



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF MENTAL HEALTH, MENTAL RETARDATION AND SUBSTANCE ABUSE SERVICES

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JAMES S. REINHARD, M.D.  
COMMISSIONER

June 23, 2006

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

Re: Proposed Co-occurring Infrastructure Measures for COSIG (as referenced in the Federal Register, volume 71, number 86, pp. 26382-3, dated May 4, 2006)

Dear Ms. King:

I am writing in support of comments submitted by Doctors Kenneth Minkoff and Christie Cline on the above initiative, to the effect that:

1. The process of data collection is defined outside the partnership between the states and SAMHSA, and outside the emerging partnerships between the states and their own systems, not just programs, but the intermediary entities that coordinate behavioral health services in many states (e.g., community services boards in Virginia).
2. The data collected is based on an incorrect or misleading model for what the majority of COSIG states are doing with regard to infrastructure development.
3. The definitions that are used to describe the different functions are not fully consistent with what is happening in the field, and not fully aligned with definitions that have been already developed and articulated by COCE, and
4. The specific data elements requested are not consistent with either assessing the state's actual infrastructure development, does not acknowledge the need to collect the information through counties or community service boards, and requests information at the program level that is beyond the core universal developmental activities that COSIG is designed to promote in state infrastructure.

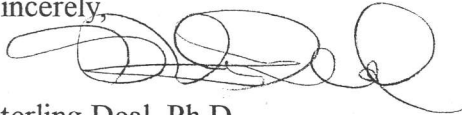
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Our providers' information systems do not collect this information. We are currently in the process of improving our capacity to collect data and a reporting requirement of this scope would not be feasible for some time. Our concern is that implementing reporting requirements as defined here would reduce the momentum we have built toward infrastructure development. I would suggest any decisions on reporting requirements be deferred until there has been time to reflect on the results of the evaluation efforts underway this summer and that consideration be given to an approach using the system-level questions put forward by Drs. Minkoff and Cline. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned below the word "Sincerely,".

Sterling Deal, Ph.D.  
Virginia COSIG Project Director