



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

State of Alaska Coronavirus Capital Projects Fund Annual Performance Report

July 2023

State of Alaska
2023 CCPF Annual Performance Report

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Executive Summary

General Overview and Uses of Funds

To date the State of Alaska has not used any of its allocation from the Coronavirus Capital Projects Fund (CCPF) as we have only recently achieved the first key milestone for the program, which is the United States Department of Treasury approval of program plans. Treasury has approved six of the CCPF program plans the State submitted in September 2022. There are another four primary projects still under review and three alternative projects that will only be considered after primary project consideration. The narrative of this Annual Performance Report is focused on the CCPF program plans approved prior to July 15, 2023, delineated in the table below.

State of Alaska's CCPF Award \$ 111,803,893	
Program Plan Name	Amount
Nuniatq Community Center	\$ 4,454,968
Anchorage Downtown Library	\$ 2,500,000
Iliuliuk Family and Health Services Center	\$ 20,000,000
Yukon-Kuskokwim Delta Multipurpose Community Facilities	\$ 10,445,000
Nenana Health and Wellness Complex	\$ 24,000,000
Ouzinkie Community Internet Café	\$ 1,400,000
Appropriated Total	\$ 62,799,968
Remaining Balance	\$ 49,003,925

It is anticipated that there will be significantly more progress in use of this funding within the coming year as remaining program plans are approved and subrecipients proceed with project design, engineering, environmental reviews, and other related project developments. Given the relatively short construction season in Alaska, it is not expected that significant construction progress will occur until spring of 2024.

The Alaska State Legislature chose to focus the State's CCPF allocation on community priority capital projects identified during the 2022 legislative session. The Legislature solicited community priority projects and these projects were reviewed based on the CPF guidance. The primary focus was on the multipurpose community facility eligibility criteria, but one urgent broadband project was also identified. The Legislature's final allocation focuses on areas across Alaska that have a lack of adequate infrastructure to enable work, education, and health monitoring.

To minimize the level of CCPF necessary for program administration and maximize funding for projects, the Legislature identified community subrecipients for each of the projects. These subrecipients will be responsible for ensuring all CCPF requirements are met, and the State will conduct required subrecipient monitoring using existing State resources. These community partners are best situated to ensure the critical needs of the area they serve are addressed during project design and implementation.

The Alaska Office of Management and Budget (OMB) worked with the subrecipients to submit program plans in accordance with Treasury's guidance for review and approval. OMB also

coordinated the back-and-forth question and answer process between the subrecipients and Treasury during the program plan review conducted by Treasury. In the coming year, the Alaska Division of Community and Regional Affairs (DCRA) will take over the State's coordination role with the subrecipients to include entering into grant agreements with each, processing reimbursement requests, and collecting and submitting required quarterly and annual report information.

More information on planned uses of funds can be found in the Approved Program Plan Details section of this publication starting on page four.

Promoting Equitable Outcomes & Community Engagement

The Alaska State Legislature solicited from communities across the state their priority projects that could be addressed with Coronavirus Capital Project Funds. Most of the requests submitted were multipurpose community facilities. The level of community engagement that informed the community project was considered by the Legislature during their determination of which projects to move forward in the State's budget. The State's budget goes through a public hearing process and receives multiple hearings with public testimony. Provided below are links to Alaska State Senate hearings with public testimony on the budget:

<https://www.akleg.gov/basis/Meeting/Detail?Meeting=SFIN%202023-04-20%2009:00:00>

<https://www.akleg.gov/basis/Meeting/Detail?Meeting=SFIN%202023-04-20%2013:30:00>

<https://www.akleg.gov/basis/Meeting/Detail?Meeting=SFIN%202023-04-21%2009:00:00>

<https://www.akleg.gov/basis/Meeting/Detail?Meeting=SFIN%202023-04-21%2013:00:00>

Five of the seven communities (over 70%) that will be served through approved program plans are considered distressed communities based on the Denali Commission's [2022 Distressed Community Report](#). The distressed status is determined by comparing average income of a community to full-time minimum wage earnings, the percentage of the population earning greater than full-time minimum wage earnings and a measure of the percentage of the population engaged in year-round wage and salary employment. Any community meeting two of the three following criterion is considered distressed: an average market income of less than an annualized minimum wage (\$21,507); 70% or more of its residents earning less than an annualized minimum wage; or 30% or more of its residents employed in all four quarters of the year.

