

# The Equity and Belonging Toolkit



The Equity and Belonging Toolkit

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**Prepared for:**

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Management Manual

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Equity First Consulting

**In Partnership with:**

ICF  
KW Consultants

## LAND ACKNOWLEDGEMENT

The California Department of Housing and Community Development acknowledges that the State of California occupies the original homelands to at least 174 distinct tribal nations. Our State commits to working with native communities in meaningful, reparative government-to-government relationships in the restoration, stewardship, and protection of their sacred practices, cultural resources, and lands.





# CALIFORNIA TRIBAL LANDS

California Native-American Pre-Contact Tribal Territories

Northern California Indian Development Council | [ncidc.org](http://ncidc.org)

## IN LAK'ECH

*Tú eres mi otro yo.*

*You are my other me.*

*Si te hago daño a ti,*

*If I do harm to you,*

*Me hago daño a mi mismo.*

*I do harm to myself.*

*Si te amo y respeto,*

*If I love and respect you,*

*Me amo y respeto yo.*

*I love and respect myself.*

—Luis Valdez





*Colorful Hands 1 of 3*

*George Fox students Annabelle Wombacher, Jared Mar, Sierra Ratcliff and Benjamin Cahoon collaborated on the mural.*

*Photograph by Tim Mossholder*



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# FOREWORD

The California Department of Housing and Community Development (HCD)'s mission is to promote safe, affordable homes and vibrant, inclusive, sustainable communities for all Californians" so that "every California resident can live, work, and play in healthy communities of opportunity" (CA HCD, 2024).

One of the ways that HCD works towards this mission is by implementing the Community Development Block Grant Program (CDBG), investing federal dollars in local communities and community members who are systemically under-resourced.

The Equity and Belonging Toolkit has been built in partnership (HCD, Equity First Consulting, ICF, and KW Consultants), based on engagement with Grantees and HCD staff, to support HCD in meeting its mission **equitably**, centering the priorities, the wisdom, and the right to self- and community-determination of the people and communities who are most impacted by **systemic inequities**. At its core, this toolkit is an offer of loving support and a call to action:

- 1 | *To the public-facing staff members who are working hard to serve their communities **equitably** and who seek strategies, tools, and/or deeper understanding to authentically do so.*
- 2 | *To the policy makers who are seeking ways to mitigate the impact of harmful policy and prevent harmful unintended consequences, but who may not yet have access to the information and strategies that they need to do so.*
- 3 | *To the planners and implementers who may or may not yet understand why they should and/or how to engage in co-design with communities that are closest to the pain of the problem.*
- 4 | *To the communities most impacted by **systemic inequities**, whose priorities, perspectives, and wisdom have rarely been centered in resource allocation.*

## Special Note:

All words **highlighted in purple** will prompt a pop-up definition box (like this) to appear when hovering the cursor over the word. To hide the definition pop-up box, simply click on the definition box.



# HOW TO USE THIS TOOLKIT

## Organizational Structure

This toolkit is meant to both be a usable resource guide for people who are involved in implementing CDBG and to reveal the connective tissue within the CDBG ecosystem. Part 1, the executive summary, leans towards the latter goal, connecting past to present, practice to harm and/or healing, and seemingly distinct components to each other.

In Parts 2-5, we shift towards breaking CDBG into its implementable parts in ways that more closely resemble the GMM chapters and the stages of program design and roll-out. Even here, though, we do not surrender the connective tissue. Part 2 focuses on the components of CDBG that are most closely connected to meaningful public participation: Engagement, marketing, and language access/justice. Part 3 addresses workforce relations, which includes procurement, hiring, and subrecipient selection. Part 4 looks at program design itself, including both cross-programmatic considerations, such as **cultural responsiveness**, relevance, displacement, and documentation requirements, and also considerations that are specific to each type of programming. Part 5 leans into accountability systems, including gathering and analyzing racial disparity data, monitoring and evaluation, and discrimination and appeals.

Each part includes an introduction, highlighting some of the overarching themes of the subsections within, followed by the subsections themselves. The subsections include an overview of an **equity**-centered version of the topic at hand and its relationship to the regulations; a table with implementation strategies, examples, and guiding questions; one or more “spotlights,” which are highlights or learnings from the field; and a GMM cross-reference list.

## Connection to the GMM

The chapters of the Grants Management Manual (GMM) for CDBG include many references to this toolkit. We tried to address the most pressing **equity** concerns within the pages of the GMM chapters itself. Sometimes, that was doable. In other instances, though, it was clear that a broader or more interconnected explanation was paramount. Every issue that could not be sufficiently addressed within the chapters themselves (as well as many that were addressed there) are included in Parts 2-5 in this appendix.

The subsections within each Part are labeled in a way that should make it easy to find what you are looking for. But we have also included GMM references at the end of each subsection.

## Relationship to the Regulations

The Equity and Belonging Toolkit has a multi-faceted relationship to the regulations that govern CDBG. Critically, there are no recommendations within this toolkit that come into conflict with any of the program-specific or applicable cross-cutting regulations. But these strategies are not limited to meeting the regulations either. Rather, they are meant to move beyond checking off regulatory boxes towards advancing the purpose and values of CDBG in an **equity**-centered way.

For example, while the regulations around language access center four-factor analysis as the way to determine the minimum requirements for translation and interpretation, we include strategies and considerations for language justice that refuse to discount any members of our communities as statistically insignificant. And while the regulations around displacement require jurisdictions to support community members economically when they are displaced, we highlight the importance of centering community agency and priorities during this process to support other forms of wellbeing, and to minimize the severing of community and belonging that inherently accompanies displacement.



# PART I: EXECUTIVE SUMMARY

## Background

When the Coronavirus pandemic spanned the globe, leading to lockdowns across the United States and indeed the world, the scope of suffering at the individual and community level was enormous. Entire economic sectors, such as retail, shut down, sending unemployment numbers soaring and forcing many businesses to shutter permanently. Others, including schools, went remote, requiring families to juggle work, child-rearing, and homeschooling, and/or to make impossible choices between staying home with young and/or sick children and putting food on the table. Still other sectors, deemed essential, such as supermarkets and hospitals, remained open, putting employees and their families and communities at great risk (Anderson, 2020; Casura et al., 2020). In 2020 alone, more than 20 million Americans got sick; and more than 360 thousand Americans died (World Health Organization, n.d.).

COVID-19 impacted everyone, but it did not impact every individual, family, or community **equitably**. As disasters tend to do, COVID shined a glaring light on existing **inequities** and exacerbated them (Casura et al., 2020). These **inequities** included the overrepresentation of people of color in jobs deemed essential, the overlap of these jobs with lack of paid time off, and higher infection and death rates for Black, Indigenous, and People of Color (**BIPOC** folks) (Casura et al., 2020; Henderson, 2020).

### The CARES Act

Congress responded by passing the Coronavirus Aid, Relief, and Economic Security (CARES) Act in March of 2020, which, among other things, pushed 5 billion dollars in Community Development Block Grants CARES Act (CDBG-CV) to states and other jurisdictions to “prevent, prepare for, and respond to Coronavirus” (HUD Exchange, n.d.a).

But federal funding, while crucial, does not always mitigate, and often exacerbates **inequities**. Federal dollars are largely inaccessible to people who are undocumented, many of whom are already particularly vulnerable to exploitation in light of the constant threat of deportation. Federal Emergency Management Agency (FEMA) allocations are higher in white neighborhoods than communities of color (Flavelle, 2021; Howell & Elliott, 2019). When disasters strike, white communities are more likely to accrue wealth while communities of color lose wealth (Howell & Elliott, 2019; Sovacool, Tan-Mullins, & Abrahamse, 2018). When more federal funds are involved in recovery, the racial gap in wealth accrual becomes even more extreme (Howell & Elliott, 2019). For folks who live their lives at the intersection of multiple marginalized identities (such as race, gender, disability, family configuration, etc.), the disparity is starker still (Howell & Elliott, 2019; Sovacool et al, 2018; Thomas et al, 2019).



## California Faces History and Focuses on Equity

In California, this infusion of money came during a time when **equity** was already being centered at the state level in unprecedented ways. Since Governor Gavin Newsom's election in 2018, the state has leveraged legislative, administrative, regulatory, and budgetary action to protect communities who are rendered vulnerable by **inequitable** systems. These actions have included tenant protections, affordable housing preservation, thoughtful coordination, housing program design, and evaluation (Governor Gavin Newsom, 2023). During this time, the California Department of Housing and Community Development (HCD) created numerous programs to both support workplace **equity** and the equitable implementation of policies, programs, and projects to serve communities that have long been marginalized (CA HCD, 2022).

