

Mission

To produce innovative Associate Degree nurses who provide safe quality care to diverse populations, invest in continued professional learning to maintain excellence, and inspire others in the profession of nursing. The nursing faculty will accomplish this through evidenced based nursing education in an environment that promotes caring, diversity, ethics, excellence, holism, integrity and patient centered care.

Accreditation

This program is approved by the Washington State Nursing Care Quality Assurance Commission and is accredited by the Accreditation Commission for Education in Nursing (ACEN), 3343 Peachtree Road NE. Suite 850, Atlanta, Georgia 30326.

Information Sessions

Applicants interested in the nursing program are encouraged to attend an information session. Check the website for session dates and times.

www.tacomacc.edu/nursing

Contacts

Pre-Nursing Advisors 253.566.6091 online@tacomacc.edu

Nursing Admissions 253.566.5218 nursing@tacomacc.edu

Associate Dean for Nursing Julie Benson, MHA, MN, CNE, ARNP

Each individual, upon entering the practice of nursing, assumes a measure of responsibility and public trust and the corresponding obligation to adhere to the standards of nursing practice.

LPN to RN Associate in Nursing (DTA/MRP)

TCC'S LPN to RN program prepares the student for a career as a Registered Nurse. Upon satisfactory completion of the curriculum, the student is awarded an Associate in Nursing – Direct Transfer Agreement/Major Related Program (DTA/MRP) degree and is eligible to take the National Council Licensure Examination (NCLEX) for Registered Nursing.

Licensed Practical Nurses (LPNs) who wish to become Registered Nurses may apply for advanced standing in the program. LPNs are admitted into the full time program once a year in winter quarter. The first quarter is level three of a six level program.

Essential Requirements for Nursing Students

The nursing profession is a highly respected field. The reasons for this are many, but largely because patients put their lives in our hands. Nurses must be worthy of that trust. The nursing program has the responsibility to assure the public that its students and graduates are competent in all of these areas.

The law relating to nursing care states in WAC 246-840-700, "Each individual, upon entering the practice of nursing, assumes a measure of responsibility and public trust and the corresponding obligation to adhere to the standards of nursing practice. The nurse shall be responsible and accountable for the quality of nursing care given to clients. This responsibility cannot be avoided by accepting the orders or directions of another person." Nursing students and graduates are held to this law.

The TCC Nursing Program curriculum is intended to lead to a student's eligibility for licensure as a registered nurse. The curriculum requires students to engage in diverse, complex, and specific experiences essential to the acquisition and practice of essential nursing skills and functions. These abilities are essential as they constitute core components of nursing practice. There is a high probability that negative consequences will result for patients/clients under the care of nurses who fail to demonstrate these abilities. A program preparing students for the practice of nursing must attend to these essential functional abilities in the education and evaluation of its students.

This statement of Technical Standards identifies the functional abilities the TCC nursing faculty deem to be essential to the practice of nursing. The Technical Standards are reflected in the Nursing Program Learning Outcomes, which are the basis for teaching and evaluating all nursing students. The TCC Nursing Program's Mission and Program Learning Outcomes are available for reference at https://www.tacomacc.edu/academics-programs/programs/nursing/dta-mrp/mission-values

Students with disabilities who have questions about or may require reasonable accommodations in meeting the Technical Standards of the Nursing Program should contact TCC's Access Services Office to discuss the process of identifying reasonable accommodations. Students should seek reasonable accommodation advising as soon as possible so that a plan for reasonable accommodation can be in place at the beginning of the program. The phone number for the Access Services Office is 253-460-4437. The e-mail address is access@tacomacc.edu. The list of essential requirements can be found at https://www.tacomacc.edu/academics-programs/programs/nursing/dta-mrp/essential-requirements

Tacoma Community College values diversity and is an Equal Opportunity Employer and Educator. Tacoma Community College provides equal opportunity in education and employment and does not discriminate on the basis of race, color, national origin, age, disability, genetic information, sex, sexual orientation, marital status, creed, religion, or status as a veteran of war. Prohibited sex discrimination includes sexual harassment (unwelcome sexual conduct of various types). Provides reasonable accommodations for qualified students, employees, and applicants with disabilities in accordance with the Americans with Disabilities Act and Federal Rehabilitation Act. The following officers have been designated to handle inquiries regarding non-discrimination policies: Title II and Title IX Officer, Bldg. 14, 253-566-5055; Section 504 Officer, Bldg. 7, 253-566-6090.



