

## 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 strives to be a data driven agency and to that end 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 the general public including grantees that utilize these instruments for reporting purposes. However, these changes to existing survey instruments, can require effort on the part of SAMHSA grantees. 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 shared by SAMHSA grantees:

- **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;
- **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. These trainings will be recorded for grantees not able to attend in person;
- **Grantees need time 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.
- **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;
- **Grantee's questions:** In addition to training, Grantees need time to understand the changes to the new survey. To ensure the most reliable data possible, SAMHSA should allow grantees an opportunity to ask related questions. SAMHSA is creating a frequently asked questions resource based on these questions and will share this resource widely.
- **Changes to the data collection system (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.);

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 December 31, 2022 and implementation of the newly approved instruments on January 1, 2023. This change will allow for a smooth transition between the instruments and ensure a burden reduction over both the short-term and long-term.