

Paul Decker  
President & CEO

**July 6, 2021**

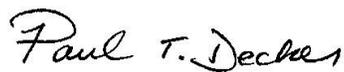
Shalanda Young  
Acting Director  
Office of Management and Budget  
Washington, DC 20500

Dear Shalanda Young:

Thank you for giving Mathematica and other members of the evidence community an opportunity to provide input into methods and leading practices for advancing equity and providing support for underserved communities through government. At Mathematica, our commitment to diversity, equity, and inclusion is fundamental to our mission of improving public well-being. Our evidence is more credible when the diverse perspectives of those with different backgrounds and lived experiences informs it and when we are intentionally inclusive, partnering with the communities we serve. Mathematica's reputation for quality and objectivity depends not only on our rigor, but also on my colleagues' commitment to improving well-being for all, which we center on equity and inclusion. As such, I am pleased to represent my colleagues in our response to **Questions 1, 2, 4, and 5**, as published in *Federal Register* no. 2021-09109 by the United States Office of Management and Budget. We share these insights in the hope they help to inform your work and facilitate important discussions and action among federal agencies.

Please direct all follow-up questions or comments to my colleague Dawnavan Davis, Mathematica's Vice President and Chief Equity and Inclusion Officer, at [DDavis@mathematica-mpr.com](mailto:DDavis@mathematica-mpr.com) or via telephone at (609) 297-4650.

Sincerely,



Paul T. Decker  
President & Chief Executive Officer, Mathematica

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**Question 1: Equity Assessments and Strategies.** OMB requests approaches and methods for holistic and program- or policy-specific assessments of equity for public sector entities, including but not limited to the development of public policy strategies that advance equity and the use of data to inform equitable policy strategies.

The January 2021 Executive Order, [Advancing Racial Equity and Support for Underserved Communities](#), directs each agency to “assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups.” In service of this requirement, agencies can use tools such as equity impact assessments (EIAs) and equity-focused evaluations to predict and understand equity impacts of federal policies. EIAs are systematic examinations of how a proposed decision will affect different people by race and ethnicity, sexual orientation, gender, or other characteristics, such as health conditions or people who have disabilities. Equity-focused evaluations assess equity impacts of policies after they are enacted and implemented.

At the request of the U.S. Department of Health and Human Services (HHS) [Office of the Assistant Secretary for Planning and Evaluation](#) (ASPE), Mathematica produced an environmental scan of EIA models, an EIA tool for legislative proposals, and a guide to developing equity-focused evaluation plans. These resources speak directly to OMB’s request. Based on this work for ASPE, we offer five recommendations for OMB to consider as agencies develop their equity action plans leading up to the January 2022 deadline.

**Recommendation 1.1: EIAs can help agencies develop equity action plans by expanding existing efforts to understand the equity impacts of federal policies and programs.**

EIAs provide an important opportunity to consider unintended negative impacts of a program or policy, even if the goal of that program or policy is to improve health or social outcomes. They call attention to equity at key decision points, helping government leaders avoid replicating unintended bias related to race, gender, or other characteristics. They also (1) signal institutional commitment to improving equity, (2) embed equity as a core value, and (3) help to increase agencies’ learning about equity over time. In addition to the work Mathematica has completed for ASPE, other organizations are working to develop EIAs and related guidance federal agencies can modify and use. For example, in its [Introduction to Racial Equity Assessment Tools](#), the Center for Racial Justice Innovation provides a detailed explanation of *equity-mindedness*, a concept related to proactively eliminating inequities and advancing racial equity in developing policies and programs, budgeting, planning, and making decisions. Its guidance for conducting EIAs includes a set of sample questions to use to anticipate, assess, and prevent adverse consequences of proposed actions on different racial groups.

HHS already uses disparity impact statements to assess how a policy or program can address health disparities and promote equity by delivering services to those who have been marginalized in the past. However, these statements arguably focus on downstream outcomes and individual-level services offered by agencies, rather than systemic causes of inequity. To the extent that EIAs encourage attention to the structural and social inequities that result in disparities, they can help agencies improve equity in more systemic, durable ways.

**Recommendation 1.2: EIA models help agencies apply impact assessments to a variety of different situations and circumstances.**

There is no one-size-fits-all approach to assessing equity, but agencies can tailor EIA models and methods to fit the contexts in which they use the models. They are typically prospective assessments that take place before policies are enacted, but they can also focus on implementation or be conducted as retrospective assessments. They can be comprehensive, resource-intensive assessments or rapid reviews. Comprehensive EIAs might take six months or more to complete and can involve efforts to collect and analyze new data, including stakeholders' input. In contrast, desktop or rapid-review EIAs typically rely on existing information and agencies can complete them in weeks or days. For example, a [toolkit published by the Government Alliance on Race and Equity](#) acknowledges the reality of compressed policy development timelines and offers a limited set of questions as an alternative to more comprehensive assessments.

