

8.05 HOME MODIFICATIONS

Introduction

Within the context of an IPE, CBVH may provide modest home modifications to assist the consumer in obtaining access to the house or apartment, or to make features of the residence more accessible. Modest home modifications are minor structural changes such as widening doorways, construction of ramps or installation of lifts, and installation of grab bars in a bathroom. Home modification services must directly benefit the individual in terms of achieving an employment outcome (including Homemaker).

Note

Modifications may only be made to those home features that are critical to participation in training to achieve an employment outcome.

Rule

All modifications or repairs must follow prescribed federal, state and local standards. Specifications developed by the American National Standards Institute (U.S. Department of Housing and Urban Development) should be consulted when necessary for technical information regarding accessibility. The American National Standards Institute has a website that provides information regarding accessibility issues.

When to Provide Home Modification Services

Home modification can only be provided to consumers in Status 18 and above, upon completion of a Home Modification Evaluation. An evaluation to determine the need for home modification may be conducted during Status 02 or 06. Exceptions to allow for provision of home modification services prior to development of an IPE may only be made:

1. With prior written approval of the District Manager for modifications costing less than \$15,000.
2. With prior written approval of the District Manager and the Director of Field Operations for modifications costing more than \$15,000.

Limitations on the Provision of Home Modification Services

The following limitations on the provision of home modification services should be discussed with the consumer prior to initiating an evaluation for home modification

services:

1. Initiation of a Home Modification Evaluation is not a guarantee that CBVH will finance, in whole or in part, such modifications. It is important to emphasize that just because an evaluator may take measurements in a particular part of the house or discusses possible modifications, it does not mean that the home will necessarily be modified.
2. CBVH must consider functional needs of the consumer, and the least costly way to meet those needs. Aesthetic issues may only be considered if they do not increase the cost of the project.
3. CBVH will provide home modification services only once for a consumer. If an individual has previously received home modification services in the past, a waiver will only be considered if the circumstances that warrant additional service are beyond the control of the consumer (e.g. house fire). The waiver must be obtained from the District Manager and documented in the case record.
4. It is the consumer's responsibility to insure and maintain modifications.
5. Only the primary residence of the consumer can be modified.
6. No home modification services can be provided to individuals who are currently involved in or planning new construction (including any additions) of a home. Individuals planning a new addition should take into consideration accessibility issues. CBVH can provide assistance in referring or locating a specialist to recommend features they should consider when building a house or addition.
7. Consumers considering a move to a new or different home or apartment may seek consultation on accessibility issues, but should not make assumptions that CBVH will modify an inaccessible house or apartment after the individual has moved in.

The Home Modification Specialist

The Home Modification Specialist (Specialist) plays a key role in the home modification process. The Specialist:

1. Performs the home modification accessibility evaluation;
2. Develops recommendations, specifications, and drawings of the needed modifications and submits the same to CBVH for its review and approval;
3. Answers bidders questions at the bidders conference;

4. Recommends necessary inspections (and may also obtain them);
5. Monitors the progress of the modification; and
6. Performs the final inspection that will trigger payment for the home modification services.

Qualifications of Home Modification Specialists

A Rehabilitation Engineer, Architect, Contractor, or other individual with sufficient knowledge of disability-related accommodations and construction to develop bid-ready specifications may assume the role of home modification specialist. The Supervisor of the Program Unit must approve the Home Modification Specialist before providing services.

Specialists may not have a conflict of interest when dealing with either the homeowner or the contractors. The Specialist or his or her employer is therefore prohibited from bidding on the modifications.

Payment to Home Modification Specialists

Home Modification Specialists are paid at an appropriate hourly rate, not to exceed \$100/hour. Specialists may be paid for on-site services and report preparation for up to 12 hours. Up to 12 additional hours may be authorized with Senior Counselor approval. The District Manager must approve any authorizations above a total of 24 hours. The Specialists may also be reimbursed for travel time and travel expenses in accordance with the "Individual Private Vendor Mileage Reimbursement" policy (refer to the Vocational Rehabilitation Services Manual, Section 15.00.06). In consultation with the Supervisor of the Program Unit, the counselor will issue payment to the Home Modification Specialist.

