

Housing Support – Supportive Housing Settings

Provider Manual

October 2022



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Manual Overview

This Manual is a resource to assist current and prospective Supportive Housing providers with the development and operation of their programs. It guides providers through the basics of Housing Support and its administration, how to get started as a new provider, and considerations for provider performance. This Manual is not legal advice. Any legislative changes to the Minnesota Housing Support Act (Chapter 256I) overrides information referenced in this document.

Housing Support Basics

What is Housing Support?

Housing Support, formerly known as Group Residential Housing (GRH), is a state-funded income supplement to help older adults and people with disabilities who have low incomes pay for their housing expenses. In order to prevent and/or reduce homelessness or institutionalization and promote housing stability, Housing Support provides financial support for rent, utilities, household needs, food, and services for eligible individuals. Housing Support is the largest housing program operated by the Minnesota Department of Human Services (the "Department"), distributing over \$187,000,000 to support more than 28,000 people during state fiscal year 2022 alone. Roughly 28% of program recipients currently receive Housing Support in their own leased housing rather than a group setting.

When is Housing Support authorized?

Housing Support is authorized when the:

- 1. Person is eligible to receive Housing Support
- 2. Provider has an active Housing Support Agreement with the county or tribe
- 3. Place satisfies all settings requirements (i.e., lease, applicable licensure or registration, completed habitability inspections)

How is Housing Support paid?

There are two types of payments for Housing Support: room/board and supplemental services. Room/board is paid all of the time when a person is receiving Housing Support. Supplemental services are available when the setting and the person are eligible to receive it. Payment rates are adjusted annually and included in the Housing Support Agreement for the upcoming state fiscal year. When Housing Support is authorized, it is paid to a vendor on the person's behalf. If the person has income, they may have an individual obligation to pay some of their housing expenses as well.

Who is eligible to receive Housing Support?

A person is eligible to receive Housing Support room/board if they:

- 1. are age 18 or older with a certified disability or disabling condition or are age 65 or older
- 2. have low income and low assets
- 3. reside in a setting authorized by the county or tribe with a Housing Support Agreement

To qualify to receive Housing Support supplemental services, a person must also require assistance in two of the following four areas:

- 1. Tenancy supports
- 2. Supportive services
- 3. Employment supports
- 4. Health supervision services

In order for a person to receive Housing Support supplemental services, they must receive Housing Support room/board. Supplemental services include, but are not limited to, oversight and up to 24-hour supervision, medication reminders, assistance with transportation, arranging for meetings and appointments, arranging for medical and social services, and connecting people to the supplemental services identified in the Professional Statement of Need (DHS-7122). Supplemental services are only authorized in certain settings. Additional services may be covered if authorized in statute for a specific residence or category of housing.

In order to determine eligibility for Housing Support room/board, a person must submit a <u>Combined Application Form</u> (DHS-5223) to their local county or tribal social services agency via paper application or online at <u>mnbenefits.mn.gov</u>. Additionally, if the person is under age 65, a <u>Professional Statement of Need</u> (DHS-7122) or <u>Request for Medical Opinion</u> (DHS-2114) is necessary to establish the presence of a disabling condition if they don't already have a certified disability (through the Social Security Administration or State Medical Review Team [SMRT]). County or tribal designees are people named by the county or tribe as allowed to complete the Professional Statement of Need for Housing Support purposes. For more information about designees, please contact the local county or tribe.

Where can Housing Support be used?

As noted above, Housing Support is only authorized when there is an active Housing Support Agreement in place with the county, tribe, or multicounty collaborative (the "Agency"). Housing Support Agreements outline statutory requirements, provider and service delivery standards, and payment rates for the corresponding state fiscal year. The Department updates Housing Support Agreements annually, sending them to the Agency to execute with providers. There are two different types of Housing Support Agreements used depending on the approved setting: Group and Community-Based.