This commitment to **equity** at the state level was in many ways new, but the need was not. **Inequity** within the state, and indeed in the country as a whole, is not an accident. **Inequity** is the inevitable outcome of a system of policies and practices, upheld by explicit and implicit norms, that are designed to create and uphold a hierarchy along racial, gender, cultural, and other boundary lines (Alexander, 2010; Crenshaw, 1991; Kendi, 2016).

In the housing sector for example, well into the 1900s, overtly racist laws, policies, and agreements were made and enforced throughout the country, including within the state of California. Zoning laws, **racially restrictive covenants**, **blockbusting**, **redlining**, and **racial steering** are all implicated in today's reality of housing segregation and worsening wealth disparities. These policies were the result of formal and informal alliances between private groups such as homeowners' associations, realtors, and the local, state, and federal government (Moore, Montojo, & Mauri, 2019).

Over time, as the public (and the courts) grew less tolerant of such overtly racist policy, and as the international community pressured the United States to apply the same standards for democracy at home as it was pushing abroad during the Cold War, tactics shifted. Rather than using explicitly racist language to justify discriminatory policy, the public and private sector began implementing laws and policies that contained no mention of race but that nevertheless created racist outcomes. For example, race-specific zoning laws became single-family zoning laws, which excluded (and continue to exclude) most people of color and people experiencing poverty from the opportunity to build wealth and gain **equitable** access to safety and other forms of wellbeing. The federal investment in the interstate highway system, coupled with the focus on eradicating blight in the inner cities, facilitated white flight from the cities. These new highway systems also displaced and severed communities of color, all while city tax bases hemorrhaged and access to services and economic investment plummeted (Palgan, 2019).

Fast forward to the early 2000s, when the continued disparities in access to federally backed mortgages set the stage for predatory lenders to specifically target communities of color with subprime loans, leading to a predictable, if atrocious, outcome: Black and Latinx families were three times more likely to be foreclosed upon in the housing bust of 2008-09 (Palgan, 2019).

Governor Newsom's agenda acknowledged this historical and present-day reality in which the private and public sector colluded to dispossess some communities for the benefit of others and sought to forge a path forward toward repair. Executive order N-16-22, signed by Governor Newsom in September of 2022, included a number of directives and accountability benchmarks. Amongst

these, the order tasked all California agencies with incorporating **equity**-centered community engagement and data analysis around **inequities** into their strategic plans. Additionally, it called for the creation of a Racial Equity Commission. According to the order, “relying upon publicly available information and data, the commission shall develop resources, best practices, and tools for advancing racial **equity**” (Executive Department, State of California, 2022).

## The Role of CDBG

When President Gerald Ford signed the Housing and Community Development Act of 1974, establishing the CDBG program, the purpose was to streamline the federal government’s ability to infuse resources into predominantly poor communities to help them stabilize and thrive, providing safe and decent housing and neighborhoods, and expanding access to economic opportunities.

In order to qualify for CDBG funding, a project has to meet one of three national objectives, and fall within one category of eligible activities. The three National Objectives\* are as follows

- 1 *Provide benefits to Low- and Moderate-Income persons in one of the following four sub-categories:*
  - *Area-benefit activities*
  - *Limited Clientele activities*
  - *Job creation/retention activities*
  - *Housing activities*
- 2 *Aid in the prevention or elimination of blight\*\*. Projects meeting this National Objective can do so in one of two ways:*
  - *Area basis (as in a neighborhood)*
  - *Spot basis (as in one building)*
- 3 *Provide funding for projects that have a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community*

While the purpose of the program is certainly noble, the history of the implementation of CDBG is marked by both successes and opportunities for growth. The funding formula for the annual program itself is an example of the way that CDBG can simultaneously address some **inequities** while exacerbating others. The United States Department of Housing and Urban Development (HUD) uses four indicators to determine the level of funding granted to a jurisdiction. They are: (1) population growth lag, (2) overcrowded housing conditions, (3) poverty rates, and (4) amount of pre-1940s housing. These are meant to act as proxies to identify areas where both public and private investment in communities is insufficient or nonexistent (Richardson, 2005; Woeller, 2018).

While these proxy indicators have certainly been used successfully to direct funds towards communities in need, they have also been implicated in widening inequities within and among communities. Woeller (2018) writes, “in the 1970s, when block grant formulas were written,

aging dwellings were considered a proxy for inadequate housing and old infrastructure. Since then, however, some distressed cities have demolished outdated tenements while gentrifying communities renovated old homes or converted empty warehouses into lofts. That dynamic eroded block grant funding for the neediest communities between 1980 and 2000 and in some cases increased funding to their wealthiest peers according to a 2005 HUD study. So, while Detroit bulldozes entire blocks to fight post-recession blight, it's also shedding pre-1940s housing and effectively eroding its funding share, while upscale Newton protects its register of historic homes and gets an edge."

Jurisdiction	CDBG \$/person (2017)*	Median Family Income (2019)*	% People Living In Poverty	% White	% Black	% Asian	% Latino
Newton, MA	\$19.54	\$151,068	4%	76%	15%	3%	5%
San Francisco, CA	\$19.00	\$112,449	10%	46%	34%	5%	15%
Allentown, PA	\$17.53	\$41,161	26%	62%	3%	15%	53%
Compton, CA	\$14.73	\$52,883	21%	35%	19%	29%	68%

\* Woeller, L. (July 8, 2018). *The federal program that can't be killed - or fixed*. Politico.

\*\* US Census Bureau. (As of July 1, 2019) Quick Facts: Compton, CA; San Francisco, CA; Allentown, PA; Newton, MA.

One of the mechanisms that creates this dynamic, in spite of the lofty goals of the program and the best intentions of the people implementing it, is that CDBG policy is only explicit about income and economic need but does not adequately account for other **intersections** of identity that can impact the extent to which folks can benefit from economic policy. For example, the Road Home Program, in the aftermath of Hurricane Katrina, used a funding formula for replacement homes granting money based on the lower of these two amounts: (a) the home's pre-storm value, or (b) the cost of repairing the damage. Because homes in Black communities are systemically undervalued, even when controlling for condition, style, and quality, Black\* survivors qualified for less money than white\* survivors, even as their homes cost the same to repair. This CDBG-DR program unintentionally exacerbated pre-existing **inequities**, by overlaying "a seemingly nonracial housing valuation formula onto a system of longstanding racial segregation. African American homeowners and neighborhoods not only bore the brunt of the flood and storm damage but suffered disproportionately from the segregative effects of the Road Home Program" (Gotham, 2015).



## NOTE: To Capitalize, or Not to Capitalize When It Comes to Race

*Capitalization, as with other aspects of the written word, and indeed language as a whole, carries meaning. When it comes to words that are used to describe communities, the general rule is that such words are capitalized when communities have a shared history and/or culture, often attached to ethnic identity, race, or places of origin. There is long-standing agreement that it is appropriate to capitalize Latine/a/o/x, Asian American, and Native American. In recent years, there has been coalescence in both **anti-racist** circles and in the mainstream press (Bauder, 2020; Painter, 2020), that the words Black and Indigenous should likewise be capitalized.*

*There is less cohesion on whether to capitalize the word white, however, including among people who are looking to practice **anti-racism** (Bauder, 2020; Painter, 2020). The **equity**-centered arguments AGAINST capitalizing white include the following: (1) White people do not have the same level of shared culture and background as people of color do, and that the racial identifier ‘white’ acts as a broad collective that serves to distinguish from all groups of non-white people, and (2) White supremacist groups capitalize ‘white’ as a way to assert racial dominance, and people who don’t share their supremacist view of the world refuse to mirror them (Bauder, 2020). The **equity**-centered arguments FOR capitalizing white are as follows: (1) Not capitalizing white creates conditions where people who benefit from whiteness can ignore the way that the invention of whiteness as a racial category creates harm, and (2) It minimizes/erases the collective way in which white people benefit from being classified as white (Painter, 2020).*

*In this toolkit, you will notice that the decision has been made to not capitalize the word ‘white.’*



## Project Stages

In their commitment to centering **equity** throughout the implementation of CDBG-CV, HCD partnered with consulting firms ICF, KW Consultants, and Equity First Consulting (Equity First). Together, these partners created an **equity**-centered learning community, grounded in ongoing engagement, and featuring capacity building and technical assistance, strategic planning, and CDBG policy review and shift. Appendix B: The Equity and Belonging Toolkit is the culminating manifestation of this learning process and is designed to support an ongoing commitment to equity in program design, implementation, and evaluation.

