

NYS Association of CASAC Professional

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New York State Association of CASAC Professionals
Public Comment on Proposed Amendments to 14 NYCRR Parts 800 and 836
Submitted to the New York State Office of Addiction Services and Supports

Re: Proposed Amendments Published in the July 1, 2026 New York State Register

The New York State Association of CASAC Professionals appreciates the opportunity to provide comments regarding the proposed amendments to Parts 800 and 836 of Title 14 of the New York Codes, Rules and Regulations.

Our Association represents addiction professionals throughout New York State who are committed to advancing the addiction treatment profession, strengthening the behavioral health workforce, and ensuring that individuals affected by substance use disorders receive timely access to high-quality, evidence-based care.

Support for the Proposed Rule

The Association supports OASAS's proposed amendment to Section 800.4 to include Credentialed Prevention Professionals (CPPs) within the definition of a Qualified Health Professional (QHP).

We commend OASAS for recognizing that the behavioral health workforce continues to evolve and that regulations should reflect the education, competency, and professional responsibilities of credentialed professionals.

Expanding the definition of Qualified Health Professional to include Credentialed Prevention Professionals demonstrates OASAS's commitment to building a stronger, more flexible workforce capable of meeting the increasing demand for prevention and treatment services across New York State.

The Association also supports OASAS's efforts to reduce unnecessary administrative burden on providers while maintaining appropriate clinical oversight and accountability.

Workforce Modernization

The proposed amendments present an important opportunity to continue the broader conversation regarding workforce modernization within New York's addiction treatment system.

Over the past several decades, OASAS has continuously strengthened the addiction counseling profession by establishing advanced credentialing standards, implementing evidence-based assessment tools, and expanding the clinical responsibilities entrusted to credentialed addiction professionals.

Today's CASAC Advanced professionals routinely conduct comprehensive substance use disorder assessments, complete the Level of Care for Alcohol and Drug Treatment Referral (LOCADTR), determine the clinically appropriate level of care, develop treatment recommendations, supervise clinical staff, and may serve as Program Directors when qualified under OASAS regulations.

These responsibilities reflect the significant evolution of the addiction counseling profession and the confidence OASAS has placed in credentialed addiction professionals.

Opportunity for Future Regulatory Review

While the Association fully supports the proposed amendments currently under consideration, we respectfully encourage OASAS to continue evaluating whether the existing regulatory framework fully reflects the education, competency, and responsibilities of advanced addiction professionals.

As OASAS recognizes additional credentialed professionals through this proposed rulemaking, we believe it is an appropriate time to undertake a broader review of the regulatory roles assigned to advanced addiction credentials administered by OASAS.

One example deserving future review is the outpatient admission process under Part 822.

CASAC Advanced professionals routinely complete the comprehensive assessment, complete the LOCADTR, determine the appropriate level of care, and formulate treatment recommendations. The Association respectfully believes it would be beneficial to review whether current admission approval requirements continue to align with these responsibilities and with the ongoing evolution of the addiction counseling profession.

We recognize that this issue is outside the scope of the current rulemaking and do not request that OASAS modify Part 822 through this proceeding. Rather, we respectfully request that OASAS consider including this topic as part of its continuing workforce modernization efforts.

Request

The New York State Association of CASAC Professionals respectfully requests that OASAS:

- Continue its efforts to modernize the behavioral health workforce through thoughtful regulatory review;
- Continue evaluating the utilization of advanced credentialed addiction professionals throughout the OASAS regulatory framework;
- Engage stakeholders, including professional associations, providers, educators, and credentialed professionals, in future discussions regarding workforce modernization; and
- Consider undertaking a comprehensive review of the regulatory role of the CASAC Advanced credential, including the relationship between current clinical responsibilities and existing regulatory authority.

Conclusion

The Association appreciates OASAS's leadership in strengthening New York's addiction treatment system and supports the proposed amendments contained in this rulemaking.

We believe these proposed changes reflect OASAS's ongoing commitment to ensuring that New York's regulatory framework evolves alongside the behavioral health workforce. As this important work continues, we respectfully encourage OASAS to include the CASAC Advanced credential in future workforce modernization initiatives to ensure that the education, competency, and responsibilities of advanced addiction professionals are fully reflected within the State's regulatory framework.

The New York State Association of CASAC Professionals looks forward to continuing to work collaboratively with OASAS in support of policies that strengthen the addiction workforce, improve access to treatment, and maintain the highest standards of care for all New Yorkers.

Respectfully submitted,

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