

#### BOARD OF SUPERVISORS

December 8, 2025

Honorable Board of Supervisors County of Alameda 1221 Oak Street, Suite 536 Oakland, CA 94612

Re: INFORMATIONAL ITEM: Update from November 6, 2025 Alameda County Together for All Ad Hoc Committee Meeting on Update on Impacts of Federal Administration Policies and Budgets on Alameda County Asian Communities & Recommendations to Address Impact

#### Dear Board Members:

At the November 6, 2025 Alameda County Together For All (ACT for All) Ad Hoc Committee meeting, the committee heard important updates and recommendations regarding the impacts of the Federal Administration's policies and budgets on Alameda County communities, specifically on AAPI communities in Alameda County. The committee, which consists of myself and Supervisor Elisa Márquez, is sharing this information with the full Board and the public to help inform our ongoing efforts and future actions to protect our communities and provide safety net services; in particular, there was an important focus on understanding the efforts to support Southeast Asian refugees and immigrants facing deportation.

Between January and July 2025, 18% of ICE arrests in our region involved people from AAPI countries, including many Asian and Southeast Asian immigrants and refugees who have final deportation orders and face a high risk of arrest at upcoming ICE check-ins; some are even targeted for deportation to third countries because they are effectively stateless. Alameda County communities, through the **Pardon Refugees Campaign**, continue to advocate for pending pardon applications that would prevent the separation of long-established community members, an effort made even more urgent after Memorial Day weekend, when the nation saw the highest number of Southeast Asian deportations ever recorded, underscoring the long-term failures of U.S. resettlement policies and the school-to-prison-to-deportation pipeline. Southeast Asian

individuals remain 3 to 5 times more likely than other immigrant groups to be deported due to old convictions, with these cases reflecting a broader national crisis affecting Southeast Asian refugee communities while also uniting youth and elders in healing, leadership, and collective advocacy. The current Federal Administration is significantly expanding deportation strategies against Southeast Asian refugees by:

- Reinterpreting decades-old repatriation agreements to remove long-standing protections,
- Increasing deportations for old convictions, which have already been resolved,
- Employing ICE tactics that circumvent and violate due process,
- Pressuring foreign governments to accept deportees through diplomatic and economic leverage, and
- Prompting widespread resistance from legal advocates and community organizations alike.

These policies are disproportionately harming refugees who arrived as children, who have served their time, and who are now integral, contributing members of our communities and our society. Below are brief summaries from community partner organizations who presented at the November ACT for All meeting and attached are their presentations.

#### **Asian Health Services**

Asian Health Services continues to deliver holistic, linguistically appropriate healthcare and Know Your Rights education for API communities, including a dedicated Community Healing Unit that offers mental health interventions, lay counseling, resource navigation, and holistic healing for individuals and families impacted by hate, violence, deportation, and xenophobia.

- Holistic Care Unit: HCU provides lay counseling and mental health support, acupuncture, resource navigation, emergency financial aid, food deliveries, support groups, and more
- Fast Access: Victims receive access to lay counseling within 48 hours of case assignment, greatly reducing wait times

#### **Center for Empowering Refugees & Immigrants (CERI)**

CERI (Center for Empowering Refugees & Immigrants) now provides culturally grounded, trauma-informed services to more than 1,200 refugees and immigrants annually across eight communities. CERI is currently supporting 47 clients with active deportation orders, 110 individuals including family members who are 3 to 5 times more likely than other immigrant groups to be deported due to old criminal convictions, with some even targeted for removal to third countries because they are effectively stateless.

#### **Asian Prisoner Support Committee**

Asian Prisoner Support Committee (APSC) provides direct support to Asian and Pacific Islander (API) prisoners and raises awareness about the growing number of APIs being imprisoned,

detained, and deported.

#### **New Light Wellness**

New Light Wellness, supports Southeast Asian families impacted by deportation through healing, reunification, and culturally rooted care, and is expanding programming for impacted leaders and building a presence in Cambodia.

#### **API Legal Outreach (APILO)**

API Legal Outreach (APILO) works to break the cycle of violence against women, youth and seniors, to advocate for the rights of immigrants and those with disabilities, to promote the dignity and independence of seniors and advocate for basic rights, such as affordable housing and the rights of tenants.