### Step 1: Ongoing Engagement

As will become clear in the remainder of this toolkit, ongoing engagement with the people who are most impacted by systemic inequities and the people who work directly with end users is key to understanding the barriers that are in place and identifying solutions that can mitigate the harm they can cause. The goal of the initial engagement process conducted by HCD was to learn about how Grantees were already working to further **equity** in their CDBG implementation and to understand the questions they have and the resources that they need to move this work forward. This took the form of two **equity** questionnaires sent to CDBG-CV Grantees, one sent out with the CDBG-CV 2/3 Notice of Funds Availability (NOFA) in December of 2021, and a follow-up survey in June of 2022. The second survey is referred to throughout this document as the “Equity Priorities Survey.”

### Step 2: Capacity Building, Technical Assistance, and Bidirectional Learning

Parallel to this engagement phase, HCD and ICF staff participated in capacity building to (1) deepen their understanding about the way that systems can create harm and/or can be used to disrupt it, (2) examine the ways that government in general and CDBG programs in particular have created harm, and (3) seek ways to disrupt these patterns. These sessions made space for self- and collective-reflection and for **bidirectional learning**. In other words, participants learned frameworks and strategies for infusing **equity** into their work, and the facilitators learned from participants about their experience creating policy, implementing programs, and/or administering grants, all of which informed this toolkit. This work was bolstered by ongoing as-needed technical assistance (which also included **bidirectional learning**) with people working to implement CDBG-CV-funded programs on the ground.

### Step 3: Strategic Planning

The work happening within the CDBG-CV program aligned with the larger **equity** priorities of the Division of Federal Financial Assistance (DFFA), and the team looked for ways to cross-pollinate, share strategies across teams/programs, and coalesce towards even greater (broader and deeper) impact.

DFFA leadership held an **equity** working session in October of 2022 to begin the process of identifying possible action steps based on the outcome of the Equity Priorities Survey. In January of 2023, three listening sessions with DFFA program staff were held virtually to seek input on their dreams, growth opportunities, and **equity**-driven solutions, and to get feedback on proposed policy shifts from DFFA leadership’s working session. In February of 2023, DFFA leadership returned to listen to the dreams and reflections of DFFA program staff as gathered in the three listening sessions. They then took the themes from their initial working session and the listening sessions and began working within their teams on the development of Equity and Belonging Action Plans.

## Step 4: Document and Policy Review and Shift

Throughout the partnership, HCD, ICF, KW Consultants, and Equity First worked together to review and update the Grants Management Manual (GMM) to disrupt harmful processes, center **equity**, support communities most impacted by systemic inequities, and align CDBG's actual practices more closely with the mission of CDBG. It was during this review process that the need for Appendix B: Equity and Belonging Toolkit became clear.

The GMM chapters, appendices, and tools were changed in a variety of ways. Harmful language was changed when possible and explained when not. Examples of programs that have disparate impacts on communities of color were replaced with examples that use a design-to-the-margins lens (see Appendix B, Section 1.3 for more information about this). Every effort was made to make language as clear and accessible as possible. And when referring to policies that have the potential to create harm, language was included to mention that harm and how to avoid it. But, on its own, this wasn't enough.

HCD, ICF, KW Consultants, and Equity First came to agree that there were some topics that needed to be addressed in longer form than what was possible within the GMM chapters. Additionally, the GMM is fragmented into sections that align with the various components of grant administration and compliance. Such fragmentation can be useful in a reference document, but it is not built to hold the **framework of interconnectivity** required to create spaces of **belonging** and pave pathways to healing. For example, (1) Relocation and displacement can happen as a direct or indirect consequence of many different programs and have ramifications far beyond economic impact; (2) Public participation is not possible without language justice; and (3) The vast majority of policies and practices that do not explicitly address race will have racially disparate outcomes, regardless of their intention, because they are overlaid over a racist system. And so, it became evident that there was a need for a space to talk about this ecosystem connecting the fragmented parts of the GMM, to examine the interactions between CDBG and the wider context, to get curious about what it could look like if CDBG was a healing tool, and to provide tools and amplify learnings from the work happening on the ground.

## Step 5: Infusing the Learnings Into the Equity and Belonging Toolkit

The journey described in Steps 1-4 is how we landed here, writing this Equity and Belonging Toolkit with and for the people who live the ramifications of government harm. The people who are closest to the pain of the problem are closest to the solutions (Martin, 2017), but are also often the furthest from institutional power. This toolkit is a humble step towards righting that wrong. It is in solidarity with you that we created this comprehensive tool. This toolkit is a call to action and an offer of loving support to the people who are working hard to serve their communities **equitably** and who seek strategies, tools, and/or deeper understanding to authentically do so; to the people who are creating policy and seeking ways to mitigate and prevent harm, but who may not yet have the information and strategies that they need to do so; to the planners and implementers who may or may not yet know why or how to co-design programs with communities that are closest to the pain of the problem.

HUD's stated objective in the founding of the CDBG program was "the development of viable urban communities by providing decent housing and a suitable living environment and through

expanding economic opportunities, principally, for persons of low- and moderate-income.” On its website, HUD includes the following value as central to CDBG: “empower[ing] people and communities to design and implement strategies tailored to their own needs and priorities,... expand[ing] and strengthen[ing] partnerships among all levels of government and the private sector in enhancing community development,... [and] build[ing] the capacity of these partners” (U.S. Department of Housing and Community Development, n.d.).

In an overarching sense, then, this toolkit is a return home to the stated purpose and the values of the CDBG program. At the same time, practically, it may seem to some like a radical departure from the status quo. The regulations that govern the implementation of CDBG do not always empower people or communities; the people who prioritize, design, and implement the strategies of CDBG are often at least a few steps removed from the folks who need the services; and capacity cannot be built without sufficient, timely, and flexible resources to devote to it.

Every single person who engaged in this process has been involved in CDBG for the right reasons, to make a difference in people’s lives and to support communities in thriving sustainably. This toolkit was written as a part of a larger process to support everyone involved as they put the mission of CDBG into action in ways that preserve people’s dignity, acknowledge and leverage the wisdom of communities who are most impacted by **systemic inequities**, and support **belonging** in this ever-evolving world.



City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams



# Shared Language



"Equity" Icon | Copyright Equity First Consulting

## What Is Equity?

### *Equity Is a Process*

Programs like CDBG are intended to help people build stronger and more resilient communities. Folks who choose to implement these programs as their career path generally do so because they care about the communities they serve and live in. In order to create the most meaningful outcomes, practices that center **equity** must be at the core of every level of planning, implementation, review, and engagement. As Lilla Watson, a Murri elder and artist, said, "If you have come to help me, you are wasting your time. If you have come because your liberation is bound up with mine, then let

us work together" (Watson, 1985). The core of **equity** work is not imposing solutions, but rather co-creating the solutions together for the betterment and wellbeing of the collective community. Putting this into practice and shifting long-standing processes, however, takes a lot of intention, reflection, advocacy, and revision.

At its core, an **equitable** world could be defined as a place where all individuals regardless of **social predictors** have access to opportunities and resources to thrive. **Equity** goes beyond equality and realizes that different individuals and community members face unique challenges which require tailored approaches in order to achieve **equitable** outcomes (powell, 2019). A lot of these challenges stem from generations of **inequitable** policy and practices, so individuals and institutions need to acknowledge the historical impacts of discrimination, **systemic racism**, power, and privilege, and investigate how current structures, policies, and practices perpetuate disparate outcomes (Kendi, 2016; Silverstein 2019). This practice requires deep intentionality at every stage of the process, from planning to hiring, implementation, monitoring, and evaluation.

Even before the planning process begins, the folks who sit at the table must reflect on their own **positionality** and recognize who is missing from the group as well as naming and mitigating the power dynamics at play. As mentioned, Glenn E. Martin (2017) reminds us that the folks who are "closest to the problem are closest to the solutions," but often the furthest from power and resources. The people who have direct lived experience with the issues being addressed, who can name both the barriers that they are facing and the solutions that would work for them, must be engaged, trusted, and resourced throughout the design process (Cervero & Wilson, 2006; Gonzalez, 2021; Martin, 2017).

