

**Commonwealth Of Pennsylvania**  
**Proposed Interagency Guidance on Home Adaptations and Assistive  
Technology Programs**

October 4, 2006

The purpose of this document is to provide guidance to organizations that are involved in providing home adaptations and/or assistive technology across the Commonwealth. Such guidance is offered to improve the capacity of home adaptation programs, while respecting the rights of the individual seeking assistance, promoting good business practices, and providing standard information to new programs seeking to become providers.

It is the intention of this Commonwealth that residents in all 67 counties will have access to information about home adaptations and technology, including design and customization advice specific to their disability and their home. And also that low-income residents have access to financial assistance to help them pay for necessary home adaptations and technology. The information and financial assistance is intended to promote and sustain safe, community-based, living arrangements for Pennsylvanians with disabilities and who are elderly.

It is also PA's intention that all federal, state, and local funds used to pay for home adaptations and technology be administered through programs that are simple and easy for residents to contact; that coordinate with each other to provide a statewide network of comparable services regardless of geographic location; that consider home adaptations and technology to be as important as social and other services; that provide services within reasonable timeframes; and that respect consumer choice and privacy.

It is recommended that program administrators seeking governmental funds controlled by the Commonwealth are hereby directed to develop staff and organizational expertise to develop and manage their home adaptation and technology assistance programs in accordance with these Commonwealth Intentions.

## **Principle 1 Consumer Direction**

*Consumer direction maintains that people with disabilities of all ages have the ability and the right to make decisions about services that affect their lives. Organizations applying to the Commonwealth for funding for home adaptations and technology funds must demonstrate that people with disabilities and who are elderly will have visible and effective methods to communicate their needs, suggestions, and concerns to program administrators.*

### **1.1 Consumer Advisory Council**

One acceptable method for demonstrating this commitment is the creation of a Consumer Advisory Council with membership that includes individuals who are disabled or elderly. In addition to communication with program administrators, Councils may also provide consumer education about home modifications and funding, offer dispute resolution services, participate in program development and evaluation, and determine when to make exceptions to program guidelines for expensive or nonstandard modification requests, among other functions.

### **1.2 Partnership Agreements between Delivery Organizations and Consumer Advocacy and Service Organizations**

A second way of demonstrating commitment to Consumer Direction is through partnerships with consumer advocacy and service organizations, as long as these organizations' executive staff or boards of directors have members who have disabilities or are elderly. In addition, these organizations must demonstrate a broad focus on all individuals who may be eligible for home modifications and not just their own clientele.

### **Documentation**

The following list reflects examples of documentation which may be offered to show the organizations practices in this area, Principle 1 Consumer Rights and Direction:

- Consumer Advisory Committee Minutes and Membership Profiles or similar documentation of meetings between program administrators and consumer advocacy and service organizations.
- Partnership documents between Delivery Organizations and Consumer Advocacy and Service Organizations
- Curriculum and attendance list of consumer training re home modifications
- Minutes of Dispute Resolution procedures; minutes of meetings where program exceptions are determined; etc.

## **Principle 2 Leadership**

*Leadership refers to the governance authority and management of organizations applying to the Commonwealth for funding to operate home modification and assistive technology programs. Organization Leaders must demonstrate commitment to administering their programs in a manner that helps keep people with disabilities or who are elderly living safely in their community and also facilitates returning to or moving to their community after stays in hospitals and nursing and rehabilitation centers. Leaders need to commit themselves and their programs to increasing program capacity over time due to the projected demand for more modification services in future years in Pennsylvania.*

### **2.1 Progressive Implementation of Commonwealth Guidance Principles and Keys, and Continuous Improvement in Program Outcomes**

Delivery organizations will build continuous improvement evaluations into their home modification programs in order to ensure that they are developing and expanding their home modification programs to meet the Commonwealth's ever increasing demand for these services as our population ages. Program Leaders commit to taking action to implement best practices and overcome deficiencies on an annual basis

### **2.2 Plans and Reports to the public**

The Delivery Organization will make public its goals and intentions for home modification program funding and will also share with the public evaluations of program successes to date and areas that remain challenges.

### **2.3 Public Meetings**

Organizations may also demonstrate their leadership's dedication to a successful home modification program by establishing annual public meetings or setting aside time at already-occurring meetings, such as Planning or Community Development Committee Hearings, to publicly discuss home modification program goals and outcomes.

The following list reflects examples of documentation which may be offered to show the organizations practices in this area.

