

WASATCH FRONT REGIONAL COUNCIL

2024 RATING AND RANKING CRITERIA - GENERAL POLICIES

The Wasatch Front Regional Council (WFRC) staff assists applicants through the CDBG process. Applicants are encouraged to take advantage of this service to help reduce administrative costs. Contact Christy Dahlberg at christy@wfrc.org or 801-363-4250 with questions.

FUNDING INFORMATION

- 1 Minimum grant amount is \$30,000 per year.
- 2 The maximum multiple-year grant amount is \$200,000 per year, up to two years (amount may change based on funding appropriation). All applicants proposing projects requiring two years of funding must have a cost estimate and/or breakdown for each year. If a project has been awarded a two-year grant, the second year's grant amount will be taken from the region's appropriation at the beginning of that year's rating and ranking process.
- 3 The maximum grant amount per year for community infrastructure projects is \$300,000. Community infrastructure projects can include water, sewer, street, sidewalk, curb, and gutter projects.
- 4 A single entity may not receive more than \$300,000 in one funding cycle. Multiple projects may be awarded to a single entity in one funding cycle, so long as they do not exceed \$300,000. An exception will be made if there is more funding available after all eligible projects have been funded.
- 5 After fully funding all projects in ranked order, any remaining funds shall be awarded to the next ranked project if it is determined that partial funding is a reasonable option. If partial funding is not an option, then the next ranked project shall be reviewed and funded if possible and so on. Should there be more funding available once all eligible projects are fully funded, contingency funds may be awarded to fully funded projects. Contingency funds will be awarded in order of highest ranked projects. Up to 10% of the project cost of contingency funds will be available for each awarded project.

| | |
|---|---|
| 6 | In compliance with the policies of the State of Utah CDBG program, and to be eligible for funding, all grantees or sub grantees must have drawn down at least 50% of any prior year's CDBG funding before the RRC's rating and ranking meeting. |
|---|---|

APPLICANT INFORMATION

- | | |
|---|--|
| 7 | All applicants are required to attend the region's annual "How to Apply" workshop. The project manager should attend the workshop. If the project manager cannot attend, he or she needs to identify an alternate representative. If sponsorship is required, representatives from the sponsoring city or county and the sub-recipient must also attend. See number 8 to determine if you need a sponsor. |
| 8 | Only cities and counties are eligible to receive CDBG funding. Applicants, other than cities or counties, are required to gain the sponsorship of a city or county no later than the date of the first public hearing. The decision to sponsor non-governmental entities is entirely up to the city or county. Sponsoring entities are required to ensure all program requirements are met including, attending the How to Apply workshop, ensure that the project is viable, and provide active oversight of the project and contract performance. Sponsors are also required to ensure that the project is part of the Consolidated Plan and that a subcontractor's agreement is mutually agreed on and signed by both entities. |

PROJECT INFORMATION

- | | |
|----|--|
| 9 | Public service providers are encouraged to apply for capital improvement projects and/or major equipment purchases. Examples include delivery trucks and other public service vehicles, fixtures, computer equipment, construction, remodeling, and facility expansion. State policy prohibits the use of CDBG funds for operating and maintenance expenses including administrative costs or salaries and items that can be easily removed from the building such as office supplies, cleaning supplies, etc. No more than 10% of the state's yearly allocation of funds may be expended for public service projects. |
| 10 | Projects must be consistent with the region's Consolidated Plan and included in a city or county prioritized capital investment list and meet the overall goals identified in the Plan. |

| | |
|----|--|
| 11 | Emergency projects may be considered by the RRC at any time. An emergency project is one that eliminates or mitigates an imminent threat to health and safety. These projects must meet all CDBG requirements. Applicants must work closely with WFRC staff to ensure program compliance. Emergency projects will be reviewed by the RRC to ensure that a regional goal listed in the Consolidated Plan will be met. Emergency |
|----|--|

