

Ms. Shalanda Young
Acting Director, Office of Management and Budget
725 17th St. NW
Washington, DC 20503

Re: FR Doc. 2021-09109, Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government

Submitted via the Federal eRulemaking Portal at <https://www.regulations.gov/>.

Dear Acting Director Young:

The Center for Law and Social Policy (CLASP) is a national, nonpartisan, nonprofit organization whose mission is advocating for policies that advance economic and racial justice. Founded more than 50 years ago, CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and on the ground service delivery) that reduce poverty, improve the lives of people with low incomes, tear down barriers arising from systemic racism, and create pathways to economic security. In the last several years, CLASP has strengthened our commitment to racial equity internally and externally, in all aspects of our operations, advocacy, and partnerships. Our responses to this RFI draw on our racial equity journey, including state and national policy advocacy, data analysis, and coalitions that center racial equity, as well as our deep commitment to connecting individuals with lived experience and expertise to policy design, implementation, and advocacy. We would be delighted to follow up on any aspect of these comments, including connecting federal officials to state and local partners and to individuals with lived experience.

Our comments address four of the five areas in the RFI, drawing on different aspects of our work:

- Our response to **Area 1** (Equity Assessments and Strategies) draws on lessons learned from our own data analysis and framework development, partnerships with racial justice consultants, and state and local technical assistance. We share insights and examples of promising methods and strategies.
- Our response to **Area 2** (Barrier and Burden Reduction) draws on many years of CLASP advocacy at the state and federal levels for better delivery of core programs such as nutrition assistance, medical assistance, and child care assistance to people with low incomes, including direct engagement with state governments, state and community-based advocates, and people with lived experience. We provide practical and tested ideas along with extensive references and would be delighted to go deeper into any of the specific suggestions.
- Our responses to **Area 4** (Financial Assistance) and **Area 5** (Stakeholder and Community Engagement) draw particularly on innovative partnerships between CLASP and people with lived experience, including participants in the Community Partnership Group (CPG), the Young Adult Engagement Strategy (YAES), and the New Deal for Youth (ND4Y)—all described in the text. In providing input under these sections, we share lessons learned engaging in these partnerships, as well as findings from listening sessions that we held to explore the questions in the RFI.

Thank you so much for the opportunity to provide input. We look forward to your questions.

Area 1: Equity Assessments and Strategies

Prior to, but especially since the COVID-19 pandemic, state and municipal governments have taken steps to assess, evaluate, and improve the racial equity impacts of their policy design and implementation. The administration can learn from these examples in its own work to ensure federal policies are designed and implemented in a way that addresses historic and structural racism, moves towards equity in key outcomes such as health and economic success, and acknowledges how white dominant culture has shaped policies.

What are some promising methods and strategies for assessing equity in internal agency practices and policies? What knowledge, skills, or supports do practitioners need to use such tools effectively?

Private organizations and state and local governments have developed several approaches to centering equity in policy design and implementation. Each of these strategies should be pursued *after* the agency and its stakeholders have identified and agreed upon racial equity goals because these tools are meant to check the alignment of an organization or government's work to an established set of racial equity goals. Generally speaking, these tools take the form of:

- *Frameworks* – a set of principles or questions to consider when making policy decisions (e.g., [Oregon State's Equity Framework](#)).
- *Assessments* – a defined process or set of questions for using quantitative (and sometimes qualitative) data to identify potential patterns of inequity in the impacts of policies or distribution of resources (e.g., [Race Forward's Racial Equity Impact Assessment](#) and [Chicago's Racial Equity Impact Assessment for housing policy](#)).
- *Data analysis and tools* – sources of information that can be used to better understand the racial impact of a policy or to deliver resources more equitably (e.g., [King County's Racial Equity Impact tool](#), the [U.S. Census's Social Vulnerability Index](#), and the [Urban Institute's Emergency Rental Assistance Priority Index](#)).
- *Community engagement and participatory processes* – organized groups of directly impacted people (e.g., advisory boards, task forces, etc.) who guide decision-making paired with consistent, accessible processes that impacted people can engage with to provide feedback to agencies (see Areas 4 and 5 of this RFI, as well as CLASP's report entitled [Shaping Equitable Early Childhood Policy: Incorporating Inclusive Community Engagement Frameworks into Expanded Data Strategies](#)).
- *Historical analysis* – the intentional, agency-wide study of a jurisdiction's histories to understand how racist policies have resulted in disinvested neighborhoods and racial disparities.

CLASP would be happy to share additional examples upon request.

What are some promising methods and strategies for identifying systemic inequities to be addressed by agency policy?

States can conduct further analysis using existing data (e.g., Census) and data required for federal reporting and other purposes to identify potential inequities. For example:

- CLASP used a combination of Census data, Child Care and Development Fund (CCDF) utilization data reported by states, and [Head Start](#) participant data to identify [inequities in access](#) to child care and early education assistance in individual states.
- The Office of Equity and Social Justice in King County, Washington State developed the [King County](#)

[Equity Impact Awareness Tool](#). This tool used existing data on race and ethnicity, income, home ownership, food insecurity and age to identify areas of the county that, while strong communities, were particularly vulnerable to the negative effects of the public health crisis.

- Chicago used existing data to [assess](#) the differential impact of its Low Income Housing Tax Credit (LIHTC) plan to produce affordable rental units. The city found that majority Black Census tracts saw a proportional increase in affordable units while majority Latinx tracts did not. They used this analysis to improve the program, including defining opportunity zones for future attention.

What are some promising methods and strategies for advancing equity on urgent agency priorities?

In Connecticut and Massachusetts, state child care agencies used the [Census Vulnerability Index](#) data to determine where to begin rapidly distributing the child care stabilization grants that were authorized in the American Rescue Plan Act. In this case, funds were required to be distributed within a relatively short timeline, so using proxy data to estimate need helped to build equity into the distribution model. This geographic data enabled administrators to prioritize the communities that were most likely to have experienced instability during the public health crisis.

How might agencies collect data and build evidence in appropriate and protected ways to reflect underserved individuals and communities and support greater attention to equity in future policymaking?

Designing data collection systems that promote equity takes intentional effort to respectfully include communities in data collection processes, while also ensuring that access to and usability of the collected data is democratized. Some recommendations for data systems that support equity are included in CLASP's recent report [Shaping Equitable Early Childhood Policy: Incorporating Inclusive Community Engagement Frameworks into Expanded Data Strategies](#), which recommends strategies to make public data systems more equitable.