Group Housing Support Agreements

Group Housing Support Agreements are utilized in settings where a Minnesota Department of Human Services or Minnesota Department of Health license or registration is required (unless it is tribe-certified housing). In these settings, meals are provided on-site and four or more people can reside at the approved location. Some examples of settings falling under this type of agreement include:

- Adult Foster Care
- Assisted Living
- Board and Lodge

Community-Based Housing Support Agreements

Providers working in supportive housing settings sign Community-Based Housing Support Agreement. In these settings, a lease and a <u>Habitability Inspection</u> (DHS-7123) are required, and a person typically receives food support through the Supplemental Nutrition Assistance Program. Providers ensure that clients have access to some type of supportive service to maintain housing stability. People may live in scattered-site or site-based programs. Some examples of settings falling under this type of agreement include:

- Supportive Housing
- Long-term Homeless Supportive Housing
- Metro Demonstration Project

This Manual focuses on Supportive and Long-Term Homeless Supportive Housing programs.

Note: Depending on the types of settings the provider operates, the provider may be required to sign both Group and Community-Based Agreements. A <u>Housing Support Settings Characteristics Chart (DHS-8292)</u> is available to further clarify differences between setting types.

Administration and Management of Housing Support

Housing Support is a state run, Agency-administered program authorized under the Minnesota Housing Support Act (Minnesota Statutes Chapter 2561). Agencies enter into Housing Support Agreements directly with providers located within their respective boundaries. Agencies are authorized to develop quality control programs in an effort to manage and review provider or vendor performance via Housing Support Agreements. Any quality control process established by a county does not apply to tribally-run Housing Support programs, even if the tribal area exists within a county's limits.

State: Oversight and Responsibilities

The responsibilities of the state are vested in Minn. Stat. §256I. The Department has the authority to:

- Supervise and monitor the administration of Housing Support activities, including but not limited to, assuring timely and accurate distribution of benefits, completeness of service, and quality program management.
- Suspend or terminate Housing Support Agreements immediately when the health or welfare of the housing or service recipients is endangered, or when the Department has reasonable cause to believe that the vendor has breached a material term of the Agreement.
- Immediately terminate Housing Support Agreements when a curable material breach of the Agreement by a vendor is not remedied within a specified timeframe.

The Behavioral Health, Housing, and Deaf and Hard of Hearing Services Administration's Housing and Support Services Division is responsible for Housing Support oversight and operations, including developing legislative proposals to improve its efficiency and efficacy. Division staff also provide technical assistance to counties, tribes, providers, and community partners. Division staff may be contacted at dhs.grh@state.mn.us.

Multi-Departmental Approach for Agencies

Housing Support is a program touching nearly every area of an Agency. Housing Support is an income supplement program distributed through financial assistance units, and contract managers oversee the execution of Housing Support Agreements. The Department authorizes an Agency to develop quality control programs in an effort to manage and review provider performance under Housing Support Agreements. However, developing and integrating systemic provider performance processes has been a challenge. State resources are not allocated to Agencies to develop such programs outside of grant opportunities (see Community Living Infrastructure Grant). As such, Agencies may resource quality control and oversight programs differently across Minnesota.

While a multi-department approach is optimal for Housing Support management, the reality is that many Agencies do not have the resources to commit to robust administration efforts. That being said, in order to effectively administer, manage, and monitor Housing Support at an Agency level, it requires investment and input from multiple units including (but not limited to):

Agency Unit	Housing Support-Related Responsibilities
Financial Assistance Unit	 Process applications, change reports, and renewals Often first-line for flagging questionable business practices or applications Receive recipient complaints and or identifies concerns
Triage Teams/Intake Social Workers and Financial Workers	 Help people identify available Housing Support resources Receive complaints or identify concerns related to provider performance May sign Professional Statements of Need for Housing Support as county designee Identify service gaps

Agency Unit	Housing Support-Related Responsibilities
Contract Managers/Business Services	 Execute all Housing Support Agreements each fiscal year Update vendor profile forms when new sites are added Submit requests for new vendor numbers and work with the Department to request overrides in MAXIS for supplemental service authorization
County or Tribal Attorney	 Provide consultation on provider performance and Housing Support Agreement compliance concerns Guide responsible program areas on scope for provider performance management
Home and Community Based Services (HCBS) Teams	 Offer expertise and guidance related to waiver services Often develop relationships with provider front-line staff and directors Help to identify service gaps or issues of concerns Assist with vetting prospective Housing Support providers intending to serve people receiving waivers
Adult Behavioral Health Teams	 Offer expertise and guidance related to behavioral health services Often develop relationships with provider front-line staff and directors Help to identify service gaps or issues of concerns Assist with vetting prospective Housing Support providers intending to serve people receiving behavioral health services
Adult Protection Teams	 Notify unit responsible for provider performance when an adult protection report is received, and/or screened-out, involving a Housing Support program
Unit or Staff Members Responsible for Provider Management, Performance, and Compliance	 May or may not be present within an Agency Develop quality control program and oversees compliance process Process and review complaints, adverse events, or identified concerns On-board, train, and monitor providers Develop and communicate consistent messaging across providers, including procedural or legislative changes Coordinate across Agency units on issues related to Housing Support Facilitate conversations regarding Housing Support with community partners and external stakeholders
Agency Leadership	 Provide guidance for development of Housing Support resources Consult on concerns or problems related to provider performance Communicate investment from the top-down through involvement in Housing Support decision-making and oversight processes