Home Modification Specialists can expect to receive payment at the following points in the home modification process; contingent upon submission and approval of appropriate documentation:

1. Upon submittal of the Initial Assessment of the Scope of the Project;
2. Upon submittal and acceptance of the formal Home Modification Evaluation Report; and
3. If they continued to monitor the home modification project, upon completion of the modification and the specialist's submittal of a final inspection report confirming the work has been completed satisfactorily.

Expenditure Review/Approval

The total cost of home modifications may not exceed \$15,000 unless previously approved by both the District Manager and the Director of Field Operations. Most modifications will cost considerably less than this amount.

The Senior Counselor (and the District Office Manager if the expenditure is greater than \$15,000) must approve every IPE and all expenditures involving home modification. Plans to provide home modifications should be discussed with the Senior Counselor prior to development of the IPE.

Economic Need

The provision of home modification services is contingent upon the consumer meeting the criteria for economic need (refer to section 5.00 of the Vocational Rehabilitation Services Manual). Home modification assessments may be provided regardless of the consumer's economic need status.

Consumers Who Do Not Meet Economic Need

If a consumer does not meet economic need criteria, but wishes to proceed with having the work done at his/her own expense, the counselor will provide the consumer with a copy of the Home Modification Evaluation Report. Prior to providing a copy of the report, the counselor must ask the consumer to sign a document stating that the consumer understands that CBVH has no further obligations or responsibility in relation to any home modifications pursued by the consumer.

Comparable Benefits

When appropriate, maximum utilization should be made of available comparable benefits (refer to Section 9.00 of the Vocational Rehabilitation Services Manual).

Preliminary Steps

Before beginning the home modification process, the counselor should discuss with the consumer the "Limitations on the Provision of Home Modifications", as outlined on the first two pages of this policy.

In addition, the following steps should be taken before home modification provision can begin:

1. Discuss with the consumer any accessibility problems that interfere with the individual's ability to participate in training or employment (home or community based).
2. Conduct a task analysis of the essential functions that the individual must perform in order to participate in training or employment. The counselor may choose to consult with a rehabilitation teacher, occupational therapist, physical therapist or other qualified professional to confirm the need for modification services and identify the modifications needed to enable the individual to perform the essential functions identified in the task analysis. The counselor makes the final determination regarding the necessary home modifications. The results of this consultation will be shared with the Home Modification Specialist who will conduct the formal assessment.
3. Ascertain if the consumer is currently involved with or planning new construction of a home, or plans to move. If so, no home modification services can be provided at the consumer's current residence.
4. Determine whether CBVH has provided home modification services in the past. If modifications were made, determine if circumstances requiring additional modification services are beyond the consumer's control. Under those conditions, the District Manager may approve a waiver to provide the additional service. If the conditions were not beyond the consumer's control, no additional modification services may be provided.
5. Explore with the consumer the feasibility of moving the consumer to a more accessible location. Moving expenses are allowable if those expenses are less costly than provision of home modifications to the individual's current residence (see 8.04.04, "Allowable Relocation Expenses"). Temporary or portable modifications should also be explored.
6. Obtain written assurance from the consumer that he/she intends to stay in the residence to be modified for the foreseeable future.
7. Explore resources for comparable benefits, e.g., Medicare, Office for the Aging Home Care Program, Medicaid Home and Community Based Waiver, Social Security (Impairment Related Work Expense program and PASS), Independent Living Centers, Rural Housing Administration, Equipment Loan Fund, Realty Associations, Division of Veterans Affairs, service clubs, or consumer contribution.
8. If someone other than the consumer owns the property, obtain written permission from the owner to perform the modification.
9. Provide the consumer with the "CBVH Consumer Handout on Home Modifications."

