



June 30, 2021

Linda Lacewell
Superintendent
NYS Department of Financial Services
One Commerce Plaza
Albany, NY 12257

Dear Superintendent Lacewell:

The undersigned organizations write today on behalf of hundreds of thousands of New Yorkers with private health insurance coverage, and the healthcare providers who serve them. Specifically, we have come together to urge the Department of Financial Services to renew for at least 60 days the emergency regulation that requires most private insurers to reimburse providers for services rendered utilizing the so-called 'audio-only' modality.

Throughout the COVID-19 pandemic, provider organizations have been reminded time and again of the unique value associated with being able to provide care via the audio-only modality. Care recipient satisfaction surveys unequivocally support the value of this option for its' unique ability to expand access to care, and to ensure continuity of care for New Yorkers who could benefit from immediate services. We have learned that the audio-only option decreases resistance when it comes to our ability to engage a client or family who could benefit from care but who may not be able to afford transportation costs associated with traveling to a bricks and mortar facility, where there is a social or cultural stigma associated with being seen walking in to a local mental health clinic, or when a New Yorker living in an impoverished community does not have the funds to pay for internet access. The COVID-19 pandemic has exposed the persistent inequities that exist across our healthcare system. We believe all New Yorkers (regardless of the type of insurance they have or if they have any insurance at all) are entitled to timely access to care that we know saves lives and decreases the likelihood of the need for more acute services at a later point in the disease process.

Recently the NYS Medicaid Program extended reimbursement for the audio-only option for at least 60 days or until the end of the federal public health disaster. Given growing waiting lists for certain medical and behavioral health services, this was the right decision for state leaders to make at a moment in time when New Yorkers have either postponed care or given up on getting it for a variety of reasons. **We urge the Department to continue the requirement for private insurers to reimburse these services on par with face-to-face visits for at least the same amount of time as was given in the Medicaid Program.**

Thank you in advance for your attention to this time sensitive matter.

On behalf of the signatories below,

Sebrina Barrett, Executive Director, Association for Community Living

Amy Dorin, President and CEO, The Coalition for Behavioral Health

Allegra Schorr, President, Coalition of Medication-Assisted Treatment Providers and Advocates of New York State

Paige Pierce, Chief Executive Officer, Families Together in NYS

Glenn Liebman, Chief Executive Officer, Mental Health Association in New York State

Wendy Burch, Executive Director, NAMI-NYS

John Coppola, Executive Director, New York Association of Alcohol and Substance Abuse Providers

Harvey Rosenthal, New York Association of Psychiatric Rehabilitation Services

Jackie Negri, Director, New York State Care Management Coalition

Andrea Smyth, Executive Director, New York State Coalition for Children's Behavioral Health

Lauri Cole, Executive Director, New York State Council for Community Behavioral Healthcare

Seth Stein, Esq, Executive Director and General Counsel, New York State Psychiatric Association

Christine Allen, PhD, President, New York State Psychological Association

Marsha Wineburgh, DSW, LCSW, Chair of Legislative Committee, New York State Society for Clinical Social Work

Laura Mascuch, Executive Director, Supporting Housing Network of New York

Cc: Christopher Tavella
Brett Friedman
Gareth Rhodes
Malini Singh McDonald