If an Agency is looking for ways to start exploring its Housing Support program as it exists now and envisioning what it could be, some recommended discussion questions are included in <u>Appendix A</u>.

Considerations for Tribally-Run Programs

As sovereign nations, tribes directly enter into Housing Support Agreements with providers of their choosing, similar to counties. Most tribes do not have access to state systems needed for billing purposes, so they must

partner with the Department to manage vendors. Tribes may need to coordinate with counties to ensure swift processing of Combined Application Forms so that people receive authorization for Housing Support.

If the Housing Support program is located on tribal land, it is subject to tribal authority related to its licensing requirements—not that of the Minnesota Department of Health.

Prospective Providers

Pre-Planning

If a potential provider is interested in providing Supportive Housing through a Housing Support program, the first step is to complete pre-planning. The more prepared a provider is before approaching an Agency to request a Community-Based Housing Support Agreement, the better. Some planning questions to consider include:

- What is the provider's motivation to operate a Supportive Housing program?
- Does the provider seek to offer Supportive or Long-Term Homeless Supportive Housing?
- If the provider elects to offer Supportive Housing, how will supportive services be offered? Does the provider intend to request banked supplemental service rate beds from the Agency (if available)?
- What expertise in housing, homelessness, or supportive housing does the provider have?
- How will the provider integrate supportive housing best practices (i.e., Housing First, Harm Reduction, and Trauma-Informed Care) as well as person-centeredness into their proposed project?
- Does the provider demonstrate areas of expertise, such as supporting a disproportionately represented population, which could benefit the community?
- How will the provider incorporate equity and the voices of people served into program design?
- What type of housing model will be used? Will the provider serve in a dual role, as a landlord/property manager and service provider, or will there be a separation?
- Will the Supportive Housing program be site-based or scattered-site?
- How many people does the provider want to serve at one time? What resources are needed to support the number of people identified?
- Is there a need for Supportive Housing providers in the community? Has the provider been in contact with the local Coordinated Entry System Priority List Manager and/or agencies serving a similar population to understand community need?
- Has the provider reached out to current Supportive Housing providers to conduct informational interviews to learn more about their experiences providing services?
- What is the provider's crisis management or safety plan, should different scenarios arise (i.e., fire, pandemic, active or alleged assault, overdose)?
- What capacity does the provider have to manage administrative tasks (i.e., paperwork completion, case noting, Homeless Management Information System (HMIS) data entry, and billing)?
- Has the provider reviewed any materials, like (i.e., policy and procedure manuals), developed by the Agency to learn more about how the program operates in an Agency's jurisdiction and any provider performance expectations that exist?

Has the provider attended the Department's Housing Support Program Overview Session Webinar?

Meeting with the Agency

Once the prospective provider completes pre-planning and has a clear idea as to how their Supportive Housing program will operate, the next step is to contact the Agency which controls the Community-Based Housing Support Agreement. Each Agency assigns responsibility of managing Housing Support differently, so it may take time to find the right person. Some Agencies have established, formal processes in place to request an Agreement, whereas others do not. When working with an Agency, prospective providers should:

- Request a meeting to talk about their idea with the Agency's identified Housing Support representative
- Be prepared to pitch their idea and answer questions
- Expect to supply more information to the Agency before a Housing Support Agreement is executed
- Understand that agencies have full discretion over which providers receive Housing Support Agreements to meet the community's needs
- Understand that at any time during the process, either party may determine that pursuing or extending a Housing Support Agreement is not in their best interests and terminate future discussions

After this meeting, or series of meetings, it is important that both the Agency and provider maintain open, transparent lines of communication to clarify questions and relay expectations. If both the Agency and the provider continue to work together, the Agency should clearly outline steps the provider must take to receive a Housing Support Agreement. An Agency should clearly identify expectations for Housing Support providers prior to application as the application process is the first step in an Agency's overall quality assurance method (see Quality Assurance and Monitoring Considerations).