One of the two communities to be served that did not fit the criteria for a distressed community, is considered a disadvantaged community by the [Climate and Economic Justice Screening Tool \(CEJST\)](#). Disadvantage communities are marginalized, underserved, and overburdened by pollution.

More information on Promoting Equitable Outcomes & Community Engagement can be found in the Approved Program Plan Details section of this publication starting on page four.

Labor Practices

No projects have commenced so there are no labor practices to report. It is anticipated that all projects will use strong labor standards to promote effective and efficient delivery of high-quality projects while supporting economic recovery through employment opportunities for workers.

The above statement on labor practices applies to all the approved program plans and is not repeated in the Approved Program Plan Details section of this publication starting on page four. Details on program plan labor practices will be included in the next CCPF Annual Performance Report.

APPROVED PROGRAM PLAN PERFORMANCE DETAILS

Program Plan ID: AK_CPF-000077

Program Plan: Nuniaq Community Center

Subrecipient: Alutiiq Tribe of Old Harbor

Funding Amount: \$4,454,968

Uses of Funds:

- No CCPF funding has been spent in support of this program plan.
- Treasury approval of this program plan was received June 12, 2023.
- The subrecipient for this program plan is the Alutiiq Tribe of Old Harbor. The Alutiiq Tribe of Old Harbor, Old Harbor Native Corporation (OHNC) and City of Old Harbor work together to build a healthy and thriving community and will work together on this project.
- This program plan will construct the Nuniaq Community Center & Tsunami Shelter in the remote village of Old Harbor. The current facility utilized for all community gatherings, youth programs and tribal offices is extremely dilapidated and presents health and safety risks for all that enter the building. Additionally, both buildings are located at sea level, which poses a tsunami risk. The Kodiak Archipelago is an area of very active geological processes. The 1964 Great Alaskan Earthquake produced a seismic event that caused sustained ground shaking and a tsunami that destroyed Old Harbor.
- The program plan is to construct a 10,000 square foot community facility located in the tsunami safety zone. The Nuniaq Community Center & Tsunami Shelter will consist of a large open gathering area, commercial kitchen, tribal preschool, youth center, public computer and internet access, tribal office spaces and storage. The Tribal offices will include space for the Tribal Administrator and administrative support and the following departments: Indian Child Welfare Act (ICWA), Environmental, Office on Violence Against Women (OVAW), Transportation, Native American Housing Assistance and Self-Determination Act (NAHSDA), Accounting, and Enrollment. The facility will meet American with Disabilities Act (ADA) requirements and allow Elders and disabled community members to participate in events.
- Outcomes will include: ADA access to the facility; sufficient space for the Tribal Departments; sufficient space with privacy and confidentiality for the Tribe's ICWA Department and OVAW Department; designated space for the Tribal Preschool; designated space for Tribal Youth Center; a large gathering area for a tsunami shelter, community meetings, gatherings and events.

- The facility will provide access to employment services, health education classes and internship programs. The community center will provide the public with access to computers and high-speed internet services and recreational activities.
- The Nuniaq Center will provide public access to internet for residents to schedule healthcare appointments online, pay bills, check lab results through healthcare portals and take appointments via telehealth. The Nuniaq Center will provide community health screening and fairs for residents provided by the Kodiak Area Native Association. There is very limited access to internet in the community due to the high cost for service and this will provide the public access necessary to address healthcare needs.

Promoting Equitable Outcomes:

- Old Harbor is a distressed and disadvantaged community. Per 2020 census, there is a population of 216 with 178 being Alaska Native (81%). In 2020, average earnings were \$13,181; 87.8% of the population with earnings less than \$20,571 and only 23% employed all four quarters of the year. The facility will provide educational programs, internet access, cultural activities, and a socially healthy gathering place for a community that has struggled with poverty, suicide, subsistence abuse and many other social ills.
- Many of the children in the community are identified as Children in Need of Aid under the federal Indian Child Welfare Act. This facility will have a significant impact in the lives of these youth by providing a youth center with computers and internet access, specifically designated for youth education and training activities.
- OHNC will provide a Culture Youth Coordinator that will provide regularly scheduled activities at the Nuniaq Center. The Culture Youth Coordinator will provide an annual education summit, afterschool educational and recreational programs, job training, college & vocational institution search and application support, funding support, culturally relevant activities, and health focused events for all youth and families.

