



Penn Highlands Clearfield Implementation Strategy Plan

October 2021



Table of Contents

l.	Introduction	4
II.	Penn Highlands Clearfield	5
III.	Penn Highlands Healthcare's Mission and Vision	6
IV.	Community Definition	7
V.	Development of Implementation Strategy Plan	10
VI.	Addressing Community Health Needs	10
VII	Looking Forward	16

I. Introduction

As a non-profit organization, Penn Highlands Healthcare (PHH) is required by the Internal Revenue Service (IRS) to conduct a community health needs assessment (CHNA) every three years. Penn Highlands Clearfield's CHNA report aligns with the parameters and guidelines established by the Affordable Care Act (ACA) and complies with IRS requirements. The CHNA document is a comprehensive review of primary and secondary data analyzing socioeconomic, public health, and demographic data at the local, state, and national level.

The community needs assessment process is a meaningful engagement, and input was collected from a broad cross-section of community-based organizations, establishments, and institutions. The CHNA was spread among seven Pennsylvania counties and 98 ZIP codes. The CHNA process undertaken by Penn Highlands Clearfield, with project management and consultation by Tripp Umbach, included input from representatives of the broad interests of the community served by the hospital, notably those with special knowledge of public health issues; data related to underserved, hard-to-reach, vulnerable populations; and representatives of vulnerable populations served by each hospital. Tripp Umbach in collaboration with working group members oversaw and accomplished the assessment and its goals.

Penn Highlands Clearfield's CHNA utilized a systematic approach to identify and address the needs of the underserved and disenfranchised communities across the hospital's geography. The CHNA report and subsequent implementation strategy planning (ISP) report will provide ways to improve health outcomes for those affected by diseases as well as social and environmental barriers to health.

Penn Highlands Clearfield would like to thank the region's stakeholders, community providers, and community-based organizations (CBOs) that participated in this assessment. Penn Highlands Healthcare and Penn Highlands Clearfield appreciate their valuable input throughout the CHNA process.

Purpose

The implementation planning report is intended to satisfy the requirements set forth by the Internal Revenue Code Section 501(r)c3 regarding the completion of community health needs assessments and implementation planning strategies. The overall intended purpose of the ISP is to address the communities' needs based on the CHNA findings and to align, create, and provide programs, services, and events within the hospital's resources.

II. Penn Highlands Clearfield

Penn Highlands Healthcare, established in 2011, is a health system in Northwestern/Central Pennsylvania that brings together the services of Penn Highlands Brookville, Penn Highlands Clearfield, Penn Highlands DuBois, Penn Highlands Elk, Penn Highlands Huntingdon, and Penn Highlands Tyrone. Through this partnership, Penn Highlands Healthcare has evolved into an organization with more than 4,000 employees in 100-plus locations throughout Northwestern/Central Pennsylvania that include community medical buildings, outpatient facilities, surgery centers, and physician practices.

Penn Highlands Healthcare provides residents with access to the region's best hospitals, physicians, two nursing homes, home care agency, and other affiliates who believe that health care should be managed by local board members who live and work in the communities they serve.

Providing exceptional quality care to the region, Penn Highlands Healthcare has more than 500 physicians and 300 advanced practice providers on staff and facilities with more than 700 beds. The system offers a wide range of care and treatments with specialty units that care for cancer, cardiovascular/thoracic, lung, neurosurgery, orthopedics, behavioral health, and neonatal intensive care.

Each facility is the largest employer in its hometown and is rooted deeply in both the popular and economic cultures of their communities. The vision is to be an integrated health care delivery system that provides premier care with a personal touch, no matter where one lives in the region. Many quality services are available in or near every community, but additional advanced services might also be available at one of the affiliates. That's one of the greatest strengths of Penn Highlands Healthcare.

The hospitals of Penn Highlands Healthcare have been serving the residents of Northwestern/Central Pennsylvania as non-profit, community organizations for more than 100 years, a commitment that is valued and cherished.

Penn Highlands Clearfield has been an integral part of the community since the first hospital was organized and opened its doors in 1900 as Penn Highlands Clearfield. As a part of Penn Highlands Healthcare, Penn Highlands Clearfield continues its rich tradition of providing excellent care to the communities it serves. Penn Highlands Clearfield continues to expand and create access to a large number of medical, surgical, and support services. Its award-winning home health care serves a large geographic region. A renovated facility reflects its commitment to improve quality care and patient comfort.