Key recommendations from the report include:

- Integrating data across state agencies to better understand and meet community needs and create aligned resources, as discussed further in Area 2.
- Using data to physically map resources through spatial analyses to gauge and/or improve community access to appropriate resources (e.g., the Utah Division of Multicultural Affairs created [a map dashboard](#) that assessed whether the majority of approved rental assistance applications were in zip codes that have the highest rates of eviction in the state).
- Making data accessible, usable, and inclusive for practitioners, families, and advocates; not just researchers, administrators, policy analysts, and policymakers.

How might agencies build capacity and provide training and support for teams conducting this work?

Race Forward has created critical tools for local and municipal governments to center racial equity in their work through their [Government Alliance on Race and Equity](#) project. Race Forward's approach pairs personal self-study to develop an understanding of individual and structural racism with organizational strategies for designing and implementing more equitable stakeholder engagement, policy design, and implementation practices.

Area 2: Barrier and Burden Reduction

“Targeted social welfare policies, including Temporary Aid to Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), and Medicaid are administered in ways that disproportionately shift administrative burden towards the beneficiaries and away from organizations, while more universal social insurance policies, such as Social Security, or even tax subsidies, like those for employer-based health insurance, are programs where administrative burdens are borne by the bureaucracies instead of beneficiaries.”
- [Ray, Herd and Moynihan](#)

Burdens associated with completing public benefit applications and staying enrolled fall almost exclusively on applicants and/or recipients, with the state and administering agencies facing few consequences when a large percentage of eligible people are not enrolled in programs. These administrative barriers to enrollment range from excessive documentation requirements to insisting recipients show up for in-person interviews. To address these known burdens and barriers to benefits access, administering agencies must reduce the amount of labor asked of applicants/recipients and assume more responsibility for getting new people enrolled and keeping existing recipients covered. We know this is doable because CLASP has been working to reduce barriers to program access for many years, with lessons documented through [the Work Support Strategies \(WSS\) project](#) in six states.

Furthermore, the COVID-19 pandemic has demonstrated that programs can be much more flexible and adaptable than they have traditionally been. [This blog post details how several states quickly made changes to their benefits administration that they had resisted for years](#) when faced with a public health and economic crisis, such as putting up an online application for TANF and eliminating a requirement that SNAP applicants provide proof that their employment ended. Allowing some flexibilities provided during COVID to be made permanent and ensuring that states know about such flexibilities and are encouraged to use them will be an important step toward reducing barriers to care. Such flexibilities include a greater use of self-attestation, continuous enrollment, and extended certification periods.

How can agencies address known burdens or barriers to accessing benefits programs in their assessments of benefits delivery?

In general, agencies should use information that has already been collected and verified by other administering agencies to determine eligibility rather than requiring applicants to resubmit that information. As much as possible, agencies should use [eligibility for one program to deem people eligible under other programs](#) with similar requirements.

Once determined eligible, enrollees should retain eligibility for extended periods by having short-term income fluctuations disregarded. Customers should be given the option of using simplified standardized deductions or of providing documentation of expenses that exceed the standard amount.

Additionally, agencies should ensure that applications are simplified to only request information mandated by law or federal guidance, written and designed clearly (including at an accessible reading level), mobile-friendly, and available online, by phone (including telephonic signature), in person, and in paper form. Extending certification periods is another important step to reducing barriers because doing so reduces the frequency of renewals, which is a time when many eligible people become disconnected from benefits.

Some burdens are amplified due to the different eligibility and verification requirements across programs. Federal agencies could reduce burdens by coordinating to eliminate barriers across programs. Examples of

coordination across federal agencies include:

- Granting waivers to allow states to align eligibility and verification requirements across programs to the extent possible;
- Partner across agencies when issuing clarifying guidance;
- Partner across agencies when simplifying applications;
- Jointly issue outreach and enrollment assistance dollars for community-based organizations to provide assistance across multiple programs; and
- Waive cost allocation requirements for federal outreach and enrollment assistance grants. Allowing grantees to help people apply for multiple benefits without needing to spend additional time at separate agencies will improve program uptake. Such a waiver would be particularly helpful for smaller organizations that have less administrative capacity to track cost allocation.

During the Work Support Strategies project, CLASP worked closely with six states to improve benefit delivery by reducing barriers. Significant strides were made by the states to improve same day service, improve timeliness, reduce churn, and coordinate across programs. For a full report of the findings and strategies, see the [multiple evaluations of the project](#); below is a list of key findings:

- Improvements in same day service and overall timeliness were achieved through multiple approaches. States redesigned their business processes to increase efficiency, changed office culture to emphasize timeliness and customer service, made policy changes, such as removing unnecessary verification requirements, and expanded their use of technology (e.g, electronic verification of client information).
- To [reduce churn](#), states used prepopulated renewal forms, leveraged existing data available electronically, lengthened certification periods, and changed their business processes.
- Another example is from Massachusetts, where multiple policy and system changes by the state [increased SNAP usage among older adults](#) by 26 percent between June 2016 and April 2020. These changes included implementing a simplified application for seniors with a longer certification period and waiving the SNAP recertification interview. The state also created a unit of caseworkers specifically for seniors and analyzed data to pinpoint when seniors were losing SNAP or not using their benefits.
- Lastly, a case study from New Mexico demonstrates [concrete ways to improve benefit access for immigrants](#). Their best practices included improving accuracy in automated eligibility systems, improving the eligibility verification process, protecting confidentiality, and improving case worker training and eligibility tools.

Are there specific requirements or processes that have been shown in rigorous research to cause program drop-off or churn by underserved individuals and communities? Similarly, is there rigorous evidence available that certain requirements or processes have little actual effect on program integrity?

Several requirements or processes have been shown to reduce access to public benefits and/or increase churn. These include:

- *Shortened eligibility periods.* Evidence has shown that shortened eligibility periods—and therefore the need for participants to complete renewal paperwork more frequently—leads to higher rates of disenrollment. In 2003, Washington state began requiring children enrolled in Medicaid renew their coverage every six months rather than every 12 months. As a result, the number of children enrolled decreased by 30,000 over two years. [When 12-month eligibility was reinstated, children’s enrollment increased by 30,000 within a year.](#) Another study showed a [decrease of gaps in insurance coverage](#) when 12 month continuous eligibility was in place. Lengthening eligibility periods for populations with

steady income, such as seniors, has [led to decreased churn in SNAP](#).

