

Comments on Consultation – PIP Threshold Consultation

Page Number (PDF version)	Section	Comment
All	All	The language, as in previous drafts, can still be confusing and in some cases misleading. Emphasis should be given to clarity, particularly with terminology and explanations.
All	All	Why is the consultation in question format? This format can be considered manipulative by directing the consultee to only consider questions that the government wants answers to rather than consulting on the proposals as a whole.
All	All	In some cases both the assessment criteria and weightings are too complicated to

		understand. Many of our members had difficulties in identifying which descriptors would apply to them. This would suggest that filling the benefit application form in accurately would be problematic.
All	All	We feel that the Government has failed to take account of some of the previous comments in earlier drafts of the consultation as we are having to repeat some of our key concerns.
All	All	This consultation has been made more difficult by the need to refer back to previous drafts. We would request that the Government make any future consultations easier to follow.
3	1.7	'The modelling suggests that the second draft would produce a 2015/16 caseload of 1.7 million people receiving Personal Independence Payment. Without introducing the new benefit we would

		<p>expect the number of 16-64 year olds claiming Disability Living Allowance in 2015/16 to be 2.2 million.' - How does the government propose to support the 500,000 people who would have been able to claim for a benefit to support them to live independently under the DLA and would be no longer able to do so under the PIP. Just because the goalposts have changed doesn't mean that the person is less in need of help and support. Also how sure can the government be of the results/impact of the proposed changes? And how positive are the Government that 500,000 people will not be entitled to PIP rather than DLA. We believe too much has been assumed.</p>
5	3.4	<p>'For the Daily Living component, thresholds at these levels enable an individual who requires aids, appliances or prompting to successfully carry out a number of the daily living activities to receive the component at</p>

		the standard rate' - what is the government's proposal for dealing with aids and adaptations needed for these activities that cost more than receiving the standard rate will allow people to purchase?
6	3.6	What is the DWP's proposals concerning being able to convert the mobility component to being able to receive and adapted car/mobility scooter through the Motability scheme as is currently the case with the DLA.
7	4.2	'We were keen not to require the same volunteers to take part in another appointment, or to seek further volunteers, in order to test the changes made to produce a second draft or to analyse the impact of the proposals. For this reason, we ensured that the initial data collected was broad enough to enable us to reconsider the same volunteers against the second draft criteria on the basis of assessing the

		original written report only.' - Would it not have been preferable for the second draft criteria to be tested against a whole new group of volunteers using face-to-face appointments or at least take the original volunteers through the process of another appointment in order to ensure that the amended activities/criteria were tested correctly instead of relying on sufficient coverage of the original data capture to be valid for the second stage of the draft?
8	4.9	'In addition, two groups of Disability Living Allowance claimants were not included in the sample: claimants who transitioned to Disability Living Allowance from its preceding benefit in 1992, where the administrative data does not have the level of detail used in the sampling (for example, on disabling condition); and 'Special Rules' cases who currently have automatic entitlement to Disability Living Allowance' -

		<p>Surely, in the interests of achieving as wide and varied a sample group as possible, these two groups should have been included in the test. This is particularly the case in relation to those receiving special rules as it is imperative to see how this very important group would be dealt with under the Personal Independence Payment. Also the test sample group is small and we believe a greater number of testees would have provided better data and more accurate analysis.</p>
	Activities	<p>There is still no reference to housework, washing of clothes and ironing in the daily living activities.</p> <p>We also still have grave concerns about the standards of washing and personal hygiene; believing that they are not to the level of social acceptance but merely subsistence.</p>
	General	<p>There MUST be full consultation on the elements of the proposed benefit that are</p>

		not included here such as the appeals process/ changes to be made at a later date/ the interview process etc.
	Questions	Some of the questions in this consultation are difficult to answer at the moment. Only time and analysis of the impact of the new assessments will provide an answer to some of the questions.
	Case studies	<p>None of the case studies cover getting to the shops/shopping.</p> <p>Also the case studies selected for the consultation appear to be straightforward examples and do not cover more complicated situations where people have multiple disabilities/complex needs that may not fit easily into the descriptors.</p> <p>Using the case studies as a guide, it should be very easy for the government to reach and in some cases exceed their current target of reducing 20% off the disability benefits as many people will not be entitled</p>

