



Always There for Healthcare

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October 27, 2023

Ann Marie T. Sullivan, MD
Commissioner
New York State Office of Mental Health
44 Holland Avenue
Albany, NY 12229

Submitted electronically: regs@omh.ny.gov

Dear Commissioner Sullivan:

The Healthcare Association of New York State, on behalf of our member nonprofit and public hospitals, nursing homes, home health agencies and other healthcare providers, appreciates the opportunity to comment on the proposed addition of Part 602 to Title 14 NYCRR regarding the use of telehealth in crisis stabilization centers.

HANYYS commends OMH for recognizing telehealth as an important tool for providing care. Telehealth is critical to overcoming longstanding obstacles to mental health treatment including stigma, access to local professionals and transportation. Telehealth is also alleviating persistent workforce challenges, especially among prescribing professionals in underserved areas.

OMH is proposing to expand telehealth to crisis stabilization centers. HANYYS strongly supports the expansion of telehealth into all OMH-regulated behavioral health services, as appropriate. The adoption of this regulation will allow crisis stabilization centers to maintain continuity of care, rapidly evaluate and screen new patients, and offer crisis and support interventions.

The proposed changes are also closely aligned with existing OMH telehealth regulations. HANYYS urges OMH to continue efforts to identify and remove other unnecessary regulatory and reporting burdens. HANYYS staff and our Behavioral Health Taskforce can support OMH with these initiatives.

If you have questions, contact Sarah DuVall, director, behavioral health, at 518.431.7769 or sduvall@hanys.org.

Sincerely,

Victoria Aufiero, Esq.
Vice president, insurance, managed care and behavioral health