Full-Time LPN Option

The nursing courses in the LPN to RN Bridge program are taught in a four-quarter sequence over a one-year period.

WINTER	LEVEL 3
SPRING	LEVEL 4
SUMMER	LEVEL 5
FALL	LEVEL 6

It is recommended that students work less than 20 hours per week.

Program Cost

Figures are estimates for the four-quarter LPN to RN Bridge program only and are subject to change.

TUITION & FEES

- \$5,139.00 --- Resident Tuition
- \$250 Technology fees

ADDITIONAL COURSE FEES

• \$900

TESTING & LICENSING FEES

- \$350 Testing fees
- \$92 ----- Washington State licensing fee
- \$200---NCLEX exam

MISCELLANEOUS:

- \$1,205 (Books, VSim, CoursePoint, Prep U, Docucare)
- Immunizations varies with insurance
- \$200-\$800 --- eReader or tablet
- \$100 --- Background checks
- Drug screening (clinical requirement)
- Misc. student uniform & equipment varies
- Graduation minimal to \$250 of optional items

Application Deadlines

 Winter Quarter (LPN full-time) Accepting applications

July 1 - October 1

Getting Ready to Submit Prerequisites for Approval

- Coursework completed at other colleges must be evaluated by TCC Enrollment Services office.
 Do not send transcripts directly to the nursing program.
- When you are sending official transcripts to Tacoma Community College, also provide the Request to Evaluate Transcript PDF document to Enrollment Services, Bldg. 7, in person, or by email at credeval@tacomacc.edu. These documents must be submitted by the application deadline.

Nursing Program Prerequisites

All **FACTORED PreREQUISITES** must be completed <u>before</u> applying to the Nursing Program. Each course must be successfully passed within two atempts to achieve a grade of "B" or higher. These attempts include all academic withdrawals "W" and "I, WI, V and Z" as well as grades "B-" and below. There is no expiration date for prerequisites. Unsuccessful attempts more than five years old are disregarded.

PreREQs to FACTORED PreREQs	FACTORED PreREQs	TITLE
ENGL/ 095 or assessment above ENGL/ 095	ENGL& 101 (5)	English Composition I
PSYC& 100	PSYC& 200 (5)	Lifespan Psychology
MATH 095 or higher (may be taken concurrently)	CHEM& 121 (5) or CHEM 161 (5)	Intro. to Inorganic Chemistry or General Chemistry
CHEM& 121 and either BIOL& 160* or BIOL& 222. CHEM 131 recommended.	BIOL& 260 (5)	General Microbiology
BIOL& 160* and CHEM& 121 or CHEM& 140. Will accept CHEM& 110 in lieu of CHEM& 121 if completed prior to Summer 2018.	BIOL& 241 (5)	Human Anatomy and Physiology I
BIOL& 241. Grade of "B" or higher	BIOL& 242 (5)	Human Anatomy and Physiology II

ASSIGNING GRADE VALUES TO ADVANCED PLACEMENT TEST SCORES

The college awards credit to students who have tested in AP courses coming out of high school. Test scores received by students will be used to calculate a grade point value as follows:

Numerical Grade	AP Testing Score	
4.0	5	
3.0	4	

Non-FACTORED PreREQUISITES which must be completed <u>before</u> applying to the Nursing Program. Requires a "C" or better.

PreREQs to Non-FACTORED PreREQs	Non-FACTORED PreREQs	TITLE	
ENGL/ 095 and a minimum grade of C in MATH 090, MATH 093 or equivalent assessment in these areas.	BIOL& 160 (5)**	General Cell Biology	
ENGL& 101 with a minimum grade of C	ENGL& 102 (5) or ENGL 103 (5) or ENGL 235 (5)	Composition II or Composition III or Technical Writing	
ENGL/ 095 with a minimum grade of C	PSYC& 100 (5)	General Psychology	
	CMST& 210 (5)	Interpersonal Communication	
	NUTR 250* (3)	Nutrition in Healthcare I	
MATH 095 with a minimum grade of C or assessment above MATH 095 and ENGL/ 095 with a minimum grade of C.	MATH& 146 (5)	Introduction to Statistics	
	Humanities (5)	from Humanities Distribution List	

^{*} NUTR 101 can be substituted for this course.