- *In Person Interviews*. Requiring someone to appear in-person as part of the application or renewal process is burdensome, particularly for people with inflexible jobs, limited access to child care or transportation, or disabilities. In person interview requirements lead to a decrease in participation among eligible participants
- *Data/Wage Checks*. Several states check electronic data sources at certain points during the Medicaid determination period. If data is found that indicates someone may not be eligible, the state sends a request for information by mail. There are several reasons a data check may give the appearance of ineligibility: an extra shift picked up in one pay period, a corporate employer name that is different from the storefront name, or simply a data error. Enrollees typically have just ten days to respond to such requests before being disenrolled, and this period is often shortened or even completely consumed by mail delays. These policies have led to significant losses of coverage. In Texas, the number of children who experienced a gap in coverage more than doubled after a wage check policy was put into place, and [in Louisiana nearly 51,000 adults were disenrolled](#). Importantly, Louisiana stated that most people lost coverage due to not responding to the request for additional information, not because any proof of being ineligible.
- *Fraud hotlines*. All states have SNAP fraud hotlines that people can call to report suspected fraud. But the public's perception of what constitutes fraud is often different than the legal definition and can be deeply biased. In practice, most reports to these lines are of purchases of foods considered "luxury," or of the use of SNAP benefits by someone who is well-dressed or driving a nice car. There are no stipulations on the type of unprepared food, clothing, or car that one can purchase to receive food assistance. The SNAP fraud hotline enables people who harbor anti-Black beliefs of the deserving v. the undeserving poor to over-police SNAP recipients. No third party can discern whether fraud has occurred without first interviewing the recipient, eligibility worker, or an attorney.

Additionally, the Work Support Strategies project demonstrated that [taking steps to provide determinations sooner and deliver benefits in a more timely manner was not correlated with an increase in error rates](#).

What data, tools, or evidence are available to show how particular underserved communities or populations disproportionately encounter these barriers? Which underserved communities experience multiple, cumulative barriers and are disproportionately burdened by specific administrative processes or requirements?

Administrative burden in public benefits is rooted in systemic racism. The people typically associated with public benefits in media and political discussion, namely low-income, Black, Brown, and/or immigrant communities, have long been subjected to more scrutiny and burden when accessing services to help them meet their basic needs. Because of this racist history, all barriers to program access disproportionately affect communities of color.

Furthermore, systemic racism in the United States has created inequities in access to education, health care, job opportunities, housing, and transportation. As a result, Black, Latinx and other communities of color are more likely to work in jobs with low-wages (especially women) and minimal (if any) health benefits, leaving communities of color more likely to be eligible for public benefit programs.

Workers earning low wages face significant barriers to public benefits, in large part due to the [nature of low-wage work](#). Workers in low wage jobs often work unpredictable and varying hours and want to work more hours than they are scheduled for. Hispanic and Black working parents are more likely than white working parents to live below 200 percent of the poverty level. Women, especially women of color, are over-

represented among the lowest paid workers.

In addition to Black and Hispanic workers facing more barriers due to the characteristics of low-wage work, other communities that face barriers include:

- *Immigrants.* Immigrants must navigate a confusing web of eligibility criteria for benefit programs, which is problematic by itself. Additionally, immigrants face significant other barriers, such as fear created by public rhetoric and previous policy actions to limit access to benefits (“chilling effect” caused by the public charge), inability to access applications and other forms in their preferred language, and inability to access translators during the application process.
- *People with housing instability.* This population often has difficulty receiving mailed information from state agencies. People are [often disenrolled from programs for not responding to a mailed request](#) for information, even though they are likely still eligible. For example, in Arkansas if mail is returned to the state as undeliverable and the state has not received a notification of an address change, the enrollee is disenrolled from coverage.
- *People with limited English proficiency.* Notices and other information sent by agencies are often confusing, and often even more so for people who speak a language other than English.
- *People with limited or no access to broadband internet.* The ability to learn about and apply for benefits through the internet is crucial to program access (even more so during the COVID-19 pandemic). [More than one in six people in poverty had no internet access](#), and AIAN, Black and Latino populations below poverty had less access to internet than White or Asian poverty communities in 2019.
- *People who are disabled but without a formal diagnosis.* Many people who are disabled having difficulty navigating the benefit process due to limited cognitive function, difficulty traveling, or other effects of their disability. However, those without a formal diagnosis are not able to access accommodations and therefore have more difficulty completing the application process.

How could agencies incorporate considerations of the psychological costs of qualifying or applying for Federal benefits programs into their assessments of equitable service delivery?

Some have suggested that making program access difficult will ensure that only those most in need will access programs, while those who have acceptable options (such as asking family for help) will [forgo benefits](#). However, this “ordeal theory” fails to recognize that those who are most in need may often not have the resources to overcome the burdens involved in accessing benefits. In practice, this harmful theory compounds the psychological costs placed on applicants and/or recipients because of administrative burdens. Applicants for public benefits are often [treated with disrespect from the moment they start to apply](#).

[Psychological costs](#) include stress, frustrations, anxiety, loss of autonomy, or a sense of stigma. Importantly, psychological costs are also incurred when people attempt to use the benefits they’ve received. For example, a neon orange EBT card may trigger stigma and judgement by staff or other customers in a grocery store. If WIC eligible foods are not clearly marked in stores that can [create stress both while shopping and while completing a purchase](#). Introducing strategies and policies that reduce the administrative burden placed on applicants, including streamlining and simplifying application processes and accepting self-attestation, combined with efforts to eliminate stigma experienced by benefits recipients can decrease psychological costs.

But to truly address these costs, agencies must first hear from participants in programs about their experiences navigating the application and enrollment process, as well as any suggestions they have related to improving benefits delivery by eliminating the psychological costs placed on applicants. This information can be shared

through authentic and formal engagement of people who have applied for and/or received benefits, as detailed in Area 4 and 5 of this response.

What types of overarching metrics (e.g., program uptake, over- or under-payments) might an agency use to measure a benefit program's outcomes or whether it is implemented as intended?

