

Pursuant to Local Law 115 of 2017 to amend the administrative code of the city of New York, in relation to requiring information on mental health services in shelters, the Department of Social Services respectfully submits the report below.

Those most at risk of homelessness are affected by high rates of poverty, family conflict and domestic violence, as well as poor health, including high rates of chronic disease and behavioral health conditions, coupled with low access to care. At DHS intake points, clients may arrive with a host of complex and interrelated challenges, but have one thing in common: a lack of safe and affordable permanent housing. The contents of this report describe mental health services for homeless individuals and should be viewed against the backdrop of the many services HRA and DHS provide to address social and structural determinants of health and homelessness. By working to prevent homelessness, bring people in from the streets 24/7, rehouse those who become homeless, and transform the approach to providing shelter that has been used over nearly 40 years, we are impacting the health of low-income New Yorkers beyond the provision of direct mental health services.

This said, as a result of the 90-day review in 2016, DHS has implemented a series of reforms, including improvements in how DHS delivers and ensures health care for those seeking or residing in shelter. The improvements, for example, include adding appropriately licensed and experienced clinical and professional staff to the DHS Medical Director's office. These individuals assist the Medical Director in designing evidence-based standards of care, planning and implementing newly-expanded program monitoring and oversight, and conduct evaluations of existing programs and services.

Among the improvements identified as part of the 90-day review in 2016, we are:

- Targeting services and rental assistance for clients with mental health needs cycling between jail and homelessness: City rental assistance will be strategically targeted to identify at-risk clients with mental health needs cycling between Rikers Island and DHS shelters.
- Continuing to implement HOME-STAT to address street homelessness: HOME-STAT is a first-of-its-kind approach to better understand and address the City's street homeless population. This initiative partners existing homeless response and prevention programs with a series of new innovations designed to better identify, engage, and transition homeless New Yorkers from the streets to low threshold engagement and support services, as well as permanent housing.
- Enhancing tools for outreach teams to bring people in from the streets: The City has increased safe haven beds, increased the number of drop-in centers, and is working to develop 15,000 units of supportive housing to provide essential tools to address street homelessness.
- Revised the hospital and nursing home referral process to shelter, created an electronic referral form, and trained all shelters and hospitals in the revised process and new form.
- Developed and revised medical and mental health standards for the delivery of services at families with children (FWC) intake and the two single adult assessment shelters that required a new clinic, to ensure that standard assessments are completed, information is collected, clients are assessed for determination of appropriate assignment to program shelters, and needed referrals are made.

- Planning for the development of a health data system to collect clinical health information from clinic providers and ensure that clients' clinical information and needs are available to DHS providers.
- We are also focusing on evaluating a group of homeless persons who are high utilizers of healthcare services and have significant health and/or behavioral health conditions, to design interventions and better coordinate their care and services, including facilitating their transition to appropriate housing and services, and working closely with hospitals and other medical providers.

High-quality transitional housing is far more than just a room to sleep in or a roof over one's head. At these sites, we work in partnership with experienced not-for-profit social service providers whose dedicated staff connect clients every day with robust wraparound resources including case management, housing placement assistance, health and mental health services, and employment counseling on site. Cost covers far more than just rent—services, staffing, security, administrative costs and overhead are all included in the contract value.

As we transform a haphazard shelter system decades in the making, we are ending the use of all stop-gap measures citywide, including phasing out the 18-year-old cluster program and the use of commercial hotel locations, which dates back on and off to the 1960s, while opening new high-quality sites that more effectively address our clients' unique needs—this includes high-quality shelters that are focused on supporting the needs of specific populations by providing targeted services/programs, including employed/employable New Yorkers, seniors, LGBTQ young persons, New Yorkers experiencing mental health challenges, veterans, etc.

