

Educational Access Cable Plan for Year 2019

Prepared for:

**‘Olelo Community Media
1132 Mapunapuna Street
Honolulu, Hawaii 96819**

and

**Cable Television Division
Department of Commerce & Consumer Affairs
335 Merchant Street
Honolulu, Hawaii 96813**

Submitted by:

**Hawaii Educational Networking Consortium (HENC)
2520 Correa Road, 6th Floor
Honolulu, Hawaii 96822**

Phone: (808) 203-9097

Fax: (808) 956-5025

**Educational Access Cable Plan
for Year 2019**

Table of Contents

1.0.0 - Foreword	3
2.0.0 – EA Constituents	3
3.0.0 - Constituent Awards	4
4.0.0 - 2019 Constituent Plans	
Hawaii State Department of Education (HDOE)	6
Hawaii Association of Independent Schools (HAIS)	8
University of Hawaii (UH)	9
5.0.0 - Summary	12
Appendix 1 - Sample Educational Access Progress Report Forms	14
Appendix 2 - UHTV Channel - Times of UHTV Transmission	16
Appendix 3 - TEACH Channel - Times of HDOE Transmission.....	17

Educational Access Cable Plan for Year 2019

1.0.0 - Foreword

The Hawaii Educational Networking Consortium (HENC) submits the following plan for the Oahu 2019 Educational Access (EA) cable funding. The 2019 plan year is comprised of the winter and spring terms of the 2018/19 academic year, the summer terms of 2019, and the fall term of the 2019/20 academic year.

This plan also serves as HENC's formal recommendation to 'Olelo: Community Media for the 2019 EA funding awards.

The two Educational Access channels on Oahu are UHTV and TEACH. On Oceanic Cable these channels can be found as digital channels 354 and 355 for UHTV and channel 356 for TEACH. On Hawaiian Telecom TV the UHTV and TEACH channels also can be found on 355 (Olelo TEC) and 356 (Olelo TEACH).

HENC thanks 'Olelo and the Hawaii Department of Commerce & Consumer Affairs for allowing the Consortium to continue to support the direction and development of Oahu's Educational Access cable programming for the residents of Hawaii.

2.0.0 - EA Constituents

The three primary Educational Access partners to this plan are:

Hawaii State Department of Education (HDOE)

Hawaii Association of Independent Schools (HAIS)

University of Hawaii (UH)

2.0.1 Infrastructure and Collaboration

The three above entities are engaged statewide with more than 350,000 students, researchers, faculty and staff. More than 75% of these individuals live, work and learn on the island of Oahu. With the extremely high cable TV subscriber penetration rate on Oahu, the majority of these individuals have access to the video services provided by HENC EA programming both at home and in their school settings.

Education access is available via free cable set-top boxes provided by Oceanic and Hawaiian Telecom upon request for basic subscribers. These boxes provide digital access for all of the EA channels as well as providing access to the current video on demand channel(s).

A brief description of each of the Educational Access partners, the people they serve, and their infrastructure follows.

2.0.2 - Hawaii Department of Education

The Hawaii Department of Education is a single statewide school district that provides oversight to 256 public schools and 36 public charter schools on seven islands. Recent figures show that the HDOE's total enrollment is approximately 179,700 students (2018 data) in kindergarten through 12th grade, which makes the HDOE approximately the 10th largest school district in the United States. Additionally, another 60,000 adult learners enroll in courses at the adult community schools two primary campuses at McKinley and Waipahu high schools and eight satellite sites.

On Oahu the HDOE video production and distribution network provides primary services from their facility located in Mapunapuna.

2.0.3 - Hawaii Association of Independent Schools

The Hawaii Association of Independent Schools is an association of member schools that advocates on behalf of licensed and accredited independent education in Hawaii. HAIS’s subsidiary, the Hawaii Council of Private Schools, also licenses the more than 160 private and parochial schools in Hawaii on behalf of the State of Hawaii. HAIS currently serves 92 member independent schools with over 36,000 students.

H AIS facilitates collaborative efforts among member schools on issues of mutual concern as well as partnerships to address shared needs. H AIS provides services that strengthen individual schools, and it supports efforts to achieve educational quality and excellence for all Hawaii students.

2.04 - University of Hawaii

On Oahu, the University of Hawaii has distance learning capabilities on the UH Manoa campus as well as Honolulu Community College, Kapiolani Community College, and Leeward Community College.

