



Always There for Healthcare

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August 8, 2022

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, welcomes the opportunity to comment on proposed changes to Part 599 of Title 14, New York Codes, Rules and Regulations.

HANYS commends OMH's recent efforts to update regulations to align requirements with other federal and state standards and build in the flexibility necessary to serve the increasing number of New Yorkers seeking mental health services.

We offer the following specific comments.

Organization and administration (§ 599.6)

As OMH introduces new written policy requirements, HANYS recommends that OMH provide flexibility and resources to support the implementation of these changes.

Mental health outpatient treatment and rehabilitative services (§599.8)

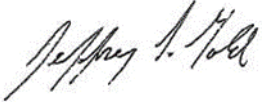
HANYS urges OMH to streamline prior approval for optional services, especially for services that did not previously require prior approval. A timely approval process will minimize unnecessary delays in access to care.

Staffing

HANYS strongly supports the expansion of qualified care providers eligible to participate in service delivery, psychiatric consultation, psychiatric assessments and treatment planning. Leveraging the full spectrum of behavioral health professionals will ensure OMH programs can reach more of the many New Yorkers in need of behavioral healthcare.

We look forward to continued opportunities to engage with your office. If you have questions, contact me at 518.431.7730 or jgold@hanys.org, or Sarah DuVall, director, behavioral health, at 518.431.7769 or sduvall@hanys.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Gold". The signature is written in a cursive style with a large initial "J".

Jeff Gold, Esq.
Senior Vice President and Special Counsel, Managed Care and Insurance