CLASP recommends the following metrics be used, all disaggregated by race and ethnicity:

- Number (and percent) of eligible people served;
- Number (and percent) of enrollees who stay enrolled for their full determination period (length of benefits before renewal is required);
- Number and percentage of people who were enrolled within the previous 90 days;
- Average application processing time;
- Number and percentage of applicants asked to provide supporting verifications (e.g., income information, household information, citizenship/immigration information);
- Ex parte renewal rate, also known as administrative renewals (Medicaid only);
- Cross-program enrollment; and
- Self-reported increase or decrease in hunger/food insecurity, ability to meet basic needs, ability to seek health care as needed.

We refer you to the full evaluation of the Work Support Strategies program for numerous examples of data collected by states to measure their benefit access and progress after implementing policy changes. Examples of data collected include [applications processed "same day"](#), [measures of timeliness](#), [churn rates](#), etc. We also refer you to [this document detailing the data to explore when uncovering administrative barriers to Medicaid](#).

CLASP also recommends reading a Code for America resource called the [National Safety-Net Scorecard: The Status Quo of Safety Net Assessment](#).

How might an agency assess or balance prioritization of potentially competing values associated with program administration, such as program uptake, program integrity, privacy protection, and resource constraints, in the context of addressing equity for underserved individuals and communities?

Currently, programs are incentivized to overreach in search of fraud. These efforts to improve "program integrity" are a smoke screen used to obscure a policymaker's or agency's true intentions of limiting benefits access, especially for programs that serve a majority people of color. Instead, administering agencies should be incentivized to improve access and enrollment for those who are eligible through questions like "Are the people at greatest risk of food insecurity in my program's jurisdiction applying?" or "Are enrollees able to use this benefit to its full potential in my program's jurisdiction?". Realigning agency priorities is critical to expanding access to benefits. CLASP recommends considering the following actions to achieve this goal:

- *Make program uptake and retention (including continuous enrollment) an explicit goal.* Agencies should reward and thereby incentivize states to improve access to programs and increase enrollment. Rather than only penalizing states when an ineligible person enrolls, the federal government should consider penalizing states when programs do not have an adequate uptake among eligible persons.
- *Increase data sharing across programs.* Successful data sharing will allow one program to use relevant information from another program (e.g., income, household size, residency, etc.) and eliminate the need for applicants to submit duplicate verifications for separate programs.
- *Agencies should be authorized to consider the moderate- and long-term benefits of program participation*

on health, well-being, educational and economic outcomes. Short-term resource constraints that limit program access, including the requirement that program waivers be cost-neutral, result in more long-term societal costs.

- *Data mining and sharing should not be used to play “gotcha” and terminate benefits.* If contradictory information is revealed through data matching, people should be allowed ample time to provide updated information. Efforts undertaken in the name of “program integrity” must be evaluated for the number of issues found, the impact on program uptake, and the cost.

It is also important for agencies to ensure that states are not misusing electronic data matching verification systems in the name of “program integrity”. Immigrants and their families face barriers to benefits due to confusing immigrant eligibility rules that often vary by state, and the burden is placed on frontline staff to make eligibility determinations. State and local agencies use—and for certain federal benefits are required to use—the System Alien Verification for Entitlements (SAVE) program, run by U.S. Citizenship and Immigration Services, as part of the process to determine whether an immigrant is eligible for a certain benefit. However, some states have used or have proposed using SAVE beyond its intended purpose to deny public benefits to eligible immigrants.

For example, when a family applies for a benefit for child care assistance, SAVE should not be used to deny this benefit based on the parents’ immigration status when the child is a U.S. citizen or has an eligible immigration status. Another example is states using SAVE as part of an eligibility determination for programs like WIC. Eligibility for WIC is not dependent on certain immigration statuses and therefore there is no need for a state to use SAVE as part of the eligibility process. Lastly, some states have proposed using SAVE to determine who is “lawfully present” for the purpose of denying any public benefit to anyone who is not lawfully present, but that is not SAVE’s intended function.

To prevent these misuses of SAVE, it’s important that state and local agencies are trained to correctly use SAVE as *one step* of the process for verifying the immigration status of the person intending to receive benefits (not always the applicant in the case of a parent applying on behalf of a child). States should not be allowed to use SAVE as a means for preventing access to benefits and, if they are found doing so, should face a financial penalty or other consequence.

In general, program administration should serve the purpose of helping people know about and apply for benefits for which they are eligible. As such, administrative activities that promote access to benefits should be prioritized and adequately funded. These activities include but are not limited to outreach and education efforts, adequately staffing call centers and other staffing needs, and modifying applications and procedures to reduce barriers, as discussed earlier in this section.

How might agencies assess if specific barriers are achieving their intended purpose?

In part, agencies can determine whether specific steps in the process like an in-person interview to determine eligibility or certain application requirements (e.g., a pay stub to prove income) lead to incomplete applications by collecting and examining data on where in the process applicants ask the most questions. Using client-centered design principles that are informed by applicant and recipient input can help agencies streamline their application processes.

Federal agencies can also contribute to decreasing burdensome program requirements by publishing clear, detailed guidance. Direct communication from federal agencies to states about what states must collect and report back to federal agencies to comply with the program’s legislation enables administrators to

eliminate superfluous requirements. CLASP often hears from states that information is collected because states *may* need to provide the information to the federal government or believe it is required. For example, many states think applicants for child care assistance must provide a written schedule of their work hours. This documentation is not required, and, because many jobs that pay low wages do not provide consistent work schedules, this documentation requirement is a barrier that could cause eligible applicants to not complete the application process.

Federal agencies should also consider streamlining processes or providing technical assistance to encourage states or localities to conduct small rapid cycle experiments to test specific changes outlined in forms or notices. Both caseworkers and participants report that notices are frequently confusing, written in legalese, and fail to give participants clear information on the next actions that they must take to access benefits. But states agencies often believe that federal rules prevent them from testing improvements through rapid cycle experiments.

Area 4: Financial Assistance

Federal grant applications hold immense power and can create incentives and encourage organizations to invest in the professional development of their staff, build capacity, hire BIPOC staff, focus on equity outcomes, and invest in addressing root causes of poverty.

