

July 6, 2021

The Office of Management and Budget
Attn: Acting Director Shalanda Young
725 17th Street, NE
Washington, DC 20503

Submitted via <https://www.regulations.gov/>

Re: Request for Information – Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government (Docket #: OMB-2021-0005).

Dear Director Young,

Vitalyst Health Foundation is pleased to offer the following comments in response to your request for information regarding Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government (OMB-2021-0005). As one of Arizona's largest health philanthropies, Vitalyst fully understands the need to develop effective practices in pursuit of equitable outcomes. We commend the Administration for taking a comprehensive approach to how agencies embed and operationalize equity, and we welcome the opportunity to provide feedback based on our long-standing and far-reaching partnerships with federal agencies. We offer the responses based on the questions posed in the request for information.

Which underserved communities experience multiple, cumulative barriers and are disproportionately burdened by specific administrative processes or requirements?

It is imperative to recognize that each community is uniquely challenged by administrative processes and requirements, and that no community is a monolith. For example, LGBTQ+ communities are often challenged by the binary construction of gender as featured on government forms. For individuals who are nonbinary, transgender, or two-spirit their identity is not reflected. This specific limitation impacts the LGBTQ+ and Indigenous communities. Rural, Indigenous, people of color and members of the LGBTQ+ community have historically been adversely impacted by governmental processes when attempting to gain access, navigate and be successful within federal systems. In Arizona there is clear historical trauma that is the result of previous federal actions, so any new practices should take that historical trauma into account.

What types of overarching metrics might an agency use to measure a benefit program's outcomes?

Communities should be allowed to define the metrics and goals of programs that are intended to impact them. Local knowledge is often a powerful indicator of success that can be more telling than traditional quantitative metrics.

Vitalyst suggests the use of:

- Weighted values for working with “hard to reach” communities: Offering addition credit for work that centers “hard to reach” communities can incentivize funded partners to focus on value over volume. For example, when developing metrics for health insurance outreach, the



Centers for Medicare and Medicaid Services should consider placing additional value on enrolling individuals from communities where the prevalence of uninsured is disproportionately high. Without such incentives, grantees will continue focusing their work on communities residing in the most densely populated regions. As a result, less outreach is conducted among rural and Tribal populations across Arizona. In short, current enrollment incentives are not designed to pursue equity; rather, they motivate results that are quantitatively favorable.

- Metrics that capture the Social Return on Investment (SROI): The social impact of a grant is as important as the economic impact, yet it is often more challenging to measure. Consider including metrics tied to SROI (e.g., trust building, perception shifts, influence and opportunity creation) that better align with the less-tangible social benefits that ultimately drive social change.

How do we achieve equity in a procurement system that must balance competing economic and social goals, including the need to conduct procurement in a streamlined and rapid manner?

Equity must be explicitly prioritized when developing procurement systems and incentives. This, in part, means that agencies must understand the extent to which they have contributed to historical disinvestment among certain communities. Relationships are key in driving equity, especially for underrepresented and underserved communities. Agencies should build relationships and contracts with businesses that are owned and/or operated by underserved communities to ensure proper representation throughout the federal government's investments. This approach may lack the simplicity and scalability of less-costly alternatives; however, this tradeoff will yield dividends as time progresses and new procurement partners grow their capacity.

What kinds of equity assessment tools might agencies use to identify inequity in their standard practices throughout acquisition lifecycle, including, but not limited to, the development of requirements, market research, selection of contract type, availability of financing, incentive structures, negotiation and evaluation of interested sources, debriefings on unsuccessful offerors, management of contracts, evaluation of contractor performance, and use of past performance in selection of services?

Grassroots and community-based approaches to assessment are effective tools to measure equity, as they center the populations most impacted by the work being done. Community-based participatory action research (CBPAR) is a growing field that may offer worthwhile assessment strategies as well. Regardless of the method, the data should be used to center inequities and identify opportunities to improve the standing of marginalized communities. The use of cross-tabulated sociodemographic data is one way to center these communities and to approach assessment using an equity lens.