Mathematica has created an EIA tool for ASPE that supports prospective assessments of the equity impacts of proposed legislative changes. The EIA tool incorporates steps found in many EIA models:

- **Scoping** involves planning a time frame and level of effort. It includes identifying a team with diverse perspectives. Agencies should consider how to meaningfully involve stakeholders in the EIA team, including representatives of other agencies or populations the proposed policy might affect.
- **Assessment** of potential impacts involves identifying populations of interest; the historical, societal, and policy contexts related to the proposed policy; information sources and gaps; and stakeholders' input.
- **Mitigation** involves identifying the need for specific implementation strategies or complementary policy strategies that can help the agency maximize positive impacts and minimize negative impacts.
- **Dissemination** involves documenting an initial plan to share results and recommendations with relevant stakeholders, including other agencies and affected communities.
- **Monitoring and evaluation** involves documenting an estimated time frame for developing a monitoring and evaluation plan and the team members likely to be involved.

Agencies can use the same set of steps to assess policies in different stages of development. For example, a federal agency could conduct an EIA to update regulations guiding the implementation of a policy after enactment. EIAs can also focus on an entire portfolio, helping agencies assess the equity impacts of a group of policies or programs.

**Recommendation 1.3: Several factors have the potential to contribute to successful use of EIAs, including strong EIA teams and stakeholders' input.**

Mathematica's tool for ASPE guides agencies through the assessment with a series of user-friendly prompts. Agency staff with relevant policy expertise and knowledge of affected communities will be able to answer most or all questions. Ideally, EIA teams will include staff who are familiar with sources of information on equity impacts and staff with diverse experiences and identities. Agencies should also consider how to include stakeholders, such as community members with relevant lived experience. If it is not possible to include stakeholders on the EIA team, the team can consider what it knows about

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stakeholders' perspectives and opportunities to collect additional input from them at later stages in the policy process.

Several other factors could contribute to federal agencies' successful use of EIAs:

- **Clear scoping guidelines.** Such guidelines can help agencies work within limited time frames. Having sufficient time to complete the EIA also contributes to success, but short policy development time frames might not allow for lengthy EIA processes. Agencies should complete the EIA early enough to have an impact on decision making.
- **Support from senior agency leaders and clear expectations for agencies.** An across-the-board requirement for EIAs in all agencies might underscore its importance and increase the potential for equity to become embedded as a routine consideration in decision making.
- **Sources of technical assistance.** Positioning agencies such as ASPE as resources for analysis tasks could support other agencies' EIA efforts. Likewise, providing examples of clear impact statements could help agencies communicate findings that inform agency and OMB decisions.
- **Data availability and expertise.** Publicly available survey and administrative data are accessible to agencies, although there might be gaps in needed measures. As agencies gain experience with EIAs, they might learn more about data gaps and how to address them.

**Recommendation 1.4: Another way to assess equity impacts of agency policies is to evaluate their effects on equity-related outcomes, after they are implemented.**

Policy and program evaluations are time-tested strategies for understanding the effects of federal policy investments, but they require careful planning to guide the use of evaluation resources and generate evidence the government can rely on. Strong evaluation plans should articulate expectations about the effects of a policy change and align them with research questions, measures, data sources, and analytic strategies. Planning an evaluation focused on equity brings added complexity: some equity impacts are difficult to measure, and thinking through equity impacts is a new skill for many agencies.

In particular, evaluations—like EIAs—offer an opportunity for agencies to think about how policies might affect structural and social determinants of equity as well as individual-level outcomes. Federal policies can advance equity at various points in the pathways that lead to disparities. Likewise, it is important to be clear about whether impacts operate at a community or population level versus an individual level. Meeting individual-level social needs does not necessarily address community-level social determinants of equity, and conflating these levels has the potential to lead to confusion about causes of inequity and the policy solutions needed to improve equity in the long term, at a societal or community level.

Mathematica's guide for ASPE discusses these important equity concepts and provides step-by-step instructions to planning an equity-focused evaluations. OMB can consider taking a similar approach to encourage other agencies to plan strong equity-focused evaluations. Recommended planning steps are as follows:

1. Use a logic model to describe and organize equity-related processes and outcomes.
2. Articulate equity-focused research questions.

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3. Define equity-focused process measures.
4. Document the need for individual- or community-level measures of outcomes.
5. Document methodological choices involved in the measurement approach.
6. Identify primary data sources.
7. Identify secondary data sources.
8. Choose an analysis method suitable for each measure.
9. Use a design table to summarize analytic strategies and other evaluation elements.
10. Discuss preliminary findings with affected communities and key stakeholders to help inform final findings.
11. Document how the agency will distribute finalized findings by engaging relevant stakeholders.