CLASP held a listening session with [A New Deal for Youth Changemakers](#) who have experience working with federal grants or who work with small community-based organizations (CBOs) and mutual aid networks. Our Changemakers identified three key barriers to equitably accessing federal grants:

- *Awareness.* Many of our Changemakers work with organizations who have never completed a federal grant application because their organizations do not know what funding opportunities exist, where to find these opportunities, and if they qualify.
- *Capacity.* Many small to mid-sized CBOs do not have the capacity to complete applications. CBOs should not need grant writers to secure government funding. Instead, agencies should create applications that any staff member can reasonably complete, ensuring nonprofits do not gatekeep professional development and that staff members who work directly with communities can apply for funding, rather than relying on a grant writer who may not understand community needs.
- *Trust.* Many organizations will still choose not to apply because they lack trust in the federal government. CBOs will choose to distance themselves from investors (including government agencies) that are contrary to their values and harm their communities. To truly move towards equitable grantmaking, agencies must intentionally work to restore trust in communities, acknowledging that the lack of trust is well-founded, as discussed further in Area 5.

How might agencies identify opportunities to adjust current practices in grants and other financial assistance programs to expand access for underserved communities and to achieve equity-oriented results?

To reach underserved communities and achieve equity-oriented results, agencies must intentionally form relationships with small community-based organizations. Agencies should:

- Create a separate funding stream for smaller CBOs and mutual aid networks;
- Create a network of smaller CBOs and mutual aid networks that agencies can directly communicate with;

- Offer free capacity-building opportunities to small CBOs;
- Simplify applications; and
- Ensure grant funding is used to address both root causes and basic needs, including through discretionary funding and multi-year unrestricted funding.

Creating a Separate Funding Stream for Small CBOs and Mutual Aid

Smaller CBOs may not meet the criteria for existing grant opportunities because they have different aims, serve different community needs, and have different operating structures. Agencies should create separate funding streams tailored to smaller CBOs and mutual aid network that are focused on getting funds directly into communities that have been historically underinvested in. Agencies should adopt new practices for this funding stream that allow unincorporated organizations like mutual aid networks to receive federal funds without needing a fiscal sponsorship. Only small, community-trusted organizations and mutual aid networks who serve underserved communities and are explicitly committed to equity should be eligible for this funding.

While smaller CBOs should be allowed to apply for funds directly, CBOs should also be encouraged to apply for funds collaboratively, creating a network of community funding and support. Smaller CBOs may not have the same reach as larger organizations, but they do have trust and access to the specific communities they serve. Rather than asking one organization to effectively serve the needs of every community member, a network approach recognizes that multiple CBOs need sufficient funding for the entire community to thrive.

Creating a Network of Small CBOs and Mutual Aid

Agencies at the federal level should create a network of equity-focused small organizations and mutual aid networks who can help design and receive federal grants. Members of this network should receive regular correspondence from relevant agencies, promoting new funding opportunities, TA opportunities, workshops, and more.

Both local and federal agencies play an important role in this model. Many CBOs are afraid to talk directly with government agencies, which underscores the lack of trust between communities and agencies, leaving them to only receive funding as money trickles down from federal to state and local governments. To ensure that funding streams for small CBOs and mutual aid networks remain consistent, these equity-focused groups need a streamlined connection to federal agencies and grant opportunities. Opening direct lines of communication could also help to dissipate this fear and build trust.

Local governments can also bridge the gap between CBOs and federal opportunities by identifying CBOs or mutual aid networks in their communities and proactively connecting them to a federal network of CBOs. Many agencies rely on outdated communication methods, resulting in relevant CBOs not finding opportunities. Therefore, agencies should first create a database of small CBOs and mutual aid networks to leverage when an opportunity to apply for federal funding arises. SAMHSA's [CBO locator](#) can serve as an example database for other agencies. Agencies cannot expect these CBOs to discover federal opportunities independently. Instead, agencies must do the working of finding and connecting with CBOs, including through regular newsletters and social media. CLASP suggests additional strategies for engaging communities in Area 5.

Free Capacity-Building Resources

Agencies should provide free resources to bolster the capacity of CBOs and mutual aid networks, helping to close the equity gaps for organizations who cannot afford a grant writer. Examples of free resources include:

- Regular workshops and office hours.
- Pro-bono grant writers who can help CBOs with their application process.

Agencies should also commit to simplifying applications and requiring less documentation; shortening applications; answering questions regarding reporting requirements and legal obligations, particularly for CBOs that work with undocumented populations; and improving language access.

Building Community Trust through Unrestricted Funds

There are currently three major challenges to building trusting relationships between community organizations and federal agencies:

- CBOs often need to jump through hoops to describe their work in the terms of a grant, rather than grants allowing them to use the funds according to community needs.
- Agencies tend to invest in band-aid solutions rather than looking upstream to address root causes, which can often lead to community members becoming even more reliant on government aid and services, exacerbating a lack of trust.
- CBOs must focus first on meeting basic needs, recognizing that they cannot produce positive outcomes unless basic needs are met; meeting these basic needs is often not an allowable cost under Federal grants.

To truly be equitable, federal grants must address both long-term thriving and immediate survival. Agencies can respond to these three barriers by:

- *Revising Federal guidelines that prohibit/limit spending on meeting basic needs* such as food and transportation and by trusting CBOs and mutual aid networks to spend grant funding according to community needs. All grants should include discretionary funding that can be used to meet basic needs, and grant applications should ask how organizations meet the basic needs of community members.
- *Awarding [multi-year unrestricted funding](#)*. This shifts decision-making power from agencies to communities and builds trust by validating the work of CBOs and mutual aid networks. Unrestricted funding helps combat silos by recognizing that people do not lead single-issue lives and need a full range of support to thrive. Further, it allows communities to invest in long-term sustainable community-level changes.

How might agencies engage in outreach and stakeholder engagement to identify opportunities to make Federal grants and other financial assistance processes more accessible?

Listening to communities is integral to building trust and moving forward equitably. Agency staff must engage multiple community members, recognizing everyone's unique perspective. Therefore, agencies should invest in sustained stakeholder engagement throughout the entire grant lifecycle, from designing the RFP, to implementation, to evaluation. This includes:

- *Community designed grants*: Agencies should engage stakeholders and CBOs before grant opportunities are announced or awarded. Agencies should listen to community members when creating grants, focusing on simplifying the layers of grants, tailoring grants to actual community needs, and defining goals and objectives according to the community's definition of success.
- *Sustained stakeholder engagement*: Once grants are awarded, agencies should create advisory councils for each grant comprised of people engaged in all levels of the grant, including those with lived experience. Agencies should require grantees to join the stakeholder committee. The committee should

meet regularly and provide ongoing feedback on supporting community needs. Grants should be flexible and responsive to community input and suggestions.