10. Include Home Modification assessment in the individual's IPE or IPEDP and document the consumer's responsibilities and understanding of the limitations on the provision of this service on the plan.

Assessing the Need for Home Modification Services

Based on the counselor's analysis of the tasks to be performed by the consumer and any OT/PT assessments, the counselor should provide information to the Supervisor of the Program Unit regarding the functional needs to be evaluated in light of the consumer's employment goal. The Supervisor of the Program Unit will:

1. Locate a Home Modification Specialist to perform an initial assessment of the scope of the proposed home modification. The Supervisor of the Program Unit will provide the Home Modification Specialist with a copy of the Home Modification Guidelines for Home Modification Specialists.
2. Require the Home Modification Specialist to provide, within 10 business days of the Specialist's visit to the consumer's home, a written "Initial Assessment of Scope of the Home Modification Project" report containing the following information:
 - a. Scope of Home Modifications recommended - what will be involved in modifying each area of the home for which the counselor requested assessment. No detailed drawings or specifications are developed at this time.
 - b. List of associated adaptive equipment recommended for the consumer.
 - c. Estimated costs for recommended modifications and adaptive equipment.
 - d. Necessary inspections to determine whether existing systems in the home are in compliance with applicable codes for the recommended modifications. In all instances, the consumer is responsible for the costs to bring the residence up to code. For example:
 - i. If a wheelchair lift is recommended, an electrical inspection may be needed
 - ii. If a roll-in-shower is recommended, a plumbing inspection may be needed.
 - e. Estimated time frame for completion of the project.
 - f. If the consumer is having other non-CBVH funded work done on the house, recommend which component (consumer renovations or CBVH

sponsored home modifications) should take place first. The Home Modification Specialist should have discussed the impact of proposed home modifications with the contractor for the other renovations.

- g. Possible alternative devices or accommodations considered which would negate the need for some or all of the modifications.

Determination of Home Modification Services to be Provided

Before meeting with the consumer, the Counselor must review/discuss the outcome of the assessment and possible options with the senior counselor. The Counselor should then:

1. Meet with consumer to discuss the Specialist's recommendations, results of the discussion with the senior counselor, cost estimates, inspection results, and relevance of the modifications to the consumer's goal in order to determine what home modifications and associated adaptive equipment will be provided, if any.
2. Confirm that the Home Modification Specialist or consumer has coordinated/obtained any needed inspections/certificates required by local village, town, county or state ordinances
3. Enter the home modification service, along with any comparable benefits and specific responsibilities and understandings of the consumer, onto the IPE, obtaining both the senior counselor and district manager's approval.

Note

It is the counselor's responsibility in consultation with the Senior Counselor to determine which modifications, if any, are necessary to enable the consumer to reach the vocational goal, and to make the final determination of which recommended home modifications to purchase.

Procedure to Obtain Home Modifications

Upon approval of the home modification(s) to be completed and inclusion of home modifications and related equipment on the IPE, the counselor must:

1. Be sure the appropriate documentation has been completed:
 - a. Specialists' "Initial Assessment of Scope of Home Modification Project".
 - b. Statement of Understanding of Limitations on the Provision of Home Modification Services on the IPE

- c. Waiver for Second Home Modification (if required)
 - d. Consumer's written intent to remain at the residence for the foreseeable future;
 - e. Landlord's written permission to conduct home modification on premises (if required); and
2. Obtain approval from the Senior Counselor for the recommended home modifications and advise the Supervisor of the Program Unit of the modifications and equipment to be provided. The Supervisor will contact the Home Modification Specialist with the information provided by the counselor and request a written "Home Modification Evaluation Report" to include all the information to seek proposals to do the work:
 - a. Detailed specifications, including related plumbing and electrical work;
 - b. "Building permit ready" drawings;
 - c. Estimated cost of home modifications;
 - d. Estimated time frame for completion of the job; and, if possible
 - e. Names and contact information for potential bidders for the work, if known.

