



Office of  
Mental Health

KATHY HOCHUL  
Governor

ANN MARIE T. SULLIVAN, M.D.  
Commissioner

MOIRA TASHJIAN, MPA  
Executive Deputy Commissioner

July 24, 2023

Andrea LaBarge, CFE  
Audit Manager  
Office of the State Comptroller  
Division of State Government Accountability  
110 State Street – 11<sup>th</sup> Floor  
Albany, NY 12236-0001

Dear Ms. LaBarge:

The following are the Office of Mental Health's (OMH) comments in response to the Office of the State Comptroller's (OSC) Follow-Up Audit Report 2023-F-11 entitled, "Benefits Advisement Services for Individuals With Disabilities Seeking Employment." We are not providing comments to recommendations 2 and 3 as OSC has confirmed they were fully implemented. OMH appreciates the acknowledgement.

**Recommendation #1**

*Formally assess the current benefits advisement system and make improvements, where possible, to address the Report's recommendation. The assessment should consider key system features recommended in the Report, including:*

- *An interactive benefits calculator that allows individuals to assess how employment will affect access to publicly funded benefits.*
- *Automated life coaching notifications sent to professional life coaches.*
- *The addition of information for other benefit types including SNAP and housing assistance.*

Status - Partially Implemented

Agency Action – In April 2022, OMH implemented a new SSI benefits calculator available through the NYESS website. This calculator, developed by Cornell University's Yang-Tan Institute on Employment and Disability, provides users with information on how their SSI benefits might change if they return to work. OMH also added a link on the NYESS website to a calculator developed by the Office of Temporary Disability Assistance, which gives individuals the ability to see if they may be eligible to receive assistance through various programs, such as Public Assistance; SNAP; Home Energy Assistance; Women, Infants & Children; and the Weatherization Assistance Program. In addition, OMH Officials said they are collaborating with an external entity to develop and test a county-specific benefits calculator, a pilot of which is scheduled to be completed in September 2024. If the roll-out of this calculator is successful, it will incorporate SNAP, Temporary Assistance for Needy Families, and other local benefits in addition to federal benefits such as SSI, SSDI, and Medicaid.

OMH has also begun to develop a professional network of certified benefits advisors, which OMH refers to as NYESS Work Incentives Navigator Specialists (WINS) in lieu of the term “life coaches.” WINS are able to run a report in [Work Incentives Navigator and Reports] WINR showing which customers have received benefit notifications, although they do not receive automated notifications, as recommended in the Report – which would help ensure customers’ needs are met in real time.

While WINR continues to send out notifications for the Earned Income Tax Credit, Medicaid Buy-In for Working People with Disabilities and continued Medicaid eligibility (Social Security Act Section 1916(b)), OMH has not obtained information on other types of benefits such as SNAP and housing assistance, as recommended in the Report. Therefore, WINR does not provide notifications for these benefits, which could improve the usefulness of notifications for customers.

#### **Response #1**

OMH will continue working toward developing a county-specific benefits calculator as noted above. In the meantime, existing tools and resources will be used to accomplish the goal of full public benefits incorporation into our work.

OMH will also continue ongoing analysis to determine the feasibility of including additional benefit types in WINR, and how to best alert WINS and other customer collaterals of these benefit types once the information is available.

#### **Recommendation #4**

*Work with the email notification vendor to capture historical notification data and use that data to assess the effectiveness of WINR notifications, making improvements to the notifications, as applicable, and collaborating with other State agencies as necessary.*

Status – Partially Implemented

Agency Action – OMH staff worked with their email notification vendor and developed internal infrastructure to obtain and store WINR notification data. This infrastructure enhancement was implemented in April 2022. OMH staff are now able to determine which email notifications bounced back as undeliverable or were opened, whether the customer clicked a link within the email, and whether the customer unsubscribed. However, OMH has not yet used the data to assess the effectiveness of the WINR notifications. Officials explained that they do not believe analyzing notification data would be useful because OMH staff are unable to tell if a recipient even opened the notification unless the recipient downloaded images in the email. Officials further stated that, even if they know a recipient has read the email, OMH would also need to know what actions the recipient took thereafter in order to measure the actual impact. While we understand there are challenges associated with complete data collection and analysis, it is important to assess the effectiveness of any program and OMH should develop steps to do so.

#### **Response #4**

OMH agrees with the importance of assessing effectiveness and will focus on that ability as we move forward. While the current tools that are utilized and the data sets that are available for WINR greatly enhance our ability to be pro-active to our customers and their support systems, including WINS, this initial iteration of an automated advisory system

has limitations pertaining to outcomes and measurement. As we look to leverage the initial infrastructure built using WINR, broaden and expand benefits that we focus on, and incorporate enhanced strategies, ongoing ability to assess effectiveness will be a key focus.

Please let us know if you have any questions or require additional information concerning the above.

Sincerely,

A handwritten signature in black ink that reads "Moira Tashjian". The signature is written in a cursive, flowing style.

Moira Tashjian  
Executive Deputy Commissioner