Agencies should consider engaging stakeholders in these planning steps to ensure the evaluation includes their perspectives and priorities. For example, stakeholders can suggest important questions agencies might not think of on their own. They can also help agencies refine question wording to help guide the evaluation.

**Recommendation 1.5: OMB should consider encouraging agencies to document gaps in the data needed to predict and evaluate equity impacts of federal policies.**

Documenting data gaps is a best practice in conducting EIAs and is a recommended part of evaluation planning. Documenting a lack of equity-related measures is helpful because, as the [Government Alliance on Race and Equity's racial equity toolkit](#) notes, "sometimes missing data can speak to the fact that certain communities, issues or inequities have historically been overlooked." Noting gaps and the need for additional measures or data can help agencies avoid overreliance on traditional data sources that do not reflect variation in socioeconomic and cultural experience or that exclude key groups. Over time, agencies can look across documented data gaps to consider ways to support developing new measures and data sources.

As noted, programmatic or administrative data are relatively accessible to federal agencies, and they lend themselves to estimates of disparities in individual outcomes. These data sources, however, often do not have reliable identifiers of race or ethnicity. This data gap significantly hinders agencies' ability to develop programming that meets the needs of marginalized populations. There are also acknowledged gaps in measures of service use for some federal programs. For example, as described in this [literature review](#) produced by the Administration for Children and Families at HHS, reliance on self-reported data can create gaps in measures of service use. Our response to Question 2 provides additional information about data gaps; it focuses on reducing barriers and burden.

**Question 2: Barrier and Burden Reduction. Approaches and methods for assessing and remedying barriers, burdens, and inequities in public service delivery and access.**

People of color are disproportionately represented among those who meet eligibility for essential safety net programs but are often unable to access needed help. A variety of barriers and burdens foster this

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inequitable access to essential supports. Fortunately, some promising practices suggest ways to improve the equity of delivery and access to public services.

Burdens and barriers to accessing programs have existed since the government began providing such support. Families who have child care needs, those who have limited transportation options, those who live in poverty, or those who have limited access to technology struggle with complex application processes and other issues. In many cases, Americans who are Black, Latinx, or Native American are at the highest risk of suffering from access barriers. [This report](#) for the Government Accountability Office (GAO), for example, reviewed how differences in program eligibility and benefit receipt were often the result of complex program rules, such as variation in income eligibility limits established by federal agencies. According to the study, complexity and variability in programs' financial eligibility rules have led to negative consequences for both program administration and access to assistance.

OMB could consider the following recommendations as it works toward reducing barriers and addressing burdens to accessing federal income support programs.

### **Recommendation 2.1: Use the “5 As of Access Framework.”**

First conceived by Penchansky and Thomas in their co-authored [Medical Care](#) journal article, the “5 As of Access Framework” within health services research could help OMB to structure the conversation around reducing burden and barriers. A growing body of research at Mathematica uses this framework to better understand racial and ethnic differences in service use. A seminal 2002 [Health Services Research article](#) describes each part of the framework: “**Affordability** is determined by how the provider’s charges relate to the client’s ability and willingness to pay for services. **Availability** measures the extent to which the provider has the requisite resources, such as personnel and technology, to meet the needs of the client. **Accessibility** refers to geographic accessibility, which is determined by how easily the client can physically reach the provider’s location. **Accommodation** reflects the extent to which the provider’s operation is organized in ways that meet the constraints and preferences of the client. Of greatest concern are hours of operation, how telephone communications are handled, and the client’s ability to receive care without prior appointments. And finally, **acceptability** captures the extent to which the client is comfortable with the more immutable characteristics of the provider, and vice versa.”

Much of what Penchansky and Thomas describe in their framework highlights the importance of collecting data and establishing a clear set of measures around the 5 As. These advancements will require more extensive data collection and analysis related to race, ethnicity, and other key characteristics.

### **Recommendation 2.2: Address deficiencies in data on race and ethnicity.**

[Lack of data on race, ethnicity, and other key characteristics](#) affects solutions seeking to reduce burden and barriers. Acquiring, sharing, and using these data is a responsibility of program providers and governments at all levels, and is possible only with fully interoperable data systems that are integrated into practice. This cross-cutting issue affects almost all income support and antipoverty programs, such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Supplemental Security Income, and Medicaid. A key aim of these programs is to ensure equitable distribution of services, yet limited racial and ethnic data in administrative records have hampered efforts to meet this goal. Although [guidance does exist](#) to help circulate a set of uniform data collection standards for including race, ethnicity, sex, and disability status in surveys conducted by HHS,

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the lack of standards related to collecting data among vulnerable subgroups remains a challenge for gaining insights and making improvements across programs.

