



## Office of Temporary and Disability Assistance

**KATHY HOCHUL**  
Governor

**BARBARA C. GUINN**  
Commissioner

**RAJNI CHAWLA**  
Executive Deputy Commissioner

February 6, 2025

Nadine Morrell  
Audit Director  
Office of the State Comptroller  
110 State Street  
Albany, NY 12236

Re: Controls Over the Empire State Supportive  
Housing Initiative (ESSHI) (2022-S-34)

Dear Nadine Morrell:

The New York State Office of Temporary and Disability Assistance (OTDA) respectfully submits this 180-day response to the Office of the State Comptroller's (OSC) final report regarding the audit of the controls over the Empire State Supportive Housing Initiative (ESSHI) (2022-S-34). The purpose of this letter is to provide an update on OTDA's implementation of the recommendations made by the OSC. Pursuant to Section 170 of the Executive Law, copies of this response will be sent separately to the Governor, the State Comptroller, and the leaders of the Legislature, as well as fiscal committees.

In response to the specific recommendations in OSC's report, OTDA responds as outlined below.

### **OSC's Recommendation**

1. Develop and maintain policies and procedures to ensure the ESSHI program achieves its goals, including addressing case management expectations.

**OTDA Response:** OTDA developed a Policies and Procedures document to help ensure the ESSHI program achieves its goals and communicates case management expectations.

2. Standardize Individualized Service Plans (ISPs) and establish the minimum requirements that each should document, including how often they need to be revisited/updated.

**OTDA Response:** OTDA's Policies and Procedures document provides best practices for case files in establishing and following up with ESSHI residents on goals.

3. Increase the frequency of provider monitoring visits to ensure the ESSHI program achieves its goals.

**OTDA Response:** OTDA will continue to evaluate the feasibility of increasing the frequency of provider monitoring visits.

4. Revise and update monitoring visit procedures to ensure providers comply with contract requirements and/or applicable policies and procedures.

**OTDA Response:** OTDA's newly developed Policies and Procedures document will be used as a tool for OTDA staff to reference when conducting monitoring visits.

5. Establish standardized performance measures to ensure all ESSHI programs offer consistent services.

**OTDA Response:** ESSHI operates under the Housing First model, and residents are offered linkage to a range of supportive services, including services offered on-site. Every ESSHI project is unique in the mix of people housed and the individual needs of the ESSHI tenants. The Housing First model supports individual choice and self-determination not only with services available but also the duration of participation in the program. The Housing First model is based on evidence, human rights and recovery principles. When a person is given a choice, versus mandated to participate, it supports their own self growth and identified goals. The responsibility of the ESSHI provider is to support the participants in their respective individual choices. OTDA measures performance against contractual obligations, ensuring that units are in good working order, contracted staff is in place, and relevant services are offered. OTDA does not believe standardization of performance measures is beneficial to the resident, as no two individuals have the same needs.

**State Comptroller's Comment** – As noted in our original State Comptroller's Comment, our audit found all seven provider contracts reviewed contained performance measures and requirements such as length of stay, occupancy rates, and ISP completion that varied by provider. Consistency among the metrics would allow OTDA to better measure performance.

6. Develop and implement a process to aggregate and track resident turnover and length-of-stay data from providers to measure the effectiveness of the program.

**OTDA Response:** OTDA disagrees that aggregating and tracking resident turnover and length of stay are suitable measures of the effectiveness of an ESSHI project. OTDA will continue its practice of asking about vacancies and turnover on Program Reports and monitoring visits. Information gained from these established processes, can be aggregated, and will allow OTDA staff to continue to have one on one conversations with ESSHI contractors about their ESSHI program and whether OTDA can provide assistance to the contractor to ensure the continued success of the contractor's ESSHI program and the success of their ESSHI residents.

**State Comptroller's Comment** – We stand by our recommendation. As noted in our original State Comptroller's Comment, OTDA would be better informed about whether ESSHI goals are being achieved by tracking and aggregating program data.

7. Review ESSHI contracts prior to award to ensure performance measures and requirements are reasonable and consistent throughout the program.

**OTDA Response:** OTDA is already acting in accordance with this recommendation. OTDA currently does, and will continue to, review contracts prior to execution to ensure contractual ESSHI requirements are reasonable.

8. Revise the Risk Assessment Tool (RAT) to ensure it evaluates providers' risk for compliance with ESSHI and contract deliverables.

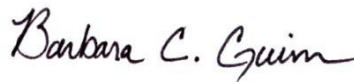
**OTDA Response:** OTDA revised the Risk Assessment Tool in 2023 to add a question to reflect any negative findings during the most recent OTDA monitoring visit.

9. Document deviations from the RAT and the reasons why higher-risk providers are not given priority.

**OTDA Response:** OTDA revised the Risk Assessment Tool by adding a column for staff to indicate the reason why a contractor was or was not visited.

If you have questions or comments concerning our response in this letter, please contact Thomas Cooper at (518) 402-0148 or [Thomas.Cooper@otda.ny.gov](mailto:Thomas.Cooper@otda.ny.gov).

Sincerely,



Barbara C. Guinn  
Commissioner

cc: Rajni Chawla