



MEMORANDUM IN OPPOSITION
Bill # A.7647

The Coalition of Behavioral Health Agencies strongly **opposes** bill number A.7647, legislation that would require new minimum training requirements of boards of directors for certain voluntary not-for-profit agencies that contract with the Office of Mental Health (OMH) and Office of Alcoholism and Substance Abuse Services (OASAS). As a representative of over 120 not-for-profit community-based mental health and substance abuse agencies, The Coalition believes that this bill would negatively impact our members, as well as other agencies across New York State.

This legislation, if enacted, would unjustly single out non-for-profits that contract with the OMH and OASAS among human services providers. An example is that it explicitly and unfairly exempts Article 28 licensed hospitals (which often offer primary and behavioral health services) from these requirements. Moreover, federal and state requirements already have standards in place that non-profit boards must comply with.

Individuals who serve on nonprofit boards of directors are usually experts in their field and devote time and energy outside of their fulltime jobs to serve in the capacity of volunteer. The new minimum standards proposed in bill number A.7647, would make serving more onerous, and could severely limit the retention and recruitment of people who can be beneficial to the missions of their agencies.

We recognize the importance of having operating procedures for emergency planning and fiscal liability or integrity (although we are unclear as to the meaning of "fiscal liability or integrity" in this context). However, it can become difficult for not-for-profit providers to meet the terms of this requirement without public funding for emergency planning or board training. This is especially true when non-for-profit revenue sources are decreasing and State assistance is being cut. By not considering an agency for recertification of its license simply because it did not have the resources or means to comply with the bill's standards seems quite severe and could cause unintended consequences in the provision of community-based services to people with disabilities.

The Coalition of Behavioral Health Agencies urges you to oppose bill number A.7647. We thank you for your consideration.