^{**} If you have taken the higher level Biology classes, you can contact Ken Cushman at kcushman@tacomacc.edu to arrange taking a challenge exam for BIOL& 160 credit.

LPN to RN Program Schedule

	COURSE NO.	COURSETITLE	CREDITS
	NURS 103	Health and Illness Concepts III	3
	NURS 124	Clinical Simulation III	2
LEVEL 3	NURS 155	Pharmacology III	1
15 CREDITS	NURS 193	Clinical III	3
	PHIL 201	Ethics and Policy in Health Care I	3
	SOCSC 204	Psychosocial Issues in Health Care I	3
	NURS 201	Health and Illness Concepts IV	4
LEVEL 4	NURS 226	Clinical Simulation IV	2
12 CREDITS	NURS 256	Pharmacology IV	1
12 CHEDITS	NURS 294	Clinical IV	3
	PHIL 202	Ethics and Policy in Health Care II	2
	NURS 202	Health and Illness Concepts V	4
	NURS 227	Clinical Simulation V	2
LEVEL 5	NURS 257	Pharmacology V	1
12 CREDITS	NURS 295	Clinical V	3
	SOCSC 205	Psychosocial Issues in Health Care II	2
	NURS 234	Transition to Practice Seminar	1
	NURS 228	Clinical Simulation VI	1
LEVEL 6	NURS 244	Preparation for RN Licensure Exam	1
12 CREDITS	NURS 286	Professional Concepts II	1
	NURS 296	Transition to Practice: Clinical	6
	NUTR 251	Nutrition in Health Care II	2
OPTIONAL	NURS 260	Nursing Focus VI: Advanced I.V. Therapy Skills (optional) THEORY/LAB	1
COURSES	HT 203	Advanced Cardiac Life Support	1

Qualification / Weighted Points

After submitting an application, all documents will be evaluated. Each applicant will be awarded a score that is comprised of the following areas:

1. Base Points (40 points)

40 base points are awarded to all students who meet the basic nursing program requirements by the published deadline.

- Completion of the six factored prerequisites (see Prerequisites, page 4)
- Completion of the non-factored prerequisites (see Prerequisites, page 4)
- » Cumulative college-level GPA of 2.5 or higher (all courses, all colleges).
- » ATITEAS Exam (see ATITEAS Exam, this page)
- » Submission of nursing application and transcripts from outside institutions by the deadline.
- » Licensed Practical Nurse (LPN) Must have an active unencumbered Washington state LPN.

Calculate Your Points:

		Max Points	My Points
Base points	Meets minimum requirements	40	
BIOL 241, 242, 260	A- (3.7 and above) = 10 pts.	30	
Military	Yes = 10 pts.	10	
TCC college-level credits	If yes, 15+ credits = 5 pts, 30+ credits = 10 pts	10	
Re-take PENALTY points	Subtract 5 pts for each biology retake	-15	
	Best Possible Score	90	

2. Weighted Plus Points (max 60 points) Additional points are awarded for the following:

- » Biology Prerequisites (max 30 points)
 Each grade of "A-" or higher in the biology prerequisites (BIOL& 241, BIOL& 242, and BIOL& 260) are weighted as follows:
 A- (3.7) = 10 pts.
- » Military Service (max 10 points) Students with military service (past or present) are awarded 10 additional points. Does not apply to spouses or family members. Minimum of 90 days service and honorable discharge.
- » TCC Credits (max 10 points)
 Students who have taken college-level credit courses at TCC are awarded the following additional points:
 - \approx 30 or more college-level credits taken at TCC are awarded 10 points.
 - ≈ 15-29 college-level credits taken at TCC are awarded 5 points.
- **3. Weighted Negative Points** (max -15 points)

 Points will be subtracted from the 40 base points for the following:
 - » Each course retake in BIOL& 241, 242 or 260 will subtract 5 points.
 - » Retakes more than five years old will not be penalized.

ATI TEAS Exam

TCC requires all nursing program applicants to take the Test of Essential Academic Skills (ATITEAS) exam. The objectives used on ATITEAS are those deemed most relevant to measure entry level academic readiness for nursing program applicants.