| | |
|---|--|
| | projects must be approved by the statewide CDBG Policy Committee. Any funding awarded for emergency projects will be deducted from the subsequent year's annual regional allocation. |
| 12 | WFRC staff will visit each applicant on site for a project evaluation/review. |
| 13 | The RRC may approve regional CDBG set-asides under the following conditions: 1) they are consistent with the region's Consolidated Plan; 2) they are approved prior to the "How to Apply" workshop. |
| RATING AND RANKING INFORMATION | |
| 14 | In order to receive points for any of the evaluation criteria, applicants must state and include the necessary information as an attachment in WebGrants. The RRC reserves the right to eliminate incomplete applications. |
| 15 | All applicants must complete or nearly complete their WebGrants application and schedule a meeting with AOG staff to review the status of your application by December 15th. |
| 16 | WFRC staff preliminarily evaluate all applications using these criteria. The pre-evaluation will be shared with the RRC who makes the final rating and ranking and funding recommendations to the Housing and Community Development Division. |
| 17 | In the event that two or more projects receive the same rating and ranking score, the RRC will rank them using the regional priorities identified in Criterion 10. If there is still a tie score, the applicant with the highest percentage of other matching funds shall prevail. |
| 18 | Prior to adoption, these Criteria shall be publicly noticed and made available for a 30-day public comment period and public open house. |
| REGIONAL REVIEW COMMITTEE (RRC) INFORMATION | |
| 19 | The members of the RRC are listed below along with their respective appointed terms. The RRC consists of six members, two from each of the three counties plus one staff member from WFRC. Each County Council of Governments appoints one elected official and one staff person to represent their county on the RRC. Each member serves a two-year term with no limit upon succession. |

| | |
|----|---|
| 20 | The RRC reviews the Rating and Ranking Criteria annually to ensure the available funding promotes regional needs and program goals. |
| 21 | RRC Membership: |
| | John Olson, Mayor, Vernon Town, January 2022 – December 2023 |
| | Rachelle Custer, Community Development Director, Tooele County, January 2022 – December 2023 |
| | Mark Allen, Mayor, Washington Terrace City, Weber County, January 2022 – December 2023 |
| | Melissa Freigang, Weber County Center of Excellence, January 2022 – December 2023 |
| | Jared Andersen, Councilmember, Morgan County, January 2022 – December 2023 |
| | Josh Cook, Morgan County, January 2023 - December 2024 |
| | SET-ASIDES |
| 21 | The Wasatch Front Regional Council will set aside \$50,000 of the region’s annual CDBG allocation to provide administration and planning assistance to eligible entities. |

| WASATCH FRONT REGIONAL COUNCIL | | | |
|---|----------------------|---|-----------------|
| 2024 RATING AND RANKING CRITERIA | | | |
| <i>Rank</i> | | | |
| <i>Applicant</i> | | | |
| <i>Sub-Applicant</i> | | | |
| <i>Project</i> | | | |
| <i>Total Points</i> | | | |
| <i>Total Project Cost</i> | | | |
| <i>2024 CDBG Request</i> | | | |
| <i>2025 CDBG Request</i> | | | |
| <i>% Match</i> | | | |
| <i>ACTUAL 2024 CDBG Funding</i> | | | |
| CRITERIA | MAX SCORE | DESCRIPTION | APPLICANT SCORE |
| 1. CAPACITY | 5 *select up to 4 | The grantee's capacity to carry out the CDBG grant. Points are awarded based on historical CDBG grant administration. State staff set and award points for these criteria. | 0 |
| Project manager consistency | 1 | | |
| Documentation and communication | 1 | | |
| Project was completed within the contract period | 1 | | |
| Compliance with regulations and laws | 2 | | |
| First time grantees (default is 2.5 points - no other points awarded) | 2.5 | | |
| 2. HOUSING STOCK | 8 *select up to 2 | Project results in the construction of housing units; or, housing units made accessible to LMI households. Projects may include acquisition of property and/or construction of infrastructure in support of the proposed housing units. Double the score if the | 0 |