Beyond supporting efforts to improve administrative data, federal agencies can also support data collection by community organizations. Several advocacy groups and nonprofit organizations have started activities to address this issue, especially in the wake of COVID-19, but progress remains slow. Mathematica is currently [working with organizations](#) such as the Robert Wood Johnson Foundation to better understand the power of enhanced data collection on race and ethnicity to build a broader research agenda with an equity lens.

### **Recommendation 2.3: Explore streamlined and automatic program eligibility.**

Confusing, complicated, and inconsistent eligibility and income requirements for different federal income support programs can be a significant barrier to access. A key challenge, for example, is that these programs are authorized by different federal statutes enacted at different times in response to differing circumstances, as described in this 2017 [GAO report](#) to the Senate Budget Committee. Streamlining rules across programs would reduce barriers caused by these complexities. However, state and local governments that establish local program rules administer programs such as Medicaid and TANF, making it more difficult to streamline rules at the federal level within or across these programs.

Attempts to modernize eligibility and administrative processes can lead to concerns about the effects of these changes on program integrity. For example, [testimony to the House Committee on Oversight and Government Reform by Stacy Dean](#) (now Deputy Under Secretary for the U.S. Department of Agriculture's Food, Nutrition, and Consumer Services) describes potential trade-offs between program integrity and access: "Some states instituted administrative practices designed to reduce errors that had the unintended effect of making it harder for many working-poor parents to participate, largely by requiring them to take too much time off from work for repeated visits to SNAP offices at frequent intervals, such as every 90 days, to reapply for benefits." Mathematica and other organizations are working to quantify the extent of [identity theft](#) in the SNAP program by estimating the state-level prevalence of identity theft and the cost to the program, and identifying operational methods and practices that succeed in preventing and detecting identity theft. The results of these analyses, not yet available publicly, will offer program administrators approaches to protect and improve program integrity within the context of modernized eligibility and administrative processes.

Automatic program eligibility could potentially reduce costs, eliminate overreaching administrative burdens, and make government programs more equitable for all participants. The GAO report sheds light on how federal programs sometimes have overlapping intended populations, and how rules for some programs allow individuals who qualify for the program to automatically qualify for another. This practice of automatic eligibility based on receipt of other programs can both ease access to these programs and reduce administrative costs. Automatic eligibility can bring benefits, but implementing such a significant change will require testing, evaluation, and assessment.

### **Recommendation 2.4: Use rapid-cycle testing and continuous learning.**

Rapid-cycle testing emphasizes innovation to learn whether and under what circumstances specific program changes produce improvements. These learning tools can explore all sorts of barrier reductions, including automatic eligibility and declining program participation. In partnership with HHS and the

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Harvard Center on the Developing Child, Mathematica developed a framework for program improvement that embeds analytic methods into the process of designing, implementing, and iteratively testing program changes. The [Learn, Innovate, Improve process](#)—or LI<sup>2</sup>—is a series of replicable, evidence-informed program improvement activities, supported by collaboration between practitioners and applied researchers. LI<sup>2</sup> brings together wisdom from social science theory, research evidence, and practice with the goal of creating innovations that are practical, effective, scalable, and sustainable. Practitioners have used the LI<sup>2</sup> process, for example, to [facilitate small-scale experimentation](#) to better engage program participants in Colorado and to [identify, test, and refine strategies](#) for working with informal child care providers in Detroit.

Another example of continuous and collaborative learning comes from Mathematica and the University of Denver's [Fathers and Continuous Learning in Child Welfare](#) (FCL) project for the Office of Planning, Research, and Evaluation within HHS' Administration for Children and Families. FCL used a methodology known as the Breakthrough Series Collaborative (BSC) to improve placement stability and permanency outcomes for children by engaging their fathers and paternal relatives. A BSC is a continuous learning methodology developed by the Institute for Healthcare Improvement that tests and spreads promising practices to help organizations improve in a focused topic area. It has five key elements: (1) the Collaborative Change Framework; (2) inclusive multilevel teams; (3) a Shared Learning Environment; (4) expert faculty; and (5) the Model for Improvement. Described in more depth in [this article](#), learning within a collaborative such as BSC is thought to be one of the most successful methods for quality improvement and system-wide change.

OMB and other federal agencies can use these tools to help explore, test, and implement innovative interventions that address equitable barriers to program entry among a variety of different federal initiatives.

