



HARRIET TUBMAN CHARTER SCHOOL

ELEMENTARY ACADEMY CAMPUS
3565 THIRD AVENUE
BRONX NY 10456
PH#(718)537-9912 Fx#(718)537-9858

JUNIOR ACADEMY CAMPUS
1176 FRANKLIN AVENUE
BRONX NY 10456
PH#(718)991-4181 Fx#(718)991-6713



WWW.HTCSBRONX.ORG

Cleveland Person, *Principal*

Jerima DeWese, *Chair, Board of Trustees*

NOTICE OF CONCERN

We preface this report with a Statement of Concern submitted by the HTCS Board of Trustees and school leaders, highlighting significant discrepancies and inconsistencies between the August 2023 Final SVR and the December 2023 Final SVR written by a new team of CSO Reviewers. These discrepancies are not trivial, as they include contradictory comments and factual errors in contrast to previous SVR reports written by individuals with a deep historical knowledge of the positive and challenging aspects of HTCS. The former CSO team also worked with HTCS for most of the renewal term versus a new CSO team that was only involved with HTCS from August 2023 until the December Site Visit Review. In addition, no one from the CSO office was involved with HTCS from January 2023 to August 2023, so there was no evidence that we know of during that time when HTCS was negligent in any way.

Thus, we raise a valid question. How could the current CSO Review Team make certain comments that directly contrast with the Final SVR Report of August 2023, written by a team with deep historical knowledge of the positive and challenging aspects of HTCS' functionality?

We present these contradictions as reference points in this report, firmly restating our objections raised in HTCS' Factual Correction Report. None of the evaluative comments submitted in this report can change the Final SVR. Only the factual corrections can. Our ability to defend comments is crucial to the renewal process, allowing us to correct any factual inaccuracies in the CSO's findings. Upon review of the CSO 2024 Factual Correction Evaluation (05/14/24), we contend that the denials we received were not in line with the evidence presented and the concerns raised in our factual comments. 13 out of 18 were regrettably denied as "evaluative" by the CSO Team. The implications of CSO's denials on our renewal terms are significant. While we submit our defenses again in this report, the Final 23-24 SVR Report cannot be revised.

Therefore, the denials upheld by the CSO team directly and significantly impact our renewal terms, potentially leading to a less favorable renewal outcome. It is only fair and just that the Board of Regents be fully informed of these discrepancies. If necessary, the HTCS Board of Trustees and school leadership will address this matter separately and directly to the Board of Regents and the Commissioner.

EVALUATIVE COMMENTS

SUBMITTED BY THE HTCS BOARD OF TRUSTEES AND SCHOOL LEADERS

May 20, 2024

The counter-responses to the CSO Factual Corrections Evaluation submitted to HTCS on May 13, 2024, are listed below. In their responsibility to counter any denials, the HTCS Board of Trustees and school leaders took into account the evidence presented and the concerns raised by the CSO. We have made every effort to ensure our evaluative comments herein are fair, objective, and thoroughly supported by evidence.

CSO Reviewers' Comments: The Board continues to have difficulty with timely and effective communication and response to CSO requests and the school has a continued lack of communication with the CSO.

We firmly restate our rejection of the denial from the CSO's Factual Response Evaluation. This denial does not align with the evidence presented and the concerns raised.

HTCS Evaluative Counterpoint: We have identified several discrepancies in the reviewers' comments from the August 2023 Final SVR vs. the May 2024 Final SVR. These discrepancies, which range from factual errors to contradictory statements, are significant and raise questions about the consistency and accuracy of the CSO's evaluations. For instance, the August 2023 report praised the school's improved communication with the CSO, while the May 2024 report criticized the school for a 'continued lack of communication with the CSO.'

We have documented evidence from the August 2023 Final Site Visit Report that contradicts the statement above. The comments in the August report, which the former CSO Liaison [REDACTED] reviewed, state that:

"Over this charter term, the trajectory for this benchmark has improved from a Falls Far Below rating in the most recent renewal report to an Approaches. The school has made significant efforts to enhance safety at the JA facility and has improved its communication with the CSO regarding compliance matters. As mentioned in Benchmark 6, the school benefits from working with an external consultant who assists the Board with compliance requirements, including any related communication with the CSO.