- Partnerships and Referral Agreements
- Cultural Competence Plan and Action reports

- Board Membership: reflects the cultures of people served, includes consumers or consumer advocates/representatives
- Announcements of public meetings
- Reports on public meetings which may include: number attending, agenda, materials offered/disseminated or used in the meeting
- Plans to inform the public about modification program
- Brochures, annual reports, fact sheets or other materials about the modification program

### **Principle 3 Organizational Practices and Ethics**

*Organizational Practices and Ethics describe the overall way in which the organization carries out its mission. The Commonwealth's expectation is that Organizational Leaders will commit to implementing and maintaining best business and consumer practices.*

*The written plans called for in this, and subsequent, Principles and Keys, are to serve as sufficient guidance to program administrators and as verifiable program descriptions to outside reviewers. They are not to be so detailed or lengthy as to be onerous to develop, maintain or use daily.*

#### **3.1 Fiscal Management**

The organization will maintain written records of grants received; disbursements for services, construction, and administrative costs; and all related expenditures in a professional manner that allows for clean program and financial reviews.

Vendor payment timeframes will be reasonable and every effort will be made to keep these timeframes similar to private sector payment speeds so that program participation by competent contractors is maximized. Written policies and procedures shall be established and updated as necessary to promote compliance with all funding requirements.

#### **3.2 Human Resources**

Delivery organizations will maintain sufficient qualified personnel through employment or contracted services to meet the needs of consumers.

#### **3.3 Ethics**

The Delivery Organization will have and maintain a written code of ethics which defines its expectations for professional conduct by staff, contract employees, and construction contractors, as well as addresses potential conflicts of interest, marketing practices and includes a “no reprisal” system for reporting suspected questionable behaviors or practices.

#### **3.4 Dispute Management**

Delivery organizations will have a written policy on dispute management so that consumers who disagree with program determinations know how such disputes will be handled. The ability to default to a neutral external mediator or arbitration service to control cost, promote healthy relationships and speed resolutions is strongly recommended.

### **3.5 Information Management**

The Delivery Organization will provide systems for information sharing and management sufficient to meet internal performance monitoring and external reporting requirements. Case files on individual consumers will be maintained.

### **3.6 Marketing and Communications (further clarified in 5.11)**

Delivery organizations will create and maintain a written marketing and communication plan which describes the home modification program and how program information will be disseminated to potential consumers. This plan will also specify how consumers who may be deaf and/or blind, who may need personal assistance in understanding program information, and who may need sensitivity due to language and/or cultural barriers will receive information. The plan will specify the reading level at which written communication will be provided so that the majority of consumers can comprehend these materials.

### **3.7 Quality Improvement (further clarified in 5.12 and 5.13)**

The Delivery Organization will commit to implementing and updating a written, plan for program evaluation, which includes ongoing assessment of consumer satisfaction with the process and outcomes, and uses the information to improve the quality of its programs.

#### **Principle 3 Business Practices**

The following list reflects examples of documentation which may be offered to show the organizations practices in this area.

- Policies and Procedures
- Board Conflict of Interest Policy
- Copies of Contracts and subcontracts
- Written Code of Ethics
- Compliance Policy
- Compliance reports including results of investigations
- HR Manuals
- Agency Brochures and Documents
- Personnel files reflecting credentials of staff(training, experience etc)
- Communication and Marketing Plans and annual reports on these activities
- Lists of software used and how
- Written program evaluation plan
- Financial audits, as required by program funders

## **Principle 4: Consumer Access to the Home Adaptation Program**

*The following keys explain how individuals will learn about modification and related social and human service program options.*

### **4.1 Individual inquiry to find services and financial support**

Delivery organizations shall provide toll-free access to intake staff for all people in their specified service area, including accessibility to people who are deaf and/or blind. Program administrators will also be prepared to have staff visit potential consumers who are unable to leave their residences (including private homes and institutional settings). Delivery organizations will commit to developing systems that allow them to assist as many people who have limited English-language proficiency as possible.

### **4.2. Uniform application**

Delivery organizations will develop a simple written application for home modification services.

### **4.3 Self Pay participants**

Delivery organizations will staff their programs sufficiently to provide home assessment and contractor referral services to individuals who do not qualify for financial assistance for home modifications. Reasonable fees may be charged for these services, unless prohibited by specific funders.

### **4.4 Individual consumer notifications**

Consumers will be notified in writing that they have been approved to receive program assistance. This notice will disclose any and all requirements of the consumer, commitments or risks they undertake by receiving program services.

Consumer notices will include the need for contractors to access the consumers' home, hours of required access, any financial participation expected of the consumer, any limitations on the consumers' ability to access future services, among other items.

Notices provided to renters must clarify legitimate expectations that the landlord may have of the tenant regarding returning the home to its previous condition when the tenant plans to move out, and whether the modifications or assistive technology are considered the tenants' for reuse at a new residence or are become part of the landlords' property.

#### 4.5 Waiting List

If delivery organizations have insufficient funds to provide services to all potential consumers, program administrators will seek additional funding for their programs from both their current funder and other potential funders. If funds are still insufficient to serve all potential consumers, the organization will develop a Wait List for services that is shared with their program funders. Wait listed consumers will be given information about where they are on the list and the expected wait until services can be provided, as well as information about other sources of funding who may be able to help them more quickly.