### **Recommendation 2.5: Increase capacity for evidence-informed, equity-focused program innovation.**

Improving service delivery, increasing efficiency, and minimizing costs are key goals for many federal income support programs, including TANF. This does not always leave room for program innovation or testing strategies to make these programs more equitable. In recent years, evidence, evaluation, and program analytics have helped harness the power of data to improve program outcomes, but there is more work to do.

For example, poverty and other chronic stressors can hinder people from developing and fully using the skills needed to set, pursue, and achieve personal goals, including finding and maintaining employment. For this reason, living in poverty might derail people's pursuit of economic security. Teams of policy and programmatic experts at Mathematica and elsewhere are working with state and local TANF programs to help increase their capacity for evidence-informed program modernizations through [Project Improve](#). Project Improve is an innovative technical assistance project sponsored by the Office of Family Assistance at HHS that aims to improve the economic security and self-sufficiency of families with lower incomes. Coaching—in which trained staff members work with participants to set individualized goals and provide support and feedback as they pursue those goals—has drawn increasing interest from the research and policy community as a way to help people with lower incomes fully realize career and family goals. Accessing these opportunities and supports can be especially challenging for people who

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also face the stressors of poverty and structural racism. [This resource](#) highlights ideas for promoting equity in coaching and navigation, such as hiring more diverse staff and training them properly.

OMB staff might also want to build upon the recent [Strengthening Working Families Initiative](#) (SWFI) sponsored by the U.S. Department of Labor. SWFI is another program example that addressed access barriers through evidence-based interventions. Established in 2017, SWFI issued grants to 13 nonprofit organizations, local workforce development boards, institutions of higher learning, and municipalities in 12 states to increase access to education and training by addressing barriers parents face, including child care. The awards encouraged grantees to partner with workforce entities, education and training providers, child care services, and business entities to achieve their goals. Mathematica's SWFI technical assistance team [supported grantees in their ambitious efforts](#) to reduce burdens and address participation barriers. The technical assistance team successfully implemented multiple methods to support SWFI grantees, such as coaching, peer sharing, webinars, convenings, and tip sheets to support SWFI grantees in their program operations.

### **Recommendation 2.6: Streamline service delivery.**

Mathematica's work on service delivery in the TANF program suggests ways in which agencies can streamline service delivery to improve equity and access. To qualify for benefits, most TANF beneficiaries must participate in interviews with program administrators about very personal matters related to household income and family support. These interviews typically include questions that are not culturally responsive or trauma-informed, and thus can introduce opportunities for implicit bias, inequity, and individual distress. [A 2019 brief published by Mathematica](#) offers ideas for reducing complexity and bureaucracy of human services programs, building skills and cultural competency for supervisors and staff, and taking a more human-centered approach to the design and delivery of human services programs. These suggestions can help programs more equitably meet the needs of families facing challenges such as low educational attainment, unemployment, and having children with special needs.

There could also be value in removing irrelevant information within the TANF application process and addressing the challenges associated with paperwork and other administrative barriers. For example, interviews tend to be better over the phone without visual cues that can be distractions rather than provide valuable information. [This brief](#) builds on three foundations for innovation, including reducing the complexity of processes, simplifying paperwork, and promoting a customer-focused culture. One key element of this process uses innovation to identify and make small, meaningful changes, as well as research-informed design principles to collaborate with program staff and check for compliance with program requirements.

### **Question 4: Financial Assistance.** Federal agencies run financial assistance programs, including grant opportunities, that have the potential to channel resources to all communities. What are promising approaches to the administration of Federal awards that should be considered?

From initiating requests for proposals to assessing compliance requirements, from collecting and evaluating performance measure data to requesting technical support, the current grantmaking process is complicated, complex, and, in many cases, opaque. Truly equitable grantmaking will require substantial

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changes to a decades-old approach, as it relates to the administration, solicitation, feedback, and performance assessment of grantees.

Working with foundations such as the Bill & Melinda Gates Foundation and the Kellogg Foundation, Mathematica has explored several strategies for making the grantmaking process more equitable. As part of the Gates Foundation's [Big Bets portfolio](#), for example, foundation officials seek to dramatically improve middle-years math instruction, so all students who are Black, Latinx, and/or experiencing poverty deeply know, can use, and enjoy math by the time they reach high school. To achieve this goal, Mathematica and foundation leaders have created an equity resource guide (not yet available publicly) that aims to help technical assistance providers integrate equity and the community voice through several stages of grant support, including addressing key stakeholder needs, co-creating research questions and study design, and reporting and dissemination.

Using insights gleaned from this and other partnerships with federal and philanthropic organizations, Mathematica has prepared a collection of ideas for OMB to consider when identifying ways to build equity into grantee administrative support, capacity-building, technical assistance, and data collection activities. Following these considerations, we provide longer-term solutions that can change the status quo and build more equity into federal processes.

