

**Suggestions NOT Incorporated into Draft INN Regulations**  
**Presented at October 24, 2013 MHSOAC Meeting**

| <b>Suggestion</b>                                                                                                                                                                                                                           | <b>Source</b>              | <b>Rationale for Not Incorporating the Suggestion</b>                                                                                                                                                                                                                                                                                                                                |
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| <b>INN Project Elements: New or Change Practice</b>                                                                                                                                                                                         |                            |                                                                                                                                                                                                                                                                                                                                                                                      |
| 1. Allow multiple counties to do the same INN projects so as to provide opportunity to validate and replicate results.                                                                                                                      | Public                     | Counties are already able and encouraged to test the same or similar Innovative Projects simultaneously and collaborate on evaluating and disseminating the results.                                                                                                                                                                                                                 |
| 2. Move the phrase, "A mental health practice or approach that has already demonstrated its effectiveness is not eligible for funding as an Innovative Project."                                                                            | CMHDA                      | The new suggested location does not logically flow with the subsection. However, will consider if the entire subsection needs to be clarified.                                                                                                                                                                                                                                       |
| <b>INN Project Elements: Primary Purpose</b>                                                                                                                                                                                                |                            |                                                                                                                                                                                                                                                                                                                                                                                      |
| 1. Consolidate two of the primary purpose so that the primary purpose of "increasing access to mental health services to underserved groups" is included in the primary purpose of generally "increasing access to mental health services." | CMHDA                      | 5830(a) and (b) separate out the two primary purposes for emphasis. The two separate purposes are included in the MHSAs. Combining the two purposes would dilute the MHSAs' intended emphasis on two separate purposes that often, but not always, overlap.                                                                                                                          |
| <b>INN Project Elements: Time-limited</b>                                                                                                                                                                                                   |                            |                                                                                                                                                                                                                                                                                                                                                                                      |
| 1. Do not limit the extension in time of INN projects to one year.                                                                                                                                                                          | Workgroup member and CMHDA | A specific time limit is critical to ensure the integrity of the intended purpose of INN projects as short term pilot projects. The one year extension allows counties to have a total of 5 years to complete INN project. If a county wants to test something that will take more than 5 years to demonstrate, they can divide the evaluation up into separate Innovative Projects. |
| <b>INN Project Elements: Evaluation</b>                                                                                                                                                                                                     |                            |                                                                                                                                                                                                                                                                                                                                                                                      |
| 1. Delete all the detailed information that is to be included in the evaluation and just require that                                                                                                                                       | CMHDA                      | The information provides needed details to assist counties in developing better evaluations. It                                                                                                                                                                                                                                                                                      |

| Suggestion                                                                                                                                                                                                                                | Source | Rationale for Not Incorporating the Suggestion                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| the counties design a method for evaluating the effectiveness and feasibility of the INN project.                                                                                                                                         |        | would be a serious disservice to counties not to articulate the basic required elements of an effective evaluation. Deleting the requirement is also inconsistent with feedback from the California State Auditor to provide the guidance necessary to effectively evaluate and report on the performance of the MHSA programs.                                                                                                                                          |
| <b>INN Project Elements:<br/>Expenditure Plan</b>                                                                                                                                                                                         |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1. Delete the requirement that a county cannot expend INN funds beyond what was approved by the MHSOAC.                                                                                                                                   | CMHDA  | Draft regulation is consistent with 5830(e) which provides for counties to expend INN funds upon approval of the MHSOAC.                                                                                                                                                                                                                                                                                                                                                 |
| <b>INN Project Plan</b>                                                                                                                                                                                                                   |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1. Delete requirement that counties describe how the county ensured staff and stakeholders involved in the community program planning (CPP) process were informed about and understood the purpose and requirements of the INN component. | CMHDA  | The requirement is consistent with AB 1467 requiring meaningful stakeholder involvement and with current regulations that require training for staff and stakeholders. Knowledge and understanding of how INN is different from the traditional treatment system is a critical element of meaningful involvement in the CPP process.                                                                                                                                     |
| <b>INN Project Reports</b>                                                                                                                                                                                                                |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1. Delete requirement to collect data on race, ethnicity, primary language spoken, sexual orientation, disability, veteran status.                                                                                                        | CMHDA  | Disaggregated data is critical to be able to evaluate the impact of the MHSA on different underserved populations, including the MHSA mandate to provide culturally and linguistically appropriate services. Deleting this limited and basic information is not compatible with the following: (1) MHSA requirement that counties report on performance outcomes; (2) Commission's focus on evaluation as a key strategy to oversight; (3) Recommendation from the State |

| Suggestion                                                                                                                                     | Source | Rationale for Not Incorporating the Suggestion                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                                                                                                                                                |        | Auditor regarding the need for more evaluations using consistent standards; and (4) Need to provide timely input on data elements as counties and state begin to design new data systems.                                                                                                                                                                                                                                                                        |
| 2. Replace the requirement to collect information with the requirement to collect “available” information regarding age.                       | CMHDA  | The draft regulation provides information so counties can include the data elements as they begin to design new data systems.                                                                                                                                                                                                                                                                                                                                    |
| 3. Delete the requirement that counties provide a summary of what was learned by the INN project.                                              | CMHDA  | Deleting this reporting element is inconsistent with the very nature and purpose of INN projects.                                                                                                                                                                                                                                                                                                                                                                |
| <b>Annual Revenue and Expenditure Report</b>                                                                                                   |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1. Delete the section that specifies what INN information is to be reported as part of the Annual MHSAs Revenue and Expenditure Report (ARER). |        | The requirements in the section are the same as those in the ARER Instructions issued by DHCS in consultation with the MHSOAC and CMHDA. The requirements in this section are intended to be a part of the ARER instructions for all the MHSAs components to be issued by DHCS under Section 5899. Because Section 5899 does not provide that the Instructions are exempt from the Administrative Procedure Act the Instructions will need to be in regulations. |
| <b>Stakeholder Involvement</b>                                                                                                                 |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1. Delete the word, “meaningful” to describe stakeholder involvement every time it is used in the proposed regulations.                        | CMHDA  | The term, “meaningful” is used in 5848 which requires the county to “demonstrate partnership of meaningful involvement of local stakeholders on mental health policy, program planning and implementation, monitoring, quality improvement, evaluation, and budget allocations.                                                                                                                                                                                  |