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May 15, 2007

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Ms. Summer King
SAMHSA Reports Clearance Officer
Room 7-1044
One Choke Cherry Road
Rockville, MD. 20857

Dear Ms. King:

The National Association of State Mental Health Program Directors (NASMHPD) is pleased to have the opportunity to comment on the Substance Abuse and Mental Health Services Administration's (SAMHSA) Center for Mental Health Services (CMHS) Federal Register Notice of the proposed FY 2008-2010 Guidance and Instructions for the Mental Health Block Grant Application. NASMHPD represents state and territorial mental health commissioners/directors and their agencies that provide public mental health services to over 6 million people. Our members manage community-based systems of care as well as inpatient care in state psychiatric hospitals for individuals with serious mental illness. CMHS Block Grants provide a vital source of flexible funding for state mental health services and programs.

NASMHPD's comments will focus on concerns expressed by a number of state mental health agency officials who have extensive experience in administering block grants in their states and who work cooperatively with other state personnel to complete the data collection, planning and analysis for the block grant application and implementation reports. The integration of National Outcomes Measures (NOMS) in the block grant planning process to track improvements in the public mental health system is fully supported by NASMHPD and the states.

NASMHPD and its state mental health agency commissioner members are deeply committed to achieving the transformation of the mental health system as recommended in the President's New Freedom Commission Report and other seminal reports. We believe strongly that states and localities must be accountable for achieving improved care for the individuals they serve. Most states are already detailing transformation activities in their mental health block grant applications and could work with CMHS to provide enhanced narrative descriptions of the progress they are making to transform their mental health systems. However, the overwhelming consensus among state agency mental

May 15, 2007
Page 2

health planners is that the proposed requirement for reporting of expenditures from the block grant and other state funding sources on transformation activities is untenable, impractical and unnecessary. We strongly recommend dropping Table 4 on page 33 of the Application Guidance and Instructions. This recommendation in no way represents a lack of support for the principles of mental health transformation. Our opposition to providing transformation expenditure data as requested in Table 4 is based on the fact that states do not budget expenditures in a manner that would allow for this data to be extracted in an accurate and meaningful way. The categories of transformation activities simply do not track with state budgeting practices. Without expensive time studies that are beyond the scope of states' accountability requirements, states would be forced to make educated guesses about expenditures which could be harmful and misleading.

NASMHPD is also requesting that CMHS examine the reporting timelines in light of the proposed requirement for reporting on additional National Outcome Measures (NOMS). On September 1, 2007, state plans for FY 08 (which include 2007 actuals and 2008 targets) are due as well as the annual consumer surveys as part of the NOMS. Three months later on December 1, the Implementation Reports are due. Because states have extensive public review processes of the block grant submissions and approval requirements by state planning councils and their Governors, the deadlines require the states to develop "actuals" before the end of the service year. Therefore, these "actuals" are really estimates or projections based on partial year data for many states. The workload involved with developing these 'temporary data' is quite costly to the states and has nominal utility. In fact, the introduction of inaccurate data produces results which may be misleading. It would be more advantageous for the states if the due dates for the Plans were pushed back so that accurate data is available for planning purposes. In addition to a review of the timelines, the definitions for the NOMS need further delineation. It is important to provide service definitions that are clear and detailed but not so precise as to limit flexibility in achieving shared goals.

NASMHPD commends SAMHSA for its collaborative approach in working with the states to derive the greatest benefit from limited funding for mental health services for children and adults. We are committed to working with you to maximize the effectiveness of the Mental Health Block Grant program.

Sincerely yours,



Robert W. Glover, Ph.D.
Executive Director
NASMHPD