPs. Where a treatment room is ventilated to allow for 10 or more air changes per hour, this reduces the baseline fallow time to 15 minutes, compared with 30 minutes for 1 to 5 air changes per hour. The guidance may be viewed at:

[Appendix 2: COVID-19 infection prevention and control \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94422/appendix-2-covid-19-infection-prevention-and-control)

3. While the situation with Covid has improved significantly in Scotland as a result of the roll-out of the vaccine, the general population is being urged to behave with caution. We also need to be mindful that the situation can deteriorate relatively quickly. We continue to

review IPC guidance but at present dental practices should continue to rest on the extant guidance.

Funding Support for Ventilation Equipment: Ventilation Allowance

4. The Scottish Government is now making funding available through NHS Boards to help dental practices purchase, renew or upgrade ventilation equipment that allows for 10 air changes per hour. The funding is being made available for air extraction equipment (air scrubbers and similar equipment that conditions/recycles the air within a space can only be claimed where the practice is unable to fit air extraction equipment). A practice may wish to speak to their NHS Board before purchasing air conditioning/recycling equipment.

Ventilation Payment Amount

5. A practice may claim the costs for the purchase, renewal or upgrade of ventilation equipment up to a maximum ventilation allowance payment of £1,500 per individual surgery.

6. The value of the ventilation allowance payment will be the lower of the following:

- the qualifying receipts which are provided to the Health Board as part of the application for the allowance; or,
- the ventilation allowance as calculated by 'practice NHS commitment percentage' multiplied by £1,500 and by the number of ventilated surgeries in the practice.

For the purpose of the ventilation allowance the 'practice NHS commitment percentage' is the average time spent on NHS work compared to private work in a typical week across all the practitioners in the practice.

7. An example has been provided below to provide an explanation of the calculation of the ventilation allowance payment. Practices will be provided with a form that will make these calculations automatically.

Example Calculation

8. Suppose there are three practitioners in the practice. Practitioner A spends 20% of their typical week on NHS; practitioner B, 40%; and practitioner C, 60%.

9. The 'practice NHS commitment percentage' is then (20% + 40% + 60%) divided by the three practitioners in the practice, which equates to 40%.

10. This percentage is then multiplied by £1500 and by the number of ventilated surgeries.

11. Suppose this same practice has three ventilated surgeries, which attracts a ventilation allowance of **up to** £1800 (40% multiplied by £1,500 multiplied by 3 surgeries), and the practice provides qualifying receipts worth £1,000 for purchase, renewal or upgrade of ventilation equipment. The ventilation payment to this practice is then the £1000 qualifying receipted value being the lower amount.

Conditions of Entitlement

12. It is a condition of entitlement for payment of the ventilation allowance that:

- all the contractors within the practice will continue to provide general dental services until 1 April 2024; and,
- the ventilation equipment for which an allowance is claimed meets the required standard.

13. It is the responsibility of the dental practice to ensure that the equipment meets the required specifications and they will be required to confirm this on the claim form.

Making a Claim for Payment

14. Claims for the ventilation allowance can be made for ventilation equipment purchased on or after 1 April 2020. This means that practices which have already invested in ventilation equipment have the opportunity to recoup some or all of this financial cost. **Where the amount received is less than the maximum ventilation allowance (as calculated for the practice in question) only the actual receipted value will be paid.**

15. NHS Boards will provide instruction to practices on their local processes for making a claim by no later than 27 July. Completed applications must be received by NHS Boards no later than 31 March 2022.

16. The claim must be completed and signed by a person who is duly authorised to act on behalf of all of the dental contractors in a practice, who is able to confirm that the equipment meets the required standards, and who can commit to the ongoing conditions attached to the claim.

17. Only one claim is permitted per dental practice. The receipts of purchase should be included with the claim form. A claim should not be made until all the works have been completed and receipts are available. Evidence other than receipts of purchase may be accepted at the NHS Board's discretion.

Recovery of Allowance Payments

18. Practices may be required to pay back all or part of the ventilation allowance if they fail to meet the conditions of entitlement.

ii. CONSEQUENTIAL CHANGES TO STATEMENT OF DENTAL REMUNERATION

19. A number of consequential changes have been made to the Statement of Dental Remuneration (SDR). A copy of the updated determinations is included in Annex A at the end of this Memorandum. The full Amendment No. 150 to the SDR can also be viewed at: <https://www.scottishdental.org/>.