The UH Manoa site and each of the community college sites listed above have production facilities for the development of cable programming as well as studio/classrooms for the transmission of live programs. These campuses also have post-production facilities and the controlled environments and staffing necessary to facilitate a wide range of distributed learning activities. These production facilities also serve as an effective training ground for students who are interested in the industry.

In summary, HENC believes the above-defined tangible and intangible assets provide the core, and supply sizeable benefits, to each of the EA constituents and to the general public at large. As a by-product of the Oahu EA agreement, the outcome (programming) is also distributed statewide to Neighbor Island PEG access centers for their use and provides educational options for many underserved communities. The Consortium feels that continued support for the above educational institutions are very important to providing continuous benefits via Educational Access cable.

3.0.0 - Constituent Awards

This plan is based on funding from Oceanic Spectrum and Hawaiian Telecom educational access fees currently available to ‘Olelo during the 2019 calendar year. ‘Olelo estimates 2019 funding to be:

	PEG Fees	HENC 25%
TWE	5,545,731.02	1,386,432.76
HTC	1,153,229.83	288,307.46
	<u>6,698,960.85</u>	<u>1,674,740.22</u>

Based on this estimate the recommended 2019 EA funding for the constituents during this plan year are as follows:

	2019 EA Plan	%
April Request:		
DOE	322,295.44	- 0.4200
HAIS	53,715.91	- 0.0700
UH	* 391,358.75	- 0.5100
HENC Admin Fee	25,000.00	
Total	792,370.10	- 1.0000
September Request:		
DOE	322,295.44	- 0.4200
HAIS	53,715.91	- 0.0700
UH	* 391,358.75	- 0.5100
HENC Admin Fee	25,000.00	
Total	792,370.10	- 1.0000
HSDM Grants **	90,000.00	
Total	882,370.10	
Total 2019 EA Funds:	1,674,740.20	

* The University of Hawaii is awarded a larger share of the EA funding because it currently provides the space and staffing for the joint video playback facility located on the Manoa campus of the University of Hawaii. This facility currently hosts all Educational Access video playback for both of the current digital EA Channels (355 and 356) and the additional Statewide digital channel 354 as required under the Oahu cable franchise agreements. In addition to these three 24x7 channels, the facility also provides for transcoding, transport and supervision of the new Video on Demand channel (Oceanic 358). This channel known as UHVOD is found on Oceanic Cable channel 358. This facility also provides for the statewide transport of the civil defense signal.

** EA will again fund the K-12 school video grants program entitled the Hawaii Schools Digital Media grants (HSDM) for a total of at least \$90,000 in 2019. The HSDM funds are awarded to HAIS for sole use as grants for video programming projects in Hawaii's K-12 public, private, charter and parochial schools. Schools are asked to submit grant applications for video and digital media projects at the start of the 2019/20 school year. Grant awards are tied to minutes of video programming to be submitted during the 2019/20 academic year. A complete list of the awardees will be part of the reports generated for 2019.

4.0.0 - 2019 Constituent Plans for Educational Access

4.0.1 - Hawaii State Department of Education (HIDOE)

4.0.2 - HIDOE Educational Access Award - 2019

For the timeframe of January 1, 2019 through December 31, 2019, HENC recommends that the Video Production Branch of HIDOE's Communications and Community Affairs Office be awarded \$644,590.88 for core programming activities provided through the Oahu Educational Access cable channels.

4.0.3 - HIDOE Project Description - 2019

HIDOE continues to play a supporting role in ensuring that all Hawaii children have a fair and equal opportunity to obtain high-quality education and reach, at a minimum, proficiency on challenging state academic achievement standards. To this end the Video Production Branch (VPB) of HIDOE is tasked with the programming of a digital cable channel on both the Oceanic Cable network and the Hawaiian Telcom cable network.

During 2019 HIDOE will continue to provide programming for the K-12 Educational Access environment on a 24x7 basis. As a by-product of the Oahu EA agreement, the signal continues to be transported to all neighbor island Access Centers for use on Channel 356 on each island.

4.0.4 - HIDOE Goals and Objectives - 2019

The VPB is part of the of HIDOE's Communications and Community Affairs Office. It is primarily responsible for the acquisition and distribution of educational video programs, creation of video programs in support of the Department of Education, duplication DVDs, and transmission of educational video programming over cable and broadcast channels.