Formally Requesting a Housing Support Agreement

When the prospective provider feels like their Supportive Housing program is well-conceptualized, it will need to complete any Agency-required contracting processes. This may include a formal proposal review process, though this is not required and depends on the Agency's resources to manage it. If the Agency supports the prospective provider's project and determines it meets both the community's needs and Agency's provider performance expectations, a Housing Support Agreement may be extended. Some Agencies may require just the Housing Support Agreement to be signed, and others may have additional contracting or compliance agreement requirements. Frequently, the Agency's attorney reviews and signs the Housing Support Agreements as well. The Agency ensures the new provider receives a copy of the Agreement and maintains a copy on file.

Note: Housing Support Agreements are template forms developed by the Department. It is critical that providers review Housing Support Agreements closely prior to signing, as they are binding and outline new or amended requirements for the upcoming fiscal year. It is strongly encouraged that provider compare their current Housing Support Agreement to any future Agreements to be clear on any changes in an effort to remain in compliance with all Department requirements.

New Provider Onboarding Process

Once a provider successfully completes the Agency's Agreement request process, the next step includes onboarding the provider to the Agency's Housing Support program. Many new providers require significant technical assistance navigating this portion of the process. Therefore, it is critical that if a provider has questions or concerns, that those are shared with the Agency immediately.

Onboarding looks different across Agencies due to available resources. Some Agencies may wish to schedule an orientation meeting with different people the provider will need to know, such as contract managers, compliance specialists, Coordinated Entry Priority List Managers, and assigned financial workers. Before a provider can start accepting referrals, the following onboarding tasks need to occur (Community-Based Agreement):

- Contact <u>Minnesota Health Care Programs</u> as providers will need to enroll in order to bill the supplemental service rate (if available) and secure an Agency ID number for background study purposes.
- Submit background studies for all required staff and volunteers (note: it can take several weeks to complete this process).
- Secure insurance or worker's compensation coverage as required by the Agency.
- Locate housing (if site-based) and obtain appropriate city, municipality, state, or tribal licensure(s) or registration(s).
 - Note: the Agency may require a walkthrough of the housing identified prior to authorizing referrals.
- Identify landlords who might be willing to extend leases to the population served.
- Complete online Housing Support Orientation and Vulnerable Adult Mandated Reporter Trainings.
- Provide or develop a lease or list of residency restrictions that may result in eviction.
- Obtain a vendor number from the Agency (required for billing and provider management purposes).
- Review Agency billing process for Housing Support room/board.
- Complete a <u>Minnesota Health Care Programs MN-ITS Billing Lab</u> (for Housing Support supplemental service rate providers only).
- Long-Term Homeless Supportive Housing only:
 - Obtain Homeless Management Information System (HMIS) site license through the Institute of Community Alliances and complete a Provider Request Form (note: it can take several weeks to complete this process).
 - Contact Coordinated Entry Priority List Manager to understand how to obtain referrals, if Coordinated Entry is required by the Agency.
- Execute appropriate Housing Support Agreement with the Agency.
- Complete any additional Agency contractual paperwork, such as compliance agreements.

Agencies are not required, though are strongly encouraged, to verify that these steps occurred before issuing a final Housing Support Agreement and authorizing the provider to accept referrals. While the Department does not require proof of all of these steps before an Agreement is executed, an Agency may require supporting

documentation beforehand. When complete, the Agency notifies the provider that they can start accepting referrals.

Current Providers

Provider Performance

Through signing the Housing Support Agreement, providers agree to comply with all Department and Agency provider and service standards. The Department authorizes Agencies to develop quality control programs or other monitoring programs to review provider performance. This includes, but is not limited to:

- Ensuring the detection, prevention, investigation, and resolution of fraudulent activities or behaviors by applicants, recipients, vendors or other participants in the Housing Support program
- Requiring and examining supporting documentation
- Conducting site visits to the Housing Support setting named in the Vendor Profile to ensure quality and compliance.