While **systemic inequity** exists across and throughout the United States, the experiences, barriers, needs, knowledge, wisdom, and solutions of each community are context-specific, and

so there is no single applicable roadmap to creating an **equitable** program or process (Cervero & Wilson, 2006; Duncan-Andrade & Morrell, 2008; Gonzalez, 2021). But there are questions and considerations that we can ask and apply in order to guide the planning process towards **equity**. At every stage, planners can ask:

- 1 *What are the **inequitable** outcomes this program is designed to address?*
- 2 *Who is harmed and who is served by the status quo?*
- 3 *Whose experiences, knowledge, wisdom, priorities, and solutions are we centering?*
- 4 *How are we accounting for **inequitable** power distribution in the planning process?*
- 5 *How are we measuring outcomes to ensure that our intentions are resulting in equitable outcomes?*
- 6 *Who is accountable for what? And to whom?*
- 7 *Who makes the decisions? Is someone missing from the process?*
- 8 *How are our structures maintaining, exacerbating, or mitigating inequitable outcomes?*

In regard to each of the previous questions, institutions should also ask themselves: How do we know? Are we making assumptions that may be based on our previous experiences, unconscious biases, and/or from our own vantage point? Or are we doing inquiry and research, centering the perspectives and priorities of the people who are closest to the pain of the problem?

## **Equity Is a Measurement**

Institutions should also look deeper at the internal and external practices, policies, and organizational cultures that are at play. This includes reflecting on how all of these social and systemic component parts impact and/or harm the people who try to access an institution at all levels. Measuring **equity** can be a complicated task, and it requires dedicated resources to assess outcomes.

This is true when measuring the impact of a public-facing program, which requires moving beyond institutional-based ideas of success and incorporating metrics defined by the community members themselves (Cervero & Wilson, 2006; Equitable Evaluation Initiative, 2020). This is also true when measuring internal systems such as human resources, which requires looking at pay scales, job descriptions, turnover rates, as well as the qualitative experiences of employees (including the folks who stay and the folks who leave) who live their lives in one or more ways on the margins (Equitable Evaluation Initiative, 2020; Equity First Consulting, 2024; Gonzalez, 2021). Measuring **equity** can happen through **culturally responsive** data collection (See Appendix B, Section 5.2), community engagement and feedback, and tracking progress within programs and/or internal systems to identify disparities and dismantle systemic barriers in order to allow all participants an opportunity to thrive.



## Equity Is an Outcome

No one program is going to single handedly address all of the **inequitable** outcomes that current systems produce, and yet, an **equity**-centered program can be a part of a larger solution. **Equitable** outcomes are grounded in systems change that positively impact the day to day of individuals and communities. Be it the ease with which folks can access forms and applications, how they are treated by staff, or how they are supported in receiving resources and services. These are all implicated in the generation of **equitable** (or **inequitable**) outcomes.



"Belonging" Icon | Copyright Equity First Consulting

Graphic representation of belonging, which consists of two hands, one dark brown and the other a medium tan, holding hands. The hands are on a teal background which contains a darker teal crescent moon behind/below the hands.

**"Belonging, or being fully human, means more than having access. Belonging entails being respected at a basic level that includes the right to both co-create and make demands upon society."**

—Dr. John Powell

## What Is Belonging, & How Does It Differ From Inclusion?

**Inclusion**, as a counter to exclusion, is an important step forward towards a more just world. But **inclusion** does not fundamentally disrupt the status quo. Inclusion assumes that the power structure remains intact, while calling for kinder **gatekeepers**. For **inclusion** to be operative, one party has to have the power to include (or exclude) another party. The party in power sets the terms of inclusion, which, in practice, strongly encourage and/or require assimilation of the newcomers in order to maintain the comfort and privilege of the powerful (Kincaid, 2023; Okun, 2021). This power is maintained by a series of interacting systems. For example, access is often only granted to a small number of people from marginalized communities, especially in decision-making positions. This happens as a result of recruitment, hiring, and promotion policies that privilege certain kinds of knowledge, credentials, and experience that are more easily accessed by members of the dominant culture (Kincaid, 2023; Lobell, 2021; Okun, 2021; Williams-Rajee, 2018). Additionally, norms (including expectations around appropriate dress, definitions of professionalism,

home/work separation, communication style, work style, etc.) compel people from non-dominant backgrounds (who often have less institutional backing) to learn these norms, and to choose between showing up authentically and expressing themselves fully or assimilating to gain and protect their social and/or economic security (Kincaid, 2023; Lobell, 2021; Okun, 2021; Williams-Rajee, 2018).

**Belonging** disrupts this imbalanced power dynamic, by insisting that institutions eliminate the **gatekeeping** system and engage in ongoing co-creation amongst all parties, to create a culture and system that meets the needs of all members and that provides pathways to repair, heal, and shift when needs are not being met. Spaces of **belonging** are created, not by ignoring power dynamics, but by naming them, mitigating their harm, and creating flexible decision-making processes that account for **positionality** and that include redirecting power and resources when applicable (Kincaid, 2023; Okun, 2021; Powell, 2020; Williams-Rajee, 2018).



\*Anti-Racism\* Icon | Copyright Equity First Consulting

**“Anti-Racism** is the active process of identifying and eliminating racism by changing systems, organizational structures, policies and practices and attitudes, so that power is redistributed and shared **equitably.**”  
 —National Action Committee on the Status of Women (n.d.)

## What Is Anti-Racism?

Much like **belonging** inherently accounts for power dynamics in order to mitigate the harm they can cause, the process of **anti-racism** is based on the fact that racism was built into the founding of the United States and to the systems and institutions (and underlying norms) that lie within (Kendi, 2016; Silverstein, 2019). Because of this, **anti-racism** must be an ongoing process, whereby institutions get curious about the way that racism shows up within their walls, their policies and practices, and their public-facing programs, regardless of the intentions of the people within these institutions. Gathering and analyzing data in a **culturally responsive** way, working with the people who are closest to the pain of the problem to identify workable solutions, and resourcing these initiatives is what **anti-racism** looks like within institutions (Cervero & Wilson, 2006; Equity First Consulting, 2024; Gonzalez, 2021; Kendi, 2019; Martin 2017).

## Harm and Healing: An Ecosystem View

Diversity, **Equity**, and **Belonging** (DEB) are key pillars upon which communities can build spaces whereby all members feel safe[r] and brave[r] to show up fully as themselves, actively participate, and make demands upon an inclusive and affirming community without fear and/or shame of being othered. To embark on a journey towards DEB, we must cultivate a collective understanding about how oppression is exercised at both the individual and systemic levels and explore the ways in which transformation and liberation can only lead to sustainable change if they take place across entire organizations. None of this is possible without taking an explicitly anti-racist stance, which is a commitment to identifying and deconstructing institutionalized racism within both internal and public-facing systems.



## The Generative Nature of Harm



"Ecosystem of Oppression" | Copyright Equity First Consulting

### The Ecosystem of Harm

The National Equity Project's Lens of Systemic Oppression asserts that oppression exists across a continuum from individual and interpersonal to institutional and structural, and that these points on the spectrum are interconnected. This lens allows for a holistic view of the ways in which both systems and individual actions play a role in creating and maintaining an oppressive space (National Equity Project, n.d.).

Equity First expands on this lens in naming that systemic oppression functions as an ecosystem, sustaining itself and the intricate web of relationships (both harmful and healing) among institutions, people, the land on which they live, and the resources they have access to and use, regardless of the attitudes and intentions of the people who act within it (Equity First Consulting, 2023a).

By way of example, economic wellbeing is not **equitably** distributed. People who grew up experiencing poverty, people of color, people who are single parents, people who have disabilities, and people who live at the **intersections** of multiple marginalized identities are much more likely than people who grew up with money, who are white, who are coupled, and who are able-bodied to experience food and housing insecurity (Stahre et al, 2015; USDA, 2021; USDA, 2022). This reality is impacted by many systems, including the one-size-fits-some school system, a neoliberal capitalistic approach to the market economy, tax policy that prioritizes wealth over income, the criminal (in) justice system in which communities of color are both over-policed (in terms of monitoring) and under-policed (in terms of protection), etc. (Alexander, 2010; Darling-Hammond, 2001; Martinez & Garcia, n.d.; Royce & Matsui, 2023).

Not only are there many layers here, but these layers feed each other. Hyper-policing disproportionately removes people of color from the market economy (Alexander, 2010). And while

some countries levy large income taxes to fund public services, the U.S. tax and funding policies follow the **neoliberal** view that markets (rather than government interventions) lessen **inequities** (Martinez & Garcia, n.d.; Royce & Matsui, 2023). This places the burden on the wage earner to provide basic needs for themselves and their families without a sufficient social safety net, so that when folks are removed from the market economy one way or another, they lose access to stability mechanisms, such as wages and healthcare, and have difficulty feeding and housing their families. This type of instability has myriad negative outcomes, and for children, one of them is that it hampers their ability to learn in school (No Kid Hungry, 2023; Sandstrom & Huerta, 2013). Meanwhile, hyper-policing shows up in disproportionate school suspension and expulsion rates as well (Wood et al., 2021). All the while, schooling is purported to be the primary mechanism available to folks (especially given the lack of social safety net) to move up the economic ladder. And so on and so forth.