In Benchmark 6, the reviewers noted that the Board showed improvement during the renewal term by:

- *Conducting a retreat to finalize the goals for the Strategic Action Plan;*
- *Using a self-evaluation tool to identify areas of growth, set performance goals, and monitor progress in meeting those goals;*
- *Demonstrating oversight of the school's mission and key design elements and*
- *Addressing legal compliance by being more responsive to CSO requests and demonstrating more timely submission of reports.*

Other salient points to our counter:

- It should be noted that from January 2023 to August 2023, there was no communication between the CSO and HTCS since our former liaison was assigned to another department. This lack of fluidity included not receiving our Final Mid-Term Site Visit Report until August 14, one day before our renewal application was due.
- No reports were due to the CSO during this period, except the Annual Report, which was submitted on time.
- On August 3, 2024, we heard from the CSO for the first time since January, announcing that our new liaison would start on August 17, 2023.

HTCS Evaluative Counterpoint: We refute CSO's denial due to a lack of evidence that HTCS has been untimely and ineffective in its responses to CSO requests. We researched all communication from August 2023 to the present to find any further instances where the Board was untimely in their communications. We examined all emails from the CSO team ([REDACTED]) to substantiate CSO's claim that HTCS did not respond in a timely manner. We only found two instances, one with a few days' delay for information needed for the December Site Visit and another where the CSD #9 Letter of Notification needed a reminder to be signed.

Appendix A, attached at the end of this report, details the chronology of emails, dates received, and HTCS' response to demonstrate that we were timely.

We contest the CSO's comments based on the following:

- We offer Appendix A as proof that the CSO did not communicate with the HTCS Board from January 2023 to August 2023. Appendix A also shows that only two minor instances were reported where the Board received a second request for a response to the CSO's emails. No reports were submitted late.
- In addition, our formal liaison reviewed the August 2023 version of the Final Site Visit Report. If the Board had not demonstrated growth in their communications with the CSO, the liaison would have changed the report and its comments.
- We question how the CSO's comments and ratings could change dramatically from the 22-23 Final SVR and seven months of FY23-24 under our former CSO Liaison when the new CSO team had only worked with HTCS from August 17, 2023, to the time of the site visit in December.

CSO Reviewers' Comments: The Board shows a lack of successful oversight of the fiscal operations, and they have an ongoing absence of a Board Treasurer.

We respectfully reject the denial from the CSO's Factual Response Evaluation.

HTCS Evaluative Counterpoint: HTCS has historically managed its finances without issue for several years without a treasurer through a finance committee structure comprised of school leaders, CSBM, and the Board finance committee. In the absence of a Treasurer, HTCS incorporated this system into its CSO-approved By-Laws. HTCS still clean audits and received 2.81 out of 3 in its last renewal review on its Composite Financial Score, an unusually high score for a charter school.

The last two years have been a decided challenge for all schools, districts, and charters alike since the pandemic. NYC has been challenged by the loss of families and chronic absenteeism. To maintain a laser-like focus on our revenue vs. expenses monthly budget reviews, we adopted a zero-based budgeting approach to inform every budget decision, cutting expenses and not filling vacancies wherever possible while staying true to our design. *Yet the CSO cited HTCS for not filling vacancies stating, "the trajectory for this benchmark has declined from a Meets to an Approaches due to a number of teacher vacancies."* We could not be fiscally responsible if we kept our staff at normal levels. We cut where there were vacancies so that we did not irreparably hurt our existing faculty.

It became an extraordinary challenge as our enrollment and absenteeism dropped considerably, coupled with the fact that HTCS assumed all the \$1.1M cost for the renovation of the Junior Academy to meet the LNO certification process to keep the JA open in 2021-22 as per the CSO/NYSED requirements. The Board also had to incur attorney's costs to negotiate the terms with the attorney from the Archdiocese. The Parish was to share in the cost, but HTCS has never received any reimbursement, placing a significant burden on the budget and depleting HTCS' reserve.

The CSO reviewers have yet to acknowledge progress in that HTCS did have a Treasurer-elect at the time of the Factual Correction.

- The CSO Review Team should have mentioned that a successful recruitment and selection process had been initiated for a Treasurer and another Trustee starting in November 2023. The candidates for Treasurer and Trustee were selected in February 2024. Thus, we feel that since the Final 23-24 SVR came out in May, it should have been added to the report.