Key best practices for engaging CBOs and community members around equitable grantmaking include:

- *Paying advisory board members and recognizing them as experts.*
- *Regularly reporting back on the status of suggestions.* Implement community input or explain why it was not implemented and what alternatives are being considered. Soliciting and then ignoring feedback exacerbates lack of trust. It is not enough to listen to community members; their ideas must be acted upon.
- *Working to reduce bureaucratic hurdles when engaging those with lived experience.* Change arbitrary rules and ethical guidance that limit community members or prior grantees from participating in feedback conversations. Agencies should issue guidance promoting and encouraging community feedback and clarifying any rules that may be perceived as preventing participation.

What kinds of training and capacity building within agencies would support equitable grantmaking and financial assistance efforts?

While all agency staff should be required to receive critical race studies trainings and anti-bias training, no agency can build up the necessary capacity to effectively work with and understand every community. Instead, capacity building within agencies should focus on systematically and consistently engaging communities without judgement.

Agencies must move away from a hierarchical relationship between agencies and grantees, instead forming mutually beneficial relationships with grantees based on trust and shared power. By shifting power from agencies to grantees, grantees can help agencies better understand the needs of communities. This power-shifting process might involve:

- Capacity and funding for grantees to train agency staff on community needs and programs.
- Working with community-based TA providers who have specialized understandings of the communities they are working in and are better able to support grantees.

Training and capacity building is not sufficient. Agencies should diversify their workforces, hiring more folks with lived experience. Diverse workforces within agencies results in less need to capacity build.

What kinds of benchmarks and assessment techniques would support equitable grantmaking and financial assistance efforts? What kinds of data should agencies collect and use to assess equity in their grantmaking and financial assistance practices?

Agencies can move towards equitable grantmaking by adopting new definitions and metrics of success that focus on authentic community change. This includes:

- *Allowing communities to define success for themselves.* CBOs should provide their own metrics and data that they believe best emphasize equity outcomes and indicates program success, recognizing both quantitative and qualitative data. Definitions and metrics of success may differ from grantee to grantee.
- *Creating community-aligned objectives.* Agencies force CBOs to jump through hoops to meet objectives they believe are evidence-based but are not community-aligned. [Agencies should move away from a reliance on evidence-based practices and towards a new understanding of evidence that is both data-](#)

[driven and community-informed.](#)

- *Focusing on root causes.* Agencies should evaluate whether grants have addressed the root causes of inequity, rather than surface-level solutions.
- *Requiring all grantees to design equity measures.*
- *Improving data tracking, including Tribal data.* Better data tracking requires data disaggregation across identities including racial and ethnic identities, nationality, and language. Once disaggregated, agencies can better understand which communities are not being served. Agencies can then be proactive by reaching out to the CBOs who serve those identities or even creating identity-specific grant opportunities.
- *Supporting capacity building and learning.* The evaluation process should be collaborative and used to strengthen grantees over time. Agencies should conduct strengths/deficits analysis on all grantees, but carry the deficits piece with explicit offers of support. For CBOs to be honest about their deficits, agency staff must establish trust with their grantees. The grantee's honesty should not negatively impact future funding.

What are some promising approaches to the award and administration of Federal awards that should be considered? What are promising practices for equitable grantmaking and the administration of financial assistance programs that agencies should consider in the course of their equity assessments?

- [HUD's Youth Homelessness Development Program](#) requires all sites to prioritize authentic youth engagement. One mechanism is through creating youth advisory boards that advise agency staff implementing grant funding. Youth are an equal voice in the room and agency staff and other stakeholders listen to their voices, particularly when deciding which projects should be prioritized for funding. Key promising practices from this program that federal agencies can replicate include:
 - Having all grants overseen by advisory boards comprised of people with lived experience.
 - Creating approval processes that ensure funds are not awarded without advisory board approval.
- [The Lumina Foundation](#) is an independent, private foundation focused on ensuring higher education is accessible to all. In their grants, they use innovative data collection strategies that focus on racial equity and measure community change.
- The [Equitable Development Initiative \(EDI\) Fund in Seattle, WA](#) was created in partnership with community organizations. The goal of the EDI Fund is to stop racialized displacement and increase access to opportunity for communities of color. The linked report overviews the successes and shortcomings of the fund in its first two cycles and offers suggestions for improvements. Key practices illuminated in the report include:
 - Developing a funding stream specifically designed to further racial justice in partnership with community organizations.
 - Conducting an external analysis of funds to ensure they're meeting their stated racial equity goals and to identify areas of improvement.
- [Trust-Based Philanthropy](#) is a five-year, peer-to-peer funder initiative that seeks to address the power balances between foundations and nonprofits by redistributing power. They have developed six principles of trust-based philanthropy that agencies should adopt, which include: unrestricted multiyear funding, do the homework, simplify and streamline paperwork, be transparent and responsive, solicit and act on feedback, support beyond the check.
- [SAMHSA's Office of Behavioral Health Equity](#) issued guidance for state administrators and state

grantees on how to better engage communities of color. Other agencies can adapt this guidance.

- [Next100](#): Next100 is a policy leadership development program and think tank created for and by the next generation of policy leaders. They intentionally recruit and hire individuals with lived experience or proximity to communities into policy roles, utilizing a very different selection and professional development process from a typical policy organization. In doing so, the organization engages impacted communities upfront and at every stage of policy development.

Area 5: Stakeholder and Community Engagement

As an organization, CLASP believes we must take a multi-disciplinary, cross-systems approach to eradicating barriers to access and imagining new policies, investments, and ways of thinking that center people with lived experience of benefits programs. We understand from our experiences in working with state and local leaders, activists with lived experiences, youth, young adults, and young parents that community engagement and racial equity are critical to any effort that seeks to advance the socio-economic mobility of individuals and families with low incomes. Our work prioritizes:

- Youth/community/family voice, participation, and partnership from the initial stages of policy and program design through continuous evaluation;
- An explicit focus on race and gender equity in program design and implementation; and
- Holistic and comprehensive design models that include wraparound supports, culturally responsive programming, personalized planning, "case managers"/navigator/advocate staff who partner with individuals and families who wish such services.

