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The Division does some great work, and the Commission does some great overview of that work – but when it comes to SAPTA the system doesn't seem to be working. I've been complaining about SAPTA not meeting Substance Abuse Block Grant requirements for over seven years. But it's a systemic problem, and the requirements aren't going to be met by blaming SAPTA.

This Commission can change part of that system. The Division's 2013 Gaps Analysis identified the lack of public overview of State behavioral health services as a longstanding and ongoing difficulty. Your agenda today provides for establishing a Bylaws Committee. Your bylaws could be revised to enhance your ability to provide public overview of SAPTA.

At your September 2016 meeting I pointed out that the Division Administrator had submitted to SAMHSA written assurance that SAPTA complies with the Substance Abuse Block Grant requirements to have a waiting list and capacity management system, outreach to injection drug users, and needs assessment which meet federal requirements, and asked that the Commission have the Division report on compliance with these requirements. I repeated that request at your November meeting. The minutes show that SAPTA's to report on implementation of those requirements at today's meeting, but SAPTA's not on the agenda.

The fact is that SAPTA isn't meeting those requirements.

In 2015 SAPTA stopped giving the Commission waiting list data in its written reports. Then it stopped giving you written reports altogether. You haven't received a written report from SAPTA for a year. But it's not because SAPTA just doesn't want to give you a written report. It's because SAPTA doesn't have the waiting list and capacity management system required for the Substance Abuse Block Grant that would generate the data required for written reports.

I've reviewed the assurances SAPTA requires of treatment programs receiving subgrant funding. SAPTA doesn't meet the requirement to have them provide outreach to injection drug users which meets federal standards.

SAPTA's working on developing a strategic plan, and I'm pleased to have been chosen to serve on the Steering Committee for that project. But there's no needs assessment which meets federal requirements, so the Committee is trying to muddle through to develop a strategic plan to meet Nevada's substance abuse service needs without really knowing

what those needs are. The fiction that SAPTA has the requisite needs assessment when it doesn't isn't helpful to SAPTA. Problems which are denied are seldom fixed.

The Division has no compunction about submitting patently false assurance that SAPTA meets each of these Block Grant requirements when in fact it doesn't. SAPTA's to give you an update on implementation at today's meeting, but it's not on the agenda. And SAPTA hasn't submitted a written report to you for a year. The Commission's bylaws state that you're to provide overview of behavioral health services, but how could you possibly provide overview of SAPTA in a system that operates like this?

And how could SAPTA possibly succeed in a system that operates like this? How could SAPTA fix the problem of noncompliance with Block Grant requirements when the Division maintains that the problem doesn't exist?

Your agenda today calls for establishing a Bylaws Committee. That's very good news, and I encourage you to take advantage of the opportunity to revise your bylaws to enhance your ability to provide public overview of SAPTA.