## The Ecosystem of CDBG

CDBG is an ecosystem that lives within this broader context, though in practice it is not treated as such, much to the detriment of communities served. For programs to qualify for CDBG funding, they have to meet a National Objective (see Appendix B, Section 1.1), be an eligible activity, and meet many federal cross-cutting requirements. But once these boxes have been checked, programs are often created, funded, and evaluated on their own, rather than as a part of a larger ecosystem. Even within an individual program, the components are systemically fragmented from each other by the compliance and monitoring system, so that they become boxes to check, divorced from the ways in which they inherently support and/or undermine each other.

Within one program, the ecosystem operates something like this: Program design should center the stated needs and priorities of the people who are closest to the pain of the problem, but engagement in the form of public participation plans - which require informing the public about engagement opportunities but not ensuring that the information lands - includes meetings at points too late in the process to meaningfully shift the design of the program. Four factor analysis means only communities deemed “statistically significant” have their language needs met during these engagement activities, and when the information about the participation opportunities is only posted in the English-language newspaper, only a very small subset of community members learn about these opportunities in the first place. Meanwhile, if the hiring practices and subrecipient selection of Grantees were to place the highest value on **culturally responsive** communication with community members, language justice and meaningful engagement might become closer to a reality. People who experience poverty and people who speak languages other than English are often overburdened in their lives already, by the amount of work that they have to do to keep their families fed and housed, and by the toxic stress that comes with insecurity around meeting basic needs (No Kid Hungry, 2023; Sandstrom & Huerta, 2013). They are then required to go through burdensome documentation processes at the hands of a government that has not historically had their best interests at heart in order to participate in programming (Rust, 2023; Sandstrom & Huerta, 2013; Taylor, 2023). These documentation practices are most likely to push out the very people who need CDBG-funded services to begin with.

Across programs, the history of government-funded community development demonstrates that providing federal funding does not always reduce (and in many cases exacerbates) **inequities**, especially around race and wealth (See Appendix B, Section 1.1). Some programs directly harm folks,



such as when displacement severs communities from each other and/or from services (McFarlane, 2001; Taylor, 2023). Some do so indirectly, such as in the form of gentrification. In these cases, programs that raise housing values can support homeowners while marginalizing renters and prospective homebuyers, leading to speculation from developers and/or from buyers from outside the immediate community who do not have unlimited resources, but who do have more purchasing power (See Appendix B, Section 4.2; Hyra, 2016). Gentrification can happen when the program directly improves the state of the housing stock, when public facilities or services are added, or even when economic development programs raise the appeal of the downtown area (Hyra, 2016). Even when direct relocation is a part of the equation, this relocation is not distributed **equitably** (there are neighborhoods that would never be severed for a CDBG project, due to the **inequitable** distribution of political sway), and the amends offered by the government are strictly financial, whereas the damage is so much broader (GMM Chapter 9; McFarlane, 2001; National Museum of American History, n.d., Taylor, 2023; Zinn Education Project, 2004).

In other words, programs impact the community as a whole, and as they address one need, they may actually exacerbate others. This does not mean that investment should be withheld. Rather, Grantees must reflect on the potential unintended outcomes of their programs, design programs with intentionality based in part on these reflections, and plan for future programs that mitigate the harms that past and current programs inadvertently create. For example, when designing a public facilities program that creates or significantly improves a neighborhood park, understand that improvements like this may raise property values (and therefore costs) in the long run. Procure companies that are owned and staffed by community members who are most vulnerable to swings in real estate value, so that they have the power to withstand these increases. Ensure that your payment schedules are faster than typical federal and state government timetables so that these companies can afford to pay their workers (who, if they are low-income, likely live paycheck to paycheck) in a sustainable way. Of course, not everyone in the community will work for this company and benefit from this project directly in an economic sense. So, prepare for the future need for direct rental and homebuyer assistance so that folks who have lived in this community prior to the investment are able to stay. An **ecosystemic lens**, while daunting, paves the way for this kind of wrap-around planning and program design (Equity First Consulting, 2023b).



City of Grass Valley Memorial Park, Photo Credit: Grass Valley PD

## The Role of Language in Perpetuating Harm

Language has immense power and has been used historically to harm communities by shaping and providing the rationale for racist and exclusionary public policy, city planning, and community development initiatives (DeVenny, 2023; Herscher, 2020; Kendi, 2016). Institutions can begin to shift the narrative by acknowledging and mitigating the way harmful language can uphold the status quo and/or drive power imbalances. This can be done by intentionally humanizing language, which refers to the practice of using language in a way that affirms and respects an individual's or community's inherent value and humanity. **Equity** and **belonging** can be fostered when we take the time to analyze how we talk about the communities and people being served.

### **Blight**

Blight is a term originating in the field of botany and is defined as “a disease or injury of plants marked by the formation of lesions, withering, and death of parts” (Merriam-Webster, n.d.). And while metaphors are common to describe phenomena, when human conditions are described using non-human comparatives (especially within a dominant culture that so deeply prioritizes the human world over the rest of the natural world), the effects can be devastating. History demonstrates time and again that people and governments are far more willing to harm communities when they frame them as less than human (DeVenny, 2023; Herscher, 2020; Landry et al., 2022).

The term blight is closely associated with the term “slum” (which was removed entirely from the GMM, see note\* below), both of which are deeply rooted in the racism baked into the urban renewal programs implemented from the 1940s to 1970s (Herscher, 2020; McFarlane 2001). The goal of these programs was to revitalize inner-city areas, which were predominantly communities of color, by way of demolishing deteriorated neighborhoods and businesses and rebuilding infrastructure or highways that led to further segregation and disparities. This was driven by a framing of blight as a public danger requiring immediate and drastic action to protect real estate values and secure endangered cities on the behalf of privileged residents (Herscher, 2020; McFarlane 2001). In working to eliminate blight, community investments were made that benefited propertied, privileged and often white residents while people of color were dispossessed of their homes, and entire communities were fragmented and displaced (Herscher, 2020; McFarlane 2001; Taylor, 2023; Zinn Education Project, 2004). In short, dehumanizing language both responded to and perpetuated the idea that communities of color were less than human, and this framing paved the way for far-reaching harm.

NOTE: As stated above, the term “slum” is rooted in racism and its use is incredibly harmful. HCD understands and recognizes this and has removed the term entirely from the GMM. Instead, the acronyms “SBA” and “SBS” are used wherever possible in order to not perpetuate harm while staying compliant with the HUD regulations that do use this term.



## Minority

Though the use of the term “minority” is intended to be used as a descriptor for groups of a smaller population in a region, it has become problematic and used to reinforce **systemic inequities** by suggesting that underrepresented groups are inferior and/or “statistically insignificant”(Black et al., 2023).

One way to address this is as follows: Rather than generalizing members of your community as “minority” groups, identify the specific communities who live in the service area. This intentional and specific language helps acknowledge the diversity within groups and moves away from treating communities as monolithic in their experiences, wisdom, culture, or priorities. This also goes beyond using generalized terms like “Asian” or “Latino/a/e” when the goal is to do very specific outreach and community engagement. Using specific, self-assigned, categories can help inform cultural and linguistic differences. For example, what comes to mind and what do you assume when you hear the general descriptors such as “Asian” and Latino” versus specific terms like “Hmong” or “Zapotec?” By shifting language to categorize people on their own terms, the institution now has increased their capacity to deliver a culturally and linguistically relevant outreach strategy.

When institutions do decide that it is necessary to use blanket terms to address residents who are not part of the dominant culture, a humanizing practice can be placing the human before the descriptor. For example, people of color, people with disabilities, people who are unhoused, etc.

Secondly, the practice of identifying specific groups and giving opportunities for people to self-identify will also be helpful when it comes to data collection. Institutions can commit to representing communities that would otherwise be omitted in demographic data for being too small or “statistically insignificant.” This concept is addressed further in Appendix B, Section 5.1.



City of Grass Valley Memorial Park, Photo Credit: Bjorn Jones

## Citizen vs Public

Though the terms citizen and public are race neutral at face value, when institutions conduct outreach, it is important to call into question who is included or excluded in the process by the language used to describe stakeholders. For example, GMM Chapter 4, Section 4.2 describes the process for what is called a “Citizen Participation Plan.” The specific use of the term “citizen” invokes the idea that a status of citizenship is required to participate and excludes residents who do not fit that criterion. If plans for community outreach are intended for residents of a specific area regardless of citizenship, consider using instead “public,” “resident,” or “community” participation plan.