| | | | |
|--|----------------------------------|--|----------|
| | | project serves chronically homeless individuals (up to 8 points). Add 1 additional point if the project serves homeless individuals or families (up to 7 points). | |
| 1 housing units | 1 | | |
| 2 housing units | 2 | | |
| 3 housing units | 3 | | |
| 4 housing units | 4 | | |
| 5 housing units | 5 | | |
| >5 housing units | 6 | | |
| Project serves chronically homeless individuals | x2 | | |
| Project serves homeless individuals or families | 1 | | |
| 3. MODERATE INCOME HOUSING PLAN | 3 *select up to 2 | Project results in the development, update, or implementation of a housing project identified in the jurisdiction's Moderate Income Housing Plan. Towns not required to comply will receive 1 point if the project benefits an affordable housing goal identified in the Consolidated Plan. | 0 |
| Project results in the development of a Moderate Income Housing Plan | 1 | | |
| Project results in the update to a Moderate Income Housing Plan | 1 | | |
| Project implements a Moderate Income Housing Plan element | 2 | | |
| Project implements a Consolidated Planning housing goal (towns) | 1 | | |
| 4a. EXTENT OF <u>VERY LOW</u> INCOME SERVED BY THE PROJECT | 6 *select 1 | Project directly benefits very low-income households (household income is at or less than 30% area median income). | 0 |
| 1 - 5% | 1 | | |

| | | | |
|--|----------------|---|---|
| 6 - 10% | 2 | | |
| 11 - 15% | 3 | | |
| 16 - 20% | 4 | | |
| 21 - 25% | 5 | | |
| >26% | 6 | | |
| 4b. EXTENT OF <u>LOW</u> INCOME SERVED BY THE PROJECT | 5 *select 1 | Project directly benefits low-income households (household income is 31%-50% area median income). | 0 |
| 1 - 10% | 1 | | |
| 11 - 20% | 2 | | |
| 21 - 30% | 3 | | |
| 31 - 40% | 4 | | |
| >41% | 5 | | |
| 4c. EXTENT OF <u>MODERATE</u> INCOME SERVED BY THE PROJECT | 4 *select 1 | Project directly benefits moderate income households (household income is 51%-80% area median income). | 0 |
| 1 - 20% | 1 | | |
| 21 - 40% | 2 | | |
| 41 - 60% | 3 | | |
| >61% | 4 | | |
| 4d. PRESUMED LMI GROUPS OR TARGETED LMI | 6 *select 1 | Projects that are completed by a public service provider and directly benefit the following: PRESUMED LMI GROUPS: elderly (62+), severely disabled adults, homeless, abused children, battered spouses, migrant farm workers, illiterate adults, and persons living w/AIDS. TARGETED LMI: project targets persons or households that are less than 80% area median income (must be income qualified). | 0 |
| Presumed 51% LMI persons or households | 5 | | |
| Targeted 100% LMI persons or households | 6 | | |

| 5. FINANCIAL MATCH | 6 | The percent of non-CDBG funds the applicant commits toward the total project cost. Percentage is based on the jurisdiction's population (where the project is located). | 0 |
|--|--------------|---|---|
| Less than 1,500 persons | *select 1 | 1,501 to 7,000 persons | |
| Match is 1 - 4% | 1 | Match is 5 - 9% | |
| Match is 5 - 8% | 2 | Match is 10 - 14% | |
| Match is 9 - 12% | 3 | Match is 15 - 19% | |
| Match is 13 - 16% | 4 | Match is 20 - 24% | |
| Match is 17 - 20% | 5 | Match is 25 - 29% | |
| Match is >21% | 6 | Match is >30% | |
| 7,001 to 10,000 persons | *select 1 | 10,001 to 20,000 persons | |
| Match is 8 - 13% | 1 | Match is 11 - 17% | |
| Match is 14 - 19% | 2 | Match is 18 - 24% | |
| Match is 20 - 25% | 3 | Match is 25 - 31% | |
| Match is 26 - 31% | 4 | Match is 32 - 38% | |
| Match is 32 - 37% | 5 | Match is 39 - 45% | |
| Match is >38% | 6 | Match is >46% | |
| More than 20,000 persons Or Public Service Providers | *select 1 | | |
| Match is 14 - 21% | 1 | | |
| Match is 22 - 29% | 2 | | |
| Match is 30 - 37% | 3 | | |
| Match is 38 - 45% | 4 | | |
| Match is 46 - 53% | 5 | | |
| Match is >54% | 6 | | |