**Recommendation 4.1: Improve and communicate more clearly about grant processes and opportunities.**

Interconnected stakeholders, including grant administrators; state, local, and Tribal grantees; and other government leaders would benefit from a shared understanding of exactly what federal government grants exist and how they work—at a very basic level.

This shared understanding includes clear summaries of rules and regulations covering three main categories: (1) categorical (formula and project) grants; (2) block grants; and (3) general revenue sharing (pass throughs, competitive, and noncompetitive). As the American Families Plan and the American Jobs Plan funnel more resources through state and local governments, creating a short and informative primer could streamline the spending process and provide consistent guidance across different sectors. With an intended audience of federal agencies, and the state and local governments they serve, a short primer on the types of grants available and how they work would help create a knowledge baseline for all potential applicants. Although this information might exist in pieces across a variety of different resources, there is no single playbook from which all stakeholders can achieve their goals and apply an equity lens to their work. The federal government could also consider hosting virtual discussions with prospective grantees before grant announcements with the goal of creating a dialogue regarding grantees' expectations and information sharing.

**Recommendation 4.2: Define equity and equitable practices through stakeholder outreach and partnerships.**

The [Executive Order](#) defines equity as, “the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latinx, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer persons; persons with disabilities; persons who live in rural areas; and persons

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otherwise adversely affected by persistent poverty or inequality.” However, digging deeper into what equity means for grantees, and better understanding what equity principles are most important to them, might be necessary across all federal offices and agencies. Offices and agencies can achieve this goal in several ways, including through partnerships with stakeholder groups and by focusing on engaging local communities.

Co-creating shared equity principles begins by building connections with local governments, grantees, and federal agencies, and by using stakeholder engagement principles (discussed in response to Question 5). Federal grantmakers might also want to seek and encourage partnerships with organizations or groups that represent marginalized communities. Groups such as the [Latino Coalition for Community Leadership](#), [Color of Change](#), [Advancement Project](#), or the [Partnership for Working Families](#), can help grantees build equity into their programs and address issues such as institutional or structural racism. Enhanced stakeholder outreach can make it easier for marginalized communities to learn about and discover grant opportunities that might be available to them or their peers. The feedback received through stakeholder outreach can also enhance understanding of community needs and priorities. Focusing on communication tools, amplification opportunities, and other campaigns to raise awareness of new grant programs could help contribute to the Executive Order’s goals for equitably distributing resources.

Defining equity is a critical component of a project currently underway for the Public Health Equity Group, the Robert Wood Johnson Foundation, and the [Equity Learning Lab partners](#), which includes Mathematica. Together, we will generate evidence focused on ways to centralize equity internally, at our own organizations, to improve our work for governments and external entities.

**Recommendation 4.3: Minimize prohibitive requirements and compliance burdens with enhanced technical assistance.**

Starting with the complexity of the application process itself, addressing administrative burden is an area ripe for change. For some grantees in rural areas—who live in marginalized communities or who lack resources, staffing, and support—federal reporting and data collection requirements can be prohibitive. In some cases, the same localities frequently receive grants because they have administrative support in place, but others are overlooked. Not all prospective grantees can compete on the same scale. Prospective grantees that have the resources to hire professional grant writers or have experience working within federal requirements are better positioned to receive funds, even if others have similar or greater needs.

As federal programs place more emphasis on reaching diverse communities and deepening efforts to serve people equally, federal agencies should consider ways to build capacity for stakeholders to apply for and meet grant requirements by providing enhanced technical assistance, such as one-on-one counseling, co-creating comprehensive service models, or providing do-it-yourself data collection and evaluation tools similar to the [Evidence-to-Insights Coach](#), which puts evidence generation directly in the hand of policymakers. In another example, Mathematica serves as a third-party provider of capacity-building and evaluation support to grantees that are part of the [Youth at Risk of Homelessness](#) program, administered through the Office of Planning, Research, and Evaluation and Children’s Bureau at HHS.

**Larger, more systems-focused changes might also be needed.** Changing the grantmaking process from the top down could shift the balance of power away from compliance and regulation and toward

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communities and people. The following list identifies opportunities for federal agencies to shift emphasis away from competition for scarce resources and toward building collaboratives.