Community Engagement:

- The project is a priority in the Community Plan for the Village of Old Harbor and a project that has been of high importance for many years.
- Alutiiq Tribe of Old Harbor holds a biannual leadership summit where the City, Tribe, and Village Councils meet to establish priorities. The Nuniaq Community Center & Tsunami Shelter has been a priority since 2006 when Old Harbor's Community Plan was developed. Many meetings have been held to discuss the design with the entire community and more detailed specifics approved by the Tribal Council. Testimony at meetings have been provided by community members for many years expressing the dire need for a community center and tsunami shelter.
- The Alutiiq Tribe of Old Harbor plans to perform ongoing community engagement by conducting annual surveys of the residents of Old Harbor. The Alutiiq Tribe of Old Harbor will also document and provide information regarding the number and type of community gatherings and events are hosted at the facility.

Program Plan ID: AK_CPF-000259

Program Plan: Anchorage Downtown Library

Subrecipient: Anchorage Library Foundation

Funding Amount: \$2,500,000

Uses of Funds:

- No CCPF funding has been spent in support of this program plan.
- Treasury approval of this program plan was received July 14, 2023.
- The subrecipient for this program plan is the Anchorage Library Foundation (ALF) a 501(c)(3) that works to promote, fund, and support the long-term vitality of the Anchorage Public Library.
- This program plan includes refurbishing and outfitting a minimum of 2,000 square feet of the Municipality of Anchorage's "Old City Hall" to accommodate a Downtown Library and associated improvements for Anchorage.
- The funding covers both physical modifications to the building/site and the elements necessary to operate a 21st-century library. The physical modifications include renovations that will allow for library system checkout and return, materials and computer availability, a conference room, tourism service and other ancillary support, maker space, workforce development support, and other elements required to create a vibrant, inclusive, and accommodating library.
- A key aspect of the Downtown Library will be to provide high speed internet access to an underserved area. Currently, Anchorage is lacking in facilities in the downtown area that provide reliable, high-speed, and free internet access availability.
- The COVID-19 public health emergency highlighted the fact that providing high-quality internet can enable work, education, and health access, and that individuals and communities lacking affordable access to such high-quality internet are at a marked disadvantage.

Promoting Equitable Outcomes:

- Downtown Anchorage is a disadvantaged community per the Federal [Climate and Economic Justice Screening Tool \(CEJST\)](#). Disadvantaged communities that are marginalized, underserved, and overburdened by pollution.
- Since 1986 downtown Anchorage has not had a local library branch. Approximately 18,000 residents live in downtown neighborhoods and currently must travel to one of the other branches to use library resources. An additional 35,000 people work downtown. (<https://librarychampion.com/projects/downtown/>)

Community Engagement:

- Recognizing a need in the community, ALF has been working to reestablish a Downtown Library since 2001. Through generous donations from the late Janet Goetz, a longtime downtown Anchorage resident, and other generous supporters, ALF has amassed approximately \$13.5 million dedicated to the establishment and maintenance of a Downtown Library.
- The Anchorage Library Foundation conducted a significant amount of public outreach related to this project, which includes community surveys, meetings with stakeholders to include the Municipality of Anchorage, Anchorage Downtown Partnership, Alaska Economic Development Corporation, among others, and feasibility studies. Details about community engagement (including survey results)

can be found at [Downtown Library - Anchorage Library Foundation \(librarychampion.com\)](http://Downtown Library - Anchorage Library Foundation (librarychampion.com)).

- In 2018 a public survey was completed to ascertain the public's interest in a downtown library. Of those surveyed, 73% said they would visit a downtown library.