For additional information, please refer to:

- Video of the November ACT for All meeting: https://alamedacounty.granicus.com/player/clip/9911?view\_id=2&redirect=true
- More information about the ACT for All meetings since February 2025: https://district5.alamedacountyca.gov/actforall/
- November meeting presentations and information: <u>ACT for All November 2025</u> <u>Handouts.pdf</u>

The impact of federal policies and budgets on Alameda County residents is severe and getting worse as the federal administration continues to arrest, detain, and deport individuals, and separate families. ACT for All will closely monitor the situation and keep our Board informed. We thank our Board for its investment in our immigrant communities.

Respectfully submitted,

Nille 7 Bar

Nikki Fortunato Bas, Supervisor

Alameda County Board of Supervisors

Fifth District

Attachment: ACT for All November 2025 Handouts.pdf

#### **Center for Empowering Refugees and Immigrants**



#### **Care Coordination**

- Interpretation/translation
- Systems navigation
- Accompaniment to appointments
- Enrollment into public service programs
- Referrals

#### **Arts & Culture**

- Cultural celebrations and rituals
- Community excursions and camping trips
- · Stories of Home
- Cultural foods at every gathering

#### **Mental Health Care**

- · Individual & family counseling
- Support Groups
- Psychiatric Clinic
- Wellness Groups
- · Clinical intern training program

#### Youth Leadership

mental health care that is holistic, culturally rooted, intergenerational, and justice-oriented.

- Dance troupe
- Weekly groups: All About Love, Leadership & Advocacy
- 4-week youth summer camp

1200

individuals served annually

languages & dialects spoken by staff

90%

of staff are immigrants & refugees

#### Community Leadership & Advocacy

- Voter education
- Census outreach

FY24-25

through outreach

1916 therapy sessions

295 group participants

30 leaders trained

Over 100 youth served

15,000+ people engaged

387 Medi-Cal enrollments

- Coalitions, campaigns, and direct actions for anti-deportation, prevention and early intervention, anti Asian hate, etc.
- Training grassroots leaders



Center for Empowering Refugees & Immigrants

www.cerieastbay.org
development@cerieastbay.org

#### **UNBREAKABLE ROOTS**

#### TRAUMA HEALING & COMMUNITY SUPPORT



#### **BACKGROUND**

In 2016, when the deportation of Southeast Asian people rose by 279% under the Trump administration, CERI mobilized to protect our communities. Cambodian community leader Kanley Souet-Pich led the way, organizing an astounding campaign that successfully stopped her husband's deportation. She brought together her family, our organization, and countless community members who had never organized before, sparking the growth of CERI's work with the legal advocacy community. Kanley is now a CERI Organizer helping to support our community members facing removal, and caring for those facing the oppression of these systems. Through organizing in connection with our legal partners, 50 people have been freed from detention or pardoned.



Community support and collective prayer for a community member's ICE Check-In in October 2024, led by Tsuru for Solidarity



Holiday card signing for community members who are currently detained or incarcerated co-hosted with APSC

CERI's added contribution is that we simultaneously tend to the mental health needs, trauma, and life needs of community members being targeted for deportation, criminalization, and incarceration so that they can sustain their fight for freedom. This unmet need to connect mental health care with legal advocacy was articulated by our communities and organizing coalitions, and we have moved to meet it.

In the current political moment, CERI members and clients are facing unprecedented scrutiny and attacks. We are responding with our Unbreakable Roots program.

#### **Mental Health & Care Coordination**

Unbreakable Roots provides mental health care including support groups, 1-on-1 counseling, arts and drama therapy. Support focuses on creating strong community groups, so that Southeast Asian communities confronting deportation support each other to heal, organizing and mobilize for collective liberation. CERI Care managers connect families to housing, food, legal services, etc. and provide direct financial aid.

#### **Community Healing**

The trauma of deportation and incarceration impacts not only the individual, but also ripples out to the entire community. In addition to 1-on-1 therapy sessions, we offer weekly community support groups to help care for impacted families and those with specific needs:

- Blossoming Women's Group: supporting the experiences of mothers, wives, and sisters of impacted community members.
- Holding Sotha Group: addressing complex mental health needs for community members impacted by the carceral system.

#### **Mobilizations Against Deportation**

The CERI community organizes to support each other's rights and freedoms by supporting leaders to:

- Pack the Court: gathering a critical mass during court hearings.
- Protest: raising our voices in front of the ICE building for ICE check ins and the Sacramento Capitol building to pardon applicants.
- Amplify Youth Voice: engaging our young people to participate at rallies, learn from elders, and get trained in organizing skills.
- Support those on the inside: with emergency financial support, parole packet preparation, letters of reference, and referrals to legal organizations.