- HTCS began uploading the required documents to the CSO Portal in February 2024 and completed its final submission on April 25. A minor correction needed to be made on May 9.
- The NYSED acknowledged receipt of all documentation with final approval on May 13, 2024. Mr. Brady is a retired accountant with over 40 years of experience in corporate/individual federal and state taxation, auditing, and accounting. His first official BoT meeting was on May 14, 2024.

CSO Reviewers' Comment: The Board has not consistently adhered to its communication plan developed as a result of the 2021 renewal conditions approved by the Board of Regents in the school's 2021 renewal item.

We respectfully reject CSO's denial, particularly since it references the entire renewal period.

HTCS Evaluative Counterpoint: HTCS submitted its Communication Protocol for approval by the CSO on July 1, 2021, with an acknowledgment from [REDACTED] stating, "Thank you for the submission of the local assessment data and the proposed communication protocol. We will review the Protocol and answer your question regarding the weighted lottery next week."

To date, we have yet to receive any approval or further response to the Communication Protocol from the CSO, nor did we receive any feedback that we were not meeting the goals outlined in the Protocol. On the contrary, in each submission and revision of the 23-24 Mid-Term Site Visit report (June 14, 2022, January 20, 2023, August 8, 2023), the former CSO reviewers made positive comments (pp 26 and 38) regarding communication as documented in the Final 23-24 Mid-Term SVR.

CSO Reviewers' Comments: HTCS fails to obtain CSO approval before implementing its revised policies

We respectfully reject the CSO's Factual Response Evaluation, particularly because it does not include all policies approved by the CSO during the entire renewal period.

HTCS Evaluative Counterpoint: Prior to and during 21-22 renewal period, the CSO approved the following HTCS policies (Technology, Acceptable Use, Complaint, Attendance, ADA, Whistleblower, Document Retention, Pesticides, Student Records, Personnel, Special Education, Lottery, School Safety Plan, Promotion, Fingerprinting, FOIL, Remote Learning, Internet Safety, COVID, Distance Learning, Enrollment, and Smoking and Vaping.) The Discipline Policy is addressed below.

The CSO approved the DASA Policy as a separate policy on 08 04 2020, and the Disciplinary Policy and Code of Conduct were approved on May 4, 2022. The only change came in 2023 when NYSED mandated that a statement be added to the Discipline Policy, detailed in the Renewal Application process. **This language change was not initiated by HTCS but was required by NYSED.**

The directions in the portal state, "Provide the school's current NYSED-approved student discipline policy and code of **conduct unless the school is proposing revisions** to the policy as part of section 4 of the renewal application. If a revision is proposed, please also provide a red-lined version of the proposed policy, and clearly label each discipline policy to differentiate them. Provide a signed statement from the school's attorney that the policy follows all applicable federal and state laws. If the school's DASA policy is not incorporated into the discipline policy/code of conduct, it must be submitted separately. **NEW:** The discipline complaint policy must clearly state that in the event a manifestation determination review (MDR) determines that the conduct of a student with a disability is attributable to that disability, the student must immediately be permitted to return to the school, instead of beginning or completing the period of suspension.

Since this was NOT a change initiated by the school, we followed the NYSED's directions and submitted the policy as directed as Attachment D and not a charter revision. We question if all schools were required to do the same. However, the CSO directed us to submit the Discipline Policy as a revision, which put HTCS out of compliance with the Revision Request Policy.

We adhered to all other conditions listed in the paragraph above (i.e., a signed statement by our attorney, clear demarcation of the Discipline Policy, Code of Conduct, and DASA policy, and a red-lined version to show where we placed the state's mandated language). Lastly, we did request that the CSO provide HTCS with a list of policies that they claim were implemented before their use at HTCS, which we did not receive.

CSO Reviewers' Comment: The principal selection was to begin on October 23. At the time of the site visit, the school had not begun this process.

We respectfully reject the CSO's Factual Response Evaluation and its denial of our evidence.

The reviewers' comment is correct, as HTCS had not begun the hiring process for a new principal. However, the CSO reviewers denied the rationale behind this decision.