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? What are some promising approaches to the award and administration of Federal awards (including, for example, the integration of program planning and design) that should be considered?

The first step to improving accessibility is to make federal applications more intuitive and easier to navigate for individuals in communities and organizations that do not have the capacity or expertise to navigate nuanced government processes. Additionally, it is important to meet people where they are and listen to their concerns and needs. Federal agencies should enter into communities without

preconceived notions about what work needs to be done and allow the community to set its own goals and objectives. Another consideration is to accept or review qualitative data to vet applications. Conducting phone interviews or viewing virtual presentations coupled with a shorter written application process could improve accessibility and equity in practice. Disaggregated demographic information and community narratives are significant pieces of information and, often, can tell stories far deeper than traditional data. Vitalyst has learned this first-hand in the evolution of its grantmaking practices.

What kinds of data should agencies collect and use to assess equity in their grantmaking and financial assistance practices?

Disaggregated data should be collected wherever possible. Socioeconomic data, demographic data, zip code-specific data and data based on other geographies (including school districts) are useful in assessing equity in practice.

What processes should agencies have in place to engage proactively with the 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?

The basis of engaging with communities should be grounded in trust-building relationships and two-way communication. This often means that staff of the federal government must prove themselves and their employer trustworthy. Processes that work with and include the community need to span beyond the traditional grant application timeline and include activities such as townhalls, Q&As and other open forums. Every community has members that are trusted and know how to communicate within their given community. These are the individuals to include and compensate for their work as relationships are built with federal government. Any work conducted in an underserved community that is not centered on trust fails to meet the minimum principles of ethical public health practice and is likely to succumb to traditional limitations associated with transactional relationships.

How can an agency assess the accessibility of the agency's rulemaking and policymaking 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 comments.

The most effective way to ensure that an agency's public comment and engagement process is accessible is to ask the communities and individuals who are directly impacted by the policy proposal. As previously stated, every community has trusted messengers, such as community health workers, school officials and educators, and elders. These are the individuals with whom trusted relationships between underserved communities and traditional institutions begin. Additionally, federal agencies should use various modes of technology as a method of collecting data and reaching audiences that may be missed. Text messaging and social media are widely used among the public and are effective methods of community engagement, although may be of limited use in areas where internet access is sporadic. Finally, it is important to recognize that traditional rulemaking and policymaking in a top-down model often builds barriers to community accessibility. It may be advantageous to deconstruct and reconstruct these models in ways that center the people who are directly impacted. For example, early key

informant interviews could reveal new ways to work with underserved populations – and uncover ways that don't expect these populations to understand and respond to institutional practices and priorities.

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

The process of interacting with federal agencies is inaccessible and cumbersome for many. Government applications are notoriously long, and many processes are overly bureaucratic. The repetitive nature of application cycles, inaccessible language, and requirement of deep navigation through government sites and databases forces small, minority-led or otherwise marginalized organizations to shift their already limited capacity to apply. Prior to application, communities must have a member with knowledge of how to navigate the federal process, obtain a Federal grant ID, identify available grants, and develop a strong application. Federal processes often create barriers for underserved communities when they do not account for local/tribal structure and governments; require forms that do not accurately represent the identities of members of certain communities (e.g., LGBTQ+ and multiracial); and prioritize quantitative data at the expense of qualitative data that could better tell a narrative about a community and its needs.

The pursuit of equity as an approach and outcome is a commendable and worthy effort, one which drives our every pursuit at Vitalyst Health Foundation. We greatly appreciate the opportunity to provide input on this critically important topic, and we are happy to provide further support to our federal colleagues as needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne Pfister". The signature is fluid and cursive, with the first name being the most prominent.

Suzanne Pfister
President and CEO
Vitalyst Health Foundation