

MEMORANDUM

TO:	Clackamas County Board of County Commissioners (BCC)
FROM:	Rodney A. Cook, Director, Health, Housing & Human Services; Vahid Brown,
	Supportive Housing Services Program Manager
RE:	Supportive Housing Services FY 2022-2023 Quarter One Progress Report
DATE:	November 22, 2022

Request: Staff would like to provide its **quarterly progress report** to the BCC on the Clackamas County Supportive Housing Services (SHS) program. Information only, no decision needed.

Pursuant to its obligations under the Supportive Housing Services Intergovernmental Agreement, the county provides quarterly progress reports to the Metro SHS Regional Oversight Committee. The report detailing the SHS program's activities/outcomes in the first quarter of FY 2022-2023 is attached for your review. This memorandum is provided for informational purposes and staff is not seeking Board action.

Report Summary: The first quarter of this fiscal year was one of growth and transition. New investments and capacity building were at the forefront of the SHS Program's activities. Clackamas County initiated the first new services from the procurement conducted at the end of last fiscal year – the largest procurement of housing services in the county's history. Expansion of internal system capacity continued this quarter with the initiation of a new Lived Experience Advisory Committee along with further progress on joining the Built for Zero Initiative and the creation of a comprehensive by-name list for Clackamas County. In addition to this expansion of services and system capacity, the SHS Program also continued enhancing its internal capacity – nearly doubling the size of the housing services team this quarter alone.

This quarter the SHS program initiated additional housing and homeless services through a series of new contracts worth approximately \$4.2M. These contracts include the first to be executed from last year's procurement and are the first wave of new and expanded services laying the groundwork for the continued expansion of housing services in Clackamas County.

Accomplishments from this first quarter include:

- 49 Households (80) people placed into permanent supportive housing
- 104 Supported emergency/transitional shelter units
- Seven new or expanded services
- Approved to move into Phase 2 for Project Turnkey
- Began developing a new Lived Experience Committee

Healthy Families. Strong Communities. 2051 Kaen Road, Oregon City, OR 97045 • Phone (503) 650-5697 www.clackamas.us



Additional services will come online in the second quarter as the largest expansion of housing and homeless services in the history of Clackamas County continues. New shelter and case management services will be initiated along with the launch of the County's first ever contracted outreach and engagement services. Additional procurements are also being designed for the continued expansion of services throughout the fiscal year.

ATTACHMENTS:

Clackamas County Supportive Housing Services FY 2022-2023 Quarter One Report

SUPPORTIVE HOUSING SERVICES QUARTERLY REPORT

SUBMITTED BY (COUNTY):CLACKAMASFISCAL YEAR:2022-2023QUARTER:FIRST

SUPPORTIVE HOUSING SERVICES

QUARTERLY REPORT

Section 1. Data and data disaggregation

Data disclaimer:

The below figures reflect SHS funded programs only and do not reflect Clackamas County's systemwide statistics. As this is the first quarter report for Fiscal Year 2022-2023, only quarterly data is provided. Year to Date data will be provided alongside quarterly data beginning in the second quarter.

Section 1.A Housing Stability Outcomes: Placements & Preventions

Housing Placements By Intervention Type: Supportive Housing

# housing placements – supportive housing*	This Quarter (Year to Date)			
	#	%		
Total people	80			
Total households	49			
Race & Ethnicity				
Asian or Asian American				
Black, African American or African	1	1.3		
Hispanic or Latin(a)(o)(x)	4	5.0		
American Indian, Alaska Native or Indigenous	5	6.3		
Native Hawaiian or Pacific Islander				
White	70	87.5		
Non-Hispanic White (subset of White category)	63	78.8		
Client Doesn't Know				
Client Refused				
Data Not Collected				
Disability status				
	#	%		
Persons with disabilities	47	58.8		
Persons without disabilities	33	41.3		
Disability unreported				

Gender identity				
	#	%		
Male	39	48.8		
Female	41	51.3		
A gender that is not singularly 'Male' or 'Female'				
Transgender				
Questioning				
Client doesn't know				
Client refused				
Data not collected				

*Supportive housing = permanent supportive housing and other service-enriched housing for Population A such as transitional recovery housing

This quarter the SHS program began providing services at Tukwila Springs, the first development completed within Clackamas County that utilizes Metro Affordable Housing Bond funds. Supportive housing case management services are being provided to 36 units at this property. However, the above data is not inclusive of these placements yet as the service providers' staff continue to be trained in HMIS data entry practices. Permanent supportive housing placements at Tukwila Springs will be reflected in future quarters.