REQUIRED: A minimum overall score of 70% and minimum scores in each category as follows: Reading 75%, Math 72%, Science 63%, English 70%. Students are allowed two attempts per year. This means that you can't have more than two attempts in the 365-day period prior to the published application deadline for the cycle for which you are applying (example: If the deadline is July 1, 2019 you can only have two attempts from July 1, 2018 to

admission factors}

July 1, 2019). All requirements must be met on one test; you can't use scores from multiple tests to meet the requirement. Results can be no more than four years old at application deadline.

Many students have already taken the ATITEAS exam, as it is a common requirement for nursing program applications. If you still need to take an ATITEAS exam, you will be able to do so here at TCC.

How to register for the ATI TEAS at TCC:

- Go to www.atitesting.com and create a personal account. You will also be asked to provide student information. Be sure to select "Tacoma CC" as the school.
- After creating an account, log in, and select the "Online Store" to register for the TEAS. In the online store, select "TEAS" located in the lefthand column under "Register for..."
- On the next screen you will need to select the state and city, and then you will have the option to select a testing time and location.
- There is a testing fee of \$90 required to finish registration. After purchase, you will receive detailed instruction of where to go, the time of testing, and expectations of what to bring on the day of your assessment. Be sure to fulfill these expectations or you will not be able to test at your scheduled time.

ATI TEAS Study Preparation:

There are many resources available to prepare for the ATITEAS. The resources best oriented towards this assessment are also available through ATI and located in the online store https://www.atitesting.com/ati_store/. These resources are produced and organized by the same developers of the ATITEAS assessment. Look under the ATITEAS "Shop by," and there are six different study solutions for ATITEAS success.

The resource with the most value for preparation and ATITEAS success is the "ATITEAS Study Package" (https://www.atitesting.com/ati_store/product. aspx?zpid=1194). This package includes two ATITEAS practice assessments that mirror the assessment. It also includes the ATITEAS Study Manual. Cost: \$209.

TO DO Check List

lete all requirements before applying to the program.
Nursing Information Sessions are held on a regular basis and last approximately 1½ hours. Applicants will be given information on the nursing profession and the nursing program application procedures. Check the website for dates and times: www.tacomacc.edu/informationsessions/areasofstudy/careertraining/nursing.
Pre-Nursing Advisor. Make an appointment and meet with your advisor. Be sure to bring your Accuplacer test scores or unofficial transcripts. Call 253.566.6091 or email online@tacomacc.edu.
Cumulative college-level GPA of 2.5 or higher.
Complete all prerequisites. See page 4.
LPN License in the State of Washington. Verification of your current LPN Unencumbered License in the State of Washington required. The license can be accessed at the licensing website (www.doh.wa.gov). Documentation must be uploaded as an attachment to the Nursing program application by the published application deadline.
Complete an ATITEAS Exam with a minimum overall score of 70% and in each category Reading 75%, Math 72%, Science 63% and English 70%.
Apply to TCC. Apply online or in person (Bldg. 7). www.tacomacc.edu/theenrollmentprocess Please note that it takes 24-48 hours for the system to generate your student ID number and access to the
student portals.
TCC student ID number and email. Check your email for a welcome message from TCC. You'll receive an assigned TCC student ID number for the ctcLink and myTCC portals.
Submit official transcripts from other institutions by the published application deadline. Official transcripts must be sent to Enrollment Services before the application deadline. Do not send transcripts directly to the nursing program.

Apply to the nursing program (see page 8).

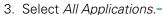
Applying to TCC's Nursing Program

Online Application Process

TCC's nursing program uses an online admission process. To apply you must be an admitted or registered student at Tacoma Community College and have access to the myTCC portal and have a TCC student email account.

How to access the application

- Sign into the TCC student portal (requires you to have an active TCC student account)
- 2. Click on the square icon (in the upper right corner), to expand options.





4. Select the Allied Health/Nursing link.



- 5. Select your application choice.
- Upload: (1) TEAS test results; (2) NAC license; and (3) military document. If you don't have military service upload a document and write "no experience." Three documents must be uploaded or your application will be rejected.
- 7. Click Submit and you are finished.
- 8. When you have completed the application, the system will send a confirmation to your TCC email. It is the responsibility of the applicant to ensure that all application materials and required documentation are received by the application deadline. Students do not need to wait UNTIL the deadline date to submit an application.

