

**Matrix of Public Comments with Staff's Recommended Responses  
Proposed INN Regulations**

Section #	Comment Author	Comment Summary	Response	Action	Rationale
3510.020	Commenters #1, 2, 3, 6, 7	<p><b><u>Comments 1.5, 2.5, 3.5, 6.5, 7.5</u></b>  <b>Align Revenue and Expenditure Reporting (RER) with Department of Health Care Services oversight.</b> Welfare and Institutions Code 5899 specifies that the Department of Health Care Services, in consultation with the MHSOAC and CMHDA, shall develop and administer instructions for the MHSR Revenue and Expenditure Report. Accordingly, requiring duplicative reporting is unnecessary. Broadly, duplicative instructions within the Innovation regulations raises the potential for confusion and for misalignment of instructions should DHCS direction for Revenue and Expenditure Reporting to counties change in the future. More specifically, the proposed expenditure reporting regulations are inconsistent with DHCS directives. RER evaluation expenses are not reported at the project level but at</p>	Reject	Retain existing language with no change	<p>The requirement would not result in duplicative reporting; there will be a single set of instructions for the Annual Revenue and Expenditure Report, including any necessary component-specific instructions, if applicable. Since each Innovative Project is a self-contained and time-limited with its own MHSOAC-approved budget, reporting at the individual Innovative Project level is necessary for fiscal oversight.</p> <p>There is no requirement or expectation in the Proposed Innovation regulations that Medi-Cal funds would be used to fund evaluation. The Innovation evaluation could be funded by Innovation funds or by some other funds; the key issue is that sufficient funds be devoted to evaluation, which is an essential, core element of every Innovative Project.</p> <p>MHSOAC is fully committed to a collaborative, non-duplicative, and integrated approach to data collection, evaluation, and reporting. MHSOAC staff is working with DHCS in its development of CSS and general reporting requirements, including the Annual Revenue and Expenditure Report, to ensure consistent county reporting requirements. The MHSR requires that “any regulations adopted by the department pursuant to Section 5898</p>

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		<p>the MHSA component level. Medi-Cal FFP funds cannot be used to fund evaluation.</p> <p><b>Recommendation:</b> Delete Section 3510.020. Innovative Project Annual Revenue and Expenditure Report.</p>			<p>shall be consistent with the commission's regulations" (WIC 5846(b)).</p>
3580.010(a)(2)	Commenter #4	<p><b>Comment 4.1</b> 3850.010(a)(2)(sic): Please omit the word "that," which doesn't belong in the sentence: Available evaluation data, including outcomes of the Innovative Project and information about which elements of the Project <b>that</b> are contributing to outcomes.</p>	Accept	<p>Change existing language as indicated:</p> <p>3580.010(a)(2)</p> <p>Available evaluation data, including outcomes of the Innovative Project and information about which elements of the Project <del>that</del> are contributing to outcomes.</p>	Grammatical correction
3580.010(a)(3)	Commenter #H1	<p><b>Comment H1.01</b> MS. HIRAMOTO: Stacie Hiramoto. REMHDCO, the Racial and Ethnic Mental Health Disparities Coalition. I, again, want to thank the staff for doing such a good job in ensuring that there's stakeholder comment and involvement.</p> <p>I guess you want to do this by section number. On page two, Section 3580</p>	No specific action suggested	<p>For consistency with PEI regulations change existing language as indicated below:</p> <p><b>3580.010(a)(3)(A)</b> Add new subsection: <u>(v) Declined to state</u></p> <p><b>3580.010(a)(3)(B)</b> Add new subsections <u>(vii)</u> <u>More than one race</u> <u>(viii) Declined to state</u></p>	<p><u>Recommended changes:</u> For consistency with the PEI regulations, staff is recommending the additional demographic information be included in this section. This is the same information proposed to be added to the PEI regulations.</p> <p>All listed demographic categories are included in at least one Federal reporting requirement and each category has a population in California above 100,000 according to 2010 census data. The three suggested additions of Puerto Rican, Mexican/Mexican</p>