#### **Legal Support**

Finding trustworthy legal advocacy is important to our community. We refer community to trusted, culturally-sensitive legal service providers who understand our communities.

Our care managers are on-call 24/7 to rally the community and accompany those who need immediate support.



"Know Your Rights" workshop on voting, presented to our community by Asian Law Caucus in October 2024

#### **Participatory Defense**

When loved ones get caught in the system, we must organize to get them out. While a legal strategy is important, and defined by legal service providers, there is so much that we as a community can do to get people home. However, it requires a deep level of experience, skill, and trust to successfully navigate the complicated court systems together.

Taking our cues from incarcerated leaders who have been expertly fighting their cases for decades, we have developed CERI's Participatory Defense Model to provide our community members with support with the trauma of being incarcerated. Distinct from a direct service model (where individuals work alone with a case manager), Participatory Defense means we work as a group to develop the skills, knowledge, relationships, and internal healing needed to advocate for ourselves and for each other.

#### **Coalition Organizing**

We work alongside other collectives organizing for the freedom of immigrant and refugee communities. Some of our coalition partners include the Asian Law Caucus, Asian Prisoners Support Committee, the Southeast Asian Refugee Action Center, and Kites to Southeast Asia Coalition. Efforts we're currently engaged in:

- Southeast Asian Deportation Relief Act
- ICE out of CA
- Southeast Asian Relief & Responsibility (SEARR) Campaign
- Stanford Immigrants' Rights Clinic
- #PardonRefugees Campaign

#### 2026 Goals

100+	impacted individuals receiving 1-on-1 therapy and/or group support
80	impacted individuals receiving intensive case management
200+	community members and allies rallying at Deportation Defense Actions
10	accompaniments per month to court appointments
15	Know Your Rights trainings
100+	Pardon applications submitted

#### **Contact Us**

For more information or to get involved, please reach out to the Development Director:

#### **Danielle Spoor**

danielle.spoor@cerieastbay.org

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Coalition partners gather in Sacramento in support of the #PardonRefugees Campaign in Sacramento, to fight for pardons for Southeast Asian refugees and immigrants facing deportation (Aug 2025)

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### "With sincere and enduring care, trauma can become integrated as power."

- J Fu, CERI Mental Health Specialist



#### **Community Needs**

- **Immigration documentation support:** FOIA requests, naturalization certificate copies, and help completing applications and declarations.
- **Post-conviction relief & pardon support:** Critical for those at risk of detention or deportation and referrals to legal consultations.
- **Safety planning:** For individuals and families facing detention, ICE contact, or deportation risks.
- Support for deported community members abroad: Mental health support, financial assistance, and digital access.

#### <u>Impact</u>

#### • Care Package Program

- Supported 90 deported API individuals across 7 countries (Cambodia, Vietnam, Philippines, China, Laos, Tonga, Samoa).
- Provided essential goods, medicine, hygiene supplies, and digital tools to increase economic opportunity.
- Created a cross-border communication network allowing APSC to track conditions, respond to emergencies, and reduce isolation.
- The program shifted from emergency relief to long-term reentry and reintegration support abroad.

#### Community And Reentry Empowerment (CARE) Support Group

- Participants witness their communities being targeted or faced with threats of detention or permanent separation, CARE offers a compassionate environment where these experiences can be processed collectively-rather than in isolation.
- Members help lead campaigns for pardon relief and post-conviction support—key immigration protection strategies.

#### • Community Impact Fellowship (CIF)

 Fellows—many with immigration vulnerabilities—complete community projects supporting deported individuals, legal aid referrals, and resource development.

