

Summary of activities implementing the Uniform Block Grant Application

On April 11, 2011 a Federal Register Notice was posted to obtain comments on the proposed collection of information sought through the revised application for the Substance Abuse Prevention and Treatment Block Grant (SABG) and the Mental Health Services Block Grant (MHBG). In total, 772 comments from 522 individuals or organizations were received. The comments were 1) supportive of the changes proposed to the FY 2012-2013 Uniform Block Grant Application, 2) requested clarification regarding certain areas or 3) requested specific changes to the Uniform Block Grant Application. The most frequent comments in support of the revised Block Grant application focused on the following areas:

- Allowing States to submit a bi-annual plan instead of an annual plan.
- Having a standard format for both the MHBG and SABG.
- SAMHSA's efforts to encourage States to use the revised Uniform Block Grant application process to be better prepared to respond to several major federal initiatives.
- Focus on planning for populations that are uninsured and below 133% of the federal poverty level that may become insured in FY 2014.
- Inclusion of family involvement, tribal consultation and a focus on the provision of recovery support services.
- Commending SAMHSA on including adolescents as a target group that States can include in their needs assessment and State Plan.

The most frequent comments seeking clarification in the revised Block Grant application focused on the following areas:

- Requesting clarification on the sections of the Block Grant application that were required versus requested.
- Requesting that SAMHSA provide States flexibility regarding the submission of Block Grant applications post the statutory submission given the compressed timeframes.
- Requesting assurances that SAMHSA will not disapprove a State Plan or payment that did not include the requested information in the block grant application.
- Clarification that SAMHSA is not consolidating the MHBG and SABG funds.
- Requesting definitions and procedure codes for the services that are included in Table 5 of the State Plan document and the reporting sections.
- Additional clarification regarding the process to develop dashboard measures for States and the proposed incentive program.
- Additional clarification and technical assistance regarding strategies to perform formal Tribal consultation.
- Comments regarding SAMHSA's proposed FY 2012 budget and the creation of State Prevention Grants. The comments were not in support of the FY 2012 proposal. While these were important comments, they were not relevant to the FRN regarding the changes in the Block Grant application.

During the 60 day review period SAMHSA conducted fourteen teleconferences to review the changes to the MHBG and SABG with State Substance Abuse authorities, State Mental Health Authorities and other stakeholders. SAMHSA also did a significant public outreach effort to solicit comments on the revised Block Grant application through announcements in various periodicals, trade association materials and prominently displayed the FRN and the application on the SAMHSA website.

Based on the comments received through the Federal Register Notice, SAMHSA has made changes to the revised block grant application. These changes include:

- Clarifying which sections of the block grant application are required to be submitted as part of the State Plan and which sections SAMHSA is requesting, but not requiring States to submit. SAMHSA continues to strongly encourage States to submit this information. This will allow SAMHSA to understand the Applicant State's efforts and identify how it can assist the applicant State meet its goals in a changing environment. In addition, this information will identify States that are models and assist other States with areas of common concern.
- Clarify to States that not submitting this information will not change SAMHSA's approval of their Plan or payment, States are strongly encouraged to submit as much as they can so the nation as a whole will have a complete picture of needs of individuals with behavioral health conditions as well as the innovative approaches States are undertaking in these areas as well as the barriers they encounter to design and implement important policies and programs.
- Require information on State's Maintenance of Effort to be included in the plan rather than the reporting section. States provided this information in their plans in previous years.
- Provided some additional clarity regarding specific sections of the plan in the following areas: Data and Information Technology, consultation with Tribes, Support of State Partners, and State behavioral Health Advisory Council.
- Provided additional clarification on specific sections of the reporting section for the MHBG and SABG.

The second 30 day FRN was published on June 17. The 30-Day comment period will be completed on July 16. Once the comments have been compiled by OMB, they will forward them to SAMHSA to respond to. The Paperwork Reduction Act (Federal Law) states that OMB has no less than 30 days (30-day FRN), no more than 60 days (August 16) to review and approve the application.