Housing Placements By Intervention Type: Rapid Re-Housing & Short-term Rent Assistance

Clackamas County provided rapid re-housing & short-term rent assistance through other funding streams this quarter, however SHS funding did not support any placements by this intervention type. Placements will be reported as the program continues to grow and rapid re-housing services are launched with SHS funding.

Housing Placements By Intervention Type: Other Permanent Housing Programs (if applicable)

Not Applicable – this quarter Clackamas County did not use SHS funding to fund other permanent housing programs.

Eviction and Homelessness Prevention

Clackamas County provided eviction and homelessness prevention support via other funding streams this quarter. The first contract using SHS funding for eviction and homelessness prevention programs was executed this quarter. While services were provided, data for the SHS funded program is not available this quarter but will be available in future reports.

Section 1.B Regional Long-Term Rent Assistance Program

The following data represents a subset of the above Housing Placements data. The Regional Long-term Rent Assistance Program (RLRA) primarily provides permanent supportive housing to SHS priority Population A clients (though RLRA is not strictly limited to PSH or Population A).

RLRA data is not additive to the data above. Housing placements shown below are duplicates of the placements shown in the data above. Please disaggregate data for the number of people leased up during the quarter and year to date.

Regional Long-term Rent Assistance		This Quarter (Year to Date)		
Quarterly Program Data	#	%		
Total people enrolled in the program*	247			
Total households enrolled in the program*	165			
Total people newly leased up	80			
Total households newly leased up	49			
Total number of RLRA vouchers issued**	7			
Race & Ethnicity				
	#	%		
Asian or Asian American				
Black, African American or African	1	1.3		
Hispanic or Latin(a)(o)(x)	4	5.0		
American Indian, Alaska Native or Indigenous	5	6.3		
Native Hawaiian or Pacific Islander				
White	70	87.5		
Non-Hispanic White (subset of White category)	63	78.8		
Client Doesn't Know				
Client Refused				
Data Not Collected				
Disability status				
	#	%		
Persons with disabilities	47	58.8		
Persons without disabilities	33	41.3		
Disability unreported				
Gender identity				
	#	%		
Male	39	48.8		
Female	41	51.3		
A gender that is not singularly 'Male' or 'Female'				
Transgender				
Questioning				
Client doesn't know				
Client refused				
Data not collected				

*People and households enrolled in the program is calculated as the total number of people and households actively leasing with RLRA as of the reporting period.

** Vouchers issued is the number issued during this reporting period, not overall. 227 Total vouchers have been issued to households through September 30, 2022.

This quarter service providers continued to work with a large group that were issued RLRA vouchers late last fiscal year, while the number of new vouchers issued slowed this quarter, placements into housing continued. The SHS program is expanding provider capacity to facilitate a new surge in voucher issuances and continues to speed up the rate of new permanent supportive housing placements.

Section 1.C Subset of Housing Placements and Preventions: Priority Population Disaggregation

The following is a **subset** of the above Housing Placements and Preventions data (all intervention types combined), which represents housing placements/preventions for SHS priority population A.

Population A Report	This Quarter (Year to Date)		
	#	%	
Population A: Total people placed into	70		
permanent housing			
Population A: Total households placed into	44		
permanent housing			
Race & Ethnicity			
	#	%	
Asian or Asian American			
Black, African American or African	1	1.4%	
Hispanic or Latin(a)(o)(x)	4	5.7%	
American Indian, Alaska Native or Indigenous	5	7.1%	
Native Hawaiian or Pacific Islander			
White	59	84.3%	
(Subset of White): Non-Hispanic White	55	78.6%	
Client Doesn't Know			
Client Refused			
Data Not Collected			
Disability status		·	
	#	%	
Persons with disabilities	43	61.4%	
Persons without disabilities	27	38.6%	
Disability unreported			
Gender identity			
	#	%	
Male	32	45.7%	
Female	38	54.3%	
A gender that is not singularly 'Male' or 'Female'			

Transgender	
Questioning	
Client doesn't know	
Client refused	
Data not collected	

The following is a **subset** of the above Housing Placements and Preventions data (all intervention types combined), which represents housing placements and preventions for SHS priority population B.