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		<p>(sic), I just want to commend the staff and support their breakdown of the demographic information that needs to be collected on innovations.</p> <p>Again, if we don't do anything different, then we're not going to make any improvements in reducing disparities. And, in order to really get a good handle on serving communities, we must disaggregate data. And thank you so much to the staff for their recommendation.</p>		<p><b>3580.010(a)(3)(C)(i)(c)</b> Amend (c)<u>Mexican/Mexican American/Chicano</u></p> <p><b>3580.010(a)(3)(C)(1)</b> Add new subsection: <u>(d) Puerto Rican</u></p> <p><b>3580.010(a)(3)(C)(1)</b> Add new subsection: <u>(g) Declined to state</u></p> <p><b>3580.010(a)(3)(C)(ii)</b> Add new subsection: <u>(b)Asian Indian/South Asian</u></p> <p>Add new subsection: <u>(m)Declined to state</u></p> <p><b>3580.010(a)(3)(C)</b> Add new subsection (iii) More than one ethnicity</p> <p><b>3580.010(a)(3)(D)</b> Amend (D)Primary language <del>spoken listed</del> used by threshold languages for the individual county</p>	<p>American/Chicano, and Asian Indian/South Asian are necessary because they meet these criteria and are consistent with terminology used in Federal reporting categories.</p> <p>Because research demonstrates that not all individuals identify with the current federal race categories the MHSOAC suggests the addition of an additional category, "other." Staff also suggests the addition of a "declined to state" category to account for individuals who declined to provide the requested information. The addition of categories for individuals who identify with more than one race and more than one ethnicity is necessary because of the prevalence of such individuals in California, whose numbers are growing.</p>

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3580.010(a)(3)	Commenters #1, 2, 3, 6, 7	<p><b><u>Comments 1.4, 2.4, 3.4, 6.4, 7.4</u></b>  <b>Remove separate reporting of race and ethnicity and create consistency between current county reporting to the Client Services Information (CSI) system and Innovation reporting.</b></p> <p><b>Recommendation:</b> Delete Section 3580.010. Annual Innovative Project Report. (a) (3). Replace with language referencing CSI.</p>	Reject	See action in response to comment H1.01 above on page 2.	<p>It is important that counties report demographic data using consistent categories in order to roll up data for statewide reporting, for a range of accountability and quality improvement purposes. It is also essential, both for the general MHSa purpose of improving the cultural and linguistic competency of services and for the Innovation-specific primary purpose of improving timely access to services for underserved populations to understand the intended beneficiaries, by demographic categories, of MHSa-funded Innovative Projects. See response to comment H1.01 above on page 2.</p> <p>MHSOAC is fully committed to a collaborative, non-duplicative, and integrated approach to data collection, evaluation, and reporting. MHSOAC staff is working with DHCS in its development of CSS and general reporting requirements, to ensure consistency for county reporting requirements regarding demographic categories. The MHSa requires that “any regulations adopted by the department pursuant to Section 5898 shall be consistent with the commission’s regulations” (WIC 5846(b)).</p>
3580.020	Commenter #H1	<p><b><u>Comment H1.02</u></b>  The next one, on Section 3580.020 on page four, somewhere in this section where they talk about the final innovative project</p>	Reject	Retain existing language with no change.	The start and end date for an Innovative Project are defined in 3910.010(a)(1) and (a)(2).