20. Amendment No. 150 will come into effect from 6 July 2021.

Enquiries

Any enquiries arising from this Memorandum should be taken up with your NHS Board.

Primary Care Directorate
6 July 2021

Statement of Dental Remuneration

DETERMINATION X ALLOWANCES AND GRANTS FOR PRACTICE IMPROVEMENTS

Determination X describes the allowances available for practice improvements, including for IT infrastructure and ventilation improvements. It also describes the grants available for practice improvements for new and established vocational training practices. The eligibility criteria; the amount that can be claimed; how to apply; and what happens if a dentist or practice fails to meet the conditions are also explained.

Part I - Allowances for Practice Improvements

General

1. Allowances under this determination may be paid, at the Health Board's discretion, to contractors towards the cost of improving existing dental practices. The Health Board shall exercise discretion in accordance with this determination and having regard to its pre-determined priorities and to its cash allocation for the relevant period. It may be determined that a contractor will not receive an allowance at all.

Eligibility

2. An allowance under this determination may only be paid where either:
- (a) a contractor's gross earnings in the financial year prior to that in respect of which the allowance is to be made are not less than the sum listed below:
 - for 2008/09 of £27,400
 - from 2009/10 of £27,800 or
 - (b) at least 90 per cent of the contractor's earnings from the practice of dentistry during the financial year prior to that in respect of which the allowance is to be paid were attributable to gross earnings.

Projects Eligible for an Allowance

3. Allowances may be paid for or towards the purchase, renewal or upgrade of practice equipment or for the modification or improvement of practice premises, which will result in improvements to patient safety, the practice environment for the benefit of patients or practice efficiency.

Amounts

4. A Health Board shall not make allowances under this scheme, which taken together over a period of a financial year, exceed the amount allocated to the Health Board by the Scottish Ministers in respect of this Determination.

Applications for Allowances

5. Applications for allowances shall be made by contractors to a Health Board in such manner as the Health Board may determine.

Payment of Allowance

6. The Health Board may, if it thinks fit, pay the allowance either in the form of cash or in the form of other assistance which may include providing or securing the provision of the new practice equipment or renewal or upgrade of practice equipment or modification or improvement of practice premises.

Conditions

7.—(1) Any allowance shall be paid subject to the condition that the contractor to whom the allowance is paid, or where appropriate his successor, shall continue to meet the eligibility criteria for a period of not less than 3 years after the allowance is paid and to such other conditions as the Health Board may think fit.

(2) An allowance under this Part shall not be paid for any improvements for which and grant has been paid under Part II or Part III of this Determination or for which a Scottish Dental Access Initiative grant has been awarded.

Part IA – Additional Allowance for Practice Improvements

General

8. Subject to paragraph 9, the CSA shall pay to a designated contractor within a practice an allowance as specified in paragraph 11 towards the cost of IT infrastructure as described in the Memorandum to NHS: PCA(D)(2016) 4. Where there is no designated dentist within a practice the CSA shall pay the allowance to a contractor nominated by the practice and agreed with the CSA.

Condition of Entitlement

9. Practices eligible for payment of an allowance under paragraph 10 are those which were in use for the provision of general dental services on 1 April 2016.

Amounts

10. The amount of allowance to be paid where the condition at paragraph 9 is met shall be £350 per practice.

Part IB – Ventilation Improvement Allowance

Payment of a Ventilation Improvement Allowance

11. (1) Subject to paragraph 1 (general) above, a Health Board may pay a ventilation improvement allowance to a practice towards the purchase, renewal or upgrade of equipment that has improved the ventilation capacity within the practice.

(2) A Health Board may only pay a ventilation improvement allowance in respect of equipment which was purchased, renewed or upgraded on or after 1 April 2020.

Amounts

12. (1) A Health Board shall not pay allowances under this Determination, which taken together over a period of a financial year, exceed the amount allocated to the Health Board by the Scottish Ministers in respect of this Determination.