Population B Report		This Quarter (Year to Date)		
	#	%		
Population B: Total people placed into	10			
permanent housing				
Population B: Total households placed into	5			
permanent housing				
Race & Ethnicity	T			
	#	%		
Asian or Asian American				
Black, African American or African				
Hispanic or Latin(a)(o)(x)				
American Indian, Alaska Native or Indigenous				
Native Hawaiian or Pacific Islander				
White	10	100.0%		
(Subset of White): Non-Hispanic White	10	100.0%		
Client Doesn't Know				
Client Refused				
Data Not Collected				
Disability status				
	#	%		
Persons with disabilities	4	40.0%		
Persons without disabilities	6	60.0%		
Disability unreported				
Gender identity				
	#	%		
Male	7	70.0%		
Female	3	30.0%		
A gender that is not singularly 'Male' or 'Female'				
Transgender				
Questioning				
Client doesn't know				
Client refused				
Data not collected				

Section 1.D Other Data: Non-Housing Numeric Goals

This section shows progress to quantitative goals set in county annual work plans. Housing placement and prevention progress are already included in the above tables. This section includes goals such as shelter beds and outreach contacts and other quantitative goals that should be reported on a quarterly basis. This data in this section may differ county to county, and will differ year to year, as it aligns with goals set in county annual work plans.

All counties please complete the table below:

Goal Type	Your FY 22-23 Goal	Progress this Quarter
Supported Shelter Units	140 Units	104 Units

If applicable for quarterly reporting, other goals from your work plan, if applicable (e.g. people served in outreach, other quantitative goals)

Goal Type	Your FY 22-23 Goal	Progress this Quarter
Outreach	700 Households	0 Households

Most outreach services funded by the SHS program will initiate in the second quarter of this fiscal year. However, the Law Enforcement Assisted Diversion Program which the SHS program began funding this quarter includes a significant outreach component in their work. Outreach was conducted this quarter, but as their contract was also executed this quarter their staff were being trained on HMIS data entry practices. Outreach statistics will begin to be reported in the second quarter.

Section 2. Progress narrative

The first quarter of this fiscal year was one of growth and transition. New investments and capacity building were at the forefront of the SHS Program's activities. Clackamas County initiated the first new services from the procurement conducted at the end of last fiscal year – the largest procurement of housing services in the county's history. Expansion of internal system capacity continued this quarter with the initiation of a new Lived Experience Advisory Committee along with further progress on joining the Built for Zero Initiative and the creation of a comprehensive by-name list for Clackamas County. In addition to this expansion of services and system capacity, the SHS Program also continued enhancing its internal capacity – nearly doubling the size of the housing services team (HST) this quarter alone.

Clackamas County has historically provided housing and homeless services across several departments and divisions. This quarter the county reorganized these services, including the SHS program, into one organizational structure—the Housing and Community Development Division (HCDD)—to deliver

housing and homeless services in a more effective and efficient manner. This reorganization will help us build and support new partnerships and initiatives, launch comprehensive services for residents in need, and create a centralized structure for service providers to access county resources and technical expertise in an efficient, effective and coordinated manner.

New Investments and Service Provider Expansion/Capacity Building

This quarter the SHS program initiated additional housing and homeless services through a series of contracts worth approximately \$4.2M. These contracts include the first to be executed from last year's procurement and are the first wave of new and expanded services laying the groundwork for the continued expansion of housing services in Clackamas County. Additional services will come online in the second quarter as the largest expansion of housing and homeless services in the history of Clackamas County continues. New shelter and case management services will be initiated along with the launch of the County's first ever contracted outreach and engagement services.

Expenditures reported for this period are lower than actual funds obligated for services rendered during the period. This is due to several factors, including the regular lag in invoicing that occurs at the beginning of each fiscal year, service provider staff turnover that has slowed work and invoicing processes, and the consolidation of housing and homeless services (and related administrative functions) under Clackamas County's new Housing & Community Development Division. Related expenses will be reported in subsequent FY 2022-23 quarterly reporting and demonstrate the continued growth of Supportive Housing Services-funded programs in Clackamas County.

