

**Attachment D1**

**Comments  
to Federal Register notice  
(May 26, 2009)**

Comment 1

---

*Re: Federal Register, Vol. 74, No. 99 (74 FR 24855), May 26, 2009*  
*Substance Abuse and Mental Health Services Administration*  
*Agency Information Collection Activities: Proposed Collection; Comment Request*  
***Proposed Project: Drug and Alcohol Services Information System (DASIS) —***  
***(OMB No. 0930-0106)—Revision***

**From:** Lundy, Christie [mailto:Christie.Lundy@dmh.mo.gov]  
**Sent:** Tuesday, June 16, 2009 12:56 PM  
**To:** King, Summer (SAMHSA/OAS)  
**Cc:** Stringer, Mark; Haupt, Jodi  
**Subject:** Comments regarding Agency Information Collection Activities - Proposed Collection

Ms. King,

I believe that Recovery Supports is an important NOMS measure as engagement in the recovery process is key to ongoing sobriety. In addition, I am glad to see SAMHSA adopt the self-help definition as opposed to the GPRA social supports question(s). The proposed self-help question is more succinct and less confusing than those comparable questions from the GPRA. I am also glad to have a firm definition as opposed to letting States decide on how they want to define it individually. I just wish that States had some prior guidance on the direction of this item. When Missouri had received the data infrastructure grant, we requested that the GPRA social support questions be added to the state's information system because that was our best guess at the direction SAMHSA was taking. It will take us at least a year to get the newly proposed self-help question added to our information system.

**Christie Lundy, PhD**  
Research Coordinator  
Department of Mental Health  
Division of Alcohol and Drug Abuse  
1706 E Elm Street  
PO Box 687  
Jefferson City, MO 65102  
phone: 573-526-1636  
fax: 573-751-7814  
e-mail: [christie.lundy@dmh.mo.gov](mailto:christie.lundy@dmh.mo.gov)  
<http://www.modmh.state.mo.us>

## Comment 2

---

**From:** Nancy K. Young [mailto:nkyoung@cffutures.org]  
**Sent:** Wednesday, July 15, 2009 7:20 PM  
**To:** King, Summer (SAMHSA/OAS)  
**Cc:** Sid Gardner  
**Subject:** Comments on SAMHSA Data Sets

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

### Re: **Agency Information Collection Activities: Comments**

The most important variables that should be added to the DASIS data set, from our vantage point, relate to children and families. We have for some years, even prior to the establishment of the National Center on Substance Abuse and Child Welfare, suggested that the absence of data on parental status is a major gap. California and other states have included this data, but its absence at the national level is a critical gap in the ability of research and policy analysts to understand intergenerational impact of treatment. Since substance use disorders have such a high degree of family-based causes and effects, this is an inexplicable gap that could be easily remedied in the same way that states have done—by asking questions about family status.

The California data yields a highly useful report which is at <http://www.adp.cahwnet.gov/FactSheets/Parents%20In%20Treatment.doc>.

A second set of critical missing variables is the number of children and custody status of children removed; this excerpt from our report on screening and assessment published by SAMHSA makes clear how important this data is:

Because there are no national data on the number of children of persons in substance abuse treatment, the percentage of parents of minor children is taken from two sources: the California Treatment Outcome Project (CalTOP) study and Center for Substance Abuse Treatment's (CSAT's) Treatment Outcomes and Performance Pilot Studies (TOPPS-II). The CalTOP study, California's implementation of CSAT's TOPPS-II, found that 60% of persons in treatment were parents (Hser et al., 2003). The cross-State analysis of the TOPPS-II study included primary data from 16 States and also found that 58.5% of persons admitted to treatment had a child younger than age 18 (Ahmed, 2006)...The Hser et al. (2003) study also found that 27.1% of parents had one or more children removed from their custody and that 36.6% of those parents with a child who was removed had their parental rights terminated.

(From SAFERR [http://www.ncsacw.samhsa.gov/files/Extent\\_People\\_Involvement\\_Factsheet.pdf](http://www.ncsacw.samhsa.gov/files/Extent_People_Involvement_Factsheet.pdf) )

While it is increasingly understood that substance abuse treatment programs need to be family centered (see for example [http://womenandchildren.treatment.org/documents/Family\\_Treatment\\_Paper508V.pdf](http://womenandchildren.treatment.org/documents/Family_Treatment_Paper508V.pdf)), the lack of data regarding children and parenting status hamper the improvement of treatment in this regard.

Thank you for the opportunity to present these comments.

Nancy K. Young, Ph.D., Director  
Children and Family Futures, Inc.  
4940 Irvine Boulevard, Suite 202  
Irvine, CA 92620  
714-505-3525  
Fax 714-505-3626