(2) The maximum allowance payable under paragraph 11 in respect of a practice is the lower of:

(a) the full value of the qualifying receipts which are provided to the Health Board as part of the application for the allowance in respect of that practice, in accordance with paragraph 14(2)(b); or

(b) the practice NHS commitment percentage multiplied by £1500, multiplied by the number of ventilated surgeries in the practice

(3) The “practice NHS commitment percentage” is calculated by:

(a) firstly adding together the NHS commitment level of all registered dental practitioners who practise dentistry from the practice, and

(b) finally dividing the result of the calculation carried out under paragraph 12(3)(a) by the total number of registered dental practitioners who practise dentistry from the practice.

(4) A Health Board may only make one allowance payment per practice .

Conditions of Entitlement

13. An allowance under paragraph 11 is not to be paid to any practice unless the Health Board has secured from an authorised representative of the contractor(s) who provide general dental services from the practice, undertakings that:

(a) the contractors will continue to provide general dental services until 1 April 2024; and

(b) the ventilation equipment for which an allowance is claimed meets the required standard.

Application for Allowance

14. (1) Applications for allowances shall be made by contractors to a Health Board in such manner as the Health Board may determine.

(2) A Health Board must only consider applications for an allowance under paragraph 11 which:

(a) are made by an authorised representative on behalf of all the contractors within the practice;

(b) enclose qualifying receipts for the ventilation equipment for which the allowance is being claimed; and

(c) are received by the Health Board on or before 31 March 2022.

Recovery of Allowances

15. Where an authorised representative receives an allowance under this Part, but the practice does not continue to meet the conditions of entitlement at paragraph 13, the Health Board must require the authorised representative to pay back one thirty-sixth of that allowance for every month of the three year period during which the conditions are not met.

Part II - Grants for Practice Improvements: New Vocational Training Practices

Conditions of Entitlement

16.—(1) A dentist who wishes to become a trainer, who satisfies the conditions specified in paragraph 16(2) and who makes a claim to the Health Board in accordance with paragraph 18 shall be entitled to a grant as specified in paragraph 17.

(2) The conditions referred to in paragraph 16(1) are:

(a) no dentist has provided vocational training within the proposed trainer's current training practice during the 5 years prior to his application to become a trainer; and

(b) the dentist has been provisionally assessed by NHS Education for Scotland as suitable to become a trainer, pending improvements to the proposed training surgery within the proposed training practice to satisfy vocational training standards.

Amount of Grant

17.—(1) The amount of grant to be paid where a dentist has satisfied the conditions in paragraph 16 and made a claim in accordance with paragraph 18 shall be up to £10,000 less any abatement in accordance with paragraph 16(2).

(2) The abatement to be applied is the amount in column 2 of the Table below corresponding to the proportion in column 1 of that Table which the dentist's NHS earnings bear to his total earnings in the financial year prior to that in respect of which the allowance is to be paid.

TABLE

<i>Column 1</i> <i>Proportion which NHS earnings bear to total earnings</i>	<i>Column 2</i> <i>Percentage of abatement</i>
90% or more	no abatement
80% or more but less than 90%	10%
70% or more but less than 80%	20%
60% or more but less than 70%	30%
50% or more but less than 60%	40%
40% or more but less than 50%	50%
30% or more but less than 40%	60%
20% or more but less than 30%	70%
10% or more but less than 20%	80%
Less than 10%	90%

(3) The grant shall be paid to one contractor per training practice on behalf of all the contractors at that practice.

(4) Only one grant shall be payable per training surgery within a proposed training practice. This training surgery to be permanent unless a change is agreed with NHS Education for Scotland. Where a dentist will be a trainer otherwise than full-time the grant to be paid shall be a pro-rata sum calculated on the basis of a whole-time week of 35 hours.

(5) A grant under this Part shall not be paid for any improvements for which an allowance has been paid under Part I of this Determination or for which a Scottish Dental Access Initiative grant has been awarded.