#### 4.6 Single Point of Contact (a “Navigator”)

The Delivery Organization will provide one staff or contract employee who will be the single point of contact (or Navigator) for the consumer from the time of their application until after the home modification is completed. When staff serving as Navigators leave this position, their consumer case load will be transferred to new staff members who will have access to the consumer’s case file to ensure continuity of services. Delivery organizations commit to making this case transfer and a discussion of file contents a prominent part of the new Navigator’s training.

#### Principle #4 Documentation

The following list reflects examples of documentation which may be offered to show the organizations practices in this area.

- Policy and procedure manual
- Flow charts of services processes
- Job descriptions
- Copy of service application and other forms used
- Copies of forms and letters used
- Waiting list and attendance actions
- Consumer case files with uniform contents and a checklist to ensure that appropriate information is collected on each consumer.

## **Principle 5 Standards and Expectations for home adaptation & assistive technology programs**

*These standards describe the expectations regarding home adaptation programs. These standards provide for a consistency of program practices which will promote a standard of high quality service throughout the Commonwealth.*

### **5.1 Program Navigator – connection between consumer and program**

Navigators will be the “human face” to consumers embarking on home modification education and home modification construction. They will be trained to be professional in the conduct of their duties, and provided with ongoing professional development opportunities so that they may grow in their capacity to help consumers.

Navigators will make home visits as appropriate. Program Administrators will make staffing or other arrangements to ensure that Navigators who cannot personally visit inaccessible homes will still be able to serve their clients.

Navigators will be knowledgeable about their agency’s home modification program, other programs within the Commonwealth, and local and state social and human services programs.

### **5.2 Coordination with other resources**

Delivery organizations will educate consumers about and help them make connections to other home modification services as well as social and human services funding and organizations so that the consumer has the best possible chance of remaining in their home in the community for as long as possible. These resources may include, but are not limited to, weatherization, LIHEAP, meals services, attendant care, other Medicaid/Medicare waiver eligible services, and medical and public assistance.

### **5.3 Consumer Files**

An individual case file will be kept on all consumers, self-pay and program funded, who receive home modification services. This file will contain, at a minimum, the name of the consumer’s navigator and a record of any previous navigators; case notes describing all contact with the consumer and all associated vendors, advocates, and other individuals. In addition, information documenting consumers’ eligibility for services and/or financial assistance paying for their modifications, all agreements with consumers and

with vendors, records of vendor payments, dispute resolution notes and information pertaining to warranties and maintenance.

#### 5.4 Home Evaluation

Delivery Organizations will provide consumers with a home evaluation that addresses the suitability of their home for their needs. The evaluation will review accessibility, safety, and code violations within the residence. The consumer will participate as much as possible in this evaluation process in order to ensure that any planned modifications meet the person's current and future needs, if their disability is of a progressive or degenerative nature.

The philosophy of the home evaluation is that a person's home is a private space and needs to be modified in a way that makes the consumer feel as safe and as independent as possible. Delivery organizations are not to substitute adherence to national or state accessibility guidance for consumer choice of modifications unless funder guidelines require adherence to any specific standards.

Consumers must approve in writing the construction specifications derived from the home evaluation prior to contractor bidding.

#### 5.5 Consumer Education and Assistance regarding Home Modification Choices

Consumers need to be fully informed of the choices to be made in modifying their residence. Program administrators will provide professional guidance to consumers that may include consultations with any of the following trained people:

- a. consumers and consumer advocates who have successfully chosen modifications, and guided others through the process, and who demonstrate knowledge of the array of modifications and assistive technology devices available.
- b. housing professionals educated about the nexus between human health and limitations, and housing structures, including experienced home modification managers, builders, architects and housing rehabilitation specialists.
- c. medical professionals who are acceptable to the consumer, including occupational therapists, medical rehabilitation specialists,

physicians and other medical staff who are educated about the nexus between human health and limitations, and housing structures.

### 5.6 Specifications and Time frames

Home evaluations will result in clear specifications which can be given to vendors for negotiation of a fair price for the home modification work. Evaluations will also specify the time frame in which the consumer needs the work to be completed and any other construction related needs the consumer may have (for example, extra dust control measures due to a respiratory condition).

### 5.7 Construction Management

Delivery Organizations will provide construction management services which include assessment of the work during construction, site inspections for safety and compliance with terms of the contract, dispute resolution, troubleshooting, final inspection, and processing of payment requests.

### 5.8 Purchasing and Bidding Policies

Delivery organizations will use purchasing and bidding policies that promote participation and retention of competent contractors and other vendors. It is expected that program leaders will make every effort to remove internal barriers to meeting this objective. Items of special concern are initial deposits to contractors, progress/flexible payments, also known as payments at agreed-upon job milestones, and a timely (within 30 days) payment following job completion. Final payment shall include a mutual agreement of the program and consumer that the work is complete.