New and Expanded Services Launched This Quarter

<u>Tukwila Springs</u>: This property is the first development completed within Clackamas County that utilizes Metro Affordable Housing Bond funds. The 48-unit development includes 36 permanent supportive housing units and has onsite services funded by the SHS program. The Native American Rehabilitation Association is providing supportive housing case management and culturally specific services for Native American residents.

<u>Casa Esperanza</u>: This emergency shelter program, operated by Northwest Family Services, provides culturally specific shelter for female-identifying Latina(x) survivors, and their families, of domestic violence, sexual assault, and sex trafficking. Households staying at Casa Esperanza work with case managers to remove any barriers to services/housing, receive recovery support, and develop a plan for their future including assistance with housing, employment, and other needs. In addition to supporting ongoing shelter operations, SHS funding is enhancing shelter operations by providing support for repairs and renovation of aging infrastructure.

<u>Veterans Village</u>: This transitional shelter community is for adults experiencing homelessness who identify as veterans of the armed services of the United States. The village consists of 24 small housing structures that serve as sleeping pods with infrastructure capable of hosting up to 30 structures, in addition to two buildings for common facilities such as kitchens, showers and restrooms. Do Good Multnomah manages operations at the Village and provides ongoing case management for its residents.

Law Enforcement Assisted Diversion: This integrative service model program is managed through a partnership with Central City Concern, in collaboration with Clackamas County law enforcement agencies and the District Attorney's Office. Services divert households experiencing or at risk of experiencing homelessness from arrest and incarceration toward voluntary engagement in case management and housing services. This service model is an integrative approach to provide outreach and engagement, connections to stable housing, supportive housing stabilization services, and wraparound supports to program participants.

<u>Hotel/Motel Emergency Shelter Services</u>: The County has utilized local hotels and motels as emergency shelters since December, 2020. Last fiscal year, the SHS program utilized leveraged funding to support these programs. This quarter the SHS program expanded its role with these shelters and expanded the services provided to them with additional housing navigation supports dedicated to households residing in these shelters. This additional support will decrease average length of stay times and enable additional households to utilize these shelters.

<u>Shelter + Care Supportive Housing Case Management:</u> This program assists homeless or previously homeless households with disabilities, including those with complex behavioral and physical health challenges. Impact NW is providing comprehensive case management, housing retention, and eviction prevention services for households in the Housing Authority of Clackamas County's Shelter + Care program.

<u>Housing Authority Peer Support Services:</u> Ongoing peer support services provided by the Mental Health & Addiction Association of Oregon for residents in programs and properties managed by the Housing Authority of Clackamas County. Peer support specialists will identify and provide supportive services for residents in need, plan and coordinate community events for residents, create and implement resident initiatives, and assist residents with resource referrals and systems navigation.

Permanent Supportive Housing

This quarter the SHS program continued expanding its permanent supportive housing capacity with the addition of 49 new households (80 people), bringing the total number of households no longer experiencing homelessness and now living in permanent supportive housing since the start of the SHS program to 165 households (247 people). This does not yet include households living at Tukwila Springs as the service provider is currently being trained on HMIS data entry practices. This quarter, service providers continued to work with a large group that were issued RLRA vouchers and referred for permanent supportive housing late last fiscal year. As such, while the number of new vouchers issued slowed, placements into housing continued. The SHS program is currently expanding provider capacity for both housing navigation and supporting housing case management services to facilitate a new surge in voucher issuances and continue to speed up the rate of new permanent supporting housing placements.

Project Turnkey 2.0

This quarter Clackamas County applied for a grant to expand transitional shelter through Project Turnkey 2.0. This is a state-funded grant administered by the Oregon Community Foundation for the acquisition of new transitional shelters through the conversion of existing hotel or motel properties. Properties acquired through project Turnkey 2.0 are to later be converted into affordable housing for residents with low-incomes.

In September the county was informed that the application was approved to move onto Phase II of the review process – site selection and due diligence. The county is currently evaluating potential sites that can support a non-congregate transitional shelter with several dozen individual units. If the application and property acquisition is successful, ongoing shelter operations including onsite services and connections to permanent housing would be funded by the SHS program. This quarter the county began community engagement regarding this potential transitional shelter and outreach is continuing throughout the second quarter as the county carries out its due diligence work.