The Department recognizes that Agency capacity to develop and manage quality control or monitoring programs varies. While some Agencies may have committed resources or <u>grant funding</u> to do so, most Agencies do not. Providers operating Supportive Housing programs across Agencies should be aware that oversight may appear different for this reason, and they should clearly understand expectations in each Agency's jurisdiction.

Agencies may implement the following measures to monitor and manage provider performance:

- Policy or Procedure Manuals/Guides
- Site visits
- File or desk audits
- Compliance actions, such as corrective actions and program improvement plans
- Formal complaint review processes
- Inter-agency partnerships to improve communication about providers across all oversight agencies

In order to successfully comply with any quality control or monitoring programs in place, providers should:

- Design programs and services that reflect person-centeredness and supportive housing best practices
- Understand all requirements and expectations, and ask for clarification as needed.
- Report any problems or adverse events that might arise to the Agency as soon as possible.
- Carve out time for administrative tasks, like case noting and data entry.
- Request technical assistance when developing and running a Supportive Housing program to ensure
 operations satisfy provider service standards and quality control requirements.
- Participate in any provider meetings or trainings to enhance skills and build professional relationships with other providers.

Ongoing Provider Support

Supportive Housing service delivery is incredibly rewarding and challenging due to the nature of the work involved. New and seasoned providers alike need ongoing assistance and support to provide high-quality supportive housing services. Depending on an Agency's resources, the scope of formalized provider support activities may vary. As such different provider support ideas include:

Provider Support Strategies

Agency-Initiated	Provider-Initiated
Implement quality control or monitoring programs with clear expectations	Create provider collaboratives, initiatives, or coalitions
Schedule regular provider meetings to discuss updates, issues, ideas, and offer support	Request clarification or technical assistance to further understand program expectations or requirements
Provide technical assistance or process issues/concerns	Build relationships with other housing providers
Offer constructive feedback where appropriate	Speak up! Share experiences as a provider and give feedback to the Agency
Create a compliance environment where providers feel safe bringing issues to the Agency before they become larger problems	Brainstorm and collaborate with the Agency, other providers, or community partners on ways to enhance Supportive Housing programs
Sponsor trainings that are free or low-cost	Request training in specific areas
Facilitate relationship building within the provider community	Attend trainings and network with other housing providers
Listen and brainstorm ways to address concerns	Attend Continuum of Care meetings
Acknowledge that providing Housing Support services can be challenging and express gratitude for services provided	Bring issues or concerns to the Agency before they become unmanageable

Creative uses of Housing Support and Complementary Benefits

Housing Support can be used creatively with other public benefits and across a variety of settings. Here are examples showing how different benefits can work together to support a person exiting a residential treatment setting.

Benefit	Explanation	Example
Housing Support – Transition from Residential Treatment	Effective 7/1/2020, there is a new temporary basis of eligibility for people exiting residential treatment into a Housing Support settings. The state authorizes up to three months of full benefit with the goal of reducing periods of homelessness after residential treatment. During the third month, the Housing Support provider assists the person to transition to the next desired setting or apply for ongoing Housing Support.	Terry exits residential substance use disorder treatment into a Housing Support Supportive Housing setting designed to help people secure permanent housing after treatment. Because Terry used this pathway, Terry entered the Supportive Housing setting without any individual obligation toward the Housing Support benefit, even though Terry has a little bit of earned income. If Terry continues to need and want Supportive Housing after the transitional period of eligibility, the Housing Support provider assists Terry to apply for ongoing Housing Support.
Minnesota Supplemental Aid (MSA) – Housing Assistance	Effective 7/1/2020, the MSA Housing Assistance benefit rate doubled and benefit eligibility criteria expanded. MSA Housing Assistance is available to people who receive, or are eligible for, Supplemental Security Income (SSI) and whose housing expenses are at least 40% of their income. People must receive Minnesota Supplemental Aid (MSA) to obtain MSA Housing Assistance. People transitioning from any Housing Support program meeting eligibility criteria are able to apply. The monthly MSA and MSA Housing Assistance benefit increases SSI recipients' income by about 60%.	Terry enters a Housing Support Supportive Housing Program after residential treatment using the pathway described above. Before the three months of transitional eligibility ends, Terry is approved for Supplemental Security Income (SSI). After getting SSI, Terry no longer wants to receive Housing Support since the individual obligation increases substantially, but Terry still wants to receive services to maintain housing. Because Terry has a landlord separate from the Supportive Housing provider, Terry can maintain the current apartment but switch payer source. Terry decides to apply for MSA and MSA Housing Assistance to increase their income.
Housing Stabilization Services	Launched 7/20/2020, Housing Stabilization Services is a state plan Medicaid benefit designed to help older adults and people with disabling conditions identify housing goals, find housing, move into housing, and maintain stability. A person must be on Medical Assistance, have a disabling condition,	Terry has the goal of having more money in their pocket at the end of each month while on SSI. Terry applies for MSA and MSA Housing Assistance to support this goal. The Supportive Housing provider works with Terry to update the landlord

