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The Federation of Mental Health Services (the Federation) is a 56-year-old not-for-profit organization that represents a broad array of community based behavioral health providers (inclusive of both mental health and substance use services) located in all five boroughs of NYC. Our linguistically and culturally competent clinicians are dedicated to providing rapid access to care to all age groups and are proud to be considered by our clients, as well as our communities, as an essential component of the safety-net upon which they rely.

**Our mission is to provide care that is patient-centered, local and easy to access.** This mission has never been more important as the country is facing both the COVID-19 pandemic and Opioid epidemic. We appreciate Governor Hochul and legislative leadership to support the essential workforce that provides mental health and substance use services to ensure we can support NY Communities. Governor Hochul's Executive SFY 2022-23 Budget provides a good start for this work by including:

- A 5.4% COLA for Behavioral Health and Human Services
- Bonuses for behavioral health workers
- Extending APGs until 2027
- Reinvestment of funds from the Managed Care Plans

But we need the legislature to build on these to ensure our essential community-based mental health and substance use services can continue to serve their communities. A final budget must also contain a delay in the implementation of certain licensure provisions that will limit the availability of qualified staff that currently meet the needs of those seeking behavioral health services.

### Budget Priorities SFY 2022-23

**Support the COLA for Behavioral and Human Services:** We fully support the 5.4% COLA in the Executive Budget.

**Support the extension of APGs but need rate enhancements:** We fully support extending APGs until 2027 and request that the final budget includes rate enhancements for OMH clinics.

**Support Limited Number of Medicaid Managed Care Organizations:** Community-based behavioral health providers have not seen the benefit of including these services in the managed care benefit. If these services remain in managed care, the proposal to limit the number of plans must be used to limit the onerous managed care policies and procedures which prevent access to services. In addition, limit and align audit protocols for OMIG and managed care plans so there is one tool.

**Permanently Codify the Other Licensed Professions Scope of Practice (particularly LMHC's)** – NYS must codify the scope of practice for non-licensed professionals operating in licensed programs. Failure to act will impact the quality and accessibility of behavioral health and substance use services.

**Support Telehealth Billing Parity:** We support the Executive Budget's proposal to ensure there is payment parity for telehealth services, which should also include telephone-only.