Penn Highlands Clearfield consists of an active Emergency Department, Medical-Surgical Units, Behavioral Health Services, Cardiac Diagnostic Services, Rehabilitation Services, Cardiac Rehab, Chemotherapy, Imaging Services, Laboratory Services, Nutrition Counseling, Pulmonary Rehabilitation, Surgical Services, Wound Care and a Swing-Bed Program.

Additional information on Penn Highlands Clearfield Hospital and its services are available here.

Penn Highlands Clearfield Highlights:

- 40 Inpatient Beds
- 10 Psych Beds
- 255 Employees
- Wound Clinic
- Outpatient Diagnostics
- Surgical Services
- Clearfield Community Medical Building

- Outpatient Behavioral Health
- 2 Outpatient Rehab Clinics
- Geropsych Unit
- 2 OCare Walk-in Clinics
- Moshannon Valley Community Medical Building
- 24-hour Emergency Room

III. Penn Highlands Healthcare's Mission and Vision

Mission Statement:

To provide patients with exceptional care through our community-based health system while maintaining a reverence for life.

Vision Statement:

To be the integrated health system of choice through excellent quality, service, and outcomes.

Value Statement:

- Quality & Safety Provide a safe environment with high-quality outcomes.
- Teamwork Foster a culture of teamwork, support, trust, and loyalty.
- Integrity Practice the principles of honesty, confidentiality, respect, and transparency.
- Person-Centered Recognize those we serve as equal partners.
- **Service** Demonstrate compassion by listening, engaging, anticipating, and exceeding needs and expectations.
- Stewardship Commit to investing in our human and material resources while practicing fiscal responsibility.
- Partnership Offer services and programs through partnerships with our physicians, providers, stakeholders, and other organizations.
- Education Expand our emphasis on education and enhance our position as a learning organization.

Penn Highlands Healthcare's mission statement focuses on improving regional access to a wide array of premier primary care and advanced services, it does so while supporting a reverence for life and the worth and dignity of each individual. The linkage provides the ability to keep control of the hospitals in the hands of a local board and is providing many other community benefits. Increased local access to physician specialists, improved quality, coordination of care and increased physician recruitment and retention are just some of the major benefits that have come from the linkage.

IV. Community Definition

Community Served by the Hospital

Clearfield County was created in 1804, from parts of Huntingdon and Lycoming counties and named for Clearfield Creek. The creek's name alluded to openings or "clear-fields" made by the large number of bison in the area. For many years Clearfield County functioned as part of Centre County, not electing its own commissioners until 1812. It was organized for judicial purposes in 1822. Clearfield, the county seat, was incorporated as a borough in 1840.¹

Clearfield County is located in the center of Pennsylvania with direct access to major markets in the Northeastern United States and the Midwest via Interstate 80, which runs directly through the center of the county. There are six exits off Interstate 80 in Clearfield County, with five of the exits having potential economic development properties available nearby. Recent additions to the Clearfield County business community include the Wal-Mart Distribution Center located in Bradford Township at old Exit 20 of Interstate 80, the newly constructed Clearfield Campus of Lock Haven University, and the State Correctional Institute at Houtzdale. Economic development opportunities also exist at the new DuBois Industrial Park.²

Defined Community

A community is defined as the geographic area from which a significant number of the patients utilizing hospital services reside. While the community health needs assessment considers other types of health care providers, the hospital is the single largest provider of acute care services. For this reason, the utilization of hospital services provides the clearest definition of the community.

In 2018, 16 ZIP code areas were defined as the primary service area of Penn Highlands Clearfield; in 2021 it now encompasses 37 ZIP codes. The following table represents the study area focus for Penn Highlands Clearfield's 2021 CHNA. The ZIP codes are based on 80 percent of Penn Highlands Clearfield's patient discharges. Penn Highlands Clearfield's discharges originate in Clearfield County; however, Penn Highlands Clearfield patients also live-in neighboring counties.

The following table and map of Penn Highlands Clearfield's geographical location displays the hospital's defined community, which relates to the 37 ZIP codes. (See Map 1).