When a New Yorker in need presents at an Assessment Site through a DHS Intake Site, staff works to identify what the individual's needs are and which program shelter would best facilitate the client's transition to housing permanency, including:

- Employment
- Mental Health
- Substance Use
- Young Adults
- LGBTQ
- Older Populations
- Veterans

While shelter services are mandated to a great extent by state regulation, with some services specific to the type of shelter, "mental health" shelters are a City-level designation (rather than regulated at State-level), reflecting our recognition that there is no one-size-fits-all solution to the nationwide and citywide challenge of homelessness.

Mental health needs are assessed as individuals in need of shelter are evaluated during intake by DHS program experts, including social workers, nurse practitioners, and psychiatric nurses, to determine which program focus would best address the applicant's needs. These program experts assess individuals' housing and employment histories as well as their psychiatric needs to make the most informed and effective decision about which programs would best help each individual stabilize their lives. Clients in need of shelter, services, and support and also experiencing substantial psychiatric or

mental health needs and/or substance misuse challenges are prioritized for facilities with mental health and/or substance misuse treatment programs to connect the applicant to services quickly.

There are a variety of factors we consider to determine a client's appropriateness for a mental health placement, including:

- History of severe mental illness;
- Past or recent psychiatric hospitalizations;
- Client's current functioning and behavior based on self-report and staff observation; and/or
- Clinical recommendation as a result of recent mental health examination or psychiatric evaluation.

Additionally, because clients may not report the challenges they are experiencing at intake, staff sometimes come to understand those challenges only during the course of working directly with clients on-site in shelter. As a result, referrals are also made from other shelters in the Single Adult system to Mental Health shelters on case-by-case basis, based on the assessment conducted by and relationships developed between case managers, housing specialists, social workers, nurse practitioners, and psychological evaluators—a collaborative needs-based determination made by social service staff and Program experts working closely with clients to help them back on their feet.

There is not a strict "label" or specific type of diagnosis required to be placed in a Mental Health shelter. Mental health needs are assessed at an individual level, with shelter-placement recommendations made based on conversations between social service staff and Program experts performing the assessment and those shelter and Program staff on-site at the specific location. If an individual placed in a Mental Health program, which is because DHS staff and the staff on-site at the location have determined, through careful deliberation, that an intensive focus on addressing Mental Health services and supports would best position the individual to obtain housing permanency. For those individuals residing at other facilities that may also experience some mental health challenges, dedicated staff remain focused on working with clients to address those unique needs and connect them with the care and services they need to get back on their feet.

Overall, NYC DHS mental health shelters provide:

- On-site behavioral health and medical services, as well as linkages to off-site care in the community.
- Behavioral health services include: psychiatric assessment, ongoing medication management, individual therapy, and group therapy related to mental illness, substance use, psychoeducation related to trauma, etc.
- Medical Services include: primary care services, episodic care, and assisting the client in accessing urgent care as needed. For clients with co-occurring mental health and substance use disorders, supportive services include harm reduction and health promotion to reduce the frequency and duration of both drug/alcohol and/or psychiatric hospitalizations. For clients with opioid use disorder, medication-for-addiction-treatment is provided onsite or via linkage to care in the community.
- The medical provider is certified by the State to provide overdose prevention training and ensure that staff able to provide overdose prevention responses are present at all times, with any staff that interact with clients, including security staff, equipped to administer live-saving naloxone should they witness an overdose.
- The medical provider also communicates with external service providers and hospitals as needed, including managing visits to emergency departments, admissions, and discharges.

The City has made important progress transforming a haphazard shelter system decades in the making by investing in historically underfunded not-for-profit service provider partners and facilities to ensure those partners are appropriately funded to deliver the services our homeless neighbors depend on as they get back on their feet; addressing conditions that have built up over many years; implementing the NYPD Management Team to oversee shelter security citywide; and raising the bar for services that we provide our homeless neighbors, moving away from a one-size-fits-all strategy towards people- and community-based system that is response to families' and individuals' unique needs. This includes:

- Investing in historically underfunded facilities and providers will help us turn the tide, which is why we've dedicated unprecedented dollars (more than a quarter-billion new dollars annually) to modernizing the outdated rates that our vital provider partners had been receiving for years to ensure those partners are appropriately funded to deliver the services our homeless neighbors depend on as they get back on their feet, while expanding education-focused programs and increasing our social work staffing and mental health services, thanks to First Lady Chirlane McCray's ThriveNYC Initiative.