		to any benefit at all. This gives us great concern for the provision of support/benefit for these people who are no longer entitled to benefits.
19/20	Case study 4/5	We are concerned that, whilst activities 1 and 4 take into account supervision whilst cooking and bathing, the activities and their descriptors do not take account of the need to support the hypothetical individual in this case study in the event of her/him fitting while at home on their own where other injuries are possible as well as those likely whilst bathing and cooking. In case study 5 there is no recognition in the activities or the descriptors of the case study individual preferring not to shower due to safety reasons when she's home alone.
All	All	Although each activity and descriptor now has weightings and we are aware of the thresholds for both the standard and enhanced rates, it is difficult to make full

		comment on whether these weightings and thresholds are correct in relation to how a condition affects the claimant's ability to carry out daily living activities and their mobility without knowing what the monetarily rates of the benefit will be and if these monetarily rates will make the PIP truly representative of an extra cost benefit.
Questions	1.	Daily activities should include a higher standard of hygiene beyond the level of mere subsistence to a standard allowing socialising and fitting into the working environment. A low minimum standard of hygiene is not acceptable; clothes have to be washed and ironed and there is no mention of the ability to undertake these tasks which are essential to both well-being and becoming an integral part of society. The ability to be able to get around, communicate and socialise is important but these are not the only factors in disabled

		people becoming a part of society.
	2.	In principle the higher weighting will accommodate the most in need but we believe it's going to be difficult for us to comment on a system not yet in place and that has not yet been proven. It is possible that some of the activities and descriptors will need to be re-assessed and once the PIP assessments have begun it may be shown that some of the weightings are too high. This scenario would of course enable the government to further cut budgets by people failing to make the weightings and therefore not receiving any benefit.
	3.	Please see our previous comments and our comments submitted for the second draft of the criteria. We believe that further change is still needed to make the activities and descriptors fair and realistic. Although we believe that the balance is reasonably correct between learning disabled, visually

		impaired disabled and physically disabled but it is possible that only time and analysis of the assessments and the number of successful appeals made to benefit judgements will tell.
		See above.
	5.	See above. And only time and correct analysis will tell.
4.	6.	We see no problem with the regulations regarding fluctuating conditions, although we are concerned that the language and terminology will require very careful explanation to some individuals so that they are able to understand as the phraseology can be quite confusing.
	7.	These words and terms should always be referred to in the regulations and descriptors. Some of the words could be regarded as subjective and therefore what is timely for one may not be considered

		timely for another. This should be made plain in every descriptor and activity where this terminology is to be used and not left as a general text for the entire application process.
	8.	Definitions should also be made plain at each relevant question or statement.
	9.	The statements are good and clear enough.

Comments on Consultation – PIP Assessment Criteria Review 2nd Stage

Page Number (PDF version)	Section	Comment
All	All	We are extremely concerned at the speed of this consultation process and at the way the DWP is rushing through this legislation. We do not believe that this is allowing sufficient and adequate time for disabled people to fully consult on changes to disability benefits. On the commencement of the informal consultation on the second draft of the criteria on 16 November 2011 we requested the alternative formats to allow our group members to be able to comment. We did not receive, despite a second request, these alternative formats until 7 January 2012. The formal consultation then

		<p>began on 16 January 2012. This left effectively no time for our group to take part in the informal consultation open to disabled people and their organisation before the full consultation opened. We therefore do not believe that the government and the DWP are taking full account of disabled People's views on this consultation.</p>
All	All	<p>As this is a public consultation it is imperative that the document is clear and transparent and uses plain English to aid relevant and constructive comments. It is also essential that unfamiliar words and terminology are not used, or if they are used they must be explained in the glossary.</p>
All	All	<p>In order that as many interested people as possible are allowed the opportunity and the sufficient length of time to consult, it is that imperative alternative formats of the</p>

		consultation such as large print, audio and easy read all available at the beginning of the consultation period
All	All	We are concerned about the high level of standards compliance and award of benefit
6 PIP Draft Note	1.6	<p>'To ensure that the assessment does not unfairly penalise individuals who choose to use aids and appliances to improve their independence, the assessment now also considers cheap, widely available aids and appliances which can 'reasonably be expected' to be used, in a similar way to Disability Living Allowance' Individuals often don't choose to use aids and appliances, they HAVE to use them and they are not often cheap. What does the DWP class as cheap and easily available aids and adaptations? It needs to be clear that if one uses an aid/appliance that it should not penalise an individual from getting an award. Aids and appliances do not mean</p>

