



To: All ISS Housing Subsidy Provider Agencies
All Fiscal Intermediary Provider Agencies
All Care Coordination Organizations
OPWDD Regional Office Staff

From: Program Implementation, Regional Offices

Date: October 20, 2020

Re: OPWDD Housing Subsidy Guidance: Housing Subsidy Certification
and Recertification Requirements

Purpose and Applicability

Due to changes in face-to-face requirements for Care Managers during the COVID-19 emergency, some of the required oversight activities related to the OPWDD Housing Subsidy program have been disrupted and/or not completed timely.

This guidance clarifies current documentation requirements and applies to agencies supporting individuals through OPWDD’s housing subsidy program (formerly known as Individual Supports and Services or ISS).

Certification and Recertification Requirements

Individuals participating in OPWDD’s housing subsidy program must meet specific criteria, including having their home and income certified before the individual initially moves into the home/apartment, and recertified at least annually thereafter. Historically, the Care Managers have assisted agencies in the collection of pertinent documents, and this may continue where practicable. However, the completion of all required documents to support billing of state dollars is ultimately the requirement of the biller of record (e.g., ISS Agency or the Fiscal Intermediary).

Income Evaluation and Reevaluation

The Agency must complete an initial evaluation before the individual is approved to receive a housing subsidy, and then must reevaluate an individual’s subsidy amount at least annually. If there is an income change ***following the individual’s last evaluation***, the Agency must reevaluate the individual’s income subsidy as soon as practicable, but no later than 60 days after the change. For example, if an individual’s income is impacted by job loss, their housing subsidy must be promptly reevaluated as the individual remains responsible for paying their contribution portion of the rent ***until*** their required contribution is adjusted.

The Agency administering the housing subsidy **must collect** income reevaluation documentation. The income reevaluation documentation must be submitted by a secure electronic mechanism (e.g., secure e-mail or fax) whenever possible to OPWDD Regional Office (DDRO) for its review and approval. The documentation should go to either the DDRO's Self-Direction Liaison or ISS Coordinator, based upon how the person is accessing the housing subsidy. If the Agency's electronic submission is not possible, then the reevaluation documentation collected by the Agency must be provided via hard copy and sent to the DDRO using the most expedient means available to the Agency (e.g., USPS mail or third-party commercial carrier). The Agency must document its electronic submission hardship within the individual's record for any potential third-party review.

Quality Assurance Assessments

Quality assurance (QA) assessments are required before the individual is approved for a housing subsidy, and annually thereafter. QA assessments may be completed by the individual's ISS agency, a Fiscal Intermediary, or Care Manager. For health and safety considerations, any staff entering an individual's home to complete the assessment must follow social distancing guidelines and use masks, gloves, and other protective gear as recommended under guidance issued by New York State. OPWDD's guidance for providers is available at: <https://opwdd.ny.gov/coronavirus-guidance>.

Documentation Submission

If the QA Assessment or other certification/recertification documentation was not completed from March 2020 through the date of this memorandum, the biller of record must ensure that the documentation is completed and submitted to the appropriate OPWDD Regional Office by November 20, 2020. The appropriate QA Assessment forms can be obtained from the DDRO ISS Coordinator. Documentation must be submitted to the DDRO electronically (e.g., fax or secure e-mail), whenever possible. If there is hardship on the electronic submission the recertification documentation hard copy format must be sent via the most expedient means available (e.g., USPS mail or third-party commercial carrier). The hardship must be documented within the individual's record for any potential third-party review. Providers must retain hardcopies of the documentation with original signatures for six (6) years.

If you have any questions, please contact OPWDD's Home and Community Living unit at 518-473-1973 or housing.initiatives@opwdd.ny.gov