Our funding for Mental Health shelters has increased by more than 50 percent since FY14. At the same time, our investment in mental health services and supports goes beyond funding Mental Health shelters:

- **Social workers in family shelters:** \$27.2M annually to enhance provision of social services with 350 new masters-level social workers, known as Client Care Coordinators, at contracted shelters for FWC at a rate of 1 per every 25 families. Nearly 290 have been hired to date, with DHS' not-for-profit social service provider partners currently filling the remaining positions. These Client Care Coordinators support families navigating multiple systems/resources across agencies and levels of government, improve access and increase connections to services in the community, and work with each family to help manage and cope with the stressors of homelessness.
- **NYCSafe:** \$7.4M annually to enhance clinical services and safety at 11 mental health and assessment locations for Single Adults with 52 new clinical staff, including psychiatrists, nurse practitioners, case managers, social workers and peer specialists, as well as the addition of more than 100 DHS Peace Officers. We have also strengthened our partnership with DOHMH through NYC Safe to help our most vulnerable clients, including homeless New Yorkers with mental health challenges, stabilize their lives by increasing connections to services/treatment both inside and outside of the shelter system to ensure their complex needs are met.
- **Mental Health First Aid:** We recently expanded our efforts to provide Mental Health First Aid training to staff, committing to train all DHS and provider frontline staff system-wide, including social workers, case managers, facilities, maintenance, fleet, and security staff over the next two years. To date, approximately 500 staff have been trained, with additional trainings ongoing.

Medical Services Providers at Assessment sites:

In addition to the initiatives listed above, we are also enhancing our provision of medical services at DHS intake and assessment facilities. Recognizing there is no one-size-fits-all solution to the citywide challenge of homelessness, we remain focused on continually strengthening our assessments of each individual and household's unique needs so that we can most effectively provide New Yorkers experiencing homelessness with the services and supports that would help them stabilize their lives, including connecting them with medical care in the community and developing strong linkages between shelter facilities and community-based service providers, organizations, and sister City Agencies.

By further developing and revising medical and mental health standards for the delivery of services at FWC intake and single adult assessment shelters, we are improving the ways in which our clients are placed in appropriate shelters as well as ensuring they are connected to care.

To that end, this year, we issued an RFP seeking qualified medical providers to deliver enhanced medical and behavioral health services at DHS intake and assessment facilities. This year, we are awarding those contracts to enhance our front-door evaluations of each client and the factors that may have contributed to their homelessness, including at:

- 30th Street Intake Facility (provider: Care for the Homeless)
- Bedford Atlantic Assessment Facility (provider: NYU-Langone, formerly Lutheran)
- PATH Family Intake (provider: The Floating Hospital)

We expect the service providers at these medical clinics to:

- assess the medical and behavioral health needs of New Yorkers seeking shelter from the City upon arrival at intake;
- communicate with their outside medical providers, if any—and, if none, help connect clients with off-site medical care or other healthcare services within the community;
- perform all recommended health screenings, including preventive health screening;
- provide care coordination and health promotion/health coaching;
- communicate with hospitals about overall policies, practices, and systems, as well as regarding specific households' needs, including coordinating care and liaising with hospital Emergency Department and in-patient unit staff on clients' behalf and provide crisis prevention and intervention.

As part of this assessment, the medical services provider will help determine if an individual is medically appropriate for shelter. Should an individual be determined inappropriate for shelter, clinical staff will coordinate to ensure the client receives appropriate emergency medical services.

Following the medical and behavioral health evaluation, shelter staff will identify and prioritize clients who are in need of immediate medical or psychiatric evaluation or episodic care for clients who do not wish to access community services and care coordinators will ensure individuals are promptly connected to community-based medical and behavioral health service providers as recommended by the evaluations.