		that someone becomes able bodied; it means that the person is unable to do the activity described with out the use of aids/appliances.
7 PIP Draft Note	1.8	'single face-to-face appointment with a health professional' - in complex cases is a single appointment sufficient enough to correctly assess people's needs?
8 PIP Draft Note	2.3	'This Assessment Development Group was established to provide technical expertise and membership was chosen to reflect a broad understanding of the impact of disability and experience of working with disabled people' - were any of the Assessment Development Group disabled people themselves?
9 PIP Draft Note	2.7	'We also tested whether this revised draft accurately and consistently identified individuals' levels of need' - was this test carried out amongst the same test group or

		another group of similar size?
9 PIP Draft Note	2.10	'independent assessor, probably a health professional, working on behalf of a third party supplier ' - any assessment must be carried out by a health professional with knowledge of the individual claimant's medical condition. Even though the assessment is based on a person's ability to carry out daily living tasks and not on the person's medical condition, knowledge of the condition will help the assessor understand the medical condition's effect on individual's ability to carry out daily living tasks.
10 PIP Draft Note	2.10	'Most individuals will have a face-to-face consultation with the assessor as part of their claim' - the face-to-face assessment must be carried out in such a way that the applicant does not feel either pressurised, undignified or harassed and they should be offered all the support that they need to be

		able to answer the questions in a fair and honest manner, including being able to have the assistance of their PA.
27 PIP draft note	4.6	Why not have a general space for people to write any extra information that they believe is relevant to their abilities which they consider are not covered in the questions that they are asked?
30 PIP draft note	4.11	Does the 24-hour period mean the day you are filling in the form or being assessed.
30 PIP Draft Note	4.14	'This is because Personal Independence Payment is intended to provide financial support for those individuals who face the greatest barriers to participating in everyday life. The Government therefore does not believe that support needs arising from short, acute periods of impairment should be met by this benefit' - this approach does not take into account conditions such as fibromyalgia, which is a

		<p>long-term condition but whose effects can fluctuate to such an extent that on worst days people suffering from this condition can be considered to 'face the greatest barriers'; in some instances being unable to get out of bed due to extreme pain levels. How does the government propose to take account of this fluctuation of a <i>long term</i> condition? Can the government guarantee that if such conditions are not met by this benefit, that they will be provided for in other benefits? These benefits should be signposted from the Personal Independence Payment.</p>
31 PIP Draft Note	4.16	<p>'We intend to seek views on the proposed definitions and to consult on whether these terms should be defined within the regulations when we formally consult on the revised draft criteria later this year' - while we understand the government's desire to remain flexible in its approach towards PIP</p>

		assessments in terms of safely, reliably, repeatedly and in a timely manner, it is also imperative that clear descriptions of each of these are included in the regulations to ensure clarity, transparency and consistency are applied to each assessment.
32 PIP Draft Note	4.24	The confusion in respondents' replies to the original consultation in relation to whether certain activities could apply to individuals with certain impairments probably lies in the need for more clarity in the description of the activities. The activities and their descriptors need to be succinct but clear i.e. torso does this mean front, back, up to the head and down to the buttocks and perineum. What about visually impaired people's ability to communicate if they are unable to see who may be speaking to them or showing them something and why does getting around not apply to visually impaired people.

32-33 PIP Draft Note	4.25-4.28	<p>It is imperative that a person using an aid/adaptation is not treated unfairly or penalised in the assessment process. It should be borne in mind that in the case of the DLA many claimants use the DLA benefit to allow them to purchase aids/adaptations to participate in society. Aids and adaptations do not make a user able-bodied; the disability is no less whether using aids or not. Aids and adaptations certainly do not remove extra costs, in fact they are the source of extra costs and this should be reflected in any assessment. Extra costs could include things like shopping online because some shops are inaccessible or difficult to get to, buying clothes that are easier to get on such as elasticated waistbands, Velcro straps etc. As well as the extra costs involved in adapting your home to make it more accessible including kitchens that have space to</p>
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		manoeuvre in if using a wheelchair, cupboards that easy to open, accessible work surfaces and laboursaving devices such as dishwashers for people who have limited manual dexterity.
33 PIP Draft Notes	4.29	Whilst it is generally true in broad terms that preparing food and drink occurs during the day and toileting needs can be both day and night, this is not always the case and the assessment process should reflect this. There are conditions that require intravenous feeding at periods throughout day and night.
33 PIP Draft Notes	4.31 activity 1- preparing food and drink	'Ability to prepare and cook food continues to be assessed at waist height or above.' – this does not take account of people preparing food and drink when seated in a wheelchair.
34 PIP Draft Notes	4.3 activity 3- managing therapy	'There must, however, be an evidence base to support their use' - when considering the