The suggestions below are drawn from specific CLASP partnerships with community voice in policy and program design. The three examples are:

- The Community Partnership Group (CPG), a diverse collective of activists from across the United States who partner with nonprofits to ensure that their work is grounded in the wisdom and experiences of people directly impacted by anti-poverty policies (ex. Supplemental Nutrition Assistance Program (SNAP)). Each member of the CPG has developed their expertise through direct experience with public benefits programs whether it be participation or discriminatory exclusion--and ongoing advocacy to eliminate poverty within their communities. The CPG was convened by CLASP staff and independent consultants in the field who aimed to dismantle the transactional and often traumatizing relationship between anti-poverty nonprofits and people with lived experiences of poverty. Staff and a consultant with lived expertise organically met CPG members at convenings, conferences and meetings and, over a six month period, built intentional individual relationships with the members; eventually, the group convened together to build collective power and trust.
- The Young Adult Engagement Strategy (YAES), built over the past three years as a way for CLASP to partner on an ongoing basis with youth and young adults. Through YAES, we have strengthened partnerships with and among young adult community stakeholders and youth-led organizations, which has helped CLASP develop a regular practice of incorporating young people in the development and implementation of our policy work. We have done this through partnership with youth development organizations and other partners, including young people in policy analysis and technical assistance, and through years of building trust and mentoring young people through workshops and co-creating materials.
- The New Deal for Youth, which builds on the YAES and is a call to leaders in the public and private

sectors to support youth-led policy solutions that address the glaring economic and social injustices facing young people today. It is a partnership of a cohort of 39 young adult Changemakers and CLASP. Through this, the Changemakers created a list of transformational and holistic policy demands to address the urgent challenges young people are facing due to COVID-19, the economic downturn, and structural racism. These demands seed a long-term vision for how our nation can and must support all young people, grounded in policy proposals and community solutions that can drive action toward healing and well-being, safe communities, and economic, climate, immigrant, and racial justice.

What processes should agencies have in place to engage proactively with underserved individuals and communities that will be most affected by agency programs, policies, rules, processes, or operations? How can agencies design and implement community engagement practices that are accessible to underserved communities? How might affected communities be engaged pro-actively and early to shape agency policy priorities and strategies?

For an agency to meaningfully engage with the individuals and communities that are most impacted—and have historically been traumatized by—benefits programs, policies, rules, processes, and operations, administrators must first acknowledge and research the racist history of these federal policies and their local implementation. Agency officials should engage in training to better understand the impact of systemic racism, implicit bias, and white supremacy to better understand current programs and regulations, as well as their origins. There should also be trainings to better understand the value and importance people with lived experience bring to conversations about policy and systems change. Only then can agencies begin to build trust within communities that have been historically excluded and/or discriminated against.

Community-based organizations, which often catalogue local histories and experiences and have earned community trust, can be strong partners in opening lines of dialogue between agencies and the people directly (or ideally) impacted by the policies they administer. It is critical that agencies seek out partnerships with organizations that are led by Black, Indigenous, Latinx, AA&NHPI, LGBTQ+, and immigrants, which have supported communities when the federal government and administering agencies have failed to do so, as well as provide adequate passthrough funding. These partnerships should be conducted with humility (rather than transactionally, as if communities owe the governments something), to successfully build trust and create dialogue.

Once the relationship between administering agencies and community members has been built, agencies can formalize this process by investing in sustained stakeholder engagement throughout the entire program's lifecycle, from designing the program, to implementation, to evaluation. For community engagement practices to be properly designed and implemented, agencies should ask for consistent input from communities at every level of decision-making. It's important to not just use the stories of benefit recipients or view them as datasets, but also accept their input on the decisions that will affect their lives. When building trust with communities, consistent engagement is critical.

Often, agencies are seeing individuals at a pivotal point in their lives when they need assistance. This may make individuals who had traumatizing experiences with administering agencies apprehensive to engage due to fear, rejection, stigma, and the possibility of being re-traumatized. Often individuals who are marginalized are not treated with respect from agencies that are supposed to serve them. Some have been met with poor customer service, dehumanizing treatment, biased opinions, and/or a cold, sterile environment. Fostering a welcoming and unbiased environment is critical in these conversations and can be cultivated through trust-building exercises and partnering as equal contributors to the work. While providing services, agencies should begin to think more innovatively as to how they share information on resources within the community outside

of the agency. For example, there could be a running document that all agency workers have access to that list all community-based organizations and nonprofits that provide assistance throughout that area, as well as a referral process for each organization.

Improvements in the actual delivery of benefits also build trust, so while we address benefits delivery more fully in another section of these comments, we want to spotlight here examples offered by people with lived experience. For example, they identify the need for investments in wraparound services (e.g., transportation, translation), especially in areas where mass transit does not exist, like rural areas. Other ways that agencies can strive to improve benefits delivery and strengthen relationships with community members include:

- Seeking to be more collaborative with one another to make services more accessible, as discussed further in Area 2. Ideally, applying for SNAP, Medicaid, WIC, and housing-related benefits would occur simultaneously with automatic eligibility for other programs if eligibility for one is confirmed.
- Taking customer complaints seriously by discussing them internally and strategizing ways that the agency can proactively address those complaints.
- Revolutionizing technology on how states collect verifications and documentation.
- Reducing call center wait times.
- Making interviews more person-centered and weave them all together if possible.
- Adequately funding case management and expecting workers to provide as wrap-around, person-centered service.
- Consistently providing clarity and information about, as well as proper referrals to, other services provided in the community outside of the agency.

What tools and best practices might agencies deploy to establish advisory boards, task forces, and commissions that are inclusive of underserved communities?

For administering agencies to be equitable and non-transactional, administrators must co-create advisory boards, task forces, and commissions alongside community members from inception to implementation and beyond. Strategies for incorporating community input and participation from the beginning of a project include:

- Non-restrictive requirements related to who can participate and transparency about process, including the expected time commitment and compensation.
- Ensure equitable access by accessing the technology and resources that leaders may have, and filling in the gaps where necessary
- Consultations with community members who specialize in engagement with people with lived expertise to build out the engagement model.
- Relationship building time to get to know one another using ice breakers or other tools
- Flexibility when plans change based on the guidance of community members

Community leaders are effective in assembling or advertising to potential advisory boards, task forces, and commission members who are dedicated to solving a particular issue in the community. However, agencies must still reach out to and actively accommodate people who work inflexible hours or care for loved ones full-time when scheduling meetings or events. Even making the boards, task forces, and commissions virtual instead of in person to help with timing and childcare issues would be more beneficial. For example, the CPG meets virtually twice a month, once in the evening from 5-7 PM and also from 11AM-1PM to accommodate the group's collective schedule. We determined the meeting time using Doodle polls and a shared Google

calendar.