For clients receiving specialty care (HIV, Hepatitis C, dialysis, etc.) who may have their own specialized care coordinators, the provider will also facilitate care coordination and continuity of care. Through establishing and maintaining contacts with providers in the neighborhood, the care coordinator will advocate for timely and adequate community-based services.

The assessments conducted by service providers at these medical clinics will also help shelter staff more effectively assist clients with accessing services and transitioning into permanent housing.

Mental Health Shelters do not provide skilled nursing services, assistance with activities of daily living, or supervised medication administration. Finally, due to the congregate nature of the single adult shelters, home care is not possible outside of limited services from nurse visits, such as wound care on a case-by-case basis.

Outlined below is the information for Calendar Year 2017 solicited in Local Law 115 of 2017

1. The number of shelters, domestic violence shelters, and HASA facilities with on-site mental health services, as well as the total number of shelters, domestic violence shelters and HASA facilities

DHS conducted a survey with all the shelter programs, to collect information for on-site mental health services. A total of 62 shelter programs, 1 domestic violence shelter, and 16 HASA facilities provided on-site mental health services (Table 1). DHS's approach is to place clients at the most appropriate location for their particular needs as such, not all shelters specialize in serving clients with mental health needs, given that only a proportion of clients have a mental health condition.

Table 1: Number of shelter programs and shelters programs with on-site mental health services, 2017		
	Overall number of shelter programs	Number of shelter programs with on-site mental health services
Shelters	643	62
<i>Single adults</i>	132	38
<i>Safe Haven facilities</i>	18	14
<i>Veteran short term housing/Criminal Justice Shelter¹</i>	3	3
<i>Adult Families</i>	25	1
<i>Families with Children²</i>	465	6
Domestic Violence Shelters³	54	1
<i>Domestic Violence Emergency Shelters</i>	46	1
<i>Domestic Violence Tier II Shelters</i>	8	0

¹ Borden VTSH is set up as 2 different 'facility code/addresses' - this includes both. Porter CJ Shelter is included in this count

² This figure in the originally submitted 2017 report did not include FWC cluster sites. This figure does include this information.

³ The New York State Domestic Violence Prevention Act was enacted in 1987 to support services for survivors of domestic violence and their children. The law requires counties to provide shelter and services to survivors of domestic violence and establishes funding for these programs. The New York State Office of Children and Family Services promulgated and maintains regulations as to the standards for the establishment and maintenance of residential and non-residential domestic violence programs. The NYC DV shelter system is in compliance with these regulations, as we provide linkages to medical and mental health services. The 46 Domestic Violence Emergency Shelters and the 8 Domestic Violence Tier IIs all have linkages to mental health providers; additional on-site mental health services would require funding beyond what is provided by New York State.

HASA Facilities⁴	196	16
<i>Emergency SRO/Family Provider Sites</i>	180	0
<i>Emergency Transitional Provider Sites</i>	16	16

Note: These are shelters that were active as of December 31 of the reporting year.

2. A description of the mental health services in each intake center

Families with Children: Families with children enter DHS shelter through the central intake center called the Prevention Assistance and Temporary Housing (PATH) center. All new families and those with specific needs, such as pregnant women, families with infants or who have a member with an acute medical condition or recent hospitalization are seen by the clinical provider at PATH, The Floating Hospital. The on-site clinician conducts a health screening and offers necessary emergency services, referrals as needed, and health education, as well as if needed coordination with the client’s existing health care providers. As needed, families are referred to the onsite psychiatric provider for a comprehensive assessment. Once in shelter, clients are encouraged to and assisted in seeking care from their primary care physicians or a local clinic of their choice.

In addition, families self-reporting or observed to be facing mental health or substance use challenges are referred to DHS Resource Room Social Workers for further assessment. Resource Room Social Workers complete mental health and substance use assessments in the DHS CARES system. Assessment findings determine whether or not a call will be placed to 911 for EMS assistance and possible hospitalization.