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		report, I think it would be helpful for us if it were specified when the program begins and when the program ends. I think that would just help for general information for us.			
3905(a)	Commenter #8	<p><b>Comment 8.1</b> Proposed additions are in <i>italics</i>, and phrases requiring clarification are in <b>bold</b>.</p> <p>Section 3905. Required Approval</p> <p>(a) The County shall use Innovation Funds <i>for a given Innovation Project</i> only after the ...approves <del>the</del> <i>that</i> Innovation Project.</p>	Accept	<p>Change existing language as indicated:</p> <p>3905(a)</p> <p>The County shall <del>use</del> <u>expend</u> Innovation Funds <u>for a specific Innovation Project</u> only after the Mental Health Services Oversight and Accountability Commission approves the <u>funds that</u> Innovative Project.</p>	<p><u>Recommended changes:</u></p> <p>(1) The comment's suggested language adds clarity to the section.</p> <p>(2) Replace the term, "use" with the term, "expend" because the MHSA uses the term "expend." See WIC 5830(e).</p>
3910(a)(1)	Commenter #8	<p><b>Comment 8.2</b> Proposed additions are in <i>italics</i>, and phrases requiring clarification are in <b>bold</b>.</p> <p>Section 3910: Innovative Project General Requirements.</p> <p>(a) The County shall design and implement an Innovative Project to do one of the following:</p>	Accept	<p>Change existing language as indicated:</p> <p>3910(b):</p> <p>Add new subsection (1):</p> <p><u>For purpose of this section, a mental health practice is deemed to have demonstrated its effectiveness if there is documentation in mental health literature of the</u></p>	<p><u>Recommended change:</u></p> <p>Most Innovative Projects are changes to existing effective mental health practices, not something entirely new. As the comment suggests, it is important to specify what constitutes a "mental health practice that has demonstrated its effectiveness" in order to know what constitutes a new or changed mental health practice that can be funded by the Innovation component.</p>

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		<p>(1)A mental health practice or approach that has already <b>demonstrated</b> its effectiveness....  <b>Comment:</b> <u>Please include clarifying language regarding what constitutes "demonstrated".</u></p>		<p><u>effectiveness of the practice.</u></p>	
3910(b)	Commenters #1, 2, 3, 6, 7	<p><b>Comments 1.1, 2.1, 3.1, 6.1, 7.1</b>  <b>Clarify definition of an "Innovative Project"</b> - The regulations must recognize the diversity of California's population, geography, and stakeholder-driven mental health service approaches county-by-county. For example, application of an approach or practice developed in one county to another county should be considered an innovative project if the other county demonstrates a unique application of the practice or approach.</p> <p><b>Recommendation:</b> Add the <i>italicized</i> language (below) so Section 3910, Innovative Project Elements reads as follows:</p> <p>(b) A mental health strategy that has already demonstrated its</p>	Accept in part	<p>Change existing language as indicated:</p> <p>3910(b):</p> <p>A mental health practice or approach that has already demonstrated its effectiveness is not eligible for funding as an Innovative project <u>unless the County provides documentation about how and why the County is adapting the practice or approach, consistent with subdivision (a)(2) above and with section 3920(c)(2). For example, the change can include specific adaptation(s) to respond to unique characteristics of the County or a community within the County, such as an adaptation for a rural setting of a mental health practice that has demonstrated its</u></p>	<p><u>Recommended change:</u> The suggestion about the need to document the “change in the mental health strategy's practice or approach” is useful and it is consistent with the requirements in proposed regulation §3930(c)(2) to include this information in the Innovative Project Plan.</p> <p>The fact that the County has unique characteristics – which is the case for all counties – does not exempt it from the MHSa requirement to develop and test a new or changed mental health practice. Proposed Innovation regulations already make it clear that one of the definitions of an Innovative Project is to “make a change to an existing practice in the field of mental health, including but not limited to, application to a different population” (§3910(a)(2)). The proposed additional language is intended to enhance that clarification.</p>