- **Use funding as a mechanism to build capacity.** To address costly grant application processes and to clarify complicated instructions, federal agencies could provide technical assistance during the grant application process, as well as after awarding the grant. Alternatively, they could conduct organizational assessments to better understand individual grantee capacity to use grant funding and deliver services. The agency could then target remaining resources around individual assessments, with customized technical assistance built into the grant. Federal agencies might also consider compensating prospective grantees for their time developing grant applications. This would encourage resource-constrained grantees to feel more confident when submitting applications and other information to federal agencies.
- **Build a feedback loop into the application process.** Another option to reduce barriers is to encourage grantees to submit short concept papers before completing a full application and to provide them with feedback on their concept papers. Some federal agencies have already implemented a process that requires a response to a request for information before submitting a full proposal, which should encourage more small businesses to apply for government contracts. We have also observed this approach used on the Gates Foundation's [P-16 project](#), which focuses on advancing systems change; it required state and local grantees to submit concept papers before completing a full application. The resulting feedback loop encourages two-way dialogue before the formal application process.
- **Implement a universal online acquisition platform all states and localities can use.** Making a large technology investment to fully digitize the federal grant application process will make it easier for states and localities to track their progress. An online acquisition platform could also benefit federal agencies by creating a universal inventory of information the government would have access to in real time. Federal agency officials could review direct award recipients and assess their history, while examining their definitions of equity and willingness to build more equitable solutions into their systems. Such a system would make it easier to build in universal performance measures and access characteristics of underrepresented communities to better target services. Agencies can track where the money is going—geographically, socioeconomically, and locally—to determine targeted efforts. Ideally, this system provides a more streamlined administrative review process that would enable federal agencies to pivot scarce resources to helping prospective grantees that might have other challenges with the application process, such as limited broadband access or other capacity constraints.
- **Generate ideas with prospective grantees first.** The federal government should include opportunities for generating ideas with stakeholders the government seeks to support before allocating resources. In other words, first get people in a room together and then see where the innovation happens. Agencies can initiate meetings, day-long conferences (in which they compensate attendees) and ask for input on how to spend resources in ways that align with community needs and priorities.

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## **Question 5: Community-Stakeholder Engagement.** Approaches and methods for accessible and meaningful agency engagement with underserved communities.

Cultivating stakeholder engagement has resulted in efforts to better represent community voices and perspectives in decision-making processes. However, long-standing biases built into policies, systems, and structures at all levels (federal, state, and local) can serve as barriers to community engagement and desired outcomes. Reducing barriers to engagement, particularly among historically underserved populations, can result in more effective programs and positively affect outcomes for individuals and communities.

Practices in the philanthropic sector point to ways in which the federal government can better engage underserved communities. Foundations such as the Robert Wood Johnson Foundation, Casey Family Programs, and the Kellogg Foundation are lighting the way for stakeholders' capacity building, leadership development, and collaborative partnerships. The Kellogg Foundation, for example, has invested resources in a project designed to test a community-based strategy to enhance the quality of informal child care in Detroit. Even before the pandemic, equity between informal child care and the formal child care system was a challenge. The [Community-Based Strategy to Enhance the Quality of Informal Child Care in Detroit](#) project team, led by Mathematica, formed a collaborative including three local community organizations to co-design services to support informal providers. The collaborative developed strategies to reach informal providers, assessed their strengths and needs, and delivered programming to support enhancing the quality of care. This type of inclusive approach, applied to federal programs, could generate positive outcomes for vulnerable populations.

Federal agencies are also making progress toward enhanced stakeholder engagement in improving programs and developing policies. For example, HHS invested in the [American Indian / Alaskan Native Family and Child Experiences Survey](#) (FACES AI/AN) to create community- and stakeholder-driven programs that meet the needs of children who live in Tribal communities. Mathematica's national descriptive study of children and families in Region XI Head Start programs provides data to assess the strengths and service needs of both AI/AN and non-AI/AN children and families in Region XI and in turn helps inform policies and practices. Extensive collaboration with a work group comprising Head Start directors from Region XI programs, early childhood researchers with experience working with tribal communities, and federal government officials informed the study's design, implementation, and dissemination.

Based on our experience working on these and other projects with federal agencies and philanthropic organizations, we have developed a set of recommendations for OMB to consider as it explores opportunities to engage stakeholders across programs.

### **Recommendation 5.1: Build on existing strengths and resources within communities.**

All established communities and stakeholder groups bring expertise and certain assets that can help inform the development and execution of shared services and solutions. Yet government leaders and policy experts could miss out on meaningful engagement with relevant groups. Using stakeholder engagement to tap into and apply the expertise that resides in communities while building on existing skills helps agencies benefit from the collective knowledge of social networks and local collectives.