Further, DHS and ThriveNYC launched an initiative to place licensed Masters’ level social workers (LMSWs) in Families with Children shelters. These Social Workers serve as Client Care Coordinators directly in shelters as employees of DHS contracted providers. Client Care Coordinators work with clients to improve access to mental health services in the Families with Children shelter system and to assist families who are homeless as they navigate multiple systems and cope with the stressors and anxiety induced by homelessness.

Adults: After intake, all adults admitted to the shelter system are sent to an assessment shelter where providers conduct a comprehensive assessment including history and physical, brief psychiatric assessment, and substance use assessment. This assessment is used to direct new entrants into the DHS system toward either a general, mental health or substance use shelter, or an employment shelter. Mental health shelters provide specialized mental health services on-site as well as linkage to an array of outpatient mental health services. On-site services include psychiatric assessment, ongoing medication management, individual therapy, group therapy related to mental illness, substance use, psychoeducation related to trauma, etc., and crisis management and de-escalation. The following outpatient services are available to DHS clients with mental health conditions:

- Care Coordination: a specially trained individual or team that helps clients better understand and manage their conditions, works with clients to create a plan of care that meets their

⁴ Unlike many shelters for single adults, SRO emergency housing provides single adults enrolled in HASA a temporary private room to reside in. HASA clients receive ongoing case management and are assigned to a caseworker at one of our HASA centers, located in all 5 boroughs. With this implementation structure and privacy measures for SRO emergency housing, mental health services in this model are most efficiently achieved through case management, rather than on-site medical services.

physical, mental health and social service needs and assists the client in finding the services and programs that are right for their needs.

- Assertive Community Treatment (ACT): an evidence-based practice model where a team composed of multiple specialized behavioral health providers, including a registered nurse and vocational supports, work together to provide treatment, rehabilitation, care coordination and support to individuals diagnosed with a severe mental illness and whose needs have not been well met by more traditional mental health services. Since mid-2017, 10 new ACT teams have been assigned to cover all the DHS mental health shelters.
- Intensive Mobile Treatment (IMT): a specialized team that provides intensive and non-billable treatment in settings that are convenient to clients who may be unstable.

Adult Families: For adult families, self-assessments are conducted at intake centers where individuals respond to questions posed from staff. Clinical assessments are not conducted by a clinician at these sites.

Naloxone in Shelters: All DHS Peace Officers are trained in naloxone administration and are certified Opioid Overdose Responders. In late 2016, the DHS medical office started systematically training DHS staff in naloxone administration to ensure that all shelters have a trained staff capable to administer naloxone to clients suspected of having an overdose on all shifts. In November 2016, DHS became an independent state certified Opioid Overdose Prevention Program (OOPP), led by the Office of the Medical Director. In 2017, DHS trained 2,323 staff and clients to administer naloxone.

The mental health services provided at Intake include referral to Comprehensive Health Assessment Team (CHAT) for assessment of a history of mental illness or substance use to determine if a person is eligible for supportive housing. For a client who screens positive for substance use can be seen by a Credentialed Alcoholism and Substance Abuse Counselor (CASAC) at intake for referral to in or out patient substance use treatment. If a client appears to be in crisis, we can contact HRA's Customized Assistance Services and request an emergency psychiatric evaluation and possible hospitalization if warranted.

Mental health services at HASA Emergency Transitional Provider Sites and Permanent Congregate Provider Sites include programs for crisis intervention and referrals for short-term hospitalization for clients diagnosed with mental illness. Treatments include individual therapy, group therapy, recreational therapy and psychological testing. Social service professionals and case managers assist clients with continuing care options that enhance their mental stability and independent functioning.

HRA's Office of Domestic Violence provides oversight for the 24-hour NYC domestic violence hotline which serves as one of the contact points for the domestic violence shelter system, but also provides safety planning and referrals. Safe Horizon, a private not-for-profit social service agency and DV service provider, is the City contracted provider operating the hotline.

Upon arrival at a domestic violence shelter, as required by State mandate a caseworker will conduct the Client Assessment within 48 hours of arrival. As a part of the client assessment process, the following medical and mental health questions are asked:

- Have you or your child (ren) ever been hospitalized? If yes, please explain.