Program Plan ID: AK_CPF-000260

Program Plan: Iliuliuk Family and Health Services Center

Subrecipient: Iliuliuk Family and Health Services

Funding Amount: \$20,000,000

Uses of Funds:

- No CCPF funding has been spent in support of this program plan.
- Treasury approval of this program plan was received June 21, 2023.
- The subrecipient for this program plan is the Iliuliuk Family and Health Services (IFHS), which operates as a 501(c)(3) and is a Federally Qualified Community Health Center (CHC) whose mission is to "Provide Quality Integrated Health Care and to Promote Health and Well-Being" to the community of Unalaska/Dutch Harbor, the fishing fleet of the Bering Sea, and to residents of outlying islands as needed.
- The program plan goal is to expand and renovate the existing Community Health Center to 1) create a much-needed larger space for clinical and expanded primary care services, and 2) provide space within the facility dedicated to multipurpose community use. The facility will provide access to health care and health monitoring services, workforce development activities, and training/education, and it will be open to the public.
- The current building is 20,000 square feet and was built in 1992. This project will include the acquisition of two medical buildings, remodeling of part of the current facility, and reorganizing into the new and remodeled space. The project will renovate approximately 8,500 square feet for primary care and 2,500 square feet for the community multi-use facility and add an additional 8,900 square feet for expanded primary care services. (See below for concept drawing.)
- The program website with more detailed information will be developed during the first year of the project and will be regularly updated. It will be prominently linked from the IFHS home page <http://www.ifhs.org>. Program partners will be encouraged to link to the website.

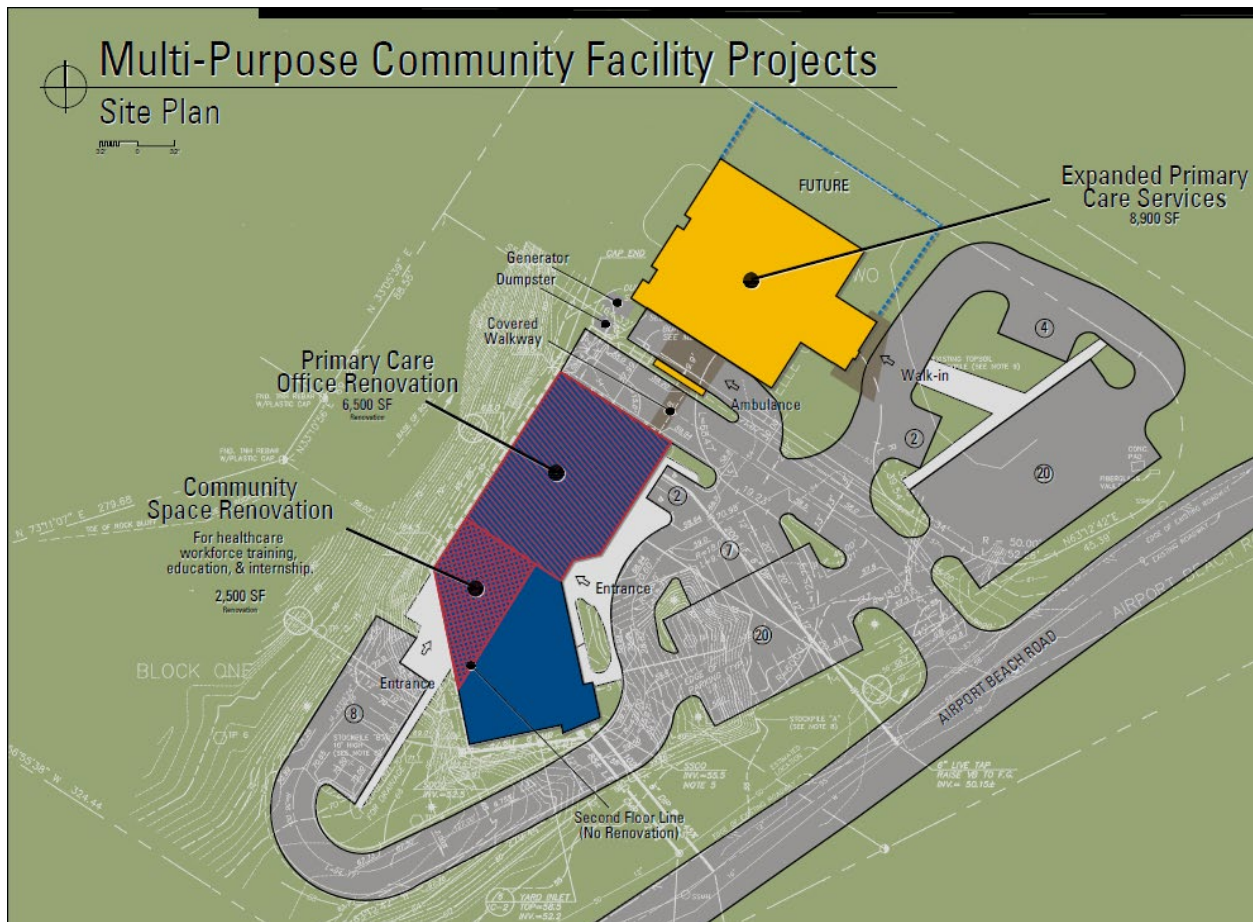
Promoting Equitable Outcomes:

- Unalaska is 800 miles from the nearest major city, Anchorage, and is accessible only by air or water. The State ferry system provides once-a-month service (only in summer), and the state-owned airport provides access for flights by small regional airlines (weather-dependent). Unalaska's economy relies on seafood harvesting and processing, which was severely impacted during the COVID-19 Pandemic due to closures of seafood processing facilities.
- The need for access to reliable and affordable Internet access for remote education, work, and health care options became more apparent and was exacerbated by COVID-19. Current service in Unalaska is spotty, unreliable, and expensive for most families and individuals.

- Unalaska lacks a State Job Center, which means there is no main access point for work-related activities such as career counseling, work preparation classes, and employability skills training. The small high school offers a limited Career and Technical Education program but there is no postsecondary training available locally, hence no opportunities to participate in skills training and gain industry certifications.

Community Engagement:

- IFHS has regular community engagement through its Board of Directors and through outreach to other community groups. The Board itself represents a cross-section of the community, including dedicated seats for the community at large, the seafood processing industry, the City of Unalaska, and the Alaska Native Village Corporation, Ounalashka.
- The Board regularly seeks input from the public at its meetings and through informal communications with community members and businesses, and an annual needs assessment is performed through a community-wide survey.
- IFHS received additional input via a recent Community Listening Session, which was moderated by the local radio station and included over 50 community members, staff from the Alaska Department of Health and Social Services, and local Alaska Native groups. These types of Listening Sessions will be held regularly throughout the project.



