

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF PUBLIC WELFARE  
P.O. BOX 2675  
HARRISBURG, PENNSYLVANIA 17105-2675

OFFICE OF MENTAL HEALTH  
& SUBSTANCE ABUSE SERVICES

JUN 28 2006

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

Dear Ms. King:

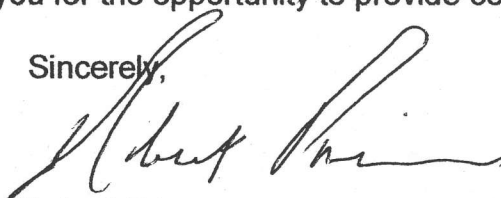
Thank you for the opportunity to provide comments on the proposed Co-occurring Infrastructure Measures. Based upon input from key stakeholders representing the provider, county, state, and research agencies involved in the COSIG infrastructure activities, Pennsylvania offers the following comments on the provider level performance measures about the screening, assessment, and treatment of co-occurring disorders.

- Please clarify the instructions for data collection: Is it for all clients/patients seen at your facility or only those clients/patients who are seen and enter treatment. Many individuals are screened but not admitted for services. This is confusing.
- The first question will not provide clear information on the system of care within the Commonwealth. As part of the statewide infrastructure development, the state has published the co-occurring disorder competency criteria for all facilities that are licensed to provide substance abuse and/or mental health services. The goal is to move the entire behavioral health system toward the achievement of core competency to serve individuals with a co-occurring disorder. Therefore, our providers are licensed and credentialed as co-occurring competent which is the initial step for creating a system of care where there is no wrong door for accessing appropriate services. From this aspect, programs that are licensed and credentialed to provide co-occurring services would not be accurately reflected by the language utilized in this question.
- In Sections B – I, The requested information is not routinely collected by providers currently. It will require alterations to their data collection systems or manual extraction of the information. This will create additional burden for our provider system in collecting information that will not be utilized for the infrastructure goals outlined in our grant proposal.
- The providers indicated that a point in time collection could be accomplished but expressed concern that the estimated time burden for ongoing collection should be higher than estimated.

- The need for accurate data is recognized and supported as a planning tool, but concern is expressed that the burden of ongoing collection will result in inaccurate data collection.
- In the policy section, it is recommended that the instructions should indicate who is to complete this information for consistency across providers and states.
- It would be helpful to clarify what the data will be used for at the Federal level. Our providers are being asked to collect extensive data with no feedback regarding the purpose or intent of this requirement. It will not be used at the state level to measure our actual infrastructure development. This will be an additional requirement for our provider system to meet Federal requirements.

I hope the above comments/suggestions are useful in finalizing the co-occurring performance measures. Pennsylvania recognizes the need for accurate and useful data to support funding co-occurring services when it does not create an additional burden on the overextended provider system. If you have any questions regarding the above comments, please contact me at (717) 783-8067 or via email at [rprimrose@state.pa.us](mailto:rprimrose@state.pa.us). Again, thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Primrose", written in a cursive style.

Robert Primrose  
COSIG Project Director