	or monitoring a health condition	evidence base to support use of therapy or medication account must be taken of therapies/medications that, whilst they do not improve the condition, may keep the condition at bay or stop it from getting any worse, as well as having a positive effect on the well-being of the claimant.
34 PIP Draft Notes	4.3 activity 3 - managing therapy or monitoring a health condition	'Ability to convey tablets to the mouth remains excluded as the same broad ability is assessed in activity 2, as part of ability to convey food to the mouth' - this should be made clear in the descriptors.
35 PIP Draft Notes	4.3 activity 6 - dressing and undressing	'now includes the ability to put on socks and slip-on shoes' - the reference to slip-on should be removed as not everyone can wear slip on shoes. Some people, particularly less mobile people and wheelchair users need to wear shoes that either have laces or Velcro straps in order to take account of foot swelling when seated. What about a person's choice in whether or

		<p>not they wear fashionable clothes.</p> <p>This activity still does not take into account either the ability to wash and iron clothes to a socially acceptable level nor does it include the ability to do housework and keep one's house clean, nor does it consider visually impaired people's ability to see that their clothes are clean or co-ordinated or their ability to physically wash their clothes.</p>
35-36 PIP Draft Notes	4.3 activity 7 - communicating	<p>'we recognise that individuals' native languages may include sign language, the assessment criteria are designed to ensure that people using sign language are not disadvantaged, as we recognise the barriers they face due to the need to have someone who understands or can interpret sign language to communicate' - the should be explicitly and clearly stated in the regulations and descriptors so as to avoid any confusion or misunderstanding.</p>
36 PIP Draft	4.3 activity 8 –	<p>'The activity takes account of non-physical</p>

Notes	communicating	support required to enable an individual to engage socially.' - Why non-physical? This does not take into account some mental health conditions or some learning disabilities that require the actual physical presence of a trusted PA, support worker, family or friends to enable them to actively take part socially a group of people, or social situation. Does this include visually impaired people who are unable to see to understand body language.
37 PIP draft notes	4.3 activity 10 - planning and following a journey	What about visually impaired people who cannot use an assistance dog?
36 PIP Draft Notes	4.3 activity 9 - making financial decisions	'The purpose of the previous <i>Planning and buying food and drink</i> activity was not well understood. Although it was intended to assess general mental, intellectual and cognitive ability to plan and manage day-to-day finances, by using ability to purchase food as a proxy, respondents often

		<p>questioned why only buying food and drink was considered.' - It is probable that the purpose of the previous activity was not well understood because it was not clearly explained in the notes nor the draft regulation what the express purpose of the government's intention was. This obviously then led to questions as to why only food and drink and not the ability to manage financial affairs on a day-to-day basis were considered. This indicates the need for clear and precise simple English explanations in the descriptors and in the regulation notes. We are also concerned that the descriptors need to include consideration for the handling of money such as the use of chip and pin machines and ATM machines, which can both be hard to use for visually impaired people, wheelchair users and people with limited manual dexterity.</p>
37 PIP draft	4.32 proposed draft	We are concerned about the weightings for

notes	descriptor weightings	<p>moving around with aids etc and those who have a physical disability compared with those who do not. Our concern is that people use wheelchairs and walkers will only get the same amount of weighting as those who are visually impaired.</p> <p>Consideration should be given to how much an assistance dog is compared to the costs of wheelchairs and walkers etc.</p>
38 PIP Draft Notes	4.35 proposed draft descriptor weightings	<p>'For the Daily Living component, scoring descriptors will apply if an individual requires aids, appliances or prompting to carry out a number of the daily living activities' - this should also include reference to assistance and supervision.</p>
38 PIP Draft Notes	4.36 proposed draft descriptor weightings	<p>'We will also be formally consulting on the criteria – including the proposed descriptor weightings – once we have reached firmer views on the weightings and, in particular, entitlement thresholds.' - whilst we appreciate that this is a developing process</p>

