

Appendix E: Public Comment Summary

Analysis of Written Public Comments received on the *Oklahoma Needs Assessment and Resource Inventory Report*

The Oklahoma Needs Assessment and Resource Inventory Report was published online for public comment August 25, 2006. The deadline for submission of written public comments was September 15, 2006. Public comments could be sent to the Innovation Center via e-mail or through regular post. Six separate documents were received by e-mail; no public comment documents were received by post. Two of the six documents were from state employees representing two state agencies: The Oklahoma State Department of Health and the Oklahoma Department of Corrections. Three of the remaining four documents were from non-profit agency employees, representing an advocacy group, a health care center and a behavioral health center. The final document was from an individual behavioral health practitioner.

This section provides analysis related to the public comments received on the Needs Assessment. It should be noted that this analysis is qualitative rather than quantitative. Quantitative analysis generally includes objective mathematical procedures that may be replicated by other researchers. The procedures for qualitative analysis, however, tend to be intuitive and subjective. It is possible, therefore, that the same comments might produce a different set of results if analyzed by other researchers. All original documents have been saved so others may conduct their own analysis, if desired.

A multi-stage content analysis was performed. During the first stage, each comment within each document was classified by objective. The six documents contained 33 distinct comments. These comments were classified into five different objectives: 1) Congratulatory; 2) Correcting inaccurate information; 3) Advising the restatement of existing content to improve clarity; 4) Recommending new content; and 5) Proposing action plans. This final objective does not specifically relate to the Needs Assessment, therefore these four comments are removed from the analysis. The following table shows the number of comments per objective.

Objective	Number of Comments	Percent
Congratulatory	4	14%
Inaccurate information	2	7%
Restatements for clarity	4	14%
New Content	19	66%
Total Number of Comments	29	100%

Once classified into objectives, each comment was subsequently reviewed for content and similar comments were clustered into sub-categories that correspond to Needs Assessment chapters. Those comments classified as congratulatory did not require further sub-classification.

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The following information provides a synopsis of the public comments received. Comments have been paraphrased to provide an abbreviated, yet meaningful, summary. These paraphrased statements are clustered by chapter and will include a notation of the perceived objective.

General Congratulations

Congratulations on a well written document that expresses the mental health and substance abuse services needs in Oklahoma.

Consumer-directed, Recovery-focused, Trauma-informed

Information concerning Oklahoma's involuntary commitment law should be added, along with a discussion about its efficacy.

Children

Adolescents in OKDHS custody, or in other state supported treatment, have difficulties transitioning into the adult behavioral health system. A discussion of this problem should be added.

Adult MH

Information should be added concerning the shortage of beds for adult Medicaid patients with mental illness.

The CAR form needs to be revised or replaced, as discussed in the report, this form is time consuming, but what is not discussed is the forms apparent cultural bias and seemingly financial motivation.

Criminal Justice

In order to clarify the Department of Corrections stance on AA/NA programs, please be aware that AA/NA programs are not approved for offender achievement credits because these programs are considered voluntary faith-based services. It should be noted, however, that AA and NA programs are offered in nearly all of DOC facilities and all offenders are encouraged to participate in these programs if they choose.

It is inaccurate to state that the Department of Corrections does not collect electronic data in regards to services offered. This information has been gathered since July 1, 2003 on all approved programs, educational services and faith-based services.

Information should be included on the effect of parental incarceration on children, especially in relation to Oklahoma's high female incarceration rate.

A discussion on the cost effectiveness of shifting money from corrections to mental health and transferring mentally ill inmates into hospitals or other treatment settings should be included.

Add information on Native American (tribal) criminal justice programs.

Housing

Add information on Native American (tribal) housing authorities.

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Employment

Add information on Native American (tribal) employment programs.

Prevention

Information should be added concerning the need for the effective evaluation of early childhood prevention efforts.

Cultural Competence

More attention needs to be given to the Native American population in Oklahoma and to their specific mental health and substance abuse services needs.

The relationship between poverty and mental health and substance abuse problems should be clarified. Specifically, information should be added which explores the intersection of poverty, race/ethnicity and mental health and substance abuse problems.

Information should be included on the processes taken to ensure that screening tools and evidenced-based practices are culturally competent.

The census may not accurately count the number of minorities. This limitation of census data should be addressed.

Technology

Add information on the Indian Health Service data management system: Resource Patient Management System (RPMS).

Appendix

The NAMI listing within the acronyms appendix needs to be corrected.