



April 15, 2024

Verbal Testimony for JCARR – General Summary of Written Testimony for JCARR

My name is Dr. Rhea Debussy, and my pronouns are she/her. I'm here to testify on behalf of Equitas Health and to provide information related to you all's review of administrative rules – MHAS Rule 5122-14-12.1; MHAS Rule 5122-26-19; ODH Rule 3701-3-17; ODH Rule 3701-59-06; ODH Rule 3701-59-07; ODH Rule 3701-83-60; and ODH Rule 3701-83-61 – as proposed by the Ohio Dept. of Health (ODH), the Ohio Dept. of Mental Health and Addiction Services (MHAS), and Gov. Mike DeWine. Equitas Health remains in strong opposition to all portions of these proposed administrative rules, and we encourage the Joint Committee on Agency Rule Review (JCARR) to recommend that all of these proposed administrative rules be invalidated.

As you may be aware, Equitas Health is a non-profit community health center and one of the largest LGBTQ+ and HIV/AIDS serving healthcare organizations in the country. Each year, we serve tens of thousands of patients in Ohio, Texas, Kentucky, and West Virginia, and since 1984, we have been working to advance "care for all." Our mission is to be the gateway to good health for those at risk of or affected by HIV; for the lesbian, gay, bisexual, transgender, and queer/questioning (LGBTQ+) community; and for those seeking a welcoming healthcare home. In doing so, we offer primary and specialized medical care, pharmacy services, dentistry, mental health and recovery services, HIV/STI prevention and treatment services, Ryan White HIV case management, overall care navigation, and a number of community health initiatives. And finally, we are one of the largest providers of gender affirming care both here in Ohio and in the Midwestern United States.

In the past three months, Equitas Health has filed three separate public comments related to the aforementioned ODH rules and four separate public comments related to the MHAS rules.

As you likely remember from your thorough review of the documents submitted ahead of today's hearing, our written testimony to JCARR alone included 27 pages of material outlining a variety of concerns with these proposed administrative rules, and our agency remains deeply concerned about the impact that these proposed administrative rules will have on access to care for patients across Ohio. Additionally, our agency is also concerned that these proposed administrative rules may conflict with several of the JCARR prongs, as described in Ohio Revised Code Section 106.021. Specifically, we are concerned that these proposed administrative rules 1) exceed the statutory authority of Governor Mike DeWine and these agencies; 2) conflict with the legislative intent under which these rules are being proposed; and 3) pose an adverse threat both to healthcare access and healthcare-related businesses throughout the state.

Given all of this, Equitas Health remains in strong opposition to all portions of these proposed administrative rules. And as such, we encourage the Joint Committee on Agency Rule Review (JCARR) to recommend that all of these proposed administrative rules be invalidated. Thank you so much for your time and consideration, and we hope that your vote will account for the numerous, grave concerns expressed here today.