### **Suggestions for vendor selection:**

Delivery organizations will commit to providing home modifications in a timely manner. Timely is defined by the consumer's needs to be safely living in the community setting of his/her choosing. Programs routinely requiring three bids regardless of the impact on the consumer are unlikely to meet this objective. Therefore the following recommendation is strongly suggested as a best practice by every delivery organization in Pennsylvania offering home modifications:

1. The delivery organization will issue a call for vendors who wish to be placed on a bidders' list. For this call, the delivery organization will create a sample list of likely modifications with a range of possible specifications, and will provide information

about the normal payment terms and expectations of working on the home modification program's jobs, including speed of payment after final inspection of completed work, and conditions of participation including the following:

- a. Willingness to provide proof of insurance
- b. Agreement not to charge for further estimates
- c. Provide the minimum of a 12 month written guarantee on all work performed which includes the number to call for consumer complaints
- d. Knowledge and experience with home adaptation, design or modification
- e. Knowledge of local building codes and inspection processes.
- f. Basic requirements such as:

In the event that a home mod involves changes to a bathroom, the contractor must leave access to a flushing commode at the end of every work day

Delivery organizations may require vendors to obtain a recognized building credential in home modifications and are encouraged to assist vendors by making referrals to such programs and holding seminars or information sessions on such credentials. It is suggested that vendors be credentialed in home modifications and that this credentialing be made easily accessible. Contractors may need an incentive to obtain such a credential which may be access to inclusion on bidding lists in large cities. Such a requirement may be burdensome in rural areas.

2. Interested vendors will supply the following documents according to the request:
  - a. No less than three references which will be verified by the delivery organizations,
  - b. A proposal which specified materials costs, labor costs and time to complete each of the requested modifications.
3. The delivery organizations will assess the responses and create a vendor list including all vendors who meet expectations for quality and price for the sample modification specifications.
4. Subsequently, the vendor may elect to bid on specific jobs and the delivery organization is free to negotiate the unique terms of the work with any vendor on the designated list.

5. Delivery organizations must also maintain the flexibility to work with other vendors so that they can meet the needs of all potential consumers in their service areas.

### **5.9 Maintenance of Equipment and Extended Warranties**

Delivery organizations are encouraged to fund maintenance or extended warranties for equipment since funding repairs is likely to be difficult for consumers. Copies of agreements and warranties must be maintained in the consumers' file.

### **5.10 Sensitivity expectations for vendors and contractors**

Delivery organizations will commit to providing information to vendors and contractors which promotes respect for people with disabilities, and informs them about the Commonwealth's and the Home Modification program's dedication to consumer direction.

### **5.11 Communications**

Delivery organizations will design and implement a communications plan aimed at potential consumers and consumer advocates/representatives. This plan shall consider a diverse approach to conveying information and may include, but is not limited to the following:

Speakers Bureau

Newspaper ads

Public Service Announcements

Presentations at: rehab centers, senior expos, schools, Is, Pediatric Rehab Centers, Churches, Neighborhood Revitalization Groups

Mass mailings

Posters: in Public Libraries,

The program shall provide reports on the following

1. Number of applicants
2. Number who chose to participate
3. Number who declined and why
4. Number who were referred and to where
5. Satisfaction and Outcome reports
6. Results on internal and external audits

Communication plans will explain and give examples of home modifications and assistive technology and educate consumers about the supports for

community living that are available to people with disabilities and who are aging.

### **5.12 Program cost outcome assessment**

Delivery organizations will commit to annual assessments of the costs and outcomes associated with their programs and will communicate this information to their funders. It is the Commonwealth's intention to have comparable information about home modification outcomes for all federally and state funded home modification initiatives.

### **5.13 Program Satisfaction**

Delivery organizations commit to conducting consumer satisfaction assessments with each consumer. Consumer input will be gathered upon first contact, at time of work completion, and prior to warranty expirations.

### **Principle #5 Documentation**

The following list reflects examples of documentation which may be offered to show the organizations practices in this area.

- Resource materials regarding other services in the community
- Job descriptions
- Assessment tools and report formats
- Forms, letters and processes used to assure consumer driven choices
- Policies and Procedure Manuals
- Home modification guides, resource catalogs, videos or other materials which can inform consumer of choices/opportunities
- Notice to contractors re sensitivity expected or other materials which convey the organizations philosophy
- Consumer files which show record of choices, dissemination of materials re modifications offered , follow up visit report, suggestions regarding additional services which the consumer may wish to pursue
- Consumer satisfaction survey tools and reports
- Action plans to improve service based on feedback
- Evidence of communication activities: reports, summaries, newspaper clippings etc