Culturally Specific Provider Expansion

Expanding culturally specific services was a primary goal of the County's Local Implementation Plan and FY 2022-2023 SHS Annual Work Plan. The Work Plan set a goal of supporting five culturally specific service providers by the end of this year. At the end of the first quarter, the SHS program was supporting three culturally specific providers with two more likely to come online in the second quarter.

This quarter the Native American Rehabilitation Association began providing culturally specific case management for Native American residents at Tukwila Springs on July 1st. SHS funding now supports culturally specific case management services for BIPOC, Latin(x), and Native American residents. In addition to these providers, the Casa Esperanza emergency shelter program provides culturally specific shelter services for Latina(x) residents. Expansion of culturally specific providers in the County's service provider network will remain a priority throughout the remainder of the year and beyond.

Internal Capacity Building

Expanding the Housing Services Team (HST) and the SHS program's infrastructure was a priority this quarter and will continue to be throughout this fiscal year. This quarter the HST significantly expanded, nearly doubling in size this quarter alone. Staff worked diligently to enhance the supporting infrastructure to better design programs and deliver services by designing a new Lived Experience Committee and furthering progress on developing a by-name list through the Built for Zero initiative.

Lived Experience Committee

Clackamas County values inclusive decision-making and ensuring participant and lived experience voice in all phases of housing services. The county's LIP and this year's Annual Work Plan made a commitment to expand the inclusive decision making infrastructure and processes which inform housing policy decisions. This quarter, Clackamas County began a pilot phase for the development of a new Lived Experience Advisory Committee. Two focus groups of people with lived experience of homelessness were convened to inform the HST program team about accessibility of services and the needs, gaps, and challenges they have or are facing.

Themes that emerged from focus group conversation included:

- Participation in this focus group was a freeing experience, felt good to talk about these experiences, like being part of a solution
- Needing low-barrier housing that does not require sobriety to get out of the cold/heat/elements
- People identified the need for a point person and central locations to help access and navigate housing services
- More is needed to meet basic hygiene needs for those experiencing unsheltered homelessness
- Negative messages from the community about experiencing homelessness impact feelings of self-worth, mental health, and ability to take the steps to access housing services.

In total, 18 people participated in the focus groups. A third focus group is planned, with the purposes of debriefing participation in the first focus group, receiving a report-back about themes collected and how the information will be used, gauging interest and identifying barriers to participating in a future on-going Lived Experience Advisory Committee. Participants were paid \$150 for the 2-hour focus group and will receive another \$150 for participation in the debrief session.

Lessons learned from this pilot phase of establishing a Lived Experience Advisory Committee present exciting opportunities for future engagement.

Creation of a By-Name List and Built for Zero

This quarter the SHS program continued progress towards a fully-functioning by-name list with regular case conferencing. Guided by the national Built for Zero Initiative, nine staff members continue to meet weekly. This quarter, the HST was able to establish an initial by-name-list that was used to submit baseline reporting to Built for Zero for the first time. In-depth data clean-up is underway. As useable and updated data has been a challenge to implementation in the past, this work represents exciting steps that were made possible by the addition of Data and Program team staff on the HST.

Housing Services Team Expansion

Expanding the County's internal capacity to implement and coordinate the influx of resources from the SHS measure is one of the program's priority investments and a keep objective in this year's Annual Work Plan. During the quarter, the HST was able to add three new Program Coordinators to the Program team:

- Outreach & Engagement and Safety Off the Streets Program Coordinator
- Housing Navigation Program Coordinator
- Supportive Housing Case Management/Housing Retention Program Coordinator

These three coordinators were hired in July and have been working hard to establish relationships with and identify support needs from service providers. They have been participating in monthly check-in

meetings with each contracted agency to provide guidance and oversight. The coordinators are adding energy, creativity, and technical support to many initiatives/systems including Built for Zero, Housing First Aid, and Coordinated Entry.

The HST also added two additional contracts analysts to enhance the operating capacity of the contracts team. This additional capacity will allow the HST to more rapidly execute contracts for new services, contract amendments for expanded services, and various agreements to partner and coordinate with other service systems and government entities.

Hiring new staff is both a challenge and opportunity. The up-front investment required to train and properly on-board new staff can temporarily slow progress. The addition of these staff will greatly enhance the internal capacity of the SHS program and provide additional technical assistance to the program's contracted partners, particularly grassroots providers once they come online later this year. The HST will continue expanding throughout this fiscal year in order to reach full operating capacity and support a fully implemented supporting housing services program.

