

## 2024 BOARD OF TRUSTEES

### BOARD OFFICERS

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 Perlestein, 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

June 28, 2024

Ann Marie T. Sullivan, MD  
Commissioner  
New York State Office of Mental Health  
44 Holland Avenue  
Albany, NY 12208

*Submitted electronically: regs@omh.ny.gov*

## Re: Amendments to Part 599 — flexibility in the provisions of both medical and mental health services

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 to provide greater flexibility for the provision of both medical and mental health services.

HANYS believes in the goal of improving the overall quality and coordination of care by treating the whole person in an integrated manner, rather than treating each condition separately. HANYS strongly supports efforts to improve and increase integrated care within the healthcare system, as its benefits are well documented.

HANYS recently convened ten associations serving diverse healthcare providers to develop recommendations for addressing delays in access to care. We strongly urged the state to enhance and strengthen integrated care services.

The associations' recommendations are published in HANYS' February 2024 report, [No more waiting: Recommendations to begin addressing care delays for New Yorkers with complex needs](#).

HANYS strongly supports the proposals to:

- align the integrated care threshold for Article 31 and Article 28 programs at 30% and increase the ability for licensed Article 31 programs to provide needed medical services to individuals; and
- allow Article 31 programs to submit claims to Medicaid for up to three services per individual per day — which can be comprised of two health services and one mental health service per day.

However, HANYS continues to urge OMH and its other state partners to streamline and expand the Integrated Outpatient Services licensure process and explore the inclusion of the Office for People With Developmental Disabilities.

Thank you for the opportunity to comment on these proposed regulations. If you have questions regarding our comments, contact me at 518.431.7889 or [vaufiero@hanys.org](mailto:vaufiero@hanys.org).

Sincerely,

A handwritten signature in cursive script that reads "Victoria Aufiero".

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