| | | | |
|---|-------------------------|---|---|
| 6. MATURITY OF PROJECT | 5 *select up to 5 | The applicant has proven that the project is mature and have provided the necessary information in their application. | 0 |
| Project manager is dedicated, involved, and attended the How to Apply workshop | 1 | | |
| Scope of work is complete, detailed, and concise | 1 | | |
| Detailed cost estimate with map AND photos of the project area | 1 | | |
| Project manager has provided a timeline showing that the project can be completed within an 18-month period (12 months for non-construction projects) | 1 | | |
| Architectural or engineering design is complete (If N/A, this is a free point) | 1 | | |
| 7. REGIONAL QUALITY PLANNING | 4 *select up to 4 | Applicants can receive points if they provide information in their application proving, they abide by regional quality planning efforts. Applicants must provide documentation. | 0 |
| Coordinates planning w/other governments in accordance w/Wasatch Choice 2050 | 1 | | |
| Plans and develops infrastructure efficiently including roads, water, and utilities | 1 | | |
| Incorporates fair housing opportunity and affordability into community planning | 1 | | |
| Plans/protects/conserves critical land, water, air, and historic sites | 1 | | |
| 8. LOCAL PLANNING | 4 *select 1 | The applicant's project must be included in the jurisdiction's Capital Investment Plan (CIP). Points are awarded to CIP projects ranked 1 - 4. | 0 |
| High/Medium #4 | 1 | | |
| High/Medium #3 | 2 | | |

| | | | |
|---|-------------------|---|---|
| High #2 | 3 | | |
| High #1 | 4 | | |
| 9. RECENT CDBG FUNDING | 6 *select 1 | The applicant or sub-applicant, when applicable, has not received CDBG funding in recent years (based on the CDBG program's fiscal year). | 0 |
| Received CDBG funding in FY2023 | 2 | | |
| Received CDBG funding in FY2022 | 3 | | |
| Received CDBG funding in FY2021 or older | 4 | | |
| Has never received CDBG funding | 6 | | |
| 10. REGIONAL PROJECT PRIORITY | 6 *select 1 | Project meets one more of the region's priorities that are identified in the region's Consolidated Plan. | 0 |
| Public health and safety equipment | 2 | | |
| Community facilities or Removal of ADA barriers | 3 | | |
| Public service activities | 4 | | |
| Public utility infrastructure | 5 | | |
| LMI housing activities | 6 | | |
| 11. GEOGRAPHICAL IMPACT | 5 *select 1 | Area impacted by and benefitting from the project. | |
| Site specific | 1 | | 0 |
| Community-wide | 5 | | |
| 12. BENEFIT COST RATIO | 5 *select 1 | Project benefits the most people with the least amount of investment. Points are determined by dividing the total CDBG dollar amount requested by the number of proposed beneficiaries. | |
| >\$6,001 | 1 | | 0 |
| \$4,001 - \$6,000 | 2 | | |

| | | | |
|---|-------------------|--|---|
| \$2,001 - \$4,000 | 3 | | |
| \$1,001 - \$2,000 | 4 | | |
| <\$1,000 | 5 | | |
| 13. PROPERTY TAX RATE | 5 *select 1 | Jurisdictions with a higher tax rate will receive additional points. Points awarded based on the jurisdiction's rate as a percent of the maximum rate allowed by law (compared to the tax ceiling set by State Tax Commission). For non-taxing entities, the jurisdiction's tax rate applies where the majority of the beneficiaries reside. | |
| 0 - 19% | 1 | | 0 |
| 20 - 30% | 2 | | |
| 31 - 40% | 3 | | |
| 41 - 50% | 4 | | |
| >51% | 5 | | |
| 14. AMERICANS WITH DISABILITIES ACT (ADA) CHECKLIST | 1 *select 1 | Jurisdictions will receive one point if they have completed the ADA checklist for "Readily Achievable Barrier Removal" for their city/county office and provide documentation in the application. | |
| Completed the checklist and provided documentation | 1 | | 0 |
| 15. CIVIL RIGHTS COMPLIANCE | 1 *select 1 | Jurisdictions will receive one point if they have adopted Civil Rights Compliance procedures and provided documentation in the application. | |
| Adopted an ADA Grievance Procedure | 1 | | 0 |
| Adopted an ADA Effective Communication Policy, Language Access Plan | 1 | | |
| Adopted an ADA Reasonable Accommodation Policy | 1 | | |

