

Agency Information Collection Activities: Proposed Collection; Comments Request 84 Fed. Rge. 59836 (November 6, 2019)
PAIMI Summary of Comments and SAMHSA's Responses as of 1/8/2020

Comment Number	Date Received	P&A Organizations	Summary of Comments	SAMHSA's Response
1	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Disability Rights Texas Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 3, Section A, #11 – Demographic Composition of PAIMI Governing Board, Advisory Council, and Program Staff - The P&As recommended changing the title to "Gender" rather than "Sex" in the demographic question.	ACCEPTED (partial): The demographic categories of "sex" and "gender" are not interchangeable and reflect distinct categorical values. SAMHSA has historically collected the categorical values of "male" and "female", which do not reflect the range of categorical values encompassed in gender. SAMHSA does not support expanding the categorical values needed to gather data on gender to accurately reflect the complexity of this term. Rather, SAMHSA will continue to require the collection of data on sex as it is collected elsewhere in the Federal Government, specifically the U.S. Census Bureau. However, SAMHSA will include, in addition to "male" and "female" values, "unknown/would not disclose", to be consistent with the data collected on "sex" among "PAIMI-Eligible Individuals Served". Each P&A may choose to collect data that they consider reflects the range of gender categories among those who are served.
2	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Disability Rights Texas Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 3, Section A, #12 – List of Mental Health Professionals on the Advisory Council - The P&As recommended an "Other" category to be added as an appropriate answer for other types of mental health professionals that may serve on the PAC.	ACCEPTED (partial): SAMHSA is interested in understanding the number and composition of the P&A Advisory Councils with particular reference to Mental Health professionals. At the same time, we did not include every possible type of Mental Health professional, only those most commonly found in mental health treatment settings. In this way, our goal is to limit the data collection burden. However, SAMHSA will add two additional categories based on submitted comments, "Peer Support Specialists" and an "Other" category, with an instruction that this category must be used minimally.

3	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 4, Section A, #15 – Governing Board Composition - The P&As recommended that additional options, beyond individuals with mental health disabilities, be added to the question related to the board composition to reflect individuals with diverse disabilities.	NOT ACCEPTED: SAMHSA is not currently interested in collecting additional data on expanded Governing Board membership composition.
4	12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 5, Section B, #2 – Sex of PAIMI Eligible Individuals Served - The P&As recommended changing the titles of "Sex" to "Gender" and "Unknown/Would Not Disclose" to "Male, Female, Not Listed, and Chose Not To Answer".	NOT ACCEPTED: The demographic categories of "sex" and "gender" are not interchangeable and reflect distinct categorical values. SAMHSA has historically collected the categorical values of "male" and "female", which do not reflect the range of categorical values encompassed in gender. SAMHSA is not interested in expanding the categorical values needed to gather data on gender to accurately reflect the complexity of this term. SAMHSA will continue to require the collection of data on sex as it is collected elsewhere in the Federal Government, including the U.S. Census Bureau. Each P&A may choose to collect data that they consider reflects the range of gender categories among those who are served.

5	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Disability Rights Texas Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 6, Section B, #4 - PAIMI-eligible Individuals Served with PAIMI Program Funds - The P&As recommended dropping the data point for the question, which ask for the number of individuals with co-occurring mental illness and intellectual and developmental disabilities. In addition, they believe the question would be more useful in describing the demographics of a program than in the eligibility section.	NOT ACCEPTED: SAMHSA believes that the data point information is important to the program. The P&A may choose to collect demographics of the program if desired.
6	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Disability Rights Texas Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Section C (Instructions): Complaints/Problems of PAIMI-eligible individuals - The P&As stated that they appreciate SAMHSA considering the outcomes of the One PPR (PPR form used by other federal agencies for P & A grants) when constructing the outcomes of the new PPR so that they more accurately reflect the P&A individual and group advocacy. However, the instructions for the abuse section on page 3 do not reflect these updated outcomes.	NOT ACCEPTED: SAMHSA considers the outcomes required in Section C, columns A through F related to allegations of Abuse, distinct from those required in Section 12, End Outcomes of P&A Activities. The outcomes in Section C are required GPRA measures.