After Applying

In the first few weeks following a deadline, applications are evaluated for accuracy and weighted items are scored.

If your application is disqualified for any reason, you will be notified by TCC student email prior to the lottery taking place. It is your responsibility to check your email regularly for any communication regarding your application. Once all applications are processed, qualified applicants and weighted scores will be posted on the website for review.

Your lottery ID (last six digits of student ID) will be posted on the website (www.tacomacc.edu/admission_lottery) prior to the lottery drawing date.

Qualified applicants are entered into the TCC nursing lottery, which selects students to fill program openings.

Overview of the Lottery Process

TCC uses a weighted lottery to randomly select qualified students to fill its nursing cohorts. TCC is committed to a fair and open lottery and to avoid any misinterpretation of results, the program has instituted a witnessed verification process.

If your application qualifies, your lottery ID number will be entered into the lottery, including the appropriate weight earned by your application.

Selected applicants will be notified by TCC email one to two days after the drawing. If a student is accepted and then declines, the next randomly generated number will be accepted.

The lottery process will remain in effect for all future application deadlines until further notice.

If Not Selected

If you are not selected and wish to be considered for future drawings, you must reapply. You do not need to resubmit transcripts. You may also wish to explore a Pre-Nursing transfer degree or other allied health program offerings at TCC. Feel free to contact an advisor at 253-566-6091 or online@tacomacc.edu.

Next Steps

New Student Nursing Orientation

If you are selected and accept a position in the nursing program, you will be required to attend a mandatory orientation. Specific information regarding this orientation will be sent to your TCC email after your acceptance into the program.

The protection of vulnerable populations is paramount in nursing. Students should be aware they will need to meet all minimum requirements of clinical agencies including health clearance procedures.

Transportation & Child Care

It is the student's responsibility to arrange for dependable transportation to and from the school and clinical sites and have reliable child/dependent care available as needed.

Background Check

Certain conviction history will exclude persons from health care employment. This could also exclude a student from certain clinical sites.

Please check the criteria at the following link (https://www.dshs.wa.gov/fsa/background-check-central-unit/disqualifying-list-crimes-and-negative-actions). If you have any charges on the list, please make an appointment with Julie Benson, Dean of Nursing, to discuss how this could affect you. Her email address is jbenson@tacomacc.edu.

Additional Requirements:

- Several online health and safety courses
- CPR card Only the American Heart
 Association "Healthcare Provider" or "Basic Life
 Support (BLS) for Professional Rescuer" will be
 accepted. Online courses are not acceptable.
- Health Insurance Proof of coverage with coverage period. If the name on the card does not match yours (the student) proof of coverage from the provider is required.
- **Vehicle Insurance** Proof of coverage.
- Drug Screening Various healthcare facilities will require drug screening prior to student's clinical assignments. These results are strictly confidential between student and facility. The screening is not required by TCC.

Proof of Immunizations

- Hepatitis B Series Proof of immunity by vaccination (3 doses) and positive titer.
 - » If titer is negative you should talk to your doctor about getting a booster or repeating the series (30-60 days after completion you will repeat the titer).
 - » If negative a second time, you are considered a non-responder. Student will be allowed in clinical during repeat series by uploading a Hep B waiver.
- Influenza Proof of immunity by vaccination OR signed waiver. Waiver option can only be used for an egg allergy. You will need to follow additional clinical requirements (i.e. masking, etc.) if you are not vaccinated. This vaccination must be current (based upon current flu season requirements).
- MMR (Measles (rubeolla), Mumps, Rubella) Proof of immunity by vaccination (2 doses) or titer.
- PPD (TB) Proof that you don't have TB by Negative Quantiferon test or 2-step PPD.
 - » You complete a 2-step PPD as follows: If the first PPD is negative then you will need to obtain a second PPD within 1-3 weeks. Yearly annuals are required after your 2-step PPD.
 - » If you have a history of positive TB results through BCG or past infection, you must provide proof of negative TB by chest x-ray and submit negative symptom check every 12 months. If you have no proof of a positive TB test, you will need to retest by PPD or provide a current negative Quantiferon test.
- Tetanus/Pertussis (Tdap) If immunized after 06/10/07. Vaccination must be within 10 years.
 Will not accept Td.
- Varicella (Chicken Pox) Proof of immunity by vaccination (two doses) or titer.