| | | |
|-------|----|---|
| TOTAL | 85 | |
| | | 0 |

| WASATCH FRONT REGIONAL COUNCIL | | | |
|--|---|--|--|
| 2024 RATING AND RANKING CRITERIA - SUPPLEMENTAL SCORING INFORMATION for CERTAIN CRITERIA | | | |
| 2. HOUSING STOCK | | | |
| Definition of a homelessness: | 1) literally homeless - individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided. | | |
| | 2) Imminent risk of homelessness - individuals and families who will imminently lose their primary nighttime residence. | | |
| | 3) Unaccompanied youth - unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition. | | |
| | 4) Fleeing/attempting to flee domestic violence - individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. | | |
| Definition of chronically homelessness: | 1) Chronically homeless individual with a disability who lives in a place not meant for human habitation, a safe haven, an emergency shelter, | | |

| | | | |
|---|---|--|--|
| | or institutional care facility continuously for 12 months or on at least 4 separate occasions in the last 3 years that total 12 months. | | |
| | 2) Chronically homeless families have an adult or minor head of household who meets the "individual" definition of chronically homeless. | | |
| Resource: | https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf | | |
| If applicable, explain how the project benefits homeless persons/families. | | | |
| 3. MODERATE INCOME HOUSING PLAN | | | |
| ALL APPLICANTS must provide documentation showing their plan is in compliance. | | | |
| 4a. EXTENT OF <u>VERY LOW</u> INCOME SERVED BY THE PROJECT | | | |
| Cities and counties use this criterion to determine the extent of low to moderate income beneficiaries. | Household income is at or less than 30% area median income. | | |
| If applicable, provide survey packet (survey methodology, map, tally sheets, and results). | | | |
| 4b. EXTENT OF <u>LOW</u> INCOME SERVED BY THE PROJECT | | | |

| | | | |
|--|--|---------------------|--|
| Cities and counties use this criterion to determine the extent of low to moderate income beneficiaries. | Household income is 31%-50% area median income. | | |
| If applicable, provide survey packet (survey methodology, map, tally sheets, and results). | | | |
| 4c. EXTENT OF <u>MODERATE</u> INCOME SERVED BY THE PROJECT | | | |
| Cities and counties use this criterion to determine the extent of low to moderate income beneficiaries. | Household income is 51%-80% area median income. | | |
| If applicable, provide survey packet (survey methodology, map, tally sheets, and results). | | | |
| 4d. <u>PRESUMED LMI</u> GROUPS OR TARGETED LMI | | | |
| Public service providers use this criterion to determine the extent of low to moderate income beneficiaries. | Projects that directly benefit the following. PRESUMED LMI GROUPS: Elderly (62+), severely disabled adults, homeless, abused children, battered spouses, migrant farm workers, illiterate adults, and persons living w/AIDS. TARGETED LMI: project targets persons or households that are less than 80% area median income (must be income qualified). | | |
| (Population bracket) | 5. FINANCIAL MATCH | (Actual population) | |
| 0-1500: | Vernon | 256 | |
| | Lake Point | 2,599 | |
| | Erda | 3,163 | |

| | | | |
|--|-------------|-----|--|
| | Rush Valley | 548 | |
| | Huntsville | 697 | |

| | | | |
|--------------|----------------------|-------|--|
| | Stockton | 630 | |
| | Uintah | 1430 | |
| | Wendover | 1258 | |
| 1500-7000: | Marriott-Slaterville | 2307 | |
| | Morgan City | 4441 | |
| | Harrisville | 6893 | |
| 7000-10000: | Plain City | 8634 | |
| | Farr West | 8380 | |
| | Riverdale | 9407 | |
| | Hooper | 9838 | |
| | Washington Terrace | 9406 | |
| 10000-20000: | Pleasant View | 11703 | |
| | Grantsville | 15342 | |
| | Morgan County | 13144 | |
| | West Haven | 18033 | |
| | South Ogden | 17680 | |
| >20000: | North Ogden | 22436 | |
| | Tooele | 39572 | |
| | Roy | 39252 | |

| | | | |
|---|--|--------|--|
| | Tooele County | 79069 | |
| | Weber County (excluding Ogden City population) | 185540 | |
| 6. MATURITY OF PROJECT | | | |
| All APPLICANTS must provide a concise scope of | | | |