Program Plan ID: AK_CPF-000276

Program Plan: Yukon-Kuskokwim (YK) Delta Multipurpose Community Facilities

Subrecipient: Association of Village Council of Presidents

Funding Amount: \$10,445,000

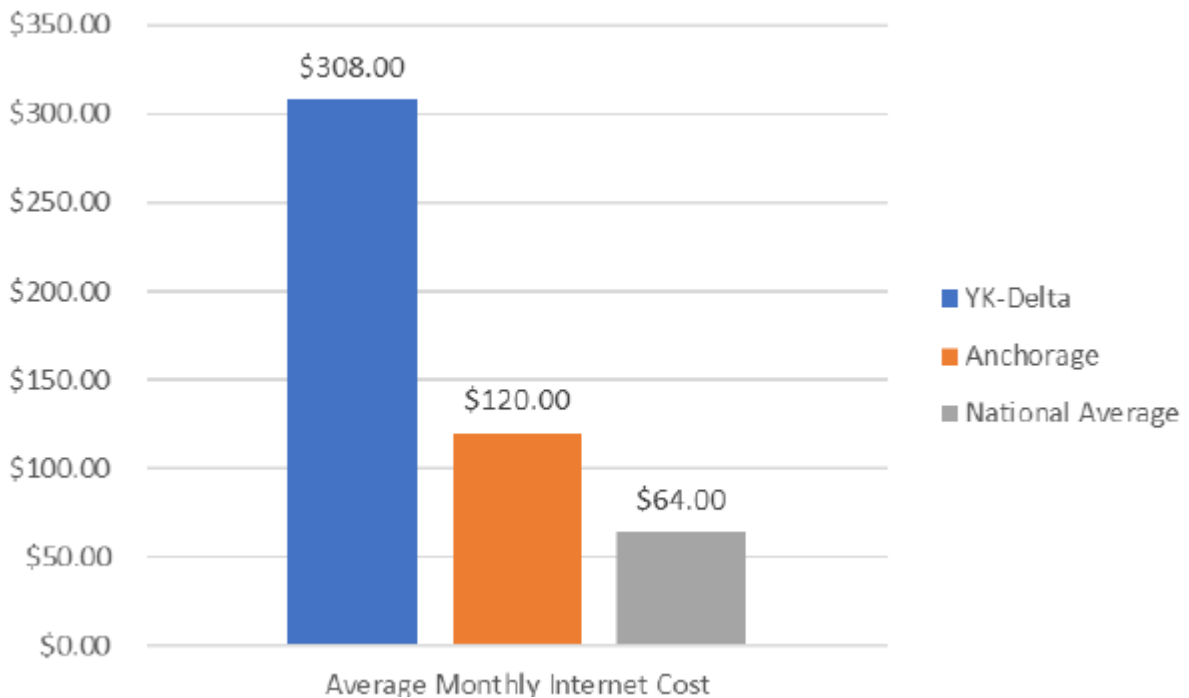
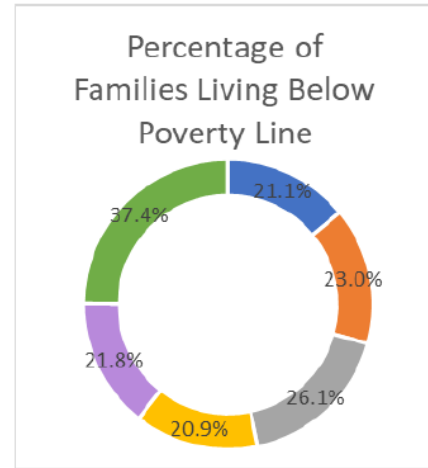
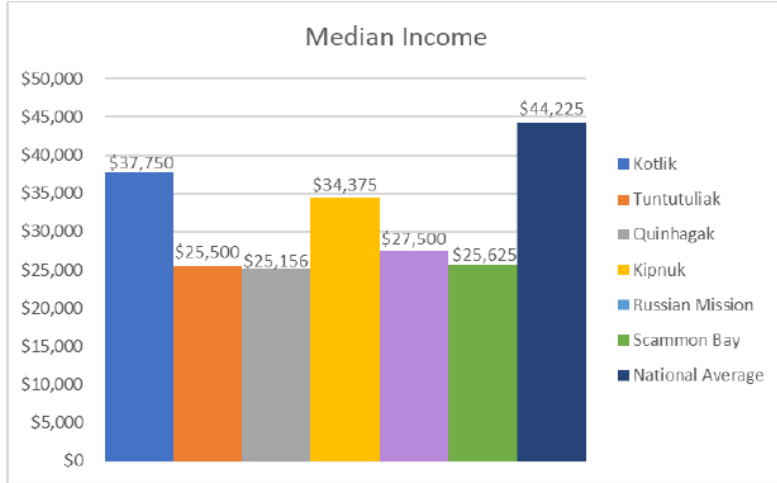
Uses of Funds:

- No CCPF funding has been spent in support of this program plan.
- Treasury approval of this program plan was received June 27, 2023.
- The subrecipient for this program plan is the Association of Village Council of Presidents (AVCP) a nonprofit Tribal consortium with 56 federally recognized Tribes operating programs within 48 remote communities in Alaska's YK-Delta region.
- The YK-Delta region spreads across approximately 55,000 square miles, an area the size of New York state, in Southwest Alaska. As a common characteristic of rural Alaska, no roads connect the 48 communities to each other or the rest of Alaska. Due to geographic location and lack of resources, AVCP has developed programs within its service communities to improve the health, safety, and well-being of its residents.
- AVCP has narrowed down sites for these Multipurpose Community Facilities to six communities: Kotlik, Tuntutuliak, Quinhagak, Kipnuk, Russian Mission, and Scammon Bay. In three of these communities, the existing space for workforce development, childcare and health monitoring is too small, is significantly aged, or is not owned by AVCP or the Tribe. In the other three communities, there is no Community Center at all. A representative of AVCP, the Project Manager, and the appropriate design team members will travel to each of these six communities to complete site assessment, building conditions assessments and community engagement to establish the two communities that have the highest need and readiness for a new Multipurpose Community Facility.
- Based on the site investigation and community readiness, AVCP will select the two sites for Multipurpose Community Facility development.