- Starting the process before we know our renewal status and conditions around the Executive Director's continuance would be counterproductive to HTCS and unfair to the candidates.
- The parents, staff, and Trustees wish to retain our Executive Director of 16 years as long as his health and willingness allow. He is an extremely effective school leader, and we need his expertise to "build back" HTCS. If the Governor extends the protection for NYCTRS retired administrator pensions for FY24-25, our ED will stay. NYSTRS has already extended it.
- In the Factual Response, we stated that the Board is fully prepared to re-engage in a principal search process once the 211 Waiver status and the renewal are determined. This information could have been added as a postscript to the CSO's site visit report.

Reviewers' Comment: The Board does not appear to be fully familiar with the NYSED Charter School Performance Framework because the Board has not successfully met the Performance Framework standards for Benchmarks 4, 5, 6, 7, 8, 9, and 10. School leadership focus group members were unable to describe a strategic framework focused on monitoring charter school goals, which is one of the school's key design elements.

The Board and school leaders have historically received ratings of Meets on the majority of Benchmarks related to the Performance Indicators, Benchmarks, and Key Design Elements as evidenced from the reviewers' comments in the 22-23 Final SVR Report. The report states:

- The school remains true to its mission statement and key design elements (p. 9)
- The Board's Action Plan demonstrates oversight of the school's mission and key design elements" (p. 26)
- The school has fully implemented the key design elements in the approved charter and in any subsequently approved revisions and remains faithful to the Key Design Elements. (p. 33)

We also disagree that the school could not describe a strategic framework. ***The 2019 Performance Framework and Benchmark Indicators is the framework by which the Board and school leaders' function.*** To further demonstrate its accountability in this area, the Board uses the Performance Framework as the basis for its Action Plan and Strategic Goals which have been submitted to the CSO as part of the renewal, Annual Report, and in check-ins with the CSO around its adherence to governance.

It is condescending and disparaging to read the CSO’s comments that the Trustees "need help understanding the 2019 Performance Framework or the Benchmark Indicators." The Final SVRs over the first two years of the charter term from 21-22 and 22-23 affirm this in the CSO’s statement that HTCS “remains true to its mission statement, key design elements.”

Not meeting a benchmark is NOT an indication of knowledge; rather, it is the conditions that impact whether or not the benchmark is met. ***CSO's language demeaned the Board “as needing help” understanding the framework, and the indicators were derogatory and unfounded.***

Below is the historical table of benchmark results for the renewal term. It is evident that the first two years’ ratings, under the support of our former CSO team of professionals, contrast dramatically with the ratings of the current CSO team of 9.5 months. The 23-24 SVR Report was also based on one site visit to HTCS, and we question why the team of reviewers who are new to CSO would not have consulted the 22-23 Final SVR Report.

Ratings Comparison during the 2021-24 Charter Term

Benchmarks	2020-21	2021-23	2023-24
Benchmark 1 - Student Performance	Meets	Meets	Meets
Benchmark 2 - Teaching & Learning	Meets	Meets	Meets
Benchmark 3 – Culture, Climate & Learning	Meets	Meets	Meets
Benchmark 4 – Financial Condition	Meets	Meets	Falls Far Below
Benchmark 5 – Financial Management	Meets	Meets	Approaches
Benchmark 6 – Bd Oversight & Governance	Falls Far Below	Approaches	Falls Far Below
Benchmark 7 – Organizational Capacity	Meets	Meets	Approaches
Benchmark 8 – Mission & Key Design Elements	Meets	Meets	Approaches
Benchmark 9 – Enrollment, Recruitment, Retention	Approaches	Approaches	Falls Far Below
Benchmark 10 – Legal Compliance	Falls Far Below	Approaches	Falls Far Below

The school and Board ratings of "Meets" and "Approaches," as stated in the 2023-24 Final SVR, demonstrate an understanding of the Framework and the Benchmarks. The Board uses the indicators to measure the BoT and the school’s annual progress. The Benchmarks are specifically stated in the BoT Action Plan and Strategic Goals and inform the progress on the academic, fiscal, and operational goals in the Annual Report. They are also critical indicators as performance measures on the Board's Self-Evaluation and the Principal Evaluation.

Furthermore, the Board uses the Performance Framework as a point of discussion in its bi-annual retreats, Trustee meetings, and Education Committee meetings to keep the focus on its governance responsibilities. The Key Design Elements are part of the charter's mission/vision and are embedded in the Performance Framework. However, the 2019 Framework provides more data around rigorous and comprehensive performance measures to assess progress.