Eligibility to take the National Licensing Exam for Registered Nurses

Registered Nurses are licensed by the State of Washington. In order to be eligible to take the licensing exam, students must graduate from a state-accredited nursing school. Applicants must file their intent to take the exam 60 days prior to the expected date, with a form supplied by the Associate Dean for Nursing. The exam fees must be paid at the same time. Graduating students must answer the following questions, which are excerpted from the Nursing Practice Law:

- Do you have a medical condition, which in any way impairs or limits your ability to practice your profession with reasonable skill and safety? If yes, please explain.
 - "Medical condition" includes physiological conditions or disorders such as, but not limited to, orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional or mental illness, learning disabilities, HIV disease, tuberculosis, drug addiction, and alcoholism.
 - 1a. If you answered "yes" to question 1, please explain whether and how the limitations or impairments caused by your medical condition are reduced or eliminated because you received ongoing treatment (with or without medications).
 - 1b. If you answered "yes" to question 1, please explain whether and how the limitations and impairments caused by your medical condition are reduced or eliminated because of your field of practice, the setting, or the manner in which you have chosen to practice.
 - If you answered "yes" to question 1, the licensing authority (Board/Commission or Department as appropriate) will make an individualized assessment of the nature, the severity, and the duration of the risks associated with an ongoing medical condition, the treatment ongoing, and the factors in "1b" so as to determine whether an unrestricted license should be issued, whether conditions should be imposed or whether you are not eligible for licensure.
- Do you currently use chemical substance(s) in any way, which impair or limit your ability to practice your profession with reasonable skill and safety?
 If yes, please explain.
 - "Currently" means recently enough so that the use of drugs may have an ongoing impact on one's functioning as a licensee, and includes at least the past two years.
 - "Chemical substances" includes alcohol, drugs, or medications, including those taken pursuant to a valid prescription for legitimate medical purposes and in accordance with the prescriber's direction, as well as those used illegally.
- 3. Have you ever been diagnosed as having or have you ever been treated for pedophilia, exhibitionism, voyeurism or frotteurism?

- 4. Are you currently engaged in the illegal use of controlled substances?
 - "Currently" means recently enough so that the use of drugs may have an ongoing impact on one's functioning as a licensee, and includes at least the past two years.
 - "Illegal use of controlled substances" means the use of controlled substances obtained illegally (e.g., heroin, cocaine), as well as the use of legally controlled substances, not taken in accordance with the directions of a licensed healthcare practitioner.
- Have you ever been convicted, entered a plea of guilty, nolo contendere or a plea similar effect, or had prosecution or sentence deferred or suspended, in connection with:
 - The use or distribution of controlled substances or legend drugs?
 - b. A charge of a sex offense?
 - c. Any other crime, other than minor traffic infractions (including driving under the influence and reckless driving)?
- 6. Have you ever been found in any civil, administrative, or criminal proceeding to have:
 - a. Possessed, used, prescribed for use, or distributed controlled substances for legend drugs in any way other than for legitimate or therapeutic purposes, diverted controlled substances or legend drugs, violated any drug law or prescribed controlled substances for yourself?
 - b. Committed any act involving moral turpitude, dishonesty or corruption?
 - c. Violated any state or federal law or rule regulating the practice of a healthcare profession?
- 7. Have you ever been found in any proceeding to have violated any state or federal law or rule regulating the practice of a healthcare profession? If "yes," explain and provide copies of all judgments, decisions, and agreements.
- 8. Have you ever had any license, certificate, registration, or other privilege to practice a healthcare profession denied, revoked, suspended or restricted by a state, federal or foreign authority, or have you ever surrendered such credential to avoid or in connection with action by such authority?
- 9. Have you ever been named in any civil suit or suffered any civil judgment for incompetence, negligence, or malpractice in connection with the practice of a healthcare profession?

Students who answer "yes" to any of the questions, should make early application to the Washington State Nursing Commission. The Commission acts on each case individually at the time of application for licensure. Provide an explanation and copies of all judgments, decisions, orders, agreements, and surrenders.

A dishonest answer to any of the questions is grounds for revocation of a license in and of itself.