How can an agency assess the accessibility of the agency's rulemaking policy, making commenting, and engagement processes, including for individuals that experience barriers to participation? Examples of barriers may include limited language access assistance, online-only engagement, and minimal proactive notification of opportunities to provide comment.

Agencies can increase accessibility by ensuring that requests for public comments or information about participating in an advisory board, task force, etc. are posted in a variety of languages, places, and platforms that are relevant to the communities they are prioritizing. Launching outreach campaigns and utilizing individuals in the community and community-based organizations to advertise these opportunities can increase the number of impacted people who participate. Hiring individuals in the community and contracting with trustworthy community organizations would also open opportunities for administering agencies to build relationships with benefit recipients while simultaneously ensuring the data collected accurately reflects the viewpoint of individuals in the community. Lastly, organizing an event with free internet, computer access, and interpreters for community stakeholders to attend and offer comments on proposed rules, for example, could improve community engagement. In all these examples, it is imperative that agencies compensate people with low incomes for their time.

Do feedback mechanisms for customers, beneficiaries, and communities affected by Government programs exist to inform policy research and evaluation processes? If so, are these feedback mechanisms accessible to underserved communities? If not, what best practices that agencies should consider?

There are requests for information or comments online, but often communities do not know about the opportunities. As one of our CPG members states, "There is no form of feedback loop for stakeholders to provide information for policy research and to evaluate processes." Additionally, communities must be given the opportunity to provide feedback more consistently than the occasional online surveys or notice and comment period. If these feedback mechanisms prove to be inaccessible, administrators should engage directly with the communities who are serviced to understand their perspective and receive feedback through listening sessions or other sustained partnerships like advisory boards. Feedback mechanisms must be community-based and they must be person-centered to ensure that every individual has a trustworthy, consistent way to provide feedback to help generate information for research and evaluate agency processes. Building trust is necessary to ensure that stakeholders know that their thoughts and experiences will be taken into consideration when agencies make change.

What tools could agencies develop for expanding stakeholder input programmatic and regulatory changes to minimize barriers and burden? How may existing processes (e.g., notice and comment on information collections) to be enhanced to improve accessibility by stakeholders?

When comments are requested, the advertisements that indicate the public comment opportunity are not easily accessible or readable because the requests themselves are often in small print, on bulletin boards where other items cover them, or plastered on signs by the road where some stakeholders do not travel or do not have transportation to see. Agencies must ensure fonts are large enough to read, materials are available in multiple languages, and advertisements are placed where communities reside. These changes can increase the number of community members who initially receive the request, and, in turn, respond. There must also be a conscious effort to workshop requests to make sure they are clear and use asset-based, positive (not derogatory) language to describe communities, taking into consideration the diverse background, languages,

and abilities of community members.

For stakeholders who come into the offices, having a form for them to read to understand that comments are open and welcomed would be beneficial. Stakeholders that have access to smartphones that can scan QR codes, for example, could potentially answer survey questions and provide comments while waiting for an appointment or to be served. Agencies can recruit and prepare trusted community leaders, members, or organizations to provide information and answer questions within the communities they represent, ensuring complete saturation of information. Not everything has to be digitized for communities. Collecting information in a traditional manner through mailers and grassroots door-to-door canvassing will help with the engagement of stakeholders.

In other words, creating tools to improve accessibility must be paired with outreach campaigns that communicate the purpose of those tools to the community. The communities who are greatly impacted by agency decisions are often isolated, unbanked, and/or lack access to information and resources that middle- and upper-class communities enjoy. Grassroots engagement that encourages community participation on all levels, from concept to implementation, can help maximize the number of community members who see and respond to requests when paired with equitable compensation for community members to share their expertise.

What tools can agency offices, including communications, civic engagement, enforcement, and policymaking offices, use to better engage or reach underserved communities?

Agencies can create tools for better recruitment and retention that can ensure people from the community, particularly people of color, are contracted with and employed by agency offices. Increasing representation within the agency can lead to deeper trust in the community as they are able to see individuals in positions of power that come from the same communities that they grew up in. In addition, the state and federal government agencies can be more transparent about programs that are currently being designed or implemented by administrators. The primary goal should be building trust through continued dialogue as historically these same agencies have marginalized Black, Indigenous, Latinx, AA&NHPI, LGBTQ+, disabled, and/or immigrant communities. To engage with these communities, agencies should prioritize communications campaigns that seek to eliminate the stigma and shame of receiving public benefits while directly and proactively addressing the harm that their agency may have inflicted on their recipients.

What are some of the barriers or factors that challenge underserved communities' interactions with Federal agencies and programs?

Marginalized communities often avoid using federal agencies as there is a lack of meaningful human interactions and relationship-building, which can be created through intentionally fostering partnerships between agency staff and the communities they serve. Another major barrier to interacting with agencies is the typical 9:00AM to 5:00PM timeframe of input sessions. When seeking input, agencies should accommodate the work schedule of community members as these individuals typically work multiple jobs or inflexible hours to make ends meet.

Community members also limit their interactions with federal agencies and programs to avoid further stigmatization. Racist stereotypes about poverty can lead to unfair treatment from eligibility workers and others who work closely with people with low incomes, which compounds feelings of shame and stigma among people who seek out public benefits. Stigma is an oppressive barrier to accessing SNAP and other public benefits. As Johnnie Tillmon noted in 1972, "We've been trained to believe that the only reason people

are on welfare is because there's something wrong with their character." The unfair and harmful treatment of public benefits recipients—compiled with a heavy focus by agencies on fraud—whether actually guilty or not—causes a chilling effect that perpetuates mistrust of government and public programs.

See the discussion of barrier reduction in Area 2 for many more suggestions for addressing these challenges.

What practices should agencies put in place to reach underserved communities in rural areas or underserved communities that otherwise are not able to visit Washington, DC, to engage policy makers?

The global pandemic underscored the need for agency officials to connect directly with underserved communities. Rural communities—many of which are populated by Black, Indigenous, and immigrant people—are often forgotten communities in America as they are more reclusive and distrustful of the federal government. This feeling of forgottenness stems from experiences being interacted with transactionally when there is a socioeconomic need for the state or federal government to intervene, rather than building transformational, caring relationships. The first step to engaging these more isolated communities is to figure out how to get agencies and policymakers directly in those communities to build transformational relationships that enable rural community members to feel supported and heard, thereby beginning to repair their trust.

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