Reviewers’ Comments: HTCS does not have a formal system for monitoring the efficacy of contracted service providers

We reject CSO’s denial, citing our process defined in our renewal application and the Factual Response, which details the process for validating the vendors' work before any invoice is paid. Vendors must provide a list of required tasks with their invoice to the Board Chair, Board Secretary, or the Director of Operations in order to get paid.

Reviewers' Comment: The teacher focus groups did not describe a structured curriculum for SEL or ELL. This key design element is partially implemented.

There was obviously a miscommunication or misunderstanding during the teacher focus group interview regarding SEL and ELL/ENL. Our teachers who participated in the focus group stated that the CSO reviewers did not explicitly mention "programs." The teachers did state that they shared practices and how strategies were implemented related to SEL and ENL rather than referencing specific programs.

Based on the teachers' understanding of the question about SEL, they shared that they were asked about practices implemented in our classroom. They discussed Morning Meetings, Check-in Greetings and Check-out Questions coordinated by the HTCS Social Worker, and the HTCS FASSTeam (Family and Student Support Team). They talked about using preventive and supportive videos as a tool to connect with students experiencing social-emotional issues.

We should note here that the SEL Coordinator does use an SEL curriculum called CASEL as a reference which is a curriculum implemented by the NYCDOE, District 75, which provides highly specialized, instructional support for students with significant challenges. The teachers do not use this as a stand-alone program. Rather, the Coordinator uses it to guide strategies which classroom teachers can implement individually or as whole school practice.

For ELL/ENL, the ENL/ELL Teacher was not present in the focus group. Both the general educator and the ELL/ENL teacher meet twice weekly to plan lessons. The ELL/ENL teacher makes modifications based on students' needs and provides resources to the general educators. The ELL/ENL teacher "pushes in" and "pulls out" students regularly during ELA periods. Teachers also use speech translators in real-time to bridge the language gap as well as translate work from English to Spanish and French

To provide our ENL/ELLs access to all curriculum content, teachers use differentiation, scaffolding, and modifications to lesson plans. The ENL/ELL teacher assists colleagues in providing instruction designed to support individual learning in classrooms with various backgrounds and needs. Students are provided with content specific bilingual glossaries in content areas. In addition, teachers are given graphic organizers and strategies that can be utilized with their lessons.

Reviewers' Comment: The Board has not demonstrated full awareness of its governance role, its legal obligations to the school and stakeholders, and the requirements of the school's charter. Examples are described in Benchmark 10 of the Final SVR report.

We reject CSO's denial, particularly because it negates the progress made during the renewal term for the first two years. HTCS was removed from the NOD on TRS. We accept that fingerprinting and TRS surfaced again in FY23-24, but we will be providing evidence via a check-in that should address the NOD so that HTCS can be released from the CAP.

The reviewers stated at the beginning of the section for Benchmark 10 that "Over this charter term, the trajectory for this benchmark has remained consistent as a Falls Far Below due to ongoing compliance issues including fingerprint clearance and TRS contributions."

In the 2023-24 Final Site Visit Review, issued in August 2023, the reviewers rated the Board as "Approaches" not only in Benchmark 10 but also in Benchmark 9 and Benchmark 6. They also earned a rating of "Meets" in Benchmark 4, 5, 7, and 8.

The report also stated, “the school has also met deadlines for document submissions to the CSO” (p. 27) and HTCS has improved in its record of compliance with applicable state and federal laws and provisions of its charter (p.37).

These supportive comments are contrary to the highly prejudicial comment made by the new CSO review team in the 23-24 Final SVR which stated, “The board does not appear to be fully familiar with the NYSED Charter School Performance Framework because the board has not successfully met the Performance Framework standards for Benchmarks 4, 5, 6, 7, 8, 9, and 10.”

Our points of contention are listed below:

- The HTCS Board or school received NO "Falls Far Below" ratings in the FINAL 2022-23 SVR from the CSO Review Team. Thus, the trajectory showed progress from 2021 to 22.
- For most of 2024, there was no liaison from the CSO for six months, from February 2023 to August 2023 until [REDACTED] was assigned on August 17. Up to the December Site Visit, HTCS had only worked with the new CSO team for 4 months. The comments made by the new CSO Site Review Team in the Final SVR Report (completed by CSO on April 30) are neither representative of the entire year nor the entire renewal term.
- While HTCS has remained on a CAP for under-enrollment of its subgroups, it was released from two Notices of Deficiencies in 2023, one from TRS and the other for resolving all fire protocols in the Junior Academy.