- Have you or your child (ren) ever received psychiatric treatment or counseling? If yes, please explain.
- Is anyone in the family currently in treatment (Yes) or (NO)?
- If yes, Name of Psychiatrist, phone#, Treatment schedule, List of medications,
- Is anyone pregnant (Yes) or (No).
 - If yes, who and expected date of delivery?
 - If yes, receiving prenatal care (Yes) or (No)? Where?
 - Any complications with the pregnancy (Yes) or (No), Explain

Depending upon the responses, referrals are made. In every case there is on-going case management at the shelter.

3. A description of the mental health services provided at drop-in centers and safe havens

Drop-in centers provide a low-threshold alternative to traditional shelter for street homeless individuals and offer temporary respite where individuals can shower, eat a meal, see a doctor, and rest. There is on-site case management and housing placement services, as well as a limited number of off-site overnight respite beds.

Services at drop-in centers and safe havens include a psychiatric assessment and referral to care as indicated from the assessment.

4. A description of the mental health services provided to the unsheltered homeless population directly and by referral, including the number of removals initiated pursuant to section 9.58 of the mental hygiene law

Outreach teams work from a harm reduction approach, building relationships with individuals who over time have historically rejected services. Outreach teams are also focused on the most vulnerable of those living outside to ensure they are safe and/or not at risk for injury or death. Outreach teams also perform crisis intervention assessments and work on placements to indoor settings through on-going case management and supportive services. This includes linking clients to medical benefits as they continue to work with these individuals throughout their journey. The outreach teams meet people “where they are” both literally and figuratively— whether that means conducting a psychiatric evaluation on a street corner or sending an outreach worker who can speak to a client in his or her native language. In 2017, there were 15 removals initiated by outreach providers pursuant to section 9.58 of the mental hygiene law.

Overall, DHS Outreach teams provide emergency and crisis intervention, counseling, case management, assistance with entitlements, benefits, housing and other resources, and provides referrals and linkages to health care services, as necessary, to individuals choosing to live on the streets.

5. A list of the 10 most common mental health issues for adults living in shelters, as self-reported at intake/assessment, and the 10 most common medical health issues for children living in shelters, as self-reported at intake/assessment

The tables below outline the top 10 mental health conditions among adults in Adult Families, Single Adults, and Families with Children shelters. This is self-reported data at the time of application from every adult client that spent the night in an adult family, families with children or single adult shelter in 2017. In this data collection method, each client has the ability to report several health conditions and

these data are not de-duplicated. These counts include clients that turned 18 while in shelter during 2017.

Rank	Mental Health Condition	n
1	Depression	1,081
2	Anxiety	884
3	Bipolar disorder	823
4	Post-traumatic stress disorder (PTSD)	336
5	Schizophrenia	289
6	Panic Disorder	183
7	Attention-deficit hyperactivity disorder (ADHD)	171
8	Serious developmental disability or autism	107
9	Schizoaffective Disorder	87
10	Substance use disorder	70

Rank	Mental Health Condition	n
1	Depression	5,756
2	Bipolar disorder	4,632
3	Anxiety	3,324
4	Schizophrenia	2,816
5	Post-traumatic stress disorder (PTSD)	1,541
6	Substance use disorder	1,509
7	Alcohol abuse/dependence	888
8	Schizoaffective Disorder	813
9	Serious developmental disability or autism	786
10	Attention-deficit hyperactivity disorder (ADHD)	727

Table 4. Top Ten Mental Health Conditions from Intake/Assessment for Adults in Families with Children Shelter in 2017

Rank	Mental Health Condition	n
1	Depression	2,163
2	Anxiety	1,656
3	Bipolar disorder	1,498
4	Serious developmental disability or autism	874
5	Post-traumatic stress disorder (PTSD)	632
6	Attention-deficit hyperactivity disorder (ADHD)	458
7	Schizophrenia	310
8	Panic Disorder	271
9	Substance use disorder	124
10	Schizoaffective Disorder	98

