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July 13, 2011

SAMHSA Desk Officer
Human Resources and Housing Branch
Office of Management and Budget
New Executive Office Bldg., Room 10235
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BY FAX TO: 202/395-7285

RE: Substance Abuse and Mental Health Services Administration, Agency
Information Collection Activities: submission for OMB Review; Comment
Request

To Whom It May Concern:

These comments are submitted by the Bazelon Center for Mental Health Law in response to the notice in the Federal Register of June 17, 2011, p 35454-35459, regarding information to be collected from the states under the Community Mental Health Services and the Substance Abuse Prevention and Treatment block grants. The Bazelon Center is a legal advocacy organization, established in 1972, concerned about the rights of individuals with mental illness, including access to mental health and support services.

We believe that the requests for information SAMHSA proposes to make to the states is eminently reasonable and vitally important to ensure that federal block grant funds are appropriately targeted to populations in need, taking into account the potential for many more people to have insurance and Medicaid coverage once the Affordable Care Act is implemented. We have also urged SAMHSA to ensure that states set their priorities for spending these funds to address the needs of the populations that have the greatest vulnerability to institutionalization and harmful outcomes. These vulnerable populations are spelled out in the law for the Community Mental Health Services block grant. SAMHSA should ensure that they continue to receive the highest priority and that funds not be diverted to serve uninsured individuals with less serious mental disorders until the state can demonstrate that the priority population is receiving the recovery-oriented services that they require.

Thank for this opportunity to submit our comments.

Sincerely,

Robert Bernstein
Executive Director