Summary to Evaluative Comments

HTCS has made every effort to meet the requirements of the CSO and Board of Regents. We fully accept that we have had significant fiscal challenges in the later part of this renewal term. However, we have remained diligent in our service and performance goals wherever possible in the most challenging times.

We ask that the BoR consider our long record of success in serving our students, families, and the Bronx community. We have never wavered from our mission and vision of helping each child achieve their fullest potential.

We are collaborating hard with a new partner, Grow Schools, a highly recognized organization that supports student recruitment/enrollment and facility and project funding specifically for charter schools. They work with 86 schools in 26 states and have numerous testimonies as to how they increased enrollment in each of their partner schools on average by 15%.

HTCS is positioned to come back to its former glory with more students. Our student retention reports show that once we enroll our students, we have an exceedingly high retention rate. We just need to bring them back through our doors. We believe that while HTCS is seen as a “school building,” we see it as a vessel that holds the future of our Bronx children inside.

We respectfully ask that the Board of Regents view these past two years as an anomaly. The past two years have been the most challenging in our 25-year history. We ask the Regents to grant us the opportunity to work collaboratively with the CSO, giving us ample time to do the work we know how to do. We are poised for success with a newly constituted Board with new members who look forward to working with our CSO Liaison, [REDACTED] who has already shown a sense of collaboration with HTCS, which is unfortunately not reflected in the CSO’s comments.

All we now need is your grace and the benefit of a renewal period that gives us time to remedy.

Appendix A: Chronicle of all requests made by the CSO to HTCS and the school’s response from August 21 to May 7, 2024, noting that HTCS responded in a timely manner.

- Request by CSO to upload of Discipline Policy Sent 8/21 Responded 8/21
- Request by ██████████ to upload Discipline Policy Sent 9/05 Responded 9/06
- Request by ██████████ for Draft Notification Letter Sent 9/08 Responded 9/09
- Request by ██████████ for Clarification of Leadership Change Sent 9/18 Responded 9/19
- Request by ██████████ for Organizational Flow Chart Sent 9/19 Responded 9/19
- Request by ██████████ for 2024-2029 Chart Sent 9/19 Responded 9/19
- Request by ██████████ to Clarify Leadership Change Sent 9/19 Responded 9/19
- Request by ██████████ for Clarifying Questions Sent 9/21 Responded 9/21
- Request by ██████████ to submit a Charter Revision Sent 10/11 Submitted to the portal on 10/12
- Request for Leadership Change
- Request by ██████████ for Letter to Chancellor Young Sent 10/12 Responded 10/25
- Request by ██████████ to open portal for download Sent 10/25 Responded 10/30 and 10/31
- Request by ██████████ for Phone Meeting Sent 11/21 Responded 11/21
- Request by ██████████ to reload Renewal Application Sent 11/20 Responded 11/21 once portal was reopened
- Request by ██████████ for missing information Sent 11/22 Responded 11/27-28 After Thanksgiving break
- Request from ██████████ to Board and School for Zoom call before the Site Visit Sent 12/04 No Response
- Request by ██████████ for Final Documents for Charter Sent 12/19 Responded 12/22
- Second Request by ██████████ for Site Visit documents Sent 12/21 Only fingerprint report sent on 12/18
- Others sent on 12/22 and 01/04
- Request by ██████████ to resubmit the Org Chart Sent 01/08 Responded 01/08
- Confirmation by ██████████ - Receipt of all Documents Sent 01/09 Responded 01/09
- Request for Review of Draft Notification Letter Sent 01/12 Responded 01/16
- Request by ██████████ to submit the Revised Discipline Policy Sent 02/02 Responded by 02/02
- CSO sent Notice of Deficiency/Corrective Action for cohort enrollment of groups, fingerprint clearances, and fiscal position Sent 02/16 Acknowledged receipt on 02/16
- Submitted Corrective Action Plans to ██████████ per March 15 deadline Sent 03/15 CSO acknowledged as receipt on 3/18
- Request from ██████████ to submit Factual Corrections Sent 4/30 Responded today on 05/07 by deadline