Promoting Equitable Outcomes:

- The YK-Delta region has an estimated population of 27,000 people with 85% of residents of Yup'ik, Cup'ik, or Athabascan descent. The median age of the region is 24 years old, meaning it is a very young region with many families and working parents. This makes affordable and quality childcare, job training, and employment opportunities critically important. In addition, Yup'ik is the primary language spoken in many villages, and many families are bilingual. This means that providing bilingual services - such as childcare, early childhood education, and employment/job training assistance - is essential.
- In rural locations, internet connectivity is typically marginal at best and is quite expensive. Current internet costs for the YK-Delta region are more than three times the national average. Having internet connectivity at a Multipurpose Community Facility will likely be the only internet many households have access to; even if the internet speeds were 110/100 Mbps, the cost of this service would be prohibitive for most households in the YK-Delta. These communities were identified as having the most critical need primarily because the existing programs either do not have space

to house all the program functions, they do not own the space, or the space is in disrepair.



Community Engagement:

- For this project, community engagement will flow through the entire project to shape implementation and outcome. At the project onset, AVCP and the project team will travel to each of the six communities to connect with residents about needs and readiness. Once the two communities for this project are selected, AVCP and project representatives will continue to visit the communities to gather input on the project’s development.

Program Plan ID: AK_CPF-000280

Program Plan: Nenana Health and Wellness Complex

Subrecipient: Nenana Native Association

Funding Amount: \$24,000,000

Uses of Funds:

- No CCPF funding has been spent in support of this program plan.
- Treasury approval of this program plan was received June 29, 2023.
- The subrecipient for this program plan is the Nenana Native Association, a federally recognized Indian Tribe in partnership with the Nenana Volunteer Fire/EMS Department.
- The Nenana Health and Wellness Complex (NHAWC) property was purchased in January 2023 by the Nenana Native Association. Two existing buildings will be renovated and repurposed for the Bush Med and Community Day Care. The Fire Station, Railbelt Mental Health and Addictions, Community Meeting Hall, and the Sub Regional Clinic will be new construction.
- The new construction square footage is estimated to be 41,674 square feet. Renovation of existing buildings is estimated to be 1,400 square feet. For a total of 43,074 square feet.
- NHAWC will include: a fire station apparatus bay; fire station admin and training space; a clinic; a maintenance bay; a space for Railbelt Mental Health and Addictions (a non-profit outpatient Community Behavioral Health Center); a community meeting hall, facility managers office, and computer lab.
- The plan is to serve all residents and visitors in the interior of Alaska. Manley Hot Springs, Minto, Nenana, Anderson, Clear Space Force Station, Healy, Denali Park, Cantwell, Lake Minchuminna, and several remote homesteads with a year-round population of 3,038. Additionally, it will serve 20,000 seasonal workers in the area during the summer months and an estimated 1.3 million tourists that drive through every summer.

Promoting Equitable Outcomes:

- According to ambulance run reports over the last 10 years – approximately 60% of the patients that were transported to Fairbanks Memorial Hospital could have been treated in a clinic such as the one proposed. Additionally, based off the same data, calls for service are increasing and are projected to continue to increase. Based off dispatch recorded times it takes on average 17 minutes to respond to a call. With the new station those times should be cut in half or by 2/3.
- Location, access, and weather information – Nenana is located in the interior of Alaska where temperatures can drop as low as -60 degrees in the winter and wildfire is an ever-present danger in the summer, travel to advanced medical care is not always possible. In early winter in November and December, there is a phenomenon that happens when after it has snowed, a warm chinook wind will blow in and the temperature rises above freezing. Typically, it rains putting a thick layer of ice on the highways making them impassable. When this happens, traffic accidents occur, and Nenana emergency personnel are unable to transport to the hospital. Last winter this happened, and they were forced to sit with a patient for two hours at the airport waiting for the runway to be plowed so a medical aircraft could land and fly the patient to the closest available hospital.

Community Engagement:

- The Nenana Health and Wellness Complex (NHAWC) Committee will hold quarterly town hall and Zoom meetings with the public and State to gain feedback from the region on what services and resources they would like to see offered at the NHAWC. After completion of construction, while the complex is in operation, for six years, the NHAWC Committee will be sending out community surveys. In addition to public meetings and surveys, the NHAWC will have a social media platform that will allow the public to ask questions, post comments, and stay up-to-date on relevant public information from the facility.