Note: The Home Modification Evaluation Report must be submitted within 20 business days of the meeting with the consumer to agree on the work desired.

3. Review the report with Supervisor of the Program Unit and/or the Home Modification Specialist prior to meeting with the consumer, and owner if applicable, to obtain final approval of home modification plans.
4. Review the specifications and drawings with the consumer, and property owner if applicable, for final approval. Any changes requested by the consumer or property owner must be reviewed and approved by the Specialist (this can be accomplished through a phone call from the consumer's home). If the changes will result in more than \$1,000 additional costs beyond the estimated cost in #2.c. above, senior counselor approval must be obtained and documented in the case record.
5. Obtain consumer, and property owner(s), if different from the consumer, signature(s) indicating approval of the planned home modifications.

The Home Modification Evaluation Report

Within 10 days of receipt of the final Home Modification Evaluation Report, the Counselor and the Supervisor of the Program Unit will determine whether the report is correct and complete. When necessary, appropriate revisions must be incorporated into the report.

The counselor should keep a copy in the case record of all materials related to the home modification.

Note

The estimated cost of the home modification will determine next steps in the process.

Pre-Bidders Conference

All contractors must participate in a pre-bidders conference so that they can fully understand the job before submitting a proposal.

If it is anticipated that the cost of home modifications will be under \$15,000, the Supervisor of the Program Unit, in consultation with the counselor may propose a date(s) acceptable with the consumer for the pre-bidders conference to take place in the consumer's home. As a general rule, the pre-bidders conference should take place approximately four weeks from the date of receipt of the Home Modification Evaluation Report. See pages 8.05.12 – 8.05.12 for Fiscal Procedures for modifications expected to cost less than \$15,000.

The Supervisor of the Program Unit will establish dates for a Pre-Bidders conference associated with the formal bidding process for modifications costing \$15,000 or more. See pages 8.05.13 – 8.05.14 for Fiscal Procedures for modifications expected to cost \$15,000 or more.

Implementation of the Home Modification, Counselor's Role

Following selection of a contractor to complete the home modification, the counselor may wish to maintain contact with the consumer and the Home Modification Specialist to ascertain and document that the work is completed as specified. However, general responsibility for monitoring implementation of the modification(s) is the primary responsibility of the Supervisor of the Program Unit.

Role of the Home Modification Specialist During Implementation of Home Modification

During the implementation of the home modification, the Home Modification Specialist may:

1. Assist in the scheduling/initiation of the home modification and follow the progress of the contractor.
2. If the modification is complicated, or problems are foreseen, perform interim inspection(s).

3. Mediate any needed problem resolution/recommend remedial action, and
4. At the completion of the work by the contractor, make a final inspection, including verification of receipt of "Certificate of Occupancy" and provide a written report documenting that the home modification work is complete.

Note: if the Home Modification Specialist is not available, the Supervisor of the Program Unit may assume the role of the Specialist during the implementation phase of the Home Modification.

Role of Counselor at Completion of Home Modification

Upon completion of the Home Modification, the CBVH counselor must:

1. Within 7-10 days of the completion of the home modification, confirm with the consumer that the work was completed to the consumer's satisfaction.
2. Upon confirmation by the Home Modification Specialist or Supervisor of the Program Unit that the work was completed satisfactorily, submit related receiving report.
3. If the Home Modification Specialist monitored the home modification through confirmation of satisfactory completion of work, authorize final payment to the Specialist
4. Advise the consumer that upon completion of the home modification, responsibility for maintenance and repair not covered under the contractor's warranty, as well as for removal, site restoration, or replacement rests with the consumer.

