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**Mental Health and Health Standards Proposed Rules
February 10, 2026 Public Hearing Oral Testimony**

Jennifer Parish- JAC/HALT

Jennifer Parish stated that the proposed changes should reflect the narrow tailoring of the language used in CHS' longstanding variances to make clear that the change only applies to stabilized individuals in general population units. Additionally, Ms. Parish suggested including references to other mental health professionals and undergoing a comprehensive review of the entire health and mental health minimum standards.

Michael Klinger- Brooklyn Defenders

Michael Klinger proposed additional edits to minimum standard sections that deal with clinic production escorting. Additionally, Mr. Klinger proposes a reporting requirement be added to the standards, especially regarding dental care.

Jennifer Nicole Alameda

Jennifer Nicole Alameda stressed the importance of reassessing psychiatric patients and mandating that services be provided to these populations, especially in the form of education and healthy food.

Kayla Simpson- Legal Aid Society

Kayla Simpson stated that comprehensive reviews of the mental health standards should also be completed. Regarding the current proposed changes, Ms. Simpson suggested altering the proposed language regarding variance procedures to ensure that specific notice requirements remain in place. Additionally, Ms. Simpson proposed eliminating the continuing variance mechanism to avoid the possibility of indefinite variances that have not properly undergone the rulemaking process.