Even more insidious within the regulatory language is the use of the phrase “alien not lawfully present in the United States” (GMM Chapter 9, Section 9.1). The term “alien” is at its core dehumanizing language, as it is popularly used to describe beings from another planet or universe. Using this term in reference to people who are immigrants conflates human beings born outside of the United States with “other” or non-human beings. It perpetuates xenophobia and stereotypes that create a second-class or sub-human status for people based on their immigration status. The harm of such language is reflected in the Biden administration order requiring that US immigration enforcement authorities stop using the term “illegal alien,” and instead refer to people as “undocumented noncitizens” in 2021 (Rose, 2021).

Additionally, terms such as “illegal alien” perpetuate a deeply ahistorical narrative, asserting that someone is illegally present on land that was itself stolen from Native communities to begin with. US immigration policy is a powerful player in a deeply **inequitable** global system, whereby some groups of people can move freely across borders in ways that are not extended to the global majority. Meanwhile, families who are not a part of this powerful subgroup must attempt to overcome almost insurmountable systemic barriers over many, many years, with little hope of success (Bier, 2023; Nepal & Iacono, 2021).

In practice, the terms “immigrant” and “undocumented” are used by advocates and folks from these communities to describe various immigration statuses, not including permanent residency or citizenship. But even the term “undocumented” creates misconceptions about the actual lived experience for people, namely that a person has no paperwork permitting their existence in the United States. In reality, many people who are considered undocumented immigrants have paperwork as thick as encyclopedias and are still living in limbo when it comes to status due to snail-paced court procedures, lack of adequate or competent legal representation, or because the laws keep changing (Ling et al., 2024; Nepal & Iacono, 2021). Similarly, the framing around the term “undocumented” implies that folks without permanent residency live entirely in the shadows and cannot contribute to society, which creates the conditions for institutions to ignore their needs. In truth, reports have shown that folks who are undocumented have contributed billions of dollars in taxes that often fund programs they cannot even qualify for (Shoichet, 2023). This is in addition to their obvious contributions to the economy via labor, which is often exploited due to their documentation status.

However, since “undocumented” is the term currently used by the spectrum of folks who fit into this demographic to self-describe, institutions can serve this community by (1) working to understand what it means to be “undocumented;” (2) shifting exclusionary policy by designing programs that are accessible for mixed-status families and/or partnering with CBOs that serve this community; and



(3) where possible, advocating for systems change to support folks who are an important part of our communities.

As communities continue to deepen and shift their understanding of their own position, and as the interplay between impacted communities and the dominant structure morph over time, language will continue to change. The duty of the system is to be flexible enough to adapt to communities' stated needs, priorities, self-described language use, and shifting understanding of the impact of language.

As will be addressed further in Appendix B, Section 2.2, it is imperative that we look deeper than just the use of the language when creating a participation plan and use strategies that are actively equity-driven. Institutions can start by reflecting on the processes they use and identify who is being explicitly or implicitly included (and who is being ignored) when referring to "public" or "community." Does this include just the voices of folks who are loudest, speak a certain language, dress or present a certain way, work in certain fields, and have access to these processes and spaces? Who is being ignored or even erased in our plans and processes?



City of Guadalupe Le Roy Park Community Center, Photo Credit: Dayanira Cruz

## Spotlight: Shifting Language in the GMM

Early on in the process of updating the CDBG Grants Management Manual, discussions about language use arose frequently. Noting the exclusionary nature of the word “citizen” and the dehumanizing use of terms such as “alien not lawfully present in the United States” (GMM Chapter 9, Section 9.1) to describe human beings and “slum” and “blight” to describe the neighborhoods within which communities build their lives, there was a choice to be made. Stick with harmful language, much of which has regulatory definition, or make a shift? The decision was made to center healing. When necessary, explanations were made about why some language cannot be changed in certain situations. “Slum” was removed, while “blight” was left behind (with an explanation) so that the National Objective could be noted. “Citizen” shifted to “public,” as in Public Participation Plans. “Alien” became “undocumented.” Most terms were referred to at least once, so that we could point to the regulatory definitions of said terms. But for the majority of the GMM, the language has shifted from harm towards healing.



City of Hollister San Benito River Park Project, Photo Credits: City of Hollister



# From Harm Towards Healing

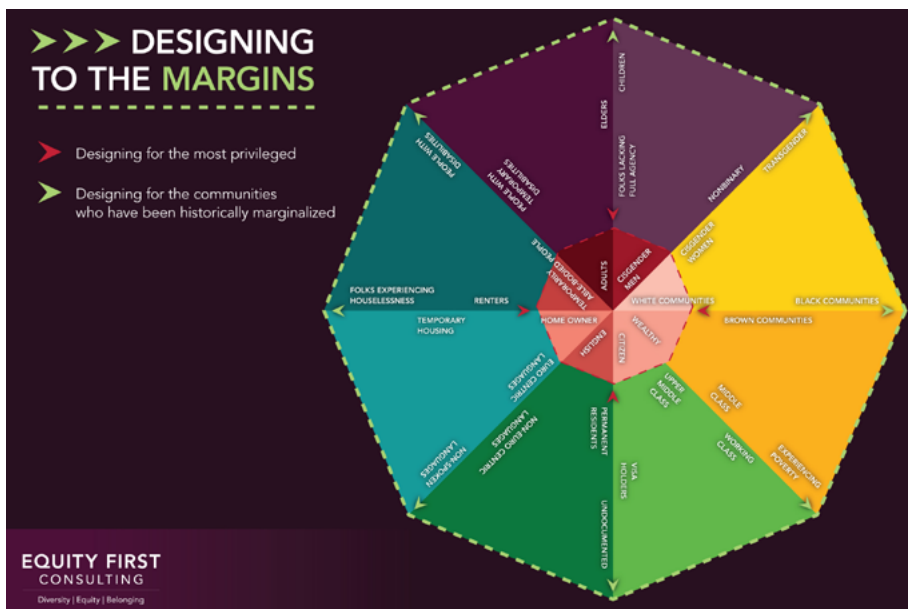


"Ecosystem of Liberation" | Copyright Equity First Consulting

## The Ecosystem of Healing

The **ecosystemic lens** presented here can feel disheartening in that it demonstrates that no single leverage point can fix **inequity**. But it also points to a road forward. If systemic harm is the result of a web of interconnected policies and practices, then policy changes across multiple leverage points can build an alternative ecosystem of liberation and healing.

## A Design-to-the-Margins Framework



Understanding the intricacies of systemic and interpersonal harms that folks experience when they encounter systems like government is a key starting point in working towards mitigating said harm. Moving towards healing, though, requires more than this. It requires that organizations reorient systems away from their current state of designing based on the needs and wisdom of the folks with

the most power and resources towards designing to and with folks who live their lives on the margins. Equity First's Design-to-the-Margins (DTM) framework holds that the key to transforming oppressive systems lies in

centering the experiences, needs, wisdom, and solutions of the people who are most impacted by **systemic inequities**. This lens requires that the burden be placed on the system to enact changes, rather than relying on individual actions, or the emotional labor of the people who are most impacted.

## Humanizing Language

Shifting language to center people’s humanity and preserve dignity is not a performative act, though it is only one of many steps. It signals safety and the possibility of **belonging** for people long marginalized by government systems. It very literally expands access, in the sense that dehumanizing language prevents participation by scaring people away and humanizing language allows folks to see themselves in the programmatic audience. And it sends implicit messages to program implementers (and other participants) as well about how to treat the community members who walk through the doors and about who is welcome to engage and participate (ICAEW Insights, 2022; Tran et al., 2018).

