Marie B. Grause, RN, JD . President

Headquarters One Empire Drive, Rensselaer, NY 12144 518.431.7600

Washington, DC Office 499 South Capitol Street SW, Suite 410 Washington, D.C. 20003 202.488.1272

Always There for Healthcare

2024 BOARD OF TRUSTEES

BOARD OFFICERS

May 13, 2024

Thomas Carman • Watertown Chair Kenneth Gibbs • Brooklyn Chair-Elect Patrick O'Shaughnessy, DO • Rockville Centre Secretary Steven Kelley • Ellenville Treasurer Jose Acevedo, MD • Geneva Immediate Past Chair

BOARD MEMBERS

Emeritus Trustees Steven Corwin, MD • Manhattan Michael Dowling • New Hyde Park Bruce Flanz • Queens Steven I. Goldstein • Rochester Herbert Pardes, MD • Manhattan Thomas Quatroche, Jr., PhD • Buffalo Michael Spicer • Yonkers

Class of 2024

Michael Backus * Oswego Scott Berlucchi * Auburn Susan Browning * Poughkeepsie John Carrigg * Binghamton Robert Corona, DO * Syracuse Richard Duvall * Carthage Evan Flatow, MD * Manhattan Carol Gomes * Stony Brook Sharon Hanson * Buffalo Seth Kronenberg, MD * Syracuse Cynthia McCollum * Manhattan Jonathan Schiller * Middletown

Class of 2025

Kevin Beiner • New Hyde Park Brian Donley, MD • Manhattan Mark Geller, MD • Nyack Muhammed Javed, MD • Olean Jonathan Lawrence • Elmira Daniel Messina, PhD • Staten Island David Perlstein, MD • Bronx Paul Scimeca • Glens Falls Robert Spolzino, Esq • New Hyde Park Charles J. Urlaub • Lewiston

Class of 2026

Gerald Cayer • Lowville John D'Angelo, MD • New Hyde Park Richard Davis, PhD • Rochester Sean Fadale • Gloversville Susan Fox • White Plains Steven Hanks, MD • Albany Cameron Hernandez, MD • Queens Susan Holliday • Rochester Mary Leahy, MD • Suffern Svetlana Lipyanskaya • Brooklyn Dennis McKenna, MD • Albany Michael Stapleton, Jr. • Canandaigua Kimberly Townsend • Syracuse Stephen Turkovich, MD • Buffalo

Allied Association Chairs

Daniel Ireland • Batavia Michelle LeBeau • Plattsburgh Philip Ozuah, MD, PhD • Bronx

Association President

Marie B. Grause, RN, JD • Rensselaer

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 regulations (Title 14 NYCRR, Parts 583 and 584) that would streamline admissions to residential treatment facilities.

HANYS convened ten associations serving diverse healthcare providers to develop recommendations for addressing delays in access to care. We strongly urged the state to increase visibility into delays and streamline the eligibility and referral process for benefits and access to services, including those for mental health services.

The recommendations are published in HANYS' February 2024 report, <u>No</u> <u>more waiting: Recommendations to begin addressing care delays for New</u> <u>Yorkers with complex needs</u>.

We commend OMH for actively pursuing solutions to address persistent delays in access to care for children in need of residential mental health treatment. HANYS strongly supports the proposal to require residential treatment facilities to report the:

- number of children or youth deemed not appropriate for admission and the reason(s) why;
- number of children or youth admitted to each residential treatment facility;
- number of children or youth transferred from a hospital operated by OMH and subsequently transferred to another hospital;
- average length of stay for residents at the residential treatment facility;
- number of children or youth served at each residential treatment facility; and
- number of involuntary placements and/or transfers from OMH-operated inpatient facilities.

Ann Marie T. Sullivan, MD May 13, 2024

By collecting this information, OMH will increase visibility into the care needs of children being served by the mental health system and be better equipped to create interventions to prevent delays in access to mental health services.

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

Sincerely,

Lietoria aufiere

Victoria Aufiero, Esq. Vice President, Insurance, Managed Care and Behavioral Health