Program Plan ID: AK_CPF-000286

Program Plan: Ouzinkie Community Internet Café

Program Plan ID: Spruce Island Development Corporation

Funding Amount: \$1,400,000

Uses of Funds/Key Milestones:

- No CCPF funding has been spent in support of this program plan.
- Treasury approval of this program plan was received June 12, 2023.
- The subrecipient for this program plan is the Spruce Island Development Corporation (SIDCO) a non-profit entity formed by the City of Ouzinkie, Ouzinkie Native Corporation and the Native Village of Ouzinkie for the purpose of working together to further the economic and social development of Ouzinkie.
- The Ouzinkie Internet Café will provide publicly available internet access to the residents of the village of Ouzinkie located on Spruce Island. Ouzinkie currently has limited satellite internet available. More than half of Ouzinkie households do not have internet access and download/upload speeds are very slow. The Ouzinkie Community Internet Café, in addition to being a public space, will provide much faster download and upload speeds and facilitate Broadband connectivity, should that become available to the community in the future.
- The initial plan for the Ouzinkie Internet Café is to construct a new building, approximately 40x40 feet, that will be an open classroom type space facilitating online classes, community meetings/Zoom-type sessions, as well as individual computer/internet use.
- The building of the Internet Café in Ouzinkie is intended to enable Ouzinkie residents reliable and improved connectivity to the internet. Improved connectivity will facilitate educational opportunities enabling residents to take online college and vocational classes. It will also enable residents to acquire necessary work skills, search for employment opportunities, and participate in training programs. The Internet Café is expected to allow those currently without connectivity to be assisted with health assessments and monitoring encouraged through group engagement and instruction. Also, improved connectivity will allow Ouzinkie residents to communicate from the Ouzinkie airport – currently a dead zone. Bush airline travel is essential for Ouzinkie residents and airport connectivity will greatly assist planning for health care and work-related travel.
- The COVID-19 pandemic highlighted the number of homes in Ouzinkie without internet access. When schooling was online, many Ouzinkie students had to sit on the steps of the school for a “hot spot” to do their schoolwork. In addition, download

and upload speeds in Ouzinkie inhibit or prohibit many internet uses that are taken for granted in most of the U.S. – downloading pictures, x-rays or detailed documents for example. Ouzinkie has participated in conversations and filed grant requests for funding better internet connectivity for most of the past 20 years.

Promoting Equitable Outcomes:

- Ouzinkie is an Alutiiq village identifying at 93% native and mixed race.
- Ouzinkie is listed as a distressed and disadvantaged community. Median household income for Ouzinkie is \$33,000. Ouzinkie is a second-class city.

Community Engagement:

- Ouzinkie has been discussing better internet connectivity for more than 20 years.
- The initial step for the program plan will be for the community to reach consensus on the location of the Internet Café. The second step will be building design and communication hardware assessments. Once design and hardware costs are estimated, SIDCO will likely use local craftsmen to build the facility and contract with communications specialists for hardware acquisition and installation.

PROGRAM PLANS UNDER REVIEW

While the CCPF Annual Performance Report is for approved program plans, provided in the below table for reference is a summary of the remaining program plans under review. There are four primary program plans and three alternative plans that will only be considered after primary plans if for some reason one of those plans is withdrawn from consideration.

Subrecipient	Program Plans Under Consideration	Amount
Kawerak	Kawerak Multipurpose Community Facilities	\$ 12,000,000
Mat-Su Borough	Mat-Su First Responder Training Facility	\$ 8,000,000
Petersburg Medical Center	Petersburg Medical and Public Health Center	\$ 20,000,000
Rampart School District	Rampart Broadband	\$ 9,000,000
<i>City of Bethel</i>	<i>Bethel Multipurpose Community Facility</i>	<i>\$ 10,000,000</i>
<i>United Human Services of Southeast</i>	<i>Teal Street Center Multipurpose Community Facility</i>	<i>\$ 3,700,000</i>
<i>Fairbanks North Star Borough</i>	<i>Noel Wien Public Library Upgrades and Repairs</i>	<i>\$ 3,580,000</i>
	Total	\$ 66,280,000

Italics represent alternative projects that will only be considered after primary project are considered.