## A Healing-Informed Lens

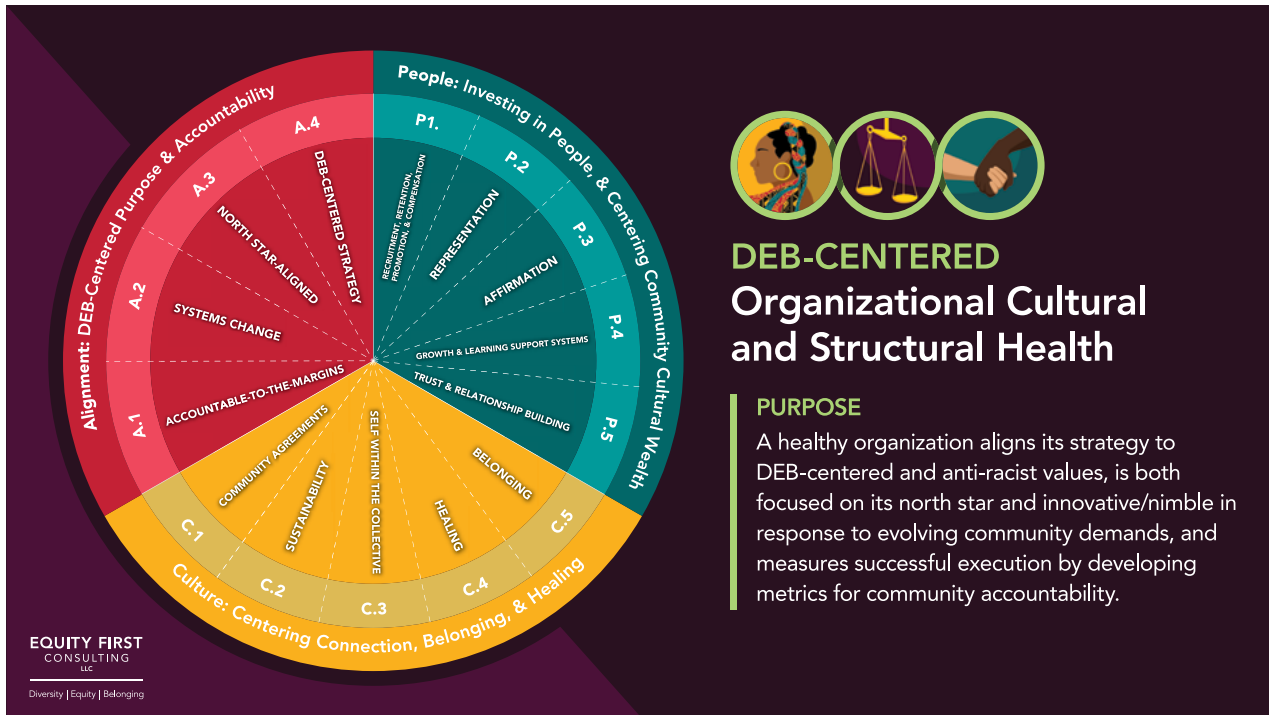
Transformation also requires that we understand harm beyond the economic bottom line. The impact of food insecurity isn’t limited to the rumbling of the stomach or the way that a lack of nutrients leeches focus. It is the toxic stress that comes with not knowing where your next meal will come from or whether or how you will be able to provide for the people who depend on you (Leung et al., 2024). Racist harm extends beyond the slur hurled in your face without warning and stop-and-frisk policing. It is the hyper-vigilance your nervous system adopts to anticipate and protect from any number of potential threats, but that ends up working overtime, and in doing so, ages the body at a faster pace than for people who aren’t subjected to these ongoing threats (Chae et al., 2020; Dobson, 2021).

Holding a healing-informed lens in this work means turning the lens on our programs and their requirements to find policies and practices that may overly burden, trigger, or retraumatize people who have experienced harm and shift these policies. This requires looking at our application processes, data gathering techniques, engagement strategies, documentation requirements, program implementation, etc. (Office of Management and Budget, 2022; Rauscher & Burns, 2023). It means examining the biases, assumptions and stereotypes we all hold that can, consciously or subconsciously, infuse harm into our processes and designs (Rauscher & Burns, 2023). No stone should be left unturned.

It also requires thinking about all decisions and decision-making processes through a design-to-the-margins lens: For folks who are white, who have citizenship privilege, who experience economic stability, etc., third-party verification of income may be an inconvenience but is less likely to put their employment at risk or retraumatize than it is for a person of color, for someone who is undocumented or living in a mixed-status household, or for someone who is experiencing poverty (Pereira et al., 2012). For people of color, women, and people experiencing poverty, whose data has been extracted, misinterpreted, and exploited in countless ways by government systems, demographic data gathering must be done in **culturally responsive** ways, with transparency, and always used to inform and improve programming through the lens of the very people being served (Chicago Beyond, 2019; Schwabish & Feng, 2021; W.K. Kellogg Foundation, 2022; Verhulst et al., 2023). Because the system is implicated in making people vulnerable, the burden should rest on the system itself to mitigate this harm.



## Looking Inward: Organizational Health



By nature, **equity** work is internal as well as external. Ecosystems of harm permeate places of employment by way of unwritten norms which can privilege some team members at the expense of others. These unwritten norms in the workplace can manifest in many ways. For example, unwritten norms around the definition of expertise can show up in pay scales and promotion practices that recognize formal school learning and accreditation but do not acknowledge the importance of experiential knowledge or cultural wisdom. Favoritism, gender/race wage gaps, imposter syndrome, boundary-crossing, loss of agency, and burnout are all potential outcomes of these norms (Kincaid, 2023; Lobell, 2021; Okun, 2021; Partners for Collaborative Change, 2019; Williams-Rajee, 2018). Diversity initiatives cannot address these issues alone, and organizations have the opportunity to support healing if they do the work to address the ways in which employees feel (un)safe, (under)valued, or (under) supported.

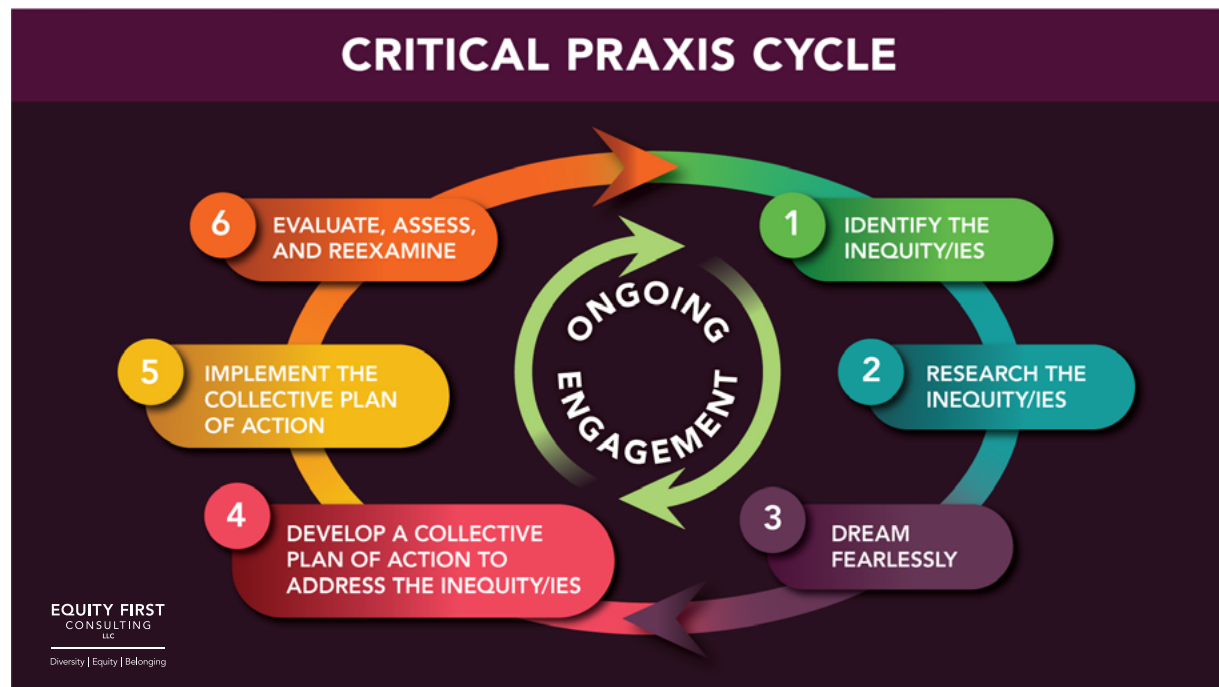
Equity First's DEB-Centered model of organizational health poses a path forward towards individual and collective liberation and healing that is rooted in design-to-the-margins and **equity**-centered design practices. A healthy institution aligns its strategy to DEB-centered values, is both focused on its north star and nimble in response to evolving community demands, and measures success by developing metrics for community accountability with community members themselves. Grounding the organization in these principles is key to mitigating the likelihood that organizations filled with good intentions will inadvertently replicate oppressive systems both internally and externally.

To this end, teams benefit from engaging in an on-going, cyclical, **equity**-centered design process that they can use to investigate and shift internal systems that will support the people working within the system and ultimately the broader community as well.