#### <u>Gaps</u>

Limited reentry support for detainees

- Limited access to legal resources
- Program growth limited by funding and staffing

#### **Opportunities**

- Strengthen partnerships with immigration legal providers
- Educate directly impacted members to support with safety planning, case support and family needs

#### **Stories**

- Paula\*\* is a Cambodian immigrant who arrived in the US at the age of 2, alongside her
  mother and sister, seeking refuge to flee the Khmer Rouge. She is a mother of six and a
  new grandmother, yet she faces the heartbreak of being separated from her family.
- During her incarceration, APSC provided her with unwavering support and helped plan her reintegration. Upon her release she was transferred directly to the Northwest Detention Facility in Tacoma, WA, where she has spent more time in detention than her original prison sentence. Even while detained, she continued to receive vital assistance from APSC as she fought for her freedom and her opportunity to remain with her family here in the United States. With no living relatives in Cambodia, her only family now resides in the US-her beloved children and granddaughter.
- Despite the dehumanizing conditions of the detention center, APSC did our best to empower her. We encouraged her to stay strong and focused as she prepared for her immigration hearing. We connected her to our partner organization to have a mental health evaluation submitted on her behalf. We provided emotional support to prepare her mentally and emotionally as she will be sharing traumatic experiences in her life. We worked alongside her in writing her declaration and relapse prevention plans, and secured placements in transitional programs in CA. We coordinated with partner and local organizations in Tacoma to offer legal assistance and assist in the intricate post-conviction relief process across states.
- Throughout her detention, our consistent peer support included regular calls and electronic messages, financial assistance for basic needs and wellness check-ins with her and her family. The harsh conditions at the detention facility weighed heavily on her, but she showed resilience, refusing to give up despite the challenges of distance, limited legal resources, and capacity constraints faced by advocates. We ensured she remained supported, informed, and connected.
- Tragically, in early November 2025, she was transferred to South Louisiana Detention Center due to Tacoma reaching its capacity. This unexpected transfer, occurring while her appeal was pending, brought a new levels of anxiety and hopelessness to her situation. Upon arrival in Louisiana, she faced alarming conditions, no access to basic necessities-no cup to drink from nor hygiene products during her menstrual cycle. We reached out to our partner organization to connect us to a local immigrant advocate group in Basille, LA.
- Facing such inhuman conditions, she made the painful decision to withdraw her appeal and agreed to sign her removal papers to Cambodia. The trauma she endured during her detention and subsequent transfer has left deep scars, forcing her to surrender her only remaining family ties and return to a country where she has no connections, no understanding of the language and culture, and where she will be perceived as an outsider and alone in a country she does not belong to.
- Now, we are in the early stages of preparing for her departure to Cambodia. It is
  heartbreaking to witness all her struggles and fight to remain for her family has resulted
  in family separation. As she prepares her departure, she is instructed by DHS to acquire
  the following approved items: 1 set of undergarments, a shirt and a pair of pants, a pair
  of socks, a pair of shoes, a duffle bag and a cellphone with a charger and if she has

- items not in the approved list, the whole package will be sent back at will be deducted from her account. She will have no hygiene products, no food, no extra clothing to change with, and nothing to support her as she returns to a country she barely knows.
- As we navigate these next steps, we remain committed to supporting her and advocating for her dignity and humanity.
- Henry\*\* has been a client of APSC Reentry Program since he returned to the
  community in 2024. With our support, he was able to face the challenges of reintegration
  head on, obtaining necessary documents to get his life on track, securing meaningful
  employment, and building valuable connections in the community. He embraced a quiet,
  humble life, devoted to caring for his elderly parents and other family members and
  giving back to his community around him.
- However in June 2025, everything changed when he was called for an emergency check-in with ICE in San Francisco. This led to his detention, and a time filled with uncertainty. He does not have family ties in Vietnam. All his family and relatives are here in the US. His unwavering spirit, his family and community helped keep hope alive.
- Through our continued support and collaborative efforts between us, his coworkers and employer, community and legal assistance from Alameda/SF County, he was able to navigate the challenges of his detention and was released after six weeks, returning to his family with renewed determination.
- Since his release from detention, we remained committed to supporting him on his
  reentry, checking in with him weekly and connecting him to community resources for
  potential employment, and other assistance to help him in his reintegration. We are
  providing assistance in his pardon application and pursuing post conviction reliefs with
  help from legal advocates. Peer support has become essential in helping him navigate
  the complexities of his situation, especially given the challenges posed by his pending
  immigration case.
- He is required to check in annually every 3 months, a situation that brings significant stress not only to his health but to his elderly parents. The fear that looms over his family and the constant threat of deportation and permanent family separation. The hardships of this uncertainty are immeasurable but we stand firmly by his side and his family to provide him the stability and hope he deserves.

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New Light Wellness serves Southeast Asian communities impacted by deportation across borders and across seas by nurturing trust, collective healing, & reunification.

Elijah Chhum Executive Director & Cofounder elijah@newlightwellness.org

# 50TH ANNIVERSARY



Largest refugee resettlement program in US history where SE Asian refugees resettled in neighborhoods enduring structural violence and racism.



