



June 18, 2020

The Honorable Andrew M Cuomo  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Dear Governor Cuomo,

The National Association of Social Work - NYC Chapter, the NYS Clinical Society for Social Work, the NYS Psychiatric Association, and the NYS Psychological Association strongly encourage your Administration to extend the expansion of authority for mental health providers to continue telehealth service delivery for patients with Medicaid and commercial insurance. We recommend such an expansion be afforded for at least, a period of twelve months after the last region of the state is fully operational. The above organizations fought for years to for parity between MH/SUD and physical health, an effort your administration has championed as well. We urge you to advance the next frontier in this battle to require parity in reimbursement between telehealth and face-to-face visits to assure network adequacy, consumer protection and to avoid health disparities.

As you are aware, telehealth expansion authorized by your Administration has proved an appropriate and essential service. It included the elimination of geographic and originating site restriction. This was an extremely helpful approach in allowing services to new patients as well as existing patients and loosening of the technology requirements for telehealth platforms. It provided additional technologies such as smartphones, added appropriate CPT codes allowed for telehealth, and provided allowance for audio-only services.

It is reported that such telehealth expansion has enabled many individuals to access mental health care for the first time. We know this is especially important as so many communities, particularly marginalized communities, have not had access to necessary health services. Maintaining continuity of care for all individuals receiving care will be critical to the overall health and well-being of the state as we enter the next phase of the pandemic. Even after health care practices are allowed to reopen, the risks of coronavirus transmission between mental health and addiction treatment providers and patients remain. Many individuals in need of mental health and substance use disorder treatment

also live with preexisting conditions that make them especially vulnerable to COVID-19. Furthermore, this may prevent them from safely or without great fear from leaving their homes and sharing close personal space with other people. This will be especially burdensome on moderate- and low-income patients who must take public transportation or rely on others to get to their health care appointments. Ongoing allowance of telehealth would mitigate these risks.

We applaud the steps you have taken already including your enactment of S.8416/A.10404-A (Chapter 124 of the Laws of 2020), which will expand amends the definition of telehealth under the Public Health Law to include audio-only telephone or video-only communications and also permit coverage and reimbursement under New York's Medicaid Program contingent upon federal financial participation. This measure is one of several needed to enhance access and reduce health care disparities for those with MH/SUD.

While we sincerely hope we are on the road to recovery, this public health crisis will have a long-lasting impact on our healthcare system and how mental health and substance use disorder services are delivered in the future. As you have mentioned, this pandemic experience offers an opportunity to improve the delivery of all health care, including mental health services. As such, we look forward to working with you to provide the best possible outcomes for all.

Sincerely,

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