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STATE OF NEW YORK  
OFFICE OF THE STATE COMPTROLLER

June 22, 2023

Anne Marie T. Sullivan, M.D.  
Commissioner  
Office of Mental Health  
44 Holland Avenue  
Albany, NY 12229

Re: Benefits Advisement Services for  
Individuals With Disabilities Seeking  
Employment  
Report 2023-F-11

Dear Dr. Sullivan:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have followed up on the actions taken by officials of the Office of Mental Health (OMH) to implement the recommendations contained in our audit report, *Benefits Advisement Services for Individuals With Disabilities Seeking Employment* (Report [2020-S-41](#)).

**Background, Scope, and Objective**

According to the 2021 American Community Survey (ACS), there were approximately 1 million working-age adults (age 18–64) with disabilities in New York State in 2021. The employment rate of working-age people with disabilities was about 37% compared to about 75% for people without disabilities. Further, ACS data shows that New Yorkers with disabilities are more than twice as likely to live in poverty.

The New York State Employment First Commission (Commission), established by Executive Order 136 and composed of representatives from several State agencies, issued a report (Report) in March 2015. The Report established an Employment First Policy for New York State with the main goal of increasing the employment rate of individuals with disabilities by 5% while also decreasing their poverty rate by 5%. One way the Report recommended this be achieved was by improving benefits advisement services to assist all individuals with disabilities in making informed decisions about going to work. Specifically, the Commission tasked OMH, in partnership with other State agencies, with developing a life coaching network available to all individuals with disabilities seeking economic self-sufficiency. The Commission also recommended implementing an interactive web-based platform to provide accurate information and benefits calculators so individuals with disabilities could better assess how work would impact their benefits. The platform should incorporate information on multiple benefits programs, including publicly funded health insurance and income support programs such as Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Supplemental

Nutrition Assistance Program (SNAP), housing assistance, and other public benefits. The Report suggested that this system be fully integrated with the New York Employment Services System (NYESS) – a system that provides all New Yorkers, regardless of disability, with a single point of access to all employment-related services and supports, including job matching. Seven participating governmental entities, including OMH, are responsible for licensing or contracting with providers for employment-related supports and services. Any provider of disability employment services in New York can be a NYESS provider affiliate, regardless of funding source or program type.

The objective of our initial audit, issued on July 20, 2021 and covering the period March 1, 2015 through January 13, 2021, was to determine if OMH had effectively addressed the findings and recommendation related to benefits advisement in the Report. The audit found that OMH had designed and launched a benefits advisement system, Work Incentives Navigator and Reports (WINR), within NYESS to address the Report's benefits advisement recommendation. However, OMH did not fully address all aspects of the recommendation. Specifically, WINR did not contain certain recommended components, including an interactive benefits advisement calculator, automated life coaching communications, and information regarding certain additional benefits such as nutritional and housing assistance, as suggested in the Report. In addition, since WINR was only available to individuals working with an employment services provider, many individuals with disabilities who would likely benefit from WINR services did not have access to the application. Finally, OMH did not take steps to assess the effectiveness of its email notification system. Active system customers may not have been receiving notifications on important benefits for which they may be eligible, as notifications were delivered only via email, and less than half of the 40,000 WINR customers were found to have a valid e-mail address in the application at the time of our original audit. Officials also did not assess the effectiveness of those emails.

The objective of our follow-up was to assess the extent of implementation, as of May 2023, of the four recommendations included in our initial audit report.

### **Summary Conclusions and Status of Audit Recommendations**

OMH has made progress in addressing the issues identified in our initial audit report. Of the initial report's four audit recommendations, two were implemented and two were partially implemented.

### **Follow-Up Observations**

#### **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 and 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 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 1619(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.

### **Recommendation 2**

*Develop a network of professional life coaches who are educated in public benefits and work incentives for individuals with disabilities, collaborating with other State agencies as necessary.*

Status – Implemented

Agency Action – OMH has begun to develop a professional network of certified benefit advisors, or WINS. In March 2023, OMH, in conjunction with its NYESS provider affiliates, developed a WINS recruitment and certification process. To obtain a WINS certification, individuals must fill out an application and successfully complete a training course through either Cornell University or Virginia Commonwealth University. According to OMH, the training is a series of intensive, remote coursework over several weeks that includes virtual class time, homework, and testing. OMH is still in the initial phase of implementing the WINS program and is currently focusing on NYESS provider affiliates. Subsequent phases will include recruitment through other State agencies and community partners. As of April 11, 2023, 50 people are fully registered as WINS, 305 have expressed interest, and another 81 are in the process of completing the training course.

### **Recommendation 3**

*Evaluate the feasibility of expanding WINR to include all individuals with disabilities, even those who are not currently working with an employment services provider, collaborating with other State agencies and external entities as necessary.*

Status – Implemented

Agency Action – Since our initial report, OMH officials have explored additional opportunities to expand the scope of WINR’s reach among individuals with disabilities. While OMH officials maintain that WINR is not intended to include all New Yorkers with disabilities and that they are constrained by the data they have access to, they have taken steps to develop new partnerships and data agreements that will increase access to WINR. For example, OMH is partnering with the Office of the Chief Disability Officer to initiate a reboot of Employment First. This will include working with the Office for People With Developmental Disabilities (OPWDD) to ensure core OPWDD systems data is available in NYESS as well as with the Department of Labor to include access to additional wage and workforce data into existing agreements. OMH is also working with OPWDD to enhance existing agreements with other State agencies to capture more data in NYESS. Furthermore, OMH is leading New York’s Advancing State Policy Integration for Recovery and Employment (ASPIRE) initiative. A core aspect of ASPIRE is coordinating with the State Education Department’s Adult Career and Continuing Education Services Vocational Rehabilitation to better support transition-aged youth with behavioral health challenges. Each of these partnerships will provide OMH with access to additional data that will enable it to broaden the scope of the NYESS customer base.

### **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.

Major contributors to this report were Richard Podagrosi, Adriane Inman, and Ryan Chauvin.

We would appreciate your response to this report within 30 days, indicating any actions planned to address the unresolved issues discussed in this report. We thank the management and staff of OMH for the courtesies and cooperation extended to our auditors during this follow-up.

Very truly yours,

Andrea LaBarge, CFE  
Audit Manager

cc: Tarra Practico, OMH