7	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Disability Rights Texas Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Iowa Disability Rights Maryland National Disability Rights Network	Page 12, Section C, #8 – Intervention Strategies - The P&As recommended that the definitions of the One PPR and the PAIMI PPR be the same between the two PPRs.	ACCEPTED: SAMHSA agrees that the addition of the Intervention Strategy "negotiation" would better reflect the activities of the P&A with regard to interventions. A definition of "negotiation" will be added to the list of definitions in the PPR instructions. It is: "Negotiation: Negotiation is a problem-solving process in which two or more people voluntarily discuss their differences and attempt to reach a joint decision on their common concerns." The definitions for the remaining Intervention Strategies in the PPR Instructions already reflect those mentioned in the comments.
8	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 15, Section C, #11 - 5E - Interventions on behalf of groups of PAIMI-eligible individuals - The P&As recommended that the definitions for the group advocacy interventions be consistent with those in the One PPR, which more accurately reflect the work of the P&As.	ACCEPTED: SAMHSA will change the category "Other" to "Other Systemic Advocacy". SAMHSA's definitions currently coincide with the comments for the following terms: Systemic Litigation and Monitoring. SAMHSA also agrees to modify the remaining definitions to be in line with those in the comments.

9	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 15, Section C, #12 - End Outcomes of P&A Activities - The P&As recommended that the outcome reads "PAIMI-eligible individuals who are provided with appropriate community-based services resulting in, or maintaining, community integration and independence."	ACCEPTED: SAMHSA concurs and will add the proposed language, i.e. the inclusion of "...maintaining already existing community integration" in "a" of this section.
10	12/30/2019 12/30/2019 12/27/2019 12/30/2019 12/30/2019 01/03/2020 01/06/2020 01/02/2020 01/06/2020 01/03/2020 01/06/2020 01/05/2020 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Disability Rights North Carolina Arizona Center for Disability Law Indiana Disability Rights Disability Rights Pennsylvania Disability Rights Oregon Disability Rights New York Alabama Disabilities Advocacy Program Disability Rights Mississippi Disability Rights Ohio Disability Rights Arkansas Disability Rights New Jersey Disability Rights Connecticut Oklahoma Disability Law Center, Inc. Protection & Advocacy System for SC Disability Rights Maryland National Disability Rights Network	Page 21 - Section G #1 - PAIMI Personnel - The P&As state they were unclear as to the importance for SAMHSA to collect data on the salaries for its PAIMI program staff. The commentors are not favor of providing this data.	NOT ACCEPTED: SAMHSA collects data on the salaries of the PAIMI program staff for financial accountability, oversight, and monitoring purposes. SAMHSA also collects the data on the salaries to ensure none of the funds provided under the PAIMI grant awards are used to pay the salary of an individual at a rate in excess of Level I of the Executive Schedule, as stated and required in the Notices of Award.
11	12/30/2019 01/06/2020 01/06/2020 01/06/2020 01/06/2020	Arizona Center for Disability Law Alabama Disabilities Advocacy Program Disability Rights Texas Disability Rights Iowa National Disability Rights Network	Page 10, Section C, #5 – Areas of Alleged Rights Violation - The P&As recommended additions, consistent with the One PPR, to the tracking of alleged rights violations.	NOT ACCEPTED: SAMHSA considers the list of types of Alleged Rights Violations to be sufficient. SAMHSA also considers "refuse to take prescribed medications" and "right to refuse treatment" to be distinct categories. Furthermore, SAMHSA is interested in the collection of data specific to the rights of individuals served in general and is not collecting this data for specific sub-populations. The P&As may, however, choose to do so.
12	01/06/2020	Disability Rights Florida	Timing of proposed changes to PAIMI PPR reporting - The P&A requested that final changes be announced well in advance of the fiscal year for which changes will be implemented.	ACCEPTED: Once OMB approves the use of SAMHSA's proposed forms, SAMHSA will distribute these immediately to the P&A.