Application for Grant

18.—(1) A dentist shall make a claim for a grant under paragraph 17 to the Health Board within 3 months of the improvements to the training surgery being completed, on a form supplied by the Health Board, and shall include with the claim a declaration:

- (a) in which he states the percentage of his NHS earnings in relation to his total earnings for the financial year prior to the year in which his claim is made;
- (b) that by the end of the second vocational training cycle of receiving a grant under paragraph 17:
 - (i) he will employ a trainee; or
 - (ii) where he does not employ a trainee, the surgery which was to be used by the trainee shall be used for the provision of general dental services by a dentist or assistant dentist who has completed his training within the previous 3 months prior to joining the practice;

(c) that the surgery shall continue to be used for vocational training or for the provision of general dental services for a period of 3 years following commencement of its use in accordance with paragraph 18(1)(b) and the full range of general dental services (except for specialist services where referral may be appropriate) will be provided to all categories of NHS patients throughout that period.

(2) A grant shall be payable on production of receipts for the work undertaken to the proposed training surgery to meet vocational training standards.

(3) A grant can only be made for those items identified by NHS Education for Scotland as requiring upgrading in the proposed training surgery to satisfy vocational training standards.

(4) Where the prospective trainer is not an owner of the proposed training practice, any application shall be made jointly by the owner(s) of the practice and the prospective trainer and the conditions in paragraph 18(1)(b) and (c) will apply equally to both the trainer and the owner(s).

Part III - Grants for Practice Improvements: Established Vocational Training Practices

Conditions of Entitlement

19.—(1) A dentist who is a trainer, who satisfies the condition specified in paragraph 19(2) and who makes a claim to the Health Board in accordance with paragraph 21 shall be entitled to a grant as specified in paragraph 20.

(2) The condition referred to in paragraph 19(1) is NHS Education for Scotland determines that:

(a) the training surgery within the training practice requires subsequent improvements to continue to satisfy vocational training standards; or

(b) the training practice is suitable for expansion to become a multiple training practice, pending improvements to the proposed additional training surgery(ies) within the training practice to satisfy vocational training standards.

Amount of Grant

20.—(1) The amount of grant to be paid where a dentist has satisfied the condition in paragraph 19 and made a claim in accordance with paragraph 21 shall be up to £6,000 less any abatement in accordance with paragraph 20(2).

(2) The abatement to be applied is the amount in column 2 of the Table below corresponding to the proportion in column 1 of that Table which the trainer's NHS earnings bear to his total earnings in the financial year prior to that in respect of which the allowance is to be paid.

<i>Column 1</i>	<i>Column 2</i>
<i>Proportion which NHS earnings bear to total earnings</i>	<i>Percentage of abatement</i>
90% or more	No abatement
80% or more but less than 90%	10%
70% or more but less than 80%	20%
60% or more but less than 70%	30%
50% or more but less than 60%	40%
40% or more but less than 50%	50%
30% or more but less than 40%	60%

20% or more but less than 30%	70%
10% or more but less than 20%	80%
Less than 10%	90%

(3) The grant shall be paid to one contractor per training practice on behalf of all the contractors at that practice.

(4) Only one grant shall be payable per training surgery within a training practice in each 5 financial years. This training surgery to be permanent unless a change is agreed with NHS Education for Scotland. Where a dentist is a trainer otherwise than full-time the grant to be paid shall be a pro-rata sum calculated on the basis of a whole-time week of 35 hours.

(5) A grant under this Part shall not be paid for any improvements for which an allowance or grant has been paid under either Part I or Part II of this Determination or for which a Scottish Dental Access Initiative grant has been awarded.

Application for Grant

21.—(1) A trainer shall make a claim for a grant under paragraph 20 to the Health Board within 3 months of the improvements to the training surgery being completed, on a form supplied by the Health Board, and shall include with the claim a declaration:

- (a) in which he states the percentage of his NHS earnings in relation to his total earnings for the financial year prior to the year in which his claim is made; and
- (b) that the training practice shall continue to provide vocational training for a period of 3 years following receipt of a grant and that the trainee shall provide the full range of general dental services (except for specialist services where referral may be appropriate) to all categories of NHS patients throughout that period or
- (c) that where he does not employ a trainee during any year within the 3 year period, the surgery which was to be used by the trainee shall be used for the provision of general dental services by the dentist to whom the trainer has provided training which has been completed within the previous 3 months.

(2) A grant shall be payable on production of receipts for the work undertaken to the training surgery to continue to meet vocational training standards.

