

## **Substance Abuse and Mental Health Services Administration**

### **Mental Health Client/Consumer Outcome Measures and Infrastructure, Prevention and Promotion Indicators**

#### **No Material or Nonsubstantive Change Justification**

The Substance Abuse and Mental Health Services Administration (SAMHSA) is requesting a no material or nonsubstantive change approval from the Office of Management and Budget (OMB) for (OMB No. 0930-0285) Mental Health Client/Consumer Outcome Measures and Infrastructure, Prevention and Promotion Indicators.

SAMHSA has made significant revisions to the Mental Health Client/Consumer Outcome Measures and Infrastructure, Prevention and Promotion Indicators data collection instruments based on both external and internal stakeholders consultation and feedback. The revisions were made in an effort to reduce burden on general public including grantees that utilize these instruments for reporting purposes. In order to avoid the risk of adding unnecessary burden SAMHSA is requesting Terms of Clearance that allow for a smooth transition to the new instruments. The request for no material or nonsubstantive change will allow SAMHSA to adequately address the following factors:

- **Grantee data collection systems:** Many grantees develop platforms to collect GPRA and other data from clients and organizations within their community. A change in the instrument will require time to make those changes in their platform;
- **Changes to SPARS:** Grantees place their data into SAMHSA Performance Accountability and Reporting System (SPARS), this system will need time to make the necessary changes to the system, pilot test and test for validity in data collection (such as appropriate skip logic patterns, etc.);
- **Grantee expectations for change.** SAMHSA notified grantees on February 25<sup>th</sup> that the current tool will not expire on the current February 28<sup>th</sup> timeframe and to continue using this instrument until further notice;
- **Grantees require training** on SPARS once the new instrument is available in the system. At least two trainings per Center will be required to support grantees on the east and west coast of the United States;
- **Grantees need to train their staff:** Grantees often have turnover of staff who complete the GRPA instrument with clients. A new set of questions will require additional training to make sure data that are collected are trauma sensitive and that grantees have time to familiarize their staff with the new items on the instrument.

SAMHSA is requesting approval of a no material or nonsubstantive change to the Terms of Clearance for (OMB No. 0930-0285) Mental Health Client/Consumer Outcome Measures and Infrastructure, Prevention and Promotion Indicators to allow the use of the previously approved instruments until September 30, 2022 and implementation of the newly approved instruments on October 1, 2022. This change allow for a smooth transition between the instruments and ensure a burden reduction over both the short-term and long-term.