2021 Penn Highlands Clearfield ZIP Codes - Primary Service Area/Study Area

Zip Codes	Town/City	County
15753	La Jose	Clearfield
15757	Mahaffey	Clearfield
15801	Du Bois	Clearfield
15848	Luthersburg	Clearfield
15849	Penfield	Clearfield

Zip Codes	Town/City	County
16616	Beccaria	Clearfield
16620	Brisbin	Clearfield
16627	Coalport	Clearfield
16645	Glen Hope	Clearfield
16651	Houtzdale	Clearfield

¹Clearfield County: https://clearfieldco.org/

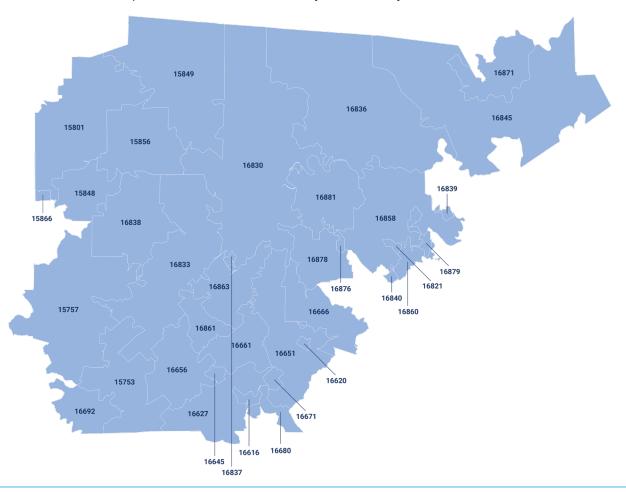
² Ihid

2021 Penn Highlands Clearfield ZIP Codes — Primary Service Area/Study Area

Zip Codes	Town/City	County
15856	Rockton	Clearfield
15866	Troutville	Clearfield
16666	Osceola Mills	Clearfield
16671	Ramey	Clearfield
16680	Smithmill	Clearfield
16692	Westover	Clearfield
16821	Allport	Clearfield
16830	Clearfield	Clearfield
16833	Curwensville	Clearfield
16836	Frenchville	Clearfield
16837	Glen Richey	Clearfield
16838	Grampian	Clearfield
16839	Grassflat	Clearfield
16840	Hawk Run	Clearfield

Zip Codes	Town/City	County
16656	Irvona	Clearfield
16661	Madera	Clearfield
16845	Karthus	Clearfield
16850	Lecontes Mills	Clearfield
16858	Morrisdale	Clearfield
16860	Munson	Clearfield
16861	New Millport	Clearfield
16863	Olanta	Clearfield
16871	Pottersdale	Clearfield
16876	Wallaceton	Clearfield
16878	West Decatur	Clearfield
16879	Winburne	Clearfield
16881	Woodland	Clearfield

Map 1: 2021 CHNA ZIP Code Study Area/Primary Service Area



Overall Penn Highlands Health Prioritized Needs

As a result of extensive primary and secondary research, community members, community leaders, and project leadership identified key regional priorities. The research illustrated the need for access to care, behavioral health, and chronic diseases/conditions. Each key need area had subareas of concentration. The table below illustrates how each hospital within Penn Highlands Healthcare will address the needs within their hospital region.

	2021 PRIORITIZED FINDINGS						
	Access to Care		•	Behavioral Health ³ (Mental Health & Substance Abuse)	Chronic	Diseases/C	onditions ⁴
	Infrastructure ⁵	Lack of PCP/Specialist ⁶	Specialty Care ⁷		Health Behaviors ⁸	Social Determinants of Health ⁹	Dental Health ¹⁰
Penn Highlands Brookville		•	•	•	•	•	
Penn Highlands Clearfield			•	•	•		
Penn Highlands DuBois	•		•	•			
Penn Highlands Elk	•	•	•	•	•		
Penn Highlands Huntingdon	•	•		•	•	•	•
Penn Highlands Tyrone	•	•	•	•	•	•	

³ Behavioral Health (Mental Health & Substance Abuse)

⁴Chronic Diseases/Conditions (e.g., diabetes, chronic obstructive pulmonary diseases, high blood pressure)

⁵ Infrastructure (e.g., care coordination, navigation, and transportation)

⁶ Lack of primary care physicians (PCP)/Physician specialists

⁷Specialty care (e.g., cancer care)

⁸ Health Behaviors (e.g., nutrition, physical activity, obesity)

⁹ Social Determinants of Health (e.g., education, income etc.)

¹⁰ In 2021, Penn Highlands Huntington (PHHD) reported dental health as a CHNA need. PHH will not address this specific CHNA need at the system level; rather, PHHD will work with local community organizations to address this need at the hospital level.