		it is difficult to comment fully on the descriptors and their weightings without knowing what the relevant thresholds for the standard and enhanced benefit are.
39 PIP Draft Notes	5.2 our approach	'The testing was based on sample assessments of volunteers who currently receive or had previously claimed Disability Living Allowance.' - we hope that the test sample of volunteers were from a range of disabilities including physical, visually impaired and learning disabilities to ensure that the descriptors were tested robustly.
39 PIP Draft Notes	5.2-5.3 our approach	'trained health professionals' - as we have previously stated the health professionals not only need to be trained but also need to have a working knowledge of the individuals medical condition, including how that condition affects people on a day to day basis. We have concerns about who the government consider to be medical professionals or experts and the use of

		third-party assessors.
39 PIP Draft Notes	5.5 our approach	'The testing focused solely on the draft assessment criteria and was not concerned with the assessment process or its delivery' - it is also important that consultation is carried out both on the assessment process and its delivery to ensure that the whole of the PIP benefit and its process of award is fair and transparent.
41 PIP Draft Notes	5.14-5.15 the face-to-face appointments	Just to clarify, because the draft notes do not expressly make it clear, are the activities and their descriptors talked through with the claimant during the appointment or completed by the assessor on their own after the appointment has ended. In order to achieve the utmost transparency and understanding the activities and their descriptors as well as the weightings should be talked through and scored in the client's presence.

42 PIP Draft Notes	5.19 validity and reliability of draft criteria	'For the first draft, we brought together small expert panels to consider the written reports against the criteria.' - did any of these panels consist of disabled people or their representatives? What were their fields of expertise?
42 PIP draft notes	5.20	We are concerned that those with learning disabilities appeared to score higher than those with physical disabilities in some activities. This could be seen as favouring one type of disability over another.
44 PIP draft notes	7.2 - general notes	Engaging socially should also apply to visually impaired people who are unable to see who is talking, unable to see body language and where they are going. Getting around is supposed to relate only to physical mobility, what about visually impaired people who are unable to see where they are or the dangers that getting around can have like crossing the road

<p>44 PIP Draft Notes</p>	<p>Appendix a - 7.4 descriptor choice</p>	<p>‘Reliably means to a reasonable standard’ - reasonable standard is fairly subjective and the definition of reasonable needs to be made clear in each activity that it relates to for example a standard of cleanliness or standard of being able to prepare healthy meals. In a timely fashion is also subjective as people do things in different ways and in different timeslots. The time it takes one disabled person to do something may be longer than another. We also question the term safely - who can say with complete accuracy if someone will be safe to do something to the point where there is no risk associated with the activity on each occasion the activity is carried out.</p>
<p>45 PIP Draft Notes</p>	<p>Appendix a - 7.10 support dogs</p>	<p>Whilst support dogs are certainly invaluable to some disabled people when following a journey safely, it should also be recognised that support dogs can also play an extremely important role in household</p>

		activities such as clothes washing and activities like dressing.
47 PIP draft notes	7.17 epilepsy	Does the note on epilepsy contained in this descriptor mean that all epileptics will be entitled to the higher rate PIP? Should epileptics be asked when their last fit was and what the frequency of their fits is?
48 PIP Draft Notes	Draft assessment criteria	It is extremely difficult to accurately assess whether the descriptor weightings represent a fair scoring without knowing what the threshold of the standard and enhanced rates are.
48 PIP Draft Notes	Draft assessment criteria	Please see above comments relating to individual activities.
48 PIP Draft Notes	Draft assessment criteria activity 1 - preparing food and drink	An appliance has previously been described as a device that provides or replaces a missing function such as a wheelchair. Therefore claimant's who have no motor skills in their lower limbs and need a