Benefit	Explanation	Example
	experience housing instability, and have an assessed need for services. Housing Stabilization Services is comprised of three services: housing consultation, housing transition, and housing sustaining. People eligible for Housing Stabilization Services receive up to 150 hours per transition and 150 hours of sustaining services annually.	about the change in payer and tells Terry about Housing Stabilization Services to receive services to maintain housing. After confirming Terry is on Medical Assistance, Terry contacts their licensed psychologist (qualified professional) to complete the Professional Statement of Need – the primary assessment pathway onto the services. After the assessment, the Housing Support provider helps Terry find an enrolled housing consultant in the area to complete a Housing Focused-Person Centered Plan. Terry meets with the housing consultant and completes the plan. The consultant helps Terry make an informed choice of housing transition/sustaining provider. After the Department approves Terry's eligibility for Housing Stabilization, Terry and the housing sustaining provider make a plan to help Terry keep their apartment. Terry uses SSI, MSA, and MSA Housing Assistance to pay for an apartment, and they receive housing sustaining services after moving in to support ongoing housing stability.

Additional Resources

The Department is committed to helping providers understand Housing Support and operate high-quality programs so that older adults or people with disabling conditions who have low-incomes can achieve housing stability. To that end, the following resources are available for continued learning:

- CountyLink Housing Support Resource Page
- Bulletin 20-48-05: 2020 Legislative Changes Impacting Housing and Support Services
- Housing Benefits 101
- Housing Stabilization Services

Questions or Technical Assistance Requests

• Please direct all questions or requests for technical assistance to dhs.dhs.grh@state.mn.us.

Appendix A: Questions for Agency Exploration of Current and Needed Housing Support Resources

- How many people receive Housing Support within the Agency's jurisdiction? Who is being served, and is anyone left out? What does the data say about equity and access to Housing Support?
- How many Housing Support Agreements are active? Who are the provider agencies?
- What is the Agency's process for executing Housing Support Agreements?
- Is there a new provider vetting process or a current provider performance review process?
- What is the reputation of Housing Support providers among Agency staff, people served, and community partners?
- Who is primarily responsible within the Agency to manage Housing Support, and what has their experience been? What are the needs and gaps identified by this person/unit?
- Does the Agency maintain a banked bed list? If so, who maintains it, and where is it stored?
- What is the Agency's plan for improving management of its existing Housing Support resources?
- How many people experience housing instability and homelessness within the Agency's jurisdiction?
 How can Housing Support be leveraged to support people who are homeless?
- Where are service gaps for people who are older or low-income and have disabilities? How can Housing Support help to meet the need?
- What is the Agency's vision to expand Housing Support? What types of resources would be needed to fulfill that vision?
- What is the experience of people receiving Housing Support? How will the Agency go about getting people's input into the development of Housing Support resources?
- How do people receiving Housing Support report complaints or concerns to the Agency holding a Housing Support Agreement with a provider?
- If the Agency receives a complaint from a person receiving Housing Support, who processes it?
- What is the experience of Housing Support providers? How will the Agency go about getting provider input into how to best support providers and the services offered?
- If a tribal agency, what type of support is needed from regional counties to process paperwork if the tribe does not have access to Department systems? Similarly, if a county agency, what type of support and partnership is needed to support tribal Housing Support activities?
- Are supportive housing best practices (Housing First, harm reduction, trauma-informed care, and person-centeredness) integrated into Agency requirements?
- What are small action steps we can take in the meantime to improve Agency processes regarding Housing Support if additional resources are not allocated or available to expand? How will we monitor those action steps and know we are moving in the right direction?