13	01/06/2020 01/06/2020	Disability Rights Florida Disability Rights Texas	Page 13, Section C., #9 – Death Investigation Activities - The P&As recommended retaining the reference to and expectation that the State report to the P&A deaths of individual in their care.	ACCEPTED: SAMHSA will include "State" as one of the sources of death notifications.
14	01/06/2020	Disability Rights Texas	Page 5 #1. Age of PAIMI-eligible Individuals Served - The P&A recommended that "Race Unknown" be added to the selection of individual served.	ACCEPTED: SAMHSA will add the age category "unknown".
15	01/06/2020	Disability Rights Texas	Page 8 - Areas of Alleged Abuse - The P&A recommended deleting the 1% limit just as it has been deleted for neglect and rights. In addition, it recommended adding additional outcomes to the abuse disposition.	ACCEPTED: SAMHSA will delete the requirement that the use of the "other" category contain less than 1% of the responses and indicates in instructions that the P&A make every effort to minimize the use the "other" category. SAMHSA will also add the following disposition categories: Lost Contact, Outcome Unknown, and Lack of Resources.
16	01/06/2020	Disability Rights Texas	Page 10 - Neglect Complaints Disposition - The P&A recommended adding additional outcomes to the neglect complaints disposition.	ACCEPTED: SAMHSA will add the following disposition categories: Lost Contact, Outcome Unknown, and Lack of Resources.
17	01/06/2020	Disability Rights Texas	Page 12 - Rights Violations Disposition - The P&A recommended adding additional outcomes to the right violations disposition.	ACCEPTED: SAMHSA will add the following disposition categories: Lost Contact, Outcome Unknown, and Lack of Resources.
18	01/06/2020	Disability Rights Texas	Page 12, #7 - Reasons for Closing Individual Advocacy Case File - The P&A recommended adding additional dispositions to the category.	ACCEPTED: SAMHSA will add the following disposition categories: Lost Contact and Lack of Resources.
19	01/06/2020 01/06/2020	Disability Rights Texas Disability Rights Iowa	Page 24, Section H - Statement of Priorities (Goals) - One of the P&As stated that Section A & C are repetitive and narratives may be duplicative for case level work. The other P&A stated that the wording of the instructions are not clear and needs clarification whether it should list only one exemplar case narrative or whether it have to briefly list all of the cases under the priority. In addition, the P&A recommended "Partially Met" be included as an option when reporting the outcomes of the priorities.	NOT ACCEPTED: SAMHSA does not consider this as duplicative. WebBGAS automatically populates these data fields in the PPR from data submitted in the application. Therefore, the data is only entered one time, in the PAIMI Application. SAMHSA will clarify in the PPR instructions that states provide a minimum of one narrative example for each Priority/Objective. In addition, SAMHSA only requires that states indicate whether a priority was met or not met. It does not include a category "partially met". The latter must be counted as "not met". However, if the state wishes to explain why a Priority was "partially met", they can submit a footnote in WebBGAS.

20	01/06/2020	Protection & Advocacy System for SC	Page 2, #10 - Commissioner/Director of State Mental Health Agency - The P&A recommended that the federal citation be cited as a reminder that the P&As are required to provide a copy of their annual PPR to the head of their state mental health agency.	ACCEPTED: SAMHSA agrees to include the federal statute citation as a reminder requiring the P&A to provide the annual PPR to the head of their state mental health agency. 42 U.S. Code Section 10805(7) states that the system established in a State shall on January 1, 1987, and January 1 of each succeeding year, prepare and transmit to the Secretary and the head of the State mental health agency of the State in which the system is located a report describing the activities, accomplishments, and expenditures of the system during the most recently completed fiscal year, including a section prepared by the advisory council that describes the activities of the council and its assessment of the operation of the system.
21	01/06/2020	Disability Rights Iowa	Section D. 3 - Reporting the # of Individual Receiving Information from Public Awareness Activities/Events - The P&A recommended adding a field to allow the reporting of the number of individuals who received information from public awareness activities/events.	NOT ACCEPTED: SAMHSA does not require such reporting, however the P&A may choose to collect such data.