		wheelchair <i>all</i> of the time to be able to move around both in the home and outside the home would need to use their wheelchair to be able to carry out activities in most of, if not all the activities.
50 PIP Draft Notes	Draft assessment criteria activity 2 - taking nutrition	Supervision needs to be included in this activity.
51 PIP Draft Notes	Draft assessment criteria activity 3 - managing therapies or monitoring health condition	Not receiving medication or managing therapies etc should NOT be scored with the same descriptor weighting as managing therapies and medication with the use of an aid or appliance. This does NOT reflect the costs associated with the use of an aid or appliance for example part of a paralysed person's prescribed exercise regime may be to use a standing frame or a passive exerciser. These items of equipment would not generally be provided by the NHS and would need to be purchased by the individual and therefore would represent an

		extra cost that someone not needing an aid or appliance would not face.
53 PIP Draft Notes	Draft assessment criteria activity 4 - bathing and grooming	It should be expressly noted in the activity description that washing the perineum is now included in bathing and grooming whereas previously it was only included in managing toilet needs or incontinence.
54 PIP Draft Notes	Draft assessment criteria activity 5 - managing toilet needs or incontinence	Supervision needs to be included in this activity as well as the possible requirement of the need to change clothes if they have become soiled due to incontinence. We consider the two points score for people who are unable to wipe themselves after evacuating their bowels too low. This means that they are either left dirty until someone can assist them or that they will smell, which is socially unacceptable and unhygienic.
55 PIP Draft	Draft assessment criteria activity 6 -	Supervision should be included in this activity.

Notes	dressing and undressing	For women there is the issue of being able to put on/takeoff a bra, a front fastening bra is restricting the choices that women are able to make. Disabled people should be able to make their own clothing choices and should not be restricted to the descriptor choice of slip on shoes. This is against our freedom of choice and antidiscrimination laws.
57 PIP Draft Notes	Draft assessment criteria activity 7 – communicating	How does the need to use voice recognition software to produce written communication such as emails and letters score in this activity? The descriptor scoring of two points for using an aid for low vision is okay for people who are in the house but what about outside where a low vision aid would not be available. How would this be scored? The descriptor of needing another person to read information to them which scores four points should be scored higher as this can affect so many things including shopping,

		leading labels at the supermarket, accessing outside written information including signage etc.
60 PIP draft notes	Draft assessment criteria activity 10 - planning and following a journey	Does it is also include people with a visual impairment who are not able to plan without help because of accessing information to buy a ticket, get to transport, read signage and information boards etc. We are concerned with the fact that higher points are awarded to someone who can make journeys with an assistance dog than if a person can make a journey with the assistance of other people. Consideration should be given to the fact that having assistance of other people can be more expensive than an assistance dog. A PA should carry the same award rate as requiring an assistance dog.
63 PIP Draft Notes	Annex B reliability and validity analysis - the	We suggest that it might have been more advantageous to have a larger test group than 99 people and to have delayed the

	sample 8.2	start of work on the second draft criteria in order to ensure that reliability and validity was as accurate as possible.
63 PIP Draft Notes	Annex B reliability and validity analysis - validity and reliability of the first draft 8.5	'in around half of the cases, a lay disabled person.' - a disabled person should have been included in all of the cases
64 PIP Draft Notes	Annex B reliability and validity analysis -8.6	'Panel members received a half-day training session on the principles of disability analysis, Personal Independence Payment and the initial draft criteria' - this does not appear to be a wholly adequate amount of training to allow a correct analysis of the data.
64 PIP draft notes	8.10	We believe the language and the wording of the descriptors might make it difficult to decide which descriptor applies to an individual. This is why we believe there should be additional space for comments

		related to the question asked to ensure that the correct descriptor used.
65 PIP draft notes	8.12	If the experts had difficulty with correctly interpreting or applying certain descriptors this does not bode well for when the assessment is in operation.
66-67 PIP draft notes	8.21-8.23	We are concerned about an individual assessors expert opinion. A lot of the worries for disabled people come from the fact that they do not feel the person assessing them would think that their individual need is great. We are also concerned that there will be inconsistency between assessments and assessors. We have concerns about how rushed the consultation appears to be; there still needs to be full analysis completed from the first draft criteria. We believe that extra time should be taken to fully take on board disabled peoples' comments on the consultation and in terms of getting the

		assessment of applicants correct in the first instant rather than incurring extra costs in appeals.
69 PIP Draft Notes	Annex B Validity and reliability of the second draft - quantitative findings 8.31	'people with learning disabilities appeared to be over-scored by the criteria compared to the level of need identified by the health professional.' - does this represent errors with the subjective assessment of the health professional or erroneous activity descriptors?