Fiscal Procedure - Projects That Have a Total Cost of \$15,000 or Less:

Upon receipt of recommendations for the home modification service, if the total cost is \$15,000 or less, the following procedures will be followed:

1. The CBVH Home Office will review the proposal, including all materials sent by the counselor, and send the proposal to a number of approved contractors along with the CBVH-designed bid form. Contractors will submit their bids by the date indicated on the bid form.
2. The CBVH Home Office will review the contractor bids and forward them to the OCFS Purchasing Unit. At this time, the CBVH Home Office will also process a purchase request through the OCFS Procurement Manager Plus (PMP) System.

3. The OCFS Purchasing Unit will review the bid information and issue a purchase order to the lowest bidder (provided that bidder can meet all the specifications outlined in the bid). The OCFS Purchasing Unit will FAX a copy of the approved purchase order to the contractor awarded the home modification project. The OCFS Purchasing Unit concurrently will send the related receiving report to the CBVH Home Office Unit.
4. The CBVH Home Office will FAX the receiving report copy to the originating counselor with the purchase order number and dollar amount. The District Office will file the receiving report in the consumer's record of service and will apply the total dollar amount against the district office's VR allocation.
5. The CBVH Home Office will inform the contractor that work should begin as soon as possible. The CBVH Home Office, at that time, will provide contact information to the contractor for fiscal concerns that may arise. The CBVH Home Office will inform the contractor that all other issues regarding the modification should be addressed to the District Office Counselor.
6. Upon satisfactory completion of the home modification, the counselor will submit the receiving report to the Home Office. OCFS Accounts Payable will then process payment to the contractor.

Fiscal Procedure - Projects That Have a Total Cost Greater Than \$15,000

When a home modification is expected to exceed \$15,000, the following steps should be taken:

1. The CBVH Home Office will review the proposal, including all materials sent from the District Office, and forward it to the OCFS Purchasing Unit with a list of qualified contractors. The CBVH Home Office will provide the OCFS Purchasing Unit with the date and time that the pre-bidders conference can be held at the consumer's home, when the consumer and the VR counselor and/or the Home Modification Specialist will be present.
2. The OCFS Purchasing Unit will review the home accessibility evaluation and all the related specifications to be completed.
3. The OCFS Purchasing Unit will submit the home modification project to the New York State Contract Reporter, who will issue an announcement regarding the bidding opportunity.
4. After the OCFS Purchasing Unit determines the bid is posted, they will take the necessary action to develop a request for a bid for the home modification project, indicating the bid opening date. The CBVH Home Office will notify the possible contractors regarding the date of the pre-bid conference.

5. The pre-bidders conference will be conducted at the specified time, where copies of the Request for Bid, specifications for the project, and architectural drawings will be provided to the attending contractors by Home Office and the Home Modifications Specialist.
6. All contractors who attended the conference and are interested in the project submit bids to the OCFS Purchasing Unit by the date and time specified on the Request for Bid.
7. After the OCFS Purchasing Unit receives all the submitted bids from interested contractors, the Purchasing Unit selects the bidder submitting the lowest cost bid. A purchase order is then written by the OCFS Purchasing Unit and forwarded to the New York State Office of the State Comptroller (NYS OSC).
8. After receiving the submitted purchase order, the NYS OSC will review and approve the purchase order and sign it. The NYS OCS will forward the approved purchase order to the OCFS Purchasing Unit.
9. The OCFS Purchasing Unit will notify the CBVH Home Office that the purchase order has been approved by the NYS OSC, and will FAX the purchase order to the awarded contractor.
10. CBVH Home Office will FAX the receiving report copy to the originating District Office Counselor with the purchase order number and dollar amount. The district office files the receiving report in the consumer's record of service and applies the total dollar amount against their VR allocation.
11. The CBVH Home Office will inform the contractor that work should begin as soon as possible. The CBVH Home Office, at that time, will provide contact information to the contractor for fiscal concerns that may arise. The CBVH Home Office will inform the contractor that all other issues regarding the modification should be addressed to the District Office Counselor.
12. Upon satisfactory completion of the home modification, the District Office Counselor will submit the receiving report to the CBVH Home. OCFS Accounts Payable will then process payment to the contractor.