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For example, a [project sponsored by Casey Family Programs](#) aimed to enhance and evaluate community-based efforts to reduce adverse childhood experiences (ACEs) in Washington State. Community-based efforts are vital to prevent ACEs and toxic stress, moderate their effects, and reduce their related public and private costs. Washington State formed a consortium of public agencies, private foundations, and community organizations that have ongoing, multifaceted initiatives targeting ACEs. Mathematica's evaluation found communities had high levels of capacity in cross-sector partnerships, evidence-based problem solving, effective communication with partners, and focusing on equity. They had less success with developing sustainable infrastructure; engaging and mobilizing residents; implementing trauma-informed programs, policies, and practices; and increasing capacity to use data. Sustaining these community efforts depends significantly on their ability to secure resources and implement a successful coalition leadership succession plan.

### **Recommendation 5.2: Emphasize co-learning and capacity building.**

Community partnerships with federal agencies work best when they are part of a reciprocal transfer of knowledge, skills, and expertise. The process of co-learning and co-creating helps generate a sense of co-ownership and buy-in, but building the trust that is essential for truly collaborative and effective relationships takes time. OMB and its partners are well situated to embark on a long-term process and commitment to sustainability, establishing relationships with communities, and developing an awareness of opportunities to grow.

We have seen opportunities to build trust and develop partnerships through the place-based [Harlem Children's Zone](#) (HCZ) project, which seeks to encourage healthy child development and academic achievement at every age. Since 2010, Mathematica has helped HCZ with a study to examine children's outcomes and school experiences as they progressed from early childhood programs through Promise Academy charter schools and HCZ collaborative classrooms. By engaging with the community, HCZ learned that nearly half of students 12 and older in the program were overweight or obese. HCZ then worked to find a funding partner to help build the capacity of the community to address this issue. The JPB Foundation invested in the implementation and effectiveness of the [Healthy Harlem initiative](#), a model for promoting healthy lifestyles in the charter schools, early childhood programs, and after-school programs operated by HCZ. We engaged with students, parents, and staff to understand their perspectives on the initiative's activities and services. We found program participation resulted in higher levels of physical fitness and a reduction in the percentage of overweight students.

### **Recommendation 5.3: Use community-based participatory research principles.**

OMB has requested information on tools agency offices—including communications, civic engagement, enforcement, and policy offices—can use to better reach and engage communities. A research strategy known as community-based participatory research—or CBPR—posits that the way to make progress in policymaking and community engagement is to partner with communities, listen to what they need, and speak to multiple representatives from multifaceted groups. Ask them where they want to make change, what solutions they already have in place to make change, and then build from that. According to a [Milbank Quarterly article](#), which lists the eight principles of CBPR, “The purpose of CBPR is to reduce the gap between research and practice through collaboration between academic researchers and community stakeholders in order to provide both benefits important to communities and interventions relevant to the community.”

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Starting with, and building upon, the existing principles of CBPR can help government leaders who struggle to engage communities as partners, especially those communities with deeply embedded concerns related to systematic racism and institutional injustice. Implementing these principles will encourage power-sharing, collaboration, and participatory coordination. CBPR begins and ends with equitable, collaborative partnerships across sectors, audiences, experts, communities, governments, and program leaders.

**Recommendation 5.4: Use dissemination to spark new ideas and implement change.**

Effectively and consistently translating research or program evaluation findings for nonacademic audiences, and then sharing those findings with community leaders, is an important component of making programs more equitable. Broadening conversations about ways to incorporate an equity lens among everyone who works within a program in both the developmental and evaluation stages can lead to informed change. It is critical to involve all partners in planning and conducting dissemination, and it is vital to use clear and respectful language, avoid deficit framing, and co-create a strategy to act on what we have learned.

The Annie E. Casey Foundation, for example, has produced a [toolkit](#) for identifying how to apply a racial equity lens to the broad range of work focused on child well-being. Practitioners in child advocacy work have used the toolkit to communicate a deeper understanding of practices to look for when communicating about these issues. For example, it states communication that uses a racial equity lens effectively usually contains all of the following: (1) consistent disaggregation of data by race and ethnicity; (2) analytic understanding of the structural causes of any significant disparities and disproportionality that the disaggregated data show; (3) framing of disparities disproportionality by a narrative that leads with structural causes; and (4) photos, format, and organization that highlight a structural understanding of what is wrong and avoids stereotypes.

## Concluding Insights

To make programs and services truly equitable, federal agencies that prioritize challenges related to siloed programs and services are headed in the right direction. For example, approaches that address social determinants of health and coordinated services recognize that health and human services programs must attend to the intersectionality of numerous factors to affect health outcomes and infuse equity into decision making. Federal agencies that work together on their impact assessments can also coordinate messaging about the importance of equity and anchor steps around participatory research to achieve their goals. Finally, more policies and programs that focus on root causes and the upstream factors affecting individuals and communities—including poverty, food insecurity, education, and criminal justice equity, among others—are well-positioned to redesign systems and structures that reduce inequities.