1.5 generation, the children born in war, genocide and refugee camps are most vulnerable to the school-to-prison-to-deportation pipeline.



Model minority myth pushes the issues of our community further in the margins and invisiblizes our suffering and stigmatizes those impacted by incarceration and deportation.

We are standing up against family separation and building our beloved community today, join us!

# ADVOCAG

### Direct Service

Connection to legal support
Rapid Response
ICE accompaniment
FOIA Request
Pardon Applications
Declaration support
Support Letter Template
Social Media Toolkit

### Wrap Around Care

Wellness Programs
Mental Health therapy
Life Coaching
Family support
Financial emergency funds
Participatory Defense Model

# SERVING THE BASE

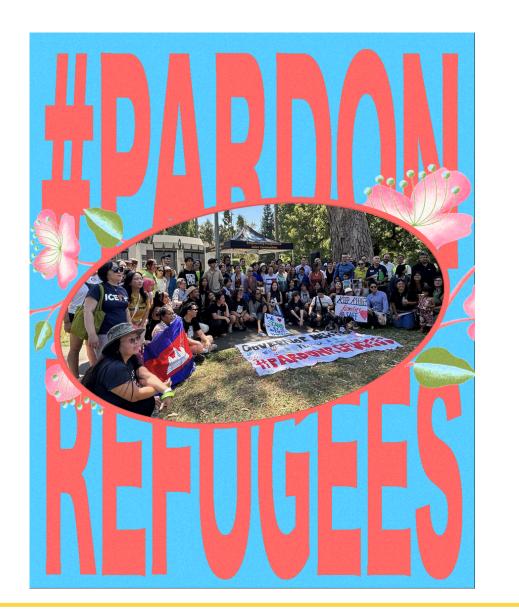
Advocacy and mental health goes hand-in-hand while serving our impacted Southeast Asian community members and while building our base.

We recognize with intergenerational trauma comes intergenerational wisdom













13

Coalition organization members and growing

32

Pardon
applications
uplifted to
pardon office

47

Statewide orgs & electeds endorsed letter 200

Intergenerational and multilingual attendees joined the peaceful vigil on August 21st



# TRANSNATIONAL MOVEMENT

#### Peer Support Groups

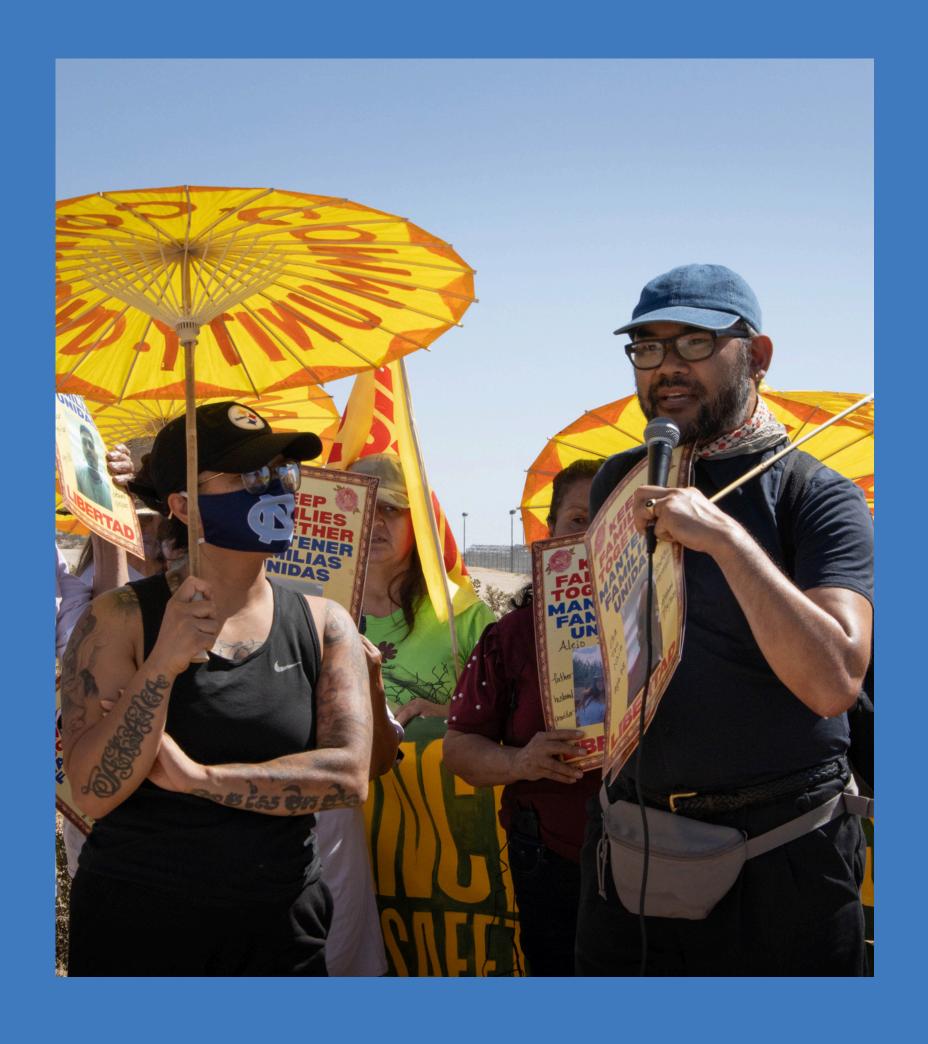
Wellness support groups to unpack intergenerational trauma and uplift communuty centered modalities