During 2019 VPB will continue to provide programming which meets the technical standards for transmission over the PEG cable channels as established by 'Olelo. The complete HIDOE schedule as well as a listing of standard-centered television programming can be found on the web at: <http://www.video.k12.hi.us/programs/tv-schedule> or <http://pw.myersinfosys.com/hetv/week>

Projected HDOE programming for 2019 will include:

Continuation of the following core programming:

Mandarin for Kids K-2; Mandarin for Kids 3-4; Japanese for Kids 3-4; Choices; Hawaii Student Digital Showcase; MOVE - Mililani Oceanic Video Exploration; Artists of Hawaii; Dirt, Artist Profiles & Air, Artist Techniques; Pacific Clues; Arts Smarts; Ke Imi Noi; and, Art Hunter.

Completion and airing the following new programming:

- Ola Na Iwi (teaching the new generation about the Kaiapuni movement that created the Hawaiian Immersion program 30 years ago)
- Na Ali'i - Stories of a number of Hawai'i DOE Schools and their relationship to the Hawai'i Ali'i they are named for or are associated with
- Kai Piha: Loko I'a (featuring the history and science behind Hawaii fish ponds)
- Kauai's Shining Stars , 9 programs (featuring Kauai schools successes and new programs)

- Artist of Hawaii, continuing series 1 new program
- Sounds of Hawaii (2 episodes) (historic and current views of how certain instruments began to enter the islands. Episode 1 looks at the ukeke of Hawaiian culture; episode 2 profiles the bagpipes and how Scottish immigrants became part of the islands.)
- Artist in the Schools (Collaborative video with the State Foundation of Culture and the Arts showing what the program is and how schools can participate in it.)
- Artist Bento (Collaborative video with the State Foundation of Culture and the Arts showing what the program is and how schools can participate in it.)
- IMPACT-Stories of the 2019 Teachers of the Year
- Hawaii Comic Book Alliance - How these artists created Hawaii super heroes, and how they share their talents with the youth of Hawaii

Acquire additional educational programming to include:

World Languages:

1. *El cuarto misterioso* (20 episodes with a continuous storyline, 5 documentaries)
2. *Rendez-vous à Nice!* (20 episodes with a continuous storyline, 5 documentaries)
3. i-Passport videos Spanish (55 episodes)
4. i-Passport videos French (55 episodes)
5. i-Videos Spanish (73 episodes)
6. i-Videos French (73 episodes)

4.0.5 - HDOE Framework for Measure - 2019

Specific targets for the Video Production Branch during 2019 include:

- The development, completion and airing of one new instructional series;
- Assist HAIS with the promotion, assessment and implementation of the Hawaii Schools Digital Media grants;
- Facilitate the collection, evaluate the quality and log each video submitted by K-12 schools as they relate to the HSDM grants; and,
- Produce a monthly student video series entitled the Hawaii Schools Digital Showcase during 2019.

4.0.6 - HDOE Reports and Feedback - 2019

HDOE progress reports in the standard format (see Appendix 1, Attachment A) will remain in effect and will be completed at the mid-term and end of 2019. This data will be due to HENC for the mid-year report no later than June 15, 2019 and for the annual report by January 15, 2020. In addition to the hourly program matrix information, a list of all programs by title will be provided for inclusion in the annual report.

4.0.7 - HDOE Single Point of Contact – 2019

The following individual will act as the entity contact for the 2019 HDOE award:

Department of Education, State of Hawaii

Edgar Ambrosio
 Video Production Branch
 1132 Mapunapuna Street, Ste. 201
 Honolulu, Hawaii 96819

Phone: (808) 307-3926
 Email: Edgar_Ambrosio@notes.k12.hi.us
 Web: <http://www.video.k12.hi.us>

4.1.1 - Hawaii Association of Independent Schools

4.1.2 - HAIS Educational Access Award - 2019

For the timeframe of January 1, 2019 through December 31, 2019, HENC recommends that the Hawaii Association of Independent Schools be awarded \$107,431.51 to complete its core programming activities during the 2019 plan year. In addition, HAIS will receive an additional \$90,000 for the Hawaii Schools Digital Media grants during the 2019-20 school year. Funds that were awarded in previous years but not distributed due to a low number of applications for the HSDM grants will be added to the 2019 award in order to bring the total amount of grants available for award to at least \$100,000 in the 2019/20 year.

4.1.3 - HAIS Project Description - 2019

HAIS advocates on behalf of independent education in Hawaii and participates actively in the educational dialogue of the broader community on all islands and nationally. In addition, HAIS facilitates collaborative efforts among its member schools and public schools on issues of mutual concern, as well as providing partnerships to address shared needs. The 2019 plan year award will allow for a primary level of core services for its project in support of the Governor's Early Learning Initiative. The objective of this project is to produce videos that provide professional development for early learning educators in the areas of need identified by the Hawaii Department of Human Services.

4.1.4 - HAIS Goals and Objectives - 2019

The Governor of Hawaii has set a long-term goal of providing universal preschool for all Hawaii families within ten years. There is currently a shortage of both facilities and trained personnel to implement this initiative. The HAIS Early Learning Committee has identified key professional development needs for early learning educators in both the private and public sector, and HAIS will devote its HENC funds over the next several years to providing videos that will meet some of this professional development need.

Projected HAIS programming for 2019 includes 10 videos:

- **Early Learning Professional Development (8 Videos)**

The HAIS Early Learning Committee will work with the Hawaii State Department of Human Services to identify those areas most in need of additional training resources for currently employed early learning educators, and then develop appropriate video resources to meet these needs.

- **Schools of the Future Conference, October 2019 (2 Videos)**

The Schools of the Future Conference is the largest conference for educators in Hawai'i. The conference brings in speakers from across the nation and the globe to share best practices in teaching and learning. The conference has also been a platform for administrators, teachers, and students from across the state to share their learning experiences, projects, programs and best practices with their peers. This year, two breakout sessions presented by a combination of local and national speakers will be filmed. With over 80 speakers to choose from, filming these sessions will allow educators to view sessions they were unable to attend or to recap and share a session they did attend.

4.1.5 - HAIS Framework for Measure - 2019

The following benchmarks will be used to monitor progress, report and to evaluate the activities of HAIS during plan year 2019:

- Produce ten programs as described in Section 4.1.4 of this plan;
- Continue to identify additional programs of relevant educational programming from local keynote speakers and educational conferences as seen relevant to independent school's mission; and,
- Provide continuing management, financial and administrative support for the ongoing development of the grants for the Hawaii Schools Digital Media initiative.

4.1.6 – HAIS Reports and Feedback - 2019

At the mid-point and end of the funding period, HAIS will submit information and a summary of its programming series. These reports will include feedback and a list all of the programs produced by HAIS. This information will be due to HENC for the mid-year report no later than June 15, 2019 and for the annual report by January 15, 2020.

4.1.7 - HAIS Single Point of Contact – 2018-19

The following individual will act as the primary contact for this award:

Hawaii Association of Independent Schools
Deanna D'Olier, Director of Programs & Services
200 North Vineyard Blvd., Suite 401
Honolulu, Hawaii 96817

Phone: (808) 973-1533
Email: ddolier@hais.us
Web: <http://www.hais.us>

4.2.1 - University of Hawaii

4.2.2 - UH Educational Access Award – 2019

For the timeframe of January 1, 2019 through December 31, 2019, HENC recommends that the University of Hawaii be awarded \$782,717.50 for core programming activities provided through the Oahu Educational Access cable channels.

4.2.3 - UH Project Description - 2019

This 2019 UH Educational Access proposal is again composed of a system-wide collaboration among multiple campuses of the University of Hawaii system. The award will provide for the continuation of the delivery of an Associate of Arts (AA) degree made available by employing the resources of EA cable, the Internet, and interactive TV.

The overall focus and ongoing direction for the 2019 University of Hawaii EA award is a continuation in the development and improvement upon previous years' access plans. Funding for this project will allow for further refinement toward the continuous availability of credit courses necessary for the completion of an AA degree. Today students can fulfill a significant portion of their education requirements by using the tools of distance education that are currently available to

the majority of residents.

Funding from this award provides only for support of faculty during the “development” of each video course; no EA funds are allocated for the actual delivery of the cable programming courses. The University will continue to provide its media production facilities, studios, the faculty salaries for the delivery of the courses, remote camera equipment, student help-desk functions, student training and assistance, and the support of the UH statewide distance learning infrastructure.

A complete list of all University of Hawaii system distance learning classes can be found at: <http://www.hawaii.edu/dl/courses/>

A complete schedule of UH cable programming can be found at: <http://www.hawaii.edu/dlus/cable/prmg.html>

4.2.4 - UH Goals and Objectives - 2019

The University of Hawaii endeavors to provide all qualified people in Hawaii with equal opportunity to a quality college and university education. Cablecast, expanded academic technologies and distributed learning tools allow the UH to extend its reach beyond the traditional limitation of an institutional classroom and expand access to higher education across the State.

In support of the above mission the primary goals of this EA award are to: continue to provide a broad range of programming (which corresponds to course work) that allows students to advance toward an AA degree; identify and program other credit courses of high demand; develop programs for community training and workforce development in areas of high demand; and, extend outreach programming to help students identify, understand and achieve their educational goals.

Specifically, the funds received from this award have been and will continue to be used in the following five areas:

- Developing and offering credit courses which apply towards the Associate of Arts degree (this includes the on-going development of new courses, as well as the revision of previously produced courses to keep content and delivery fresh and relevant);
- Identifying, developing and offering programs of high demand for training and workforce development which capitalizes on student needs and the expertise of the faculty throughout the University system;
- Staff and maintain playback facility for three Educational Access cable channels and the associated video on demand channels allocated to education;
- 24x7 infrastructure requirements for the continual cablecast of all programs (except noted maintenance downtimes found in Appendix 2); and,
- Provide on-going opportunities for informational and other non-credit programming support for educational videos intended for the general public.

Additionally, the UH will continue to provide support to complement Hawaii's unique educational needs. In the spirit of cooperation, the UH will make available its facilities and staff (on a space and personnel available basis) to support programming for HENC identified initiatives and accredited educational member entities.

This award will provide for the uninterrupted delivery of course work needed for an Associate of

Arts degree. Such a degree is made possible through a UH system-wide collaboration that employs all resources of distance learning including Educational Access cable.

Stable funding for this project has provided for ongoing benefits to the public by supporting the Associate of Arts degree offered by the UH community colleges as well as other community programming of high demand. Four broad examples of the types of public benefits from this award include: transferability of coursework to a baccalaureate granting institution; opportunities for occupational growth, training and skill upgrades; improved earning potential for the learner (and higher tax revenues to the State); and, occasion for enjoyment and personal enrichment.

In return, the University will continue to provide cable playback functions, media production facilities, faculty development (essential for delivery of distance learning courses) as well as student services necessary to support a statewide distance learning infrastructure.

4.2.5 - UH Framework for Measure - 2019

The following benchmarks will be used to monitor progress, report and to evaluate the activities of UH during plan year 2019:

For the plan year 2019 UH will provide further refinement of the continuous availability of credit courses necessary for the completion of an Associate of Arts degree. During the plan year UH plans to:

- Produce two to three new credit courses or equivalent during 2019.
- Revise four to six previously produced credit courses during 2019.
- Provide approximately 15 credit courses, one "informal" program and related 24x7 cable programming each semester of the academic year.
- Continue to update the AA degree program for distance learning.
- Provide for support services (ex. programming to support study skills, test and note taking, help desk functions) for students working toward their AA degree.

During 2019 the University of Hawaii will continue to provide Educational Access services on the statewide Video on Demand (VOD) channel. This channel can be found on Oceanic 358. This channel has proven to be an attractive venue for access to educational programming that is irrespective of the student and public subscribers time.

4.2.6 - UH Reports & Feedback - 2019

The University of Hawaii will supply data relating to its core programming on its standard progress report template at the close of each semester. In addition to the hours of programming, UH will also provide an annual list of all programs by title and by category. This information will be due to HENC for the mid-year report no later than June 15, 2019 and for the annual report by January 15, 2020.

4.2.7 - UH Single Point of Contact - 2019

The following individual will act as the primary contact for this project:

University of Hawaii
Hae Okimoto, PhD
Director, Academic Technologies
Information Technology Services

2520 Correa Road
Honolulu, Hawaii 96822

Phone: (808) 956-3504
Fax: (808) 956-9966
Email: hae@hawaii.edu
Web: <http://www.hawaii.edu/dl/>

5.0.0 - Summary

This document constitutes the consolidated plan for Oahu Educational Access cable activities for the plan year 2019. Collectively this EA plan allocates \$1,674,740.20 for programming activities for cablecasts on Channels 354, 355, 356 and 358.

This plan is believed to be in full compliance with the terms of the Educational Access Agreement signed in 1998. If this is not found to be the case the Senior HENC Program Coordinator, upon request, will attempt to resolve any issues, concerns or conflicts with ‘Olelo and the Department of Commerce and Consumer Affairs (DCCA) relating to the matters covered in this document.

The following individual is the primary contact for this report:

Philip J. Bossert, Ph.D.
Senior HENC Program Coordinator
Hawaii Educational Networking Consortium
2520 Correa Road, 6th Floor
Honolulu, Hawaii 96822

Phone: (808) 203-9097
Fax: (808) 956-5025
Email: bossert@hawaii.edu

Appendix 1

Sample Educational Access Progress Report Templates

Attachment A - Hawaii State Department of Education

Attachment B - University of Hawaii

HDOE 2019 Educational Access Progress Report

Name of Grantee: _____

Contact Person: _____

Dates Covered in this Report: _____

UNITS OF MEASURE	Spring Semester	Summer & Fall Semester	Year to Date
Number of hours of local programming			
Number of hours of credit courses <input type="checkbox"/> Live <input type="checkbox"/> Taped delayed <input type="checkbox"/> Rebroadcast			
Number of hours of non-credit programs <input type="checkbox"/> Live <input type="checkbox"/> Taped delayed <input type="checkbox"/> Rebroadcast			
Number of hours of educational programming From non HDOE Institutions <input type="checkbox"/> Live <input type="checkbox"/> Taped delayed <input type="checkbox"/> Rebroadcast			
Number of students enrolled/using programs			

Significant achievements (qualitative on separate sheet)

List of Programming by Category (on separate sheet)

UH 2019 Educational Access Progress Report

Name of Grantee: _____
 Contact Person: _____

Grant Dates: _____
 Dates Covered in this Report: _____

UNITS OF MEASURE	Spring Semester	Summer & Fall Semester	Year to Date
Number of hours of credit courses • locally produced • purchased/ produced elsewhere • live • tape delayed • rebroadcast			
Number of hours of non-credit programs • locally produced • purchased/ produced elsewhere • live • tape delayed • rebroadcast			
Number of hours of informational programs • locally produced • purchased/ produced elsewhere • live • tape delayed • rebroadcast			
Number of credit courses			
Number of non-credit programs			
Number of students enrolled in credit courses			

Significant Achievements

List of Programming by Category

Appendix 2

UHTV CHANNEL 355 - Times of UHTV Transmission

The following dates exclude the UH's annual technical maintenance downtimes (see below for further details regarding downtime dates). The proposed UHTV hours include:

Spring & Summer Semesters 2019

Sunday-Saturday

January 9 to August 12, 2019

24 hours/day

Fall Semester 2019

Sunday-Saturday

August 21 to December 8, 2019

24 hours/day

Annual Technical Maintenance Downtime (No UHTV Programming)

Each year the UH regularly brings their system down for maintenance. These downtimes occur twice a year: 1) from the end of Summer session to the beginning of Fall semester, and, 2) from the end of Fall semester to the beginning of Spring semester. Depending on the academic year the exact dates of these downtimes vary, however they generally occur in the same months of August and December.

During the following defined maintenance downtime, the UH will not provide any UHTV programming to the UHTV Channel. The dates of the annual technical maintenance downtimes include:

Spring & Summer Semesters 2019

January 1 to January 8, 2019

Fall Semester 2019

August 13 to August 20, 2019

December 9 to December 31, 2019

Appendix 3

TEACH CHANNEL 356 - Times of HDOE Transmission

The TEACH channel plans to provide EA programming on a 24x7 basis during 2018

. This will include providing programming during all official State holidays.

A 24x7 signal is being provided 365 days of the year on Oahu and is also being sent to all of the Neighbor Island cable access centers for use on their K-12 Educational Access channel as defined by each PEG entity.

Annual Technical Maintenance

There are currently no scheduled maintenance windows for Channel 356 during 2019.

As is always the case the Video Production Branch will always consider proposals to amend its schedule if they are deemed in the best interest of PEG access.