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		effectiveness is not eligible for funding as an Innovative Project, <i>unless there is documentation as to a change in the mental health strategy's practice or approach, or documentation of the unique characteristics of the community.</i>		<u>effectiveness in an urban setting, or vice versa.</u>	
3910	Commenter #H2	<p><b>Comment H2.01</b>  MS. SHILTON: Good afternoon. Adrienne Shilton, California Institute for Behavioral Health Solutions, providing comments today on behalf of the County Behavioral Health Directors Association.</p> <p>We did provide written comments to all of you with five key recommendations -  - most that are around some clarifications of language and consistency of reporting requirements, based on what counties are required to report to the Department of Health Care Services.</p> <p>But, one of our key recommendations is related to Section 3910, about the definition of innovation projects, and we do have</p>	Accept in part	Same as response to comments 1.1, 2.1, 3.1, 6.1, and 7.1 above on page 6.	See response to comments 1.1, 2.1, 3.1, 6.1, and 7.1 above on page 6.

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		<p>some proposed language in our written comments. But, basically, the notion is that we want to support language that allows counties across the state to fund innovation projects, even if they are funded in other counties, even if they are -- they're similar projects, as long as there is a documentation that that particular approach is unique to that community or county.</p> <p>So, we look forward to continuing to work with Commissioners and staff as these move forward. Thank you.</p>			
3910.010(a)	Commenter #4	<p><b>Comment 4.2</b> 3910.010(a). Please change four years to <b>five</b> years. (b)(1) indicates five years, which is contradictory. It makes sense to allow a total of five years if this is the amount of time a county needs to demonstrate the success of the Innovative Project.</p>	Accept	<p>Change existing language as indicated:</p> <p>3910.010(a):</p> <p>An Innovative Project shall have an end date that is not more than <del>four</del> <u>five</u> years from the start date of the Innovative Project, <del>unless extended pursuant to subdivision (b) of this section.</del></p>	<p><u>Recommended change:</u> This change makes it clear that the time limit is five years, whether designated originally or requested as an extension.</p>

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3910.015	Commenter #8	<p><b>Comment 8.3</b> Proposed additions are in <i>italics</i>, and phrases requiring clarification are in <b>bold</b>.</p> <p>Section 3910.015. Continuation of an Innovative Project</p> <p>(a) After <b>completion of the evaluation</b>, the County, with meaningful involvement of stakeholders...and incorporated into the local mental health delivery system <i>"to provide a continuity of services for those individuals with serious mental illness or families who were being served"</i> and with what other funding sources, if funding is required."</p> <p><b>Comment 1:</b> Please clarify what signals the completion of the evaluation.</p> <p><b>Comment 2:</b> Please include the same protective language used in Section 3910.020, as shown.</p> <p>(c) "To <b>continue</b> a successful Innovative Project, the County shall</p>	Accept in part	<p>Change existing language as indicated:</p> <p>Amend Section 3910.015 (a)After completion of the evaluation (<u>i.e. when the evaluation questions are answered</u>) the County, with meaningful involvement of stakeholders, shall decide whether and how to <u>an</u> Innovative Projects or elements of <u>an</u> Innovative Projects, will be continued and incorporated into the local mental health delivery system and with what other funding sources, if funding is required.</p>	<p><u>Recommended change:</u> The additional language is proposed to clarify the term.</p> <p>Proposed regulations section 3930(c)(4) requires the County to include in the Innovation Project Plan a description of the method the County will use to evaluate the Innovative Project. The specific steps involved in completing the evaluation will vary depending on the specific Innovative Project and evaluation design. As such, "completion of the evaluation" must be broadly defined.</p> <p><u>Continuity of services:</u> Section 3910.015(a) specifically addresses the requirements related to the decision of whether to continue the project, or elements of the project, without Innovation funds. The ethical mandate to provide service continuity and transitions for individuals with serious mental illness who were being served is more appropriately addressed in sections 3910.010, 3910.020, and 3930.</p> <p>Section 3910.01(d) requires the County to have a plan to protect and provide continuity for individuals with serious mental illness who are receiving services from the Innovative Project when the project is complete and Section 3930(c)(6) requires the County to include that information in its Plan requesting MHSOAC approval of the Innovative Project. In addition, as mentioned by the commenter, 3910.020(a)(1)(A) includes</p>

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		<p>transition the Project...to another category of funding."</p> <p><i>(d) If the county decides not to continue an Innovation Project upon completion of the evaluation, it shall, if applicable, take all reasonably necessary steps to protect and provide continuity of services for individuals with serious mental illness and families who were being served.</i></p> <p><i>(e) If the county decides not to continue an Innovation Project, the County shall notify stakeholders and the Mental Health Services Oversight and Accountability Commission within 30 days of the County's decision to not continue the Innovation Project, or elements thereof.</i></p> <p><i>(1) If the Innovative Project provides services to individuals with serious mental illness, the notification shall include a description of the steps the County took to protect and provide continuity of services for those</i></p>			<p>protection for continuity of services if the project is terminated early.</p>

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		<p><i>individuals who were being served or families who were being served.</i></p> <p><b>Comment 1:</b> Please describe the steps for continuing the services.</p> <p><b>Comment 2:</b> Please insert suggested language in (d), (e), and (1).</p>			
3910.020(a)(2)	Commenter #8	<p><b>Comment 8.4</b> Section 3910.020. Early Termination of an Innovation Project.</p> <p>(a) "The County,..., may terminate an Innovative Project prior to the planned end date."</p> <p>(2) If Applicable, The County,...provide continuity of services for individuals with serious mental illness or families who were being served.</p> <p><b>Comment:</b> Please make this section consistent and parallel with the language in Section 3910.020, (2) (b) (1) (A) which specifies "who were being served or families".</p>	Accept	<p>Change existing language as indicated:</p> <p>3910.020(b)(1)(A):</p> <p>If the Innovative Project provides services to individuals with serious mental illness, the notification shall include a description of the steps the County took to protect and provide continuity of services for those individuals <del>or families</del> who were being served.</p>	<p><u>Recommended change:</u> This language change corrects an inadvertent inconsistency between 3910.010(d), 3910.020(a)(1)(A), 3910.020(a)(2), and 3930(c)6), all of which refer to "individuals with serious mental illness," and 3910.020(b)(1)(A), which refers both to "individuals with serious mental illness" and also to "individuals or families who were being served."</p> <p>Because Innovative Projects are time-limited pilots, it is likely that some will be providing direct services to individuals at the conclusion of the project, whether terminated as planned or in the event of an unforeseen early termination. In order to protect vulnerable individuals with serious mental illness, it is essential that the County formulate and communicate a plan to transition those who need ongoing services and supports to other resources to avoid harm, abandonment, stress, or other negative consequences. Ethical planning for the best interest of</p>

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					<p>clients is a critical element of designing and conducting a time-limited pilot project.</p> <p>Innovative Projects are by definition unique and there is no comparable service to which to refer clients. Limiting this requirement to those clients with serious mental illness makes this reference consistent with the other relevant sections of Proposed Innovation regulations, and is a reasonable approach to protecting vulnerable clients while avoiding overly burdensome requirements for counties.</p>
3915(b)	Commenters #1, 2, 3, 6, 7	<p><b><u>Comments 1.2, 2.2, 3.2, 6.2, 7.2</u></b>  <b>Use meaningful evaluation indicators</b> - CBHDA appreciates the MHSOAC's desire to provide guidance that results in effective reporting and evaluation on MHSA programs. To that end, program evaluation must use indicators related to the objectives of the programs. Overly prescriptive evaluation measures will undermine the very intent of the MHSA component to facilitate innovation, and inappropriate indicators will fail to deliver meaningful data and learning.</p>	Accept	<p>Change existing language as indicated:</p> <p>3915(b):</p> <p>The evaluation shall measure the <del>achievement of</del> <u>intended mental health outcomes selected by the County that are relevant to the risk or onset of mental illness or to the improvement of</u> <del>for individuals and families, related to a risk of or manifestation of serious mental illness and/or for the mental health system, using appropriate indicators selected by the County.</del></p>	<p><u>Recommended change:</u> The original language was intended to be broad and flexible to account for variation in Innovation Projects and evaluations, while still linking all Innovative Projects and evaluations to the purposes of the MHSA: to improve outcomes for individuals, the mental health system, and communities. However, the comment makes useful suggestions about ways to broaden the language while retaining this key purpose. The suggested revision combines the best and essential elements of both.</p>

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		<p><b>Recommendation:</b> Replace Section 3915, Innovative Project Evaluation, (b) with the following language:</p> <p>(b) The evaluation shall measure the achievement of mental health outcomes and/or mental health system outcomes that follow from the project objectives and learning goals, using appropriate indicators selected by the County.</p>		<p>(1)The County shall <u>select the appropriate indicators to measure the intended mental health outcomes</u></p>	
3915(e)	Commenter #4	<p><b>Comment 4.3</b> 3915(d)(sic). Please require the evaluation to use quantitative <b>and/or</b> qualitative methods. Requiring both methods seems too burdensome for many counties, especially small counties, especially for this purpose of linking elements and practices to outcomes.</p>	Accept	<p>Change existing language as indicated:</p> <p>3915(e).</p> <p>The evaluation shall use quantitative <u>and/or</u> qualitative research methods to determine which elements of the Innovative Project contributed to successful outcomes in order to support data-driven decision about incorporating new and/or revised mental health practices into the County's existing systems and services and</p>	<p><u>Recommended change:</u> While it is generally useful to use both qualitative and quantitative methods for an evaluation of an Innovative Project, both kinds of methods are not necessarily appropriate, necessary, or feasible for all Innovative Projects. Providing the flexibility for a County to use the most appropriate methods for the specific evaluation is, as the comment points out, necessary to support sound evaluations for the broad range of Innovative Projects.</p>

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				disseminating successful practices.	
3915(e)	Commenters #1, 2, 3, 6, 7	<p><b><u>Comments 1.3, 2.3, 3.3, 6.3, 7.3</u></b>  <b>Clarify evaluation goals -</b> proposed language is confusing and needs clarity.</p> <p><b>Recommendation:</b>  Replace Section 3915, Innovative Project Evaluation (e) with the following language:</p> <p>(e) The evaluation shall use quantitative and/or qualitative evaluation methods to determine the effectiveness of the Innovative project in order to support data-driven decisions about incorporating new and/or revised mental health practices into the county's existing systems and services in order to better disseminate successful practices.</p>	Reject	See response to comment 4.3 above on page 13	See response to comment 4.3 above on page 13

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3930	Commenter #H1	<p><b><u>Comment H1.03</u></b>  A general comment on Section 3930 on page nine - again, we're very pleased with the requirement for meaningful stakeholder involvement, but, just in general, as with the PEI and the Innovation Regulations, we hope that there will be more work done on what constitutes meaningful stakeholder engagement. And I think we were told that that section really belongs to DHCS, but we're really concerned.</p>	No specific action suggested	No specific action suggested	Because meaningful stakeholder involvement is required for all of the MHSA community program planning process the definition needs to be part of the general MHSA regulations which are under the authority of DHCS.
3935(a)	Commenter #H1	<p><b><u>Comment H1.04</u></b>  On Section 3935, on page twelve - please specify that the stakeholder involvement in this section - - under (a) - specify that it must be comparable to the stakeholder involvement for the three-year expenditure plan or around the annual updates, because it does say stakeholder involvement, but it's not specified. We'd like to make sure that it's comparable to the quality and the intensity for the other components. Thank you.</p>	Accept in part	Same as response to comment 4.4 below on page 16	Subdivision (b) provides the County with three options for submitting the Innovative Project Change Request. Two of the options, include the Request as part of the Three-Year Program and Expenditure Plan or the Annual Update, already require the County to follow the community program planning process set forth in the current MHSA regulations. Only the third option, submit the Request as a separate request, does not fall under the current community program planning process. As such, the recommended change to section 3935 applies only to the situation in which the Innovative Project Change Request is submitted as a separate request. See

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					the response to comment 4.4 below on page 16.
3935(b)	Commenter #4	<p><b>Comment 4.4</b>  Add a new (a) to 3935(2)(sic): If the County submits the Innovative Project Change Request separate from an Annual Update or a Three-Year Program and Expenditure Plan, the County shall include an explanation of how stakeholders were involved in the decision to change the previously approved Innovative Project.</p>	Accept	<p>Change existing language as indicated:  Add new subdivision(b)(1)  (1)<u>If the County submits the Innovative project Change Request as a separate request and not part of a Three-Year Program and Expenditure Plan or Annual Update, the County shall document how it complied with the community planning and the local review requirements in Title 9 California Code of Regulations sections 3300 and 3315.</u></p>	<p><b>Recommended change:</b> The additional language reinforces the requirement that is in subdivision (a). As the comment points out, a decision by the County to change the approved Innovative Project requires the same kind and level of meaningful stakeholder engagement as any other decision to use MHSA funds, consistent with WIC 5848(a) and regulations regarding the community planning process for use of MHSA funds.</p>

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No Specified Section	Commenter #5	<p><b>Comment 5.1</b>  Basically, I just found out today, August 25, 2014, that there was a MHSOAC public comment going on. I've raced through the Draft of Regulations and Stanislaus Final Reports. I couldn't find LAC- DMH's or San Joaquin's submits. I filtered the Draft Regulations and Stanislaus' Final Reports for the terms cost, \$, budget, balance sheet, ledger and under-budget. Cost and budget are one of the four basic project management constraints.</p> <p>Expenditure Reporting: In general, it is a good thing if you can bring a project home on time and under-budget. And it is even a better thing if you can share with the taxpayers coming in under- budget. Here in Orange County Mary Hale, Dr. Jeff Nagel, (MHSA Coordinator) and Gerry Aguirre (Innovations Coordinator) announced earlier this month that all project ideas must come with budgets.</p>	Reject	Retain existing language with no change	The proposed regulations section 3510.020 does require the County to report by fiscal year, the total dollars spent on each Innovative Project and how much was spent on administration of each Project as well as how much was spent on the evaluation of each Project.

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		<p>Suggestion: I suggest adding a Regulation that indicates how to report the amount a project actually costs (spends) in detail. Aside note: From a public perspective, it is hard to believe these projects are not only spending all their money, yet, they seem to spend the exact amount allocated (approved). Since the last time I read the Draft Regulations MHSOAC has updated them. Your newer section on expenditure reporting might address itemized yearly and total project cost balance sheets.</p>			
No Specified Section	Commenter #H3	<p><b><u>Comment H3.01</u></b>  MR. ANDERSON: Hi. I'm Ivan Anderson. And it's more like a recommendation for -- not just for the -- not just for the whole entire Commission board. It's -- with me, since I'm more visually aware of what's going on based on -- based off of presentations, for me, it's like, I would rather -- and I'm having to be --</p> <p>For a phone-in Commission meeting, I would like to try to see Skype being</p>	Not relevant to the regulations	Retain existing language with no change.	Not relevant to the language of the regulations

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		<p>innovated for reasons so I could be able to not just -- just -- not because of the teleconferencing, but I also would like to be able to see what I'm seeing as far as the material that's being presented for the committee that I'm on.</p> <p>Because it's a lot easier for me to actually see it than just to actually hear it and not have to be basically present all the time, because it's like, I'm in the middle of three different projects at the same time.</p> <p>So, I would like to recommend you as the Commission board adding Skype to -- as an innovative way for all of us who don't have time to necessarily participate by teleconference, but also make it more visually known for all of us who are in the modern technology world, like me. Thanks.</p>			