#### Piligrimage

Bringing US delegation and impacted leaders to Cambodia on freedom journey to learn, listen and share resources

#### Life Coaching

Connecting impacted leaders to life coaches to develop psychoeducation and wellness facilitation skills



# FEAR OF GOUNTRY DEPORTATION

SE Asian community members are being deported to Eswatini and South Sudan. There are impacted community members that Vietnam, Laos nor Cambodia will not recognize or accept as a citizen.

# STRATEGIES SHIFTED

In fear of retaliation, public campaigns have gone quiet. Building relationships with public defenders, District Attorneys, the Attorney General, the Governor's office, and elected officials are crucial to support with post conviction relief and other legal strategies if pardons are not a viable option.



# GAPS & OPPORTUNITIES

Community support: we want to do as much as we can as community organizers to support impacted individuals, their families and lawyers gather documents, request for records, and declarations.

Hotlines are working though we need more lawyers to be trained with the issues of SE Asian community members with prior convictions and who lost their status due to 1996 IIRIRA Act.

We need more immigration lawyers to be trained in filing Habeas Corpus, Stay of Removal, Motion to Reopen

We need more public defenders and district attorneys to support in Post Conviction Relief

If we continue to advocate quietly and through internal strategies, and there if there is real fear to go public, how can people in positions of power support us to keep our stories and struggle visible?

There is a need for more mental health and wellness services steeped in trauma informed care, cultural humility, with language access and centering the impacted individual and family's strengths.

#### **ABOUT US**

The mission of the Asian Prisoner Support Committee (APSC) is to provide direct support to Asian and Pacific Islander (API) prisoners and to raise awareness about the growing number of APIs being imprisoned, detained, and deported.

Since 2002, APSC has led programs in prisons, organized anti-deportation campaigns, provided resources to "lifers," and developed culturally relevant reentry programs. APSC grew out of the campaign to support the "San Quentin 3"—Eddy Zheng, Viet Mike Ngo, and Rico Riemedio. The San Quentin 3 advocated for Ethnic Studies at San Quentin and in retaliation by the prison administration—were sent to solitary confinement and transferred to different prisons. After spending months in solitary confinement (up to 11 months), Eddy, Mike, and Rico were released and eventually, all received parole (Eddy 2005, Rico 2007, Mike 2011).

For over a decade, APSC operated as an all-volunteer organization. In 2017, APSC hired its first paid staff employees and opened an office space in Oakland Chinatown. Today, APSC facilitates Ethnic Studies programs in prisons, provides community-based, culturally-grounded re-entry and care for community members returning home from incarceration, and organizes deportation defense campaigns and strategies.

