



## HAWAII DISABILITY RIGHTS CENTER

1132 Bishop Street, Suite 2102  
Honolulu, Hawaii 96813

Phone/TTY: (808) 949-2922 Fax: (808) 949-2928 Toll Free: 1-800-882-1057

E-mail: [info@hawaiidisabilityrights.org](mailto:info@hawaiidisabilityrights.org)

Website: [www.hawaiidisabilityrights.org](http://www.hawaiidisabilityrights.org)

April 11, 2011

Summer King, SAMHSA Reports Clearance Officer  
Room 8-1099  
1 Choke Cherry Road  
Rockville, MD 20857

Re: Proposed Revision of PAIMI PPR (OMB No. 0930-0169)  
76 FR 9032 (Feb. 16, 2011)

We offer the following comments for revising the annual program performance report form for the PAIMI Program:

1. PPR Section 3.A.4 – Delete or clarify the following: “[include individuals who received other services such as information and referral in-lieu].”

Information and referral services reported in PPR Section 6.A are distinct from the number of individuals who were not served either due to insufficient PAIMI funding or non-priority issues. The language quoted above confuses the two subjects and leads some P&As to report I&Rs in Section 3.A.4 as well as in 6.A, while others do not include any I&Rs in Section 3.A.4.

2. ACR Section B.1 – Revise item B.1.m to read as follows: “Number of PAC members who are either R/FR of MH services or family members of these individuals (count each member only once but include both primary and secondary IDs).

It is unclear from the present form whether the 60% requirement includes all members in the specified categories or just the primary IDs. The proposed change would clarify that all should be counted.

Very truly yours,

John P. Deller  
Executive Director

041101.11



HAWAII'S PROTECTION AND ADVOCACY SYSTEM FOR PEOPLE WITH DISABILITIES  
HAWAII'S CLIENT ASSISTANCE PROGRAM