## An Equity-Centered Design Process

**Equity**-centered design is a process that allows teams to operationalize the tenets of diversity, **equity, belonging, anti-racism**, design-to-the-margins, and healing-informed practice, both in their internal and public-facing work. It begins with **culturally responsive**, community-centered engagement (invoking a definition of community that centers the people who are closest to the pain of the problem) and infuses engagement throughout the entire process. Engaging impacted folks in identifying the problems, dreaming of potential solutions, and evaluating the success of a program is therefore key (Gonzalez, 2021; Martin, 2017; National Equity Project, 2021; W.K. Kellogg Foundation, 2022).

The **equity**-centered design process moves through a cycle of (1) problem identification, (2) dreaming potential solutions, (3) grounding the dreams based on existing constraints, (4) generating a plan for operationalization, (5) implementation of the plan, and (6) reflection and refinement. The cycle repeats again and again, with the acknowledgement that there is no perfect endgame and community makeup and needs and challenges morph over time. To this end, meaningful, design-to-the-margins engagement is an integral component of each step and each subsequent iteration of the process.



## Looking Outward: Creating Transformative Programs

In addition to turning the lens inward, institutions and Grantees can use this design process to examine and shift their public-facing initiatives (such as CDBG-funded programs) as well. They can start by conducting on-going engagement through a design-to-the-margins lens, and resource the priorities and solutions identified by the people who are closest to the pain of the problem. They can leverage the relationships built during engagement processes to design programs that are responsive to the dreams, needs, and priorities of the people who have been systemically erased from decision-making processes and simultaneously deemed “hard to reach.” These community members (stakeholders, community-based leaders, end users, and staff who live within these communities), all of whom should be compensated for their time (See Spotlight, p41), can drive the

iterative process of dreaming, grounding, developing, and then evaluating programs implemented by the Grantees. This process prevents the inertia-driven outcome that generally leads to programs serving majority well-connected, better-resourced folks, and/or people who experience marginalization along only one or two identity markers. For example, using this design process to create a program that supports people who are unsheltered would increase the likelihood that the program is responsive to the needs and priorities of people who identify as LGBTQ+, people who need multi-generational housing, people with disabilities, and people who have experienced trauma.

### ***Looking Beyond: Shifting Ecosystems***

Additionally, institutions and the people who work within them (ranging from small rural jurisdictions to HCD itself) are uniquely positioned to promote ecosystem change. When structural guardrails stand in the way of the dreams held within the institution, teams should approach these moments as opportunities to use their institutional power and political sway to push for broader, cross-agency change. If these teams institutionalize “dreaming” and create space for organizing, they can push longer-term strategies for structural change that will serve everyone more **equitably**.

For example, at the state level, HCD does not, as of right now, have the power to make certain changes to its hiring practices if the desired shifts conflict with the California Department of Human Resources’ (CalHR) regulations. However, as a large and influential agency within the state, HCD does have the power to work with other agencies and advocate to shift the regulations in the long run. If the regulations are creating harm, HCD, in fact, has the responsibility to amplify that harm and push for needed shifts.

Likewise, when Grantees, municipal staff, HCD representatives (or, in the case of CDBG-CV, Grant Administrators (GAs) notice that broader policy beyond their control is creating harm, elevating their concerns up the ranks on behalf of the people they serve is imperative. For example, in CDBG-CV, when GAs see that multiple Grantees are struggling to translate all of the documents they are producing into languages spoken in their communities, they can use feedback loops like office hours and **equity** surveys to explicitly name the barriers and proposed solutions, such as pooled resources and translation services at the state level. HCD then has the responsibility to secure funding and to act.

In other words, wherever you find yourself positioned within this ecosystem, consider this: If someone is closer to the pain of the problem than you are, (whether you are a grant administrator and your counterpart is a municipal employee; or if you are HCD leadership and you are hearing from Reps and GAs), you have a responsibility to put feedback loops in place, and listen to and amplify these experiences to the people with more power than you. Likewise, if you are closer to the pain of the problem (especially if you are employed within the ecosystem, and of course only when/if it is safe for you to do so), you have a responsibility to send calls to action up the chain.

# PART II: MEANINGFUL PUBLIC PARTICIPATION

## Introduction

### What Is Equity-Centered Public Participation, and Why Does It Matter?

Typical public participation models tend to benefit well-resourced and well-informed members of the community such as people who have the financial and scheduling flexibility to take the time to learn the system and participate civically, who fluently speak the dominant language, and who know their opinion will be taken seriously (Abundant Housing LA, 2021; Glimmerveen et al., 2021; McFarlane, 2001; Scott & Rodriguez Leach, 2024).

**Equity**-centered public participation prioritizes the voices and experiences of people who have been historically erased by these processes. This means identifying the resources and practices necessary to ensure that the most impacted community members are heard and can participate fully. This can include transportation access, language access, partnering with trusted community organizations, and other methods that can promote access to participation (HUD Exchange, n.d.b.). When we fail to actively engage in these practices, organizations risk leaving out the voices of the community members they are intending to serve, rendering them ever more vulnerable and driving deeper social harm, which in turn feeds the warranted distrust in government and institutions that often exists in systemically underserved communities (Abundant Housing LA, 2021; Cohen, 2021; HUD Exchange, n.d.b.; McFarlane, 2001).

### The Public Will Participate; Will the Institution Listen?

**Equity**-centered public participation involves more than opening up the doors to current systems and processes. It requires shifting these processes to create safety for the cultural ways of the people who are newly in the room. The unwritten norms that govern acceptable etiquette within public participation are not neutral. They are rooted in values and ways of the dominant culture, and they function to maintain the status quo, forcing people who do not ascribe to them to either assimilate, leaving parts of themselves at the door in order to earn the conditional approval of those in power, or risk subjecting themselves to the danger that comes with pushing back (Blackburn Center, 2021; McFarlane, 2001; Okun, 2021; Partners for Collaborative Change, 2019).

An institution can disrupt the harm caused by these norms by examining the unspoken assumptions built into their participation processes that dictate which methods of communication are thought to be “acceptable” or “meaningful,” and which are deemed “unprofessional” or “divisive,” (Amnesty International, n.d.; Blackburn Center, 2021; Glimmerveen et al., 2021). Ask yourselves, do we solely value the perspectives of people who speak in measured tones (not too softly, but definitely not too loudly) at a community meeting, or are we also listening to and incorporating wisdom from the emotionally charged testimony of displaced residents at a protest near our project site as well as hearing the silent testimony of people wearing matching shirts in solidarity at a public meeting? Does a resident’s clothing or hairstyle or tone of voice or body language impact how responsive we are to their input?



## Spotlight: Protecting Public Participation via an Equity-Centered Use of Force Policy

CDBG requires Grantees to “adopt and enforce a policy prohibiting the use of excessive force by law enforcement agencies within the jurisdiction of the municipality against any individuals engaged in nonviolent civil rights demonstrations” (GMM Chapter 4, Section 4.9). Jurisdictions can and should adopt policies that center the voices of communities on the margins and that ascribe more value to human life, safety, and wellbeing than to the right to freely engage in commerce and/or the value of property. But they can also move beyond that to understand the purpose, and indeed the systemic reasons, why people protest in the first place, so that they can respond beyond the immediate moment to instead address the issues that people are trying to communicate about.

When institutions fail to create an **equity**-centered, meaningful, **culturally responsive** participation process, community members may turn to alternative methods of communication, such as community organizing, public outrage, or protests. As was famously said by Martin Luther King Jr., riots (protests) are “the language of the unheard, and what is it that America has failed to hear?” (King, 1967).

Institutions will be able to serve their community best if they view protests as a method of communication and a valid form of public participation (Amnesty International, n.d.). These institutions can choose to fiercely protect the right to free speech with meaningful use-of-force policies (that prioritize the safety of residents and democratic principles over property, economic activity, and decorum), and they can also choose to deeply listen to the message being delivered by protesters. (GMM Chapter 4, Section 4.9)

\*It is critical in this stage to reflect on institutional reactions to protest through a design-to-the-margins lens. Which protests lead to action and which do not? Which are deemed riots, and which are deemed political speech?

## Engagement

### What Is Equity-Centered Engagement, and How Might It Move Beyond the Regulations?

**Equity**-centered engagement is crucial to ensuring more effective and sustainable outcomes for a diverse group of community and institutional stakeholders. This can be a growth point where institutions can (re)build trust and buy-in with communities who have been historically underserved and who rightfully distrust government due to decades of racist policies and programs (Alexander, 2010; Gonzalez, 2021; McFarlane, 2001; Zinn Education Project, 2004). