

**Carol Skelly Comments on Proposed Behavioral Health Docket
September 2, 2019 (previously submitted to Deborah Warren by email July 15, 2019)**

NOTE: These suggested edits are intended to clarify that “dual diagnosis” as a criterion for eligibility means both: (1) co-occurring mental illness and substance use disorder; and (2) co-occurring mental illness and developmental disability. This appears to be the intent of the Abstract (see page 1, second bullet under “participant eligibility”); however, the terminology used is inconsistent throughout the document and is likely to result in confusion and misinterpretation.

In addition, it is suggested that everywhere the term “developmental disability” is relevant, the phrase “including autism spectrum disorder” be added. This is important because some individuals with autism do not meet the CSB definition of “developmental disability” and would thus be excluded.

COMMENTS:

On the second page of the docket application, bullet 3, under "target population," change the phrase "criteria met for SMI or dual diagnosis" to "criteria met for serious mental illness, or combined conditions of serious mental illness and either substance use disorder or intellectual and developmental disability, including autism spectrum disorder."

Page 1 of the abstract, bullet 2, currently reads “Diagnosed with a serious mental illness or dually diagnosed – meaning diagnosed with significant thought, mood or anxiety disorder and potentially carrying a secondary diagnosis of substance use or an intellectual or developmental disorder.” The problem with this language is that a developmental disability is likely to be a primary and not a secondary diagnosis. Suggest changing this language to “potentially also carrying a diagnosis of substance abuse or an intellectual or developmental disability, including autism spectrum disorder.”

Page 2 of the abstract, bullet 3, currently reads “On a case by case basis, individuals with a sole diagnosis of an intellectual or developmental disability will be considered for inclusion.” Add the phrase “including autism spectrum disorder” to this bullet.

Inconsistencies in the Problem Statement: Throughout the Problem Statement, beginning in paragraph 1, the term SMI/DD is used in the traditional sense, to mean serious mental illness or serious mental illness in combination with substance use disorder. This is fundamentally inconsistent with the Abstract’s bullet 2, which provides two possible diagnostic combinations for dually diagnosed – one SMI with substance use disorder and the other SMI with developmental disability. The confusion is compounded because “DD” is also the commonly used abbreviation for “developmental disability.” Suggest reworking the language throughout the Problem Statement to clarify which diagnoses are intended in each section.