Section 3. Financial Reporting

Metro Supportive Housing Services Financial Report for Quarterly Progress Report (IGA 7.1.2) and Annual Program Report (IGA 7.1.1) Clackamas County FY 2022-2023

	Annual Budget	Q1 Actuals	Q2 Actuals	Q3 Actuals	Q4 Actuals	Total YTD	Variance	% of	Comments
_						Actuals	Under / (Over)	Budget	
Metro SHS Resources		10.010.115					(0.710.115)	127%	
Beginning Fund Balance	32,200,000	40,912,115		ļ		40,912,115	(8,712,115)	· · · · · · · · · · · · · · · · · · ·	
Aetro SHS Program Funds		9,618,954				9,618,954	(9,618,954)	N/A	
nterest Earnings	-					-		N/A	
nsert addt'l lines as necessary						-		N/A	
Total Metro SHS Resources	32,200,000	50,531,069	-	-	-	50,531,069	(18,331,069)	157%	
Netro SHS Requirements									
Program Costs									
Activity Costs									
helter, Outreach and Safety on/off the	6,855,667					-	6,855,667	0%	
treet									
hort-term Housing Assistance	1,670,262					-	1,670,262	0%	
Permanent supportive housing services	6,221,600					-	6,221,600	0%	
ong-term Rent Assistance	7,400,270	615,916				615,916	6,784,354	8%	Includes cost for RLRA staff conducting RLRA progra operations in addition to direct rental assistance
Other supportive services	591,937					-	591,937	0%	
HS Program Operations	2,280,237	271,099				271,099	• • • • • • • • • • • • • • • • • • •	12%	
Subtotal Activity Costs	25,019,973	887,015	-	-	-	887,015	24,132,958	4%	
Administrative Costs ^[1] Admin: Long-term Rent Assistance	740,027	28,390				28,390	711,637	4%	
Admin: Other	1,610,000	73,641				73,641		5%	
Subtotal Administrative Costs	2,350,027	102,031	-	-	-	102,031	2,247,996	4%	
Other Costs									
Debt Service	-					-	-	N/A	
Regional Strategy Implementation Fund [2]	1,610,000					-	1,610,000	0%	
nsert addt'l lines as necessary						-		N/A	
Subtotal Other Costs	1,610,000	-	-	-	-	-	1,610,000	0%	
Total Program Costs	28,980,000	989,045	-	-	-	989,045	27,990,955	3%	
Contingency and Stabilization Reserve									
Contingency ^[3]	1,610,000	1,610,000				1,610,000		100%	
tabilization Reserve ^[4]	1,610,000	1,610,000				1,610,000		100%	
Subtotal Contingency and Stabilization Reserve	1,010,000	1,010,000		-		1,010,000		100%	
Subiotal Contingency and Stabilization Reserve	3,220,000	3,220,000	-	-	-	3,220,000	-	100%	
Total Mater CUC Deminanta	32,200,000	4,209,045		-	-	4,209,045	27,990,955	13%	
Total Metro SHS Requirements									

(1) Per IGA Section 3.4.2 ADMINISTRATIVE COSTS, Metro recommends, but does not require, that in a given Fiscal Year Administrative Costs for SHS should not exceed 5% of annual Program Funds allocated to Partner; and that Administrative Costs for administering long-term rent assistance programs should not exceed 10% of annual Program Funds allocated by Partner for long-term rent assistance.

[2] Per IGA Section 8.3.3 REGIONAL STRATEGY IMPLEMENTATION FUND, each County must contribute not less than 5% of its share of Program Funds each Fiscal Year to a Regional Strategy Implementation Fund to achieve regional investment strategies.

[3] Per IGA Section 5.5.4 CONTINGENCY, partner may establish a contingency account in addition to a Stabilization Reserve. The contingency account will not exceed 5% of Budgeted Program Funds in a given Fiscal Year.

(4) Per IGA Section 5.5.3 PARTNER STABILIZATION RESERVE, partner will establish and hold a Stabilization Reserve to protect against financial instability within the SHS program with a target minimum reserve level will be equal to 10% of Partner's Budgeted Program Funds in a given Fiscal Year. The Stabilization Reserve for each County will be fully funded within the first three years.