V. Development of Implementation Strategy Plan

A team of hospital senior leaders representing different departments within the Penn Highlands Healthcare system reviewed the previous implementation strategy plan and developed reinforced strategies, prioritized selected efforts, and assessed ways to continue to provide services and care to the community at large through the implementation strategy plan. Representatives from Penn Highlands Healthcare and Brookville Hospital's senior leadership participated in the CHNA/ISP's working group. Senior leadership will continue to review the implementation strategy plan and edit where necessary with periodic changes to better address the evolving health needs of its residents.

Summary of Health Needs Identified

Penn Highlands Clearfield's community health needs as determined primary and secondary data include:

- 1. Access to Care
 - Specialty Care
- 2. Behavioral Health (Mental Health and Substance Abuse)
- Chronic Diseases/Conditions
 - Health Behaviors

Additional information on Penn Highlands Brookville Hospital's CHNA report can be found here.

VI. Addressing Community Health Needs

Penn Highlands Healthcare and each of its hospitals provide an array of services, assistance, and programs in a combined effort to address the needs of the region. The execution of services and programs at Penn Highlands Clearfield focuses on providing high-quality care and amenities to improve overall community health, solidify relationships with community-based organizations, collect community feedback, and continually evaluate the hospital's strategies.

Penn Highlands Healthcare's community health initiatives in conjunction with local community organizations have a unified strength to improve the health and health equity of community members, in particular the underserved, disenfranchised, low-income, underserved, and vulnerable populations.

The implementation strategy planning report includes the prioritized community health needs identified during the 2021 Penn Highlands Clearfield Hospital CHNA and hospital-specific strategies to address those needs through 2024.

Access to Care

Penn Highlands Clearfield's 2021 CHNA identified access to care, in particular specialty care, a need in the community. The priority strategies will focus on the hospital's efforts to improve access to care to those in the region.

Access to care, in particular, primary care and specialty care, is important to residents in order to manage their health, receive treatments, and take preventative measures. Access to care tends to include insurance coverage, lack of health services, and timeliness of care. It can also include high cost of services, transportation issues, and availability of providers. Penn Highlands Clearfield will specifically address access to care emphasizing the need for additional primary and specialty physicians and specialty services such as cancer. Strategies and plans related to cancer will be addressed at the system level with involvement from all PHH facilities. It is important to note that access to care has been a priority for Penn Highlands Healthcare for many years, including the previous CHNA and Implementation Plan. The following tables are Penn Highlands Clearfield's plans to address the issue of access to care in their service area.

	Goal: Improve access to care to residents within the Penn Highlands Healthcare service area.							
Infrastructure	Lack of PCP/ Specialist	Specialty Care	Target Population	Objectives/Strategies	Evaluation Methods/Metrics (Goals)	Partners		
		X	- Clearfield Co. residents (in Philipsburg and west of St. College), communities on 322 that lack a local PT facility	Expand physical therapy interventions by 2% per FY for a total of 6% in 3 years.	 Increase in number of physical therapy interventions by 2% per year Track PT interventions by FY2024 	- Rural Healthcare Clinic - Free Clinic Frenchville - AAA - U. Orthopedics- State College contact - PCP in MVCMB		
		Х	- Clearfield Co. residents	Expand hours and flex staff according to demand.	Track high utilization times/dates Track overall volume of patients	- Rural Healthcare Clinic - Free Clinic Frenchville - AAA - U. Orthopedics- State College contact - PCP in MVCMB		
		Х	- Clearfield Co. residents	Expand pulmonology services to Clearfield County residents by the placement of a pulmonologist to provide comprehensive/diagnostic services locally 2 days/week.	Number of days/weeks Provider in Clearfield Co. Number of days/wk. pulmonologist in Clearfield Co.	- Rural Healthcare Clinic - Free Clinic Frenchville - AAA - U. Orthopedics- State College contact - PCP in MVCMB		
		Χ	- Clearfield Co. residents	Recruit a pulmonologist.	Number of recruited pulmonologists	- Rural Healthcare Clinic		
		X	- Clearfield Co. residents	Dedicate 2 days to Penn Highlands Clearfield	Track number of days in Penn Highlands Clearfield office	- Rural Healthcare Clinic		

office.

Cancer¹¹

				Goal: Early Detection	n and Prevention.	
Infrastructure	Lack of PCP/ Specialist	Specialty Care	Target Population	Objectives/Strategies	Evaluation Methods/Metrics (Goals)	Partners
		X	- Adults - Elderly and atrisk population - Residents with suspected cancer conditions	Increase community awareness and engagement regarding cancer prevention and screening.	 Number of public speaking events Number of attendees Pre-and post-test results 	- Physicians - APP's - Registered nurses
		Х	- Adults - Elderly and at- risk population	Seek opportunities for public speaking engagements.	Number of speaking events Number of attendees	- Physicians - APP's - Registered nurses
		X	- Adults - Elderly and at- risk population	Progressively expand advocacy groups including community volunteers and patient groups to cover all regions.	 Number/type of advocacy groups Number of new advocacy groups Track region of coverage 	- Physicians - APP's - Registered nurses
		Х	- Elderly and atrisk population - Residents with suspected cancer conditions	Feature monthly awareness campaigns to the community regarding specific cancer month. Example: March Colon and October Breast	Increase in number of colonoscopies conducted across PHH Increase in number of mammograms across PHH	- Pharm companies - GI Lab physician leaders - GI Lad admin leaders - Area Agency on Aging - Practice Management
		Х	- General population	Tri-County Sunday Education Articles for The Community Radio Education Spots.	 Number of radio spots advertised Number of education articles 	- Pharm companies - GI Lab physician leaders - GI Lad admin leaders - Area Agency on Aging - Practice Management - Marketing
		Х	- General population	Increase cancer awareness among influential groups and the public.	Number of presentations made Number of participants reached	- Physicians - APP's - Registered nurses
		Х	- General population	Monthly social committee meetings.	Number of attendeesNumber of meetings held	- Physicians - APP's - Registered nurses

¹¹ Penn Highlands Healthcare will address cancer initiatives at the system-level.

	Goal: Early Detection and Prevention.						
Infrastructure	Lack of PCP/ Specialist Care Care Opposite the control of the cont		•	Objectives/Strategies	Evaluation Methods/Metrics (Goals)	Partners	
		X	- Community partners in the cancer community	Engage and mobilize key stakeholders within the cancer community who will champion the development and implementation of an awareness plan for cancer prevention.	 Increase in number of partnerships with stakeholders in the cancer community Number of new stakeholders identified 	- Stakeholders in the cancer community	
		Х	- General population	Develop relationships with stakeholders within the cancer community.	Track number of new partnerships	- Stakeholders in the cancer community	

Behavioral Health (Mental Health and Substance Abuse)

Behavioral health, which includes mental health and substance abuse,¹² affects families and individuals throughout the United States, and the Penn Highlands Healthcare service area is no exception. The disease and the number of residents diagnosed with the disease continue to grow exponentially. Along with the growth, the need for mental health services and substance abuse programs have not diminished.

Mental health is an important part of overall health and well-being. Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. Mental health also helps determine how we handle stress, relate to others, and make healthy choices. Mental health is important at every stage of life, from childhood and adolescence through adulthood.¹³

The use of drugs and alcohol is increasing. Substance abuse is often intertwined with those who also have a mental health illness. It is important to note that these conditions have been a priority for Penn Highlands Healthcare for many years, including the previous CHNA and implementation plan. Due to Penn Highlands Healthcare having its own dedicated behavioral health department, the implementation strategy plan and its objectives related to behavioral health will be addressed from an overall system perspective.

¹²The previous implementation strategy plan was not categorized by each facility but rather from an overall system perspective.

¹³ Centers for Disease Control and Prevention: www.cdc.gov/mentalhealth/index.htm

	Goal: Collaborate with community substance abuse providers to reduce substance abuse.							
Behavioral Health	Target Population	Objectives/ Strategies	Evaluation Methods/Metrics (Goals)	Partners				
X	- Schools - At-risk youth - Justice Department - Homelessness - Free Clinic - Community residents	Address barriers that impede the ability to meet the assessment and treatment demand.	Collaborate with the education system three times per year Number of new partners Number of partners no longer participating Increase mental health services in rural health clinics in the service area and track number of visits. Increase the use of telemedicine technology to enhance service utilization and track number of visits.	- Cen Clear Drug and Alcohol - Clearfield Jefferson Drug and Alcohol Commission - Pyramid Healthcare - Health and Human Service Agencies - Tri County Drug and Alcohol - Opioid Task Force - Cove Forge - Elk County Drug and Alcohol Rural Hospital Opioid Program (RHOP)				
Х	- Patients in the local ED - Patients at the Free Clinic	Identify available transportation to treatment.	Develop partnerships with local transportation providers, constable, Uber, D&A & Pyramid Health Care Number of new partnerships in FY	- Local constables - Uber - Drug and alcohol treatment providers - Social service agencies				
X	- Patients at Free Clinic - Clearfield Jefferson Drug and Alcohol referrals - ED referrals	Develop a list of hospital detox beds and rehabs in the area.	Up-to-date list of detox and rehab beds for hospital staff to reference.	- Cen Clear Drug and Alcohol - Clearfield Jefferson Drug and Alcohol Commission - Pyramid Healthcare - Work with local VISTA (AmeriCorps funded program Junita College – MH throughout community)				
X	- Health care staff, emergency room, physicians and nurses	Educate the staff on drug trends and treatment.	 Number of education sessions per year Number of attendees Track number of materials distributed 	- Staff - Net Learning on drugs trends and treatment				

Implementation Strategies that Penn Highlands Healthcare Placed on Hold

Five health strategies that will no longer be tracked by Penn Highlands Healthcare in this implementation strategy plan falls under the behavioral health community need. Penn Highlands Healthcare does not have the current resources (i.e., manpower, finances, and infrastructure) to adequately address specific strategies identified from the 2018 ISP. Penn Highlands Healthcare will refocus its resources to effectively measure and track the current strategies identified in this assessment cycle. Penn Highlands Healthcare believes there are ample future opportunities to improve behavioral health services.

Penn Highlands Healthcare administration is deeply involved with the development of the implementation strategy plan and will be alerted to additional opportunities to improve behavioral health in the community.

Chronic Diseases/Conditions

Broadly defined, chronic conditions are conditions that last more than one year and require ongoing medical attention or limit daily activities. Heart disease, cancer, and diabetes are leading causes of death and disability in the United States. The engagement of healthy behaviors and positive habits such as regular physical activity, getting adequate amounts of sleep, eating/following a healthy diet, and eliminating the use of tobacco and alcohol can significantly reduce disease and improve one's quality of life. Living a healthy lifestyle is essential to addressing a specific health problem or maintaining one's health, and it reduces the likelihood to be diagnosed with a chronic disease.

Penn Highlands Clearfield is committed to addressing the communities' needs to improving health equity, healthy behaviors, and health outcomes. As a large community health need, Penn Highlands Clearfield identified chronic diseases/conditions (e.g., diabetes, chronic obstructive pulmonary diseases, high blood pressure), in particular health behaviors, as prevalent in the community. It is important to note that these conditions have been a priority for Penn Highlands Healthcare for many years, including the previous CHNA and implementation strategy plan. The following table is Penn Highlands Clearfield's plan to address the issue of chronic diseases/conditions in the community.

Goal: Expand awareness and services to promote preventive health and wellness throughout the community.							
Health Behaviors	Врон	Dental Health	Target Population	Objectives/Strategies	Evaluation Methods/Metrics (Goals)	Partners	
Х			- All employees at PHH	Increase healthy weight loss.	Number of employees participating	- Rehabilitation Dept./ facilities	
Х			- School-aged-students	Expand nutrition and health information to schools.	Number of events provided	- School food service	
Х			- Community residents	Host mini nutrition/health fairs	Number of events	- Community resources	
X			- All employees and interested community members	Provide nutrition and health information to employees and community.	Number of employees	- Morrison websites - Health and human services organizations	
X			- Patient families, employees, and residents	Promote healthy selections in the cafeterias for visitors and employees.	Number of people served	- Food vendors	
Х			- Those diagnosed with Parkinson's disease, family members, and caregivers	Expand support for Parkinson's disease.	Number of presentations made	- Marketing - Rehabilitation	
Х			- Adult females	Reduce osteoporosis among adult female patients.	Number of presentations made	- Cardiac Rehabilitation	

VII. Looking Forward

Penn Highlands Clearfield's community health needs identified in the 2021 CHNA are multifaceted. Reducing/decreasing, eliminating, or improving access to care, behavioral health, and chronic diseases/conditions require continued collaboration among Penn Highlands Clearfield's local health, human, and social services agencies, community partners, and community residents.

Continuing alignment and partnership with organizations and community residents, Penn Highlands Clearfield will continue to engage residents as part of the CHNA and ISP. The implemented strategies and initiatives will strengthen the health system for all citizens within the service area.

Resource Commitment

Penn Highlands Clearfield will commit both in-kind and financial resources during FY 2021-2023 to implement the identified initiatives and programs. Resources may include both clinical and non-clinical services, partnerships, and collaborations for solutions in addition to dedicated staff time to advancing the health system's work, charitable contributions, and volunteerism that will occur naturally within the ISP phase.

