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To: Office of Federal Financial Management, Office of Management and Budget

Date: December 4, 2023

Subject: Response to Request for Comment on Uniform Guidance for Grants and Agreements - Docket (OMB-2023-0017)

The Center for Law and Social Policy (CLASP) is a national, nonpartisan nonprofit advancing anti-poverty policy solutions that disrupt structural and systemic racism and sexism and remove barriers blocking people from economic security and opportunity. We work at the federal and state levels, supporting policy and practice that makes a difference in the lives of people living in conditions of poverty. CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and implementation) that reduce poverty, improve the lives of people with low incomes, and create pathways to economic security for everyone. That includes directly addressing the barriers people face because of race, ethnicity, gender, disability, and immigration status. Through high-quality analysis grounded in data and on-the-ground experience, effective advocacy, a strong public voice, and hands-on technical assistance, CLASP develops and promotes new ideas, mobilizes others, and provides guidance to government leaders and advocates to help them implement strategies that improve the lives of people across America.

CLASP works to amplify the voices of directly impacted workers and families and help public officials design and implement effective programs. In recent years, CLASP has significantly expanded its partnerships with people who have been denied economic justice because we believe that effective programs must be community-driven and endorsed. We appreciate the steps undertaken in this rulemaking to support community engagement in program development and make it clear that recipients of federal grants may use these funds to support participants who provide their advice and expertise that is developed from their experience with the programs. This rulemaking is consistent with several Executive Orders that promote public participation and community engagement.

We support the language at §200.202(b) that clearly states that “Federal agencies should develop programs in consultation with communities benefiting from or impacted by the program.” We urge OMB to include an assessment of whether and how well agencies consulted affected communities in

designing grant programs as part of its oversight of grant programs, including as part of the Paperwork Reduction Act review of grant solicitations. OMB should also encourage agencies to explain in their grant solicitations and other public materials how public engagement shaped the program, so that people can see the impact they have made.

In §200.202(a)(5), where the proposed rule states that programs must be designed to encourage recipients of federal grants to similarly “engage members of the community that will benefit from or be impacted by program during the design phase, when practicable,” we recommend that the phrase “where practicable” be dropped. This phrase is vague enough to create an excuse any time when a recipient does not wish to undertake community engagement.

We appreciate the clear statement at §200.456 that participant support costs are an allowable use of federal grants and the definition at §200.1 that these may include “stipends, subsistence allowances, travel allowances, registration fees, dependent care, and per diem paid directly to or on behalf of recipients.” Participants should not be expected to absorb costs incurred in the process of providing valuable expertise and insight to programs, and such costs often make it impossible for people with low-incomes to engage in public meetings, conferences, or other events. We suggest adding “monetary or in-kind incentives” to this definition.

Further, we appreciate and support the clarity that participants may be engaged in many ways without creating a formal advisory council or committee. The misconception that all participant engagement is subject to the rules and requirements of advisory committees is sometimes a barrier to such engagement.

We recommend the addition of a new subsection § 200.455(d) under organizational costs that makes clear that community engagement and outreach activities are also allowable costs. We suggest the following language:

“Community engagement and outreach activities are permitted and may include (but are not limited to) personnel, materials, and resources necessary to support the gathering, sharing, analyzing, and integrating of information relevant to the administration and/or improvement of programs, including for program design, evaluation, and other purposes. Examples of allowable activities include community meetings, online surveys, focus groups, human-centered design activities, behavioral science techniques, participant support costs, and other community engagement tools.”

However, we note that this rulemaking is only a first step towards making participant and community engagement a routine part of program development. It is important for OMB to encourage all agencies to provide plain language notice of these expectations, and the allowable uses of funds, to their grantees.

OMB should also encourage agencies to partner together in engaging communities on related topics, to leverage each others' relationships, minimize burden and "consultation fatigue." OMB should convene staff across federal agencies to share their expertise and learnings about participant engagement. In addition, OMB should create a virtual community engagement hub to house all advice, resources, and guidance and update it regularly as additional materials are created or identified.

In the past decade, nonprofits, agencies, and other groups have documented and compiled lessons learned from community engagement efforts. These resources should be widely shared among program participants. By sharing best practices that make directly impacted people feel secure and respected, OMB will reduce labor spent independently researching and establish a standard for equitable engagement. Examples can be found on the Office of the Assistant Secretary for Planning and Evaluation within the Department of Health and Human Services's website,<sup>1</sup> the Urban Institute's Community Engagement Resource Center,<sup>2</sup> and Family Voice Compass<sup>3</sup>, which was informed and named by the Colorado Department of Human Services' Family Voice Council. Some other resources with more general advice include:

- Tamarack's 10: Engaging People with Lived/Living Experience<sup>4</sup>
- Chicago Beyond's Why Am I Always Being Researched?<sup>5</sup>
- Urban Institute's Fostering Partnership for Community Engagement: Community Voice and Power Sharing Guidebook<sup>6</sup>
- Atlanta Community Engagement Playbook<sup>7</sup>

Thank you for your consideration. If you have questions on these comments, please contact Elizabeth Lower-Basch, CLASP's Deputy Executive Director for Policy at [elowerbasch@clasp.org](mailto:elowerbasch@clasp.org)

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<sup>1</sup> "Engaging People with Lived Experience to Improve Federal Research, Policy, and Practice," U.S. Department of Health and Human Services Office of the Assistant Secretary for Planning and Evaluation, <https://aspe.hhs.gov/lived-experience>.

<sup>2</sup> "Community Engagement Resource Center," Urban Institute, <https://www.urban.org/research-methods/community-engagement-resource-center>

<sup>3</sup> "Family Voice Compass: Resources to Build a Family Voice Council," Colorado Department of Human Services, 2022. <https://sites.google.com/state.co.us/familyvoicecompass/home>

<sup>4</sup> Alison Homer, *10 Engaging People with Lived/Living Experience: A Guide for Including People in Poverty Reduction*, Tamarack Institute, 2019, <https://www.tamarackcommunity.ca/hubfs/Resources/Publications/10-Engaging%20People%20With%20LivedLiving%20Experience%20of%20Poverty.pdf>.

<sup>5</sup> *Why Am I Always Being Researched? A Guidebook for Community Organizations, Researchers, and Funders to Help Us Get from Insufficient Understanding to a More Authentic Truth*, Chicago Beyond, 2018, [https://chicagobeyond.org/wp-content/uploads/2019/05/ChicagoBeyond\\_2019Guidebook\\_19\\_small.pdf](https://chicagobeyond.org/wp-content/uploads/2019/05/ChicagoBeyond_2019Guidebook_19_small.pdf).

<sup>6</sup> Jessica Shakesprere, Matthew Mizota, Rod Martinez, Hannah Daly, and Elsa Falkenburger, *Fostering Partnerships for Community Engagement*, Urban Institute, 2021, [https://www.urban.org/sites/default/files/publication/104935/fostering-partnerships-for-community-engagement\\_0.pdf](https://www.urban.org/sites/default/files/publication/104935/fostering-partnerships-for-community-engagement_0.pdf).

<sup>7</sup> *Atlanta Community Engagement Playbook*, Atlanta Office of Zoning & Development and Resident Partners, <http://ourcommunity.is/engaged/>.