| | | | |
|--|--|--|--|
| work, detailed cost estimate, map and photos of the project area. | | | |
| 7. REGIONAL QUALITY PLANNING | | | |
| ALL APPLICANTS must provide their designation as a Quality Growth Community; or, information detailing how they meet each of the 4 planning goals. Acceptable documents to prove compliance with the outlined criterion include but are not limited to; adopted plans and conservation easements. If you have any questions about acceptable documentation, please contact Christy Dahlberg. | Accepted documents to prove quality planning include but are not limited to; adoption of policies that allow for more affordable housing options such as an ADU policy, higher density allowances in a center or station area, etc., adoption and/or implementation of a center, a multi-city plan, and adopted plans and conservation easements. To inquire about additional documents that may qualify, contact Christy Dahlberg, christy@wfrc.org . | | |
| 8. LOCAL PLANNING | | | |
| ALL APPLICANTS must provide their jurisdiction's Capital Investment/Facilities Plan | | | |

| | | | |
|--|--|----------|-----|
| and highlight the proposed CDBG project. | | | |
| 10. REGIONAL PROJECT PRIORITY | | | |
| Public health and safety equipment: | Projects that protect property such as lead based paint screening, flood control and fire protection. | | |
| Community facilities or Removal of ADA barriers: | Projects can include senior citizen centers, food banks, or health clinics. Removal of ADA barriers refers to projects that improve the accessibility of public facilities to persons with disabilities. | | |
| Public service activities: | Projects can include services for child care, youth, seniors, handicapped, mental health, legal, transportation, substance abuse, abused and neglected children, and battered and abused spouses. | | |
| LMI housing activities: | Projects can include fair housing activities, rental housing, housing counseling, homeownership assistance, rehabilitation of housing,. | | |
| Public infrastructure and public utilities: | Public infrastructure and public utility projects include the construction of streets, water, and sewer facilities and projects that increase the capacity and safety of water and sewage systems. | | |
| 12. BENEFIT COST RATIO | | | |
| Example: | A project seeking \$200,000 that benefits 250 people has a cost benefit of \$800 ($200,000 / 250 = 800$). | | |
| 13. PROPERTY TAX RATE | | | |
| city max rate: | 0.007 | | |
| county max rate: | 0.0032 | | |
| 0 - 19% | Farr West | 0.000424 | 6% |
| | Harrisville | 0.001123 | 16% |

| | | | |
|--|------------|----------|-----|
| | Hooper | 0.000544 | 8% |
| | Huntsville | 0.000939 | 13% |

| | | | |
|----------|----------------------|----------|-----|
| | Marriott-Slaterville | 0 | 0% |
| | Plain City | 0.000463 | 7% |
| | Pleasant View | 0.000941 | 13% |
| | Riverdale | 0.000848 | 12% |
| | Rush Valley | 0.000908 | 13% |
| | Uintah | 0.000594 | 8% |
| | Vernon | 0.000888 | 13% |
| | West Haven | 0 | 0% |
| 20 - 30% | Morgan City | 0.001471 | 21% |
| | North Ogden | 0.00118 | 17% |
| | Tooele County | | |
| | Tooele City | 0.002763 | 39% |
| 31 - 40% | Grantsville | 0.001901 | 27% |
| | Morgan County | 0.002291 | 33% |
| | Roy | 0.001733 | 25% |
| | South Ogden | 0.00265 | 38% |
| | Stockton | 0.002605 | 37% |
| | Washington Terrace | 0.002187 | 31% |

| | | | |
|---|--------------|----------|-----|
| | | | |
| 41 - 50% | Weber County | | 43% |
| | Wendover | 0.003226 | 46% |
| >51% | | | |
| 14. ADA CHECKLIST | | | |
| ALL APPLICANTS shall provide a copy of their jurisdiction's ADA | | | |

| | | | |
|---|--|--|--|
| checklist titled, Readily Achievable Barrier Removal. | | | |
| 15. TITLE IV COMPLIANCE | | | |
| ALL APPLICANTS shall provide a copy of their jurisdiction's adopted Title IV Compliance procedures. | | | |