(3) A grant can only be made for those items identified by NHS Education for Scotland as requiring upgrading in the training surgery to continue to satisfy vocational training standards.

(4) Where the trainer is not an owner of the training practice, any application shall be made jointly by the owner(s) and the trainer and the condition in paragraph 21(1)(b) will apply equally to both the trainer and the owner(s).

Transitional Application of Part III

22. A contractor who has received a grant under this Part of this Determination in the financial year 2012/13 shall not be entitled to received a further grant for 4 complete financial years.

Part IV - Repayment of Allowances and Grants

23.—(1) Where there has been a breach of paragraph 7 above, the allowance will be recovered in whole or in part by taking back one third for each financial year in which the relevant condition was unmet. In such circumstances, payment must be made within three months of demand. If the dentist fails to repay the amount due, appropriate recovery action by the Health Board will follow.

(2) Where there has been a breach of paragraph 18(1)(b) or (c) or 21(1)(b) or (c) above, the grant will be repaid in full or by an amount calculated by taking the percentage of the number of months unserved compared with the agreed period of 24/36 months plus 20%, whichever is the lesser. In such circumstances, payment must be made within 3 months of demand. If the dentist fails to repay the amount due, appropriate recovery action by the Health Board will follow.

Interpretation

24.—(1) In this Determination, unless the context otherwise requires:

“assistant” has the meaning given in regulation 2(1) of the National Health Service (General Dental Services) (Scotland) Regulations 2010 but excludes those assistants who are vocational trainees;

“contractor” means a person who has undertaken to provide general dental services and whose name is included in sub-part A of the first part of the dental list;

"dental list" means a list prepared by a Health Board in accordance with regulation 4(1) of the National Health Service (General Dental Services) (Scotland) Regulations 2010;

"dentist" means a registered dental practitioner whose name is included in sub-part A of the first part of the dental list;

“designated contractor” means that contractor deemed designated by the practice and recorded by the CSA;

"financial year" means the period beginning on 1 April in one year and ending on 31 March in the next year;

"gross earnings" means in relation to Part I the contractor's gross earnings from the provision of general dental services under the National Health Service (Scotland) Act 1978 and does not include remuneration by way of salary;

"gross earnings" means in relation to Parts II and III the dentist's gross earnings from the provision of general dental services under the National Health Service (Scotland) Act 1978 and does not include remuneration by way of salary;

“NHS commitment level” means the average percentage of time spent on NHS work compared to private work in a typical week;

"NHS earnings" means the dentist's gross earnings, excluding any remuneration by way of salary, from the provision by him in person of general dental services under the National Health Service (Scotland) Act 1978;

“a practice” means a single geographical location from which general dental services are provided, this location being the practice address on a Health Board list;

“practice NHS commitment percentage” has the meaning given in paragraph 13(3);

“qualifying receipts” mean receipts for the purchase, renewal, upgrading and (if needed) installation of ventilation equipment which meets the required standard;

“required standard” in respect of ventilation equipment means equipment which allows for 10 or more air changes per hour in the surgery in which it is installed;

"total earnings" means the dentist's gross earnings, excluding any remuneration by way of salary, from the practice of dentistry by him in person;

"trainee" means a dentist who is employed by a trainer as an assistant in accordance with paragraph 2

of Determination IV;

"trainer" means a dentist who employs a trainee as an assistant in accordance with paragraph 2 of Determination IV;

"training" means a period of one year's vocational training or two years general professional training;

"training practice" means a practice which has been assessed as being an appropriate standard to undertake vocational training as determined by NHS Education for Scotland;

"training surgery" means the surgery which has been agreed with NHS Education for Scotland as being the surgery to be used by a trainee to provide general dental services;

"ventilated surgery" means a surgery in which ventilation equipment which meets the required standard has been installed;

"vocational training" has the meaning given in regulation 2(1) of the National Health Service (General Dental Services) (Scotland) Regulations 2010;

"vocational training cycle" means a period beginning on 1 August in one year and ending on 31 July in the next year;

"year" means a vocational training cycle.

(2) In this Determination, a reference to a numbered paragraph is to the paragraph bearing that number in this Determination and a reference in a paragraph to a numbered sub-paragraph is to the sub-paragraph bearing that number in that paragraph.