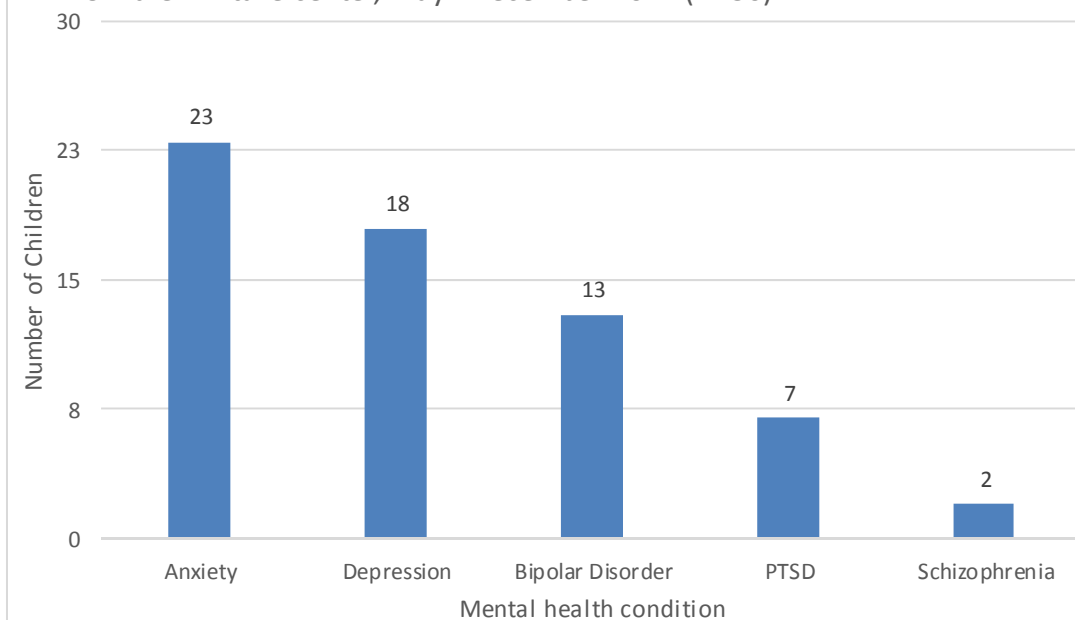
In May 2017, DHS Office of the Medical Director started collecting, via an enhanced data collection tool, self-reported behavioral conditions for new families presenting at the FWC intake center (PATH) to apply for shelter.

From May – December 2017, data were collected for 2,900 children. Of those 2% (n=56) reported at least one mental health condition, as reported by the head of the household for each family member. The leading mental health condition among children was anxiety (Figure 1).

The health screening captures self-reported mental health information on the 5 most common mental health conditions among children plus an option to mark ‘other’ without ability to specify what the other conditions entail. Only six (6) children had other, unspecified, conditions reported. Therefore, we can report only on the 5 specified mental health conditions at this time (Figure 1). Beginning in September 2018, DHS revised and implemented a new survey at PATH to collect more information on behavioral health conditions as reported by head of the household. This will provide information on the top 10 mental health conditions going forward.

Figure 1 shows the 5 mental health conditions among children as reported by head of the household for each family member.

Figure 1: Mental conditions among children as self-reported by head of the household for each family member at Families with Children intake center, May - December 2017 (N=56)



6. A list of the 10 most common mental health issues for adults living in shelters and the 10 most common mental health issues for children living in shelters, as reported by providers under contract or similar agreement with the department to provide mental health services in shelter

For this initial report, these data are not available.

DHS designed a tool to collect data on medical services provided to the clients on-site at 30th Street and Atlantic Assessment shelters, which will be used once the new clinical provider contracts go into effect. This tool will provide us data on 10 medical health conditions. The use of this tool will be expanded to the other single adult assessment shelters via contract amendment.

7. Any metrics relevant to the provision of mental health services reported to the department by any entity providing such services.

Please refer to the new overdose report and the annual mortality report submitted pursuant to LL225 of 2017 and LL63 of 2005, replaced by LL 7 of 2012, respectively.