#### **CONNECT WITH US**

Email: info@asianprisonersupport.org

Website:

www.asianprisonersupport.org

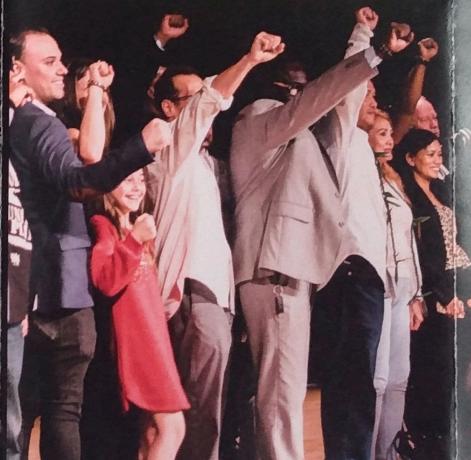
Mailing Address: P.O. Box 1031, Oakland, CA 94604

#### MORE ON OUR LINKTREE













### In-Prison Programming and Advocacy

R.O.O.T.S (Restoring Our Original True Selves) is the first prison program in the nation dedicated to Ethnic Studies and Asian-American Studies. It was first established within San Quentin State Prison.

With the collaboration of APSC staff, volunteers, and our incarcerated leadership team, R.O.O.T.S grounds in the framework of an Ethnic Studies curriculum to promote healing, connection across racial and ethnic identities, political consciousness, and culturally-grounded transformation for its participants.

APSC's mail correspondence program supports incarcerated individuals by offering:

- Support Letters: Assistance for parole board hearings, commutation applications, and 1170(d) petitions.
- Legal Referrals: Guidance for legal consultations and immigration issues.
- Re-entry Housing Resources
- Political Updates: Information on current immigration policies.
- · APSC inside-outside newsletter
- Holiday Cards

## Community-Based Reentry Support and Leadership Development

APSC's ROOTS 2 Re-entry and other re-entry programs provide culturally responsive care and support for individuals returning to their communities from incarceration. Our programs are led by our impacted leaders and offer direct services, mutual aid, peer-to-peer mentoring, and meaningful opportunities for community-building and connection.

COMMUNITY AND REENTRY EMPOWERMENT PROGRAM (C.A.R.E) builds leadership and community care among women, gender non-conforming, and transgender participants through virtual and in-person connection.

community impact fellowship (c.i.f) provides hands-on training for formerly incarcerated and system-impacted individuals interested in nonprofit work, social justice, and direct service provision. The program equips participants with practical skills, knowledge, and professional support.

care packages for Deportees provide essential items to 62 community members who have been deported across six countries. Rooted in community care, it offers tangible support during times of transition



### Deportation Defense Advocacy and Strategies

Rooted in the belief that families belong together, APSC supports community members in seeking deportation relief. Our approach includes direct support, defense planning, legal referrals, individual advocacy campaigns, and legislative action. We assist individuals navigating pardon applications, resentencing, vacatur motions, post-conviction relief, and other legal remedies.





#### About us

API Legal Outreach's commitment to advancing the rights of immigrants is rooted in providing vital legal services for the diverse immigrant communities of the Greater Bay Area. API Legal Outreach has long been committed to immigrants' rights and remains one of the few agencies providing direct legal services to immigrant victims of crime and their families. Our communities need more than just information about their rights: they need the expert legal representation that is critical to making those rights a reality.

API Legal Outreach works in collaboration with the San Francisco Immigrant Legal Defense Collaborative (SFILDC), Collaborative Resources for Immigrant Services on the Peninsula (CRISP), San Francisco Office of Civic Engagement & Immigrant Affairs (OCEIA), and the San Francisco Pathways to Citizenship Initiative (SFPCI)





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www.apilegal outreach.org

## Immigration & Naturalization



English\_08.04.21

## Legal Representation & Advocacy

- Naturalization/US Citizenship
- Asylum
- Removal/deportation defense T-Visa for survivors of human trafficking
- U-Visa for crime victims
- Special Immigrant Juvenile Status
- Deferred Action for Childhood Arrivals (DACA)
- Permanent Residency application and renewal
- Violence Against Women Act (VAWA) self-petitions
- Other immigration legal representation & advocacy

Legal intake line: (415) 567-6255 or (510) 251-2846

#### **Clinics & Workshops**

API Legal Outreach provides free legal counseling, referrals, and brief legal consultations. Please call our legal intake line to be scheduled at one of our clinics.

Call (415) 567-6255 or (510) 251-2846 to make an appointment.

In partnership with Asian American Bar Association of Northern California and API Council

#### **Multi-Lingual Services**

API Legal Outreach staff provide on- site culturally and linguistically appropriate services in the following languages:

- Cantonese
- Farsi
- Japanese
- Korean
- Mandarin
- Spanish
- Tagalog
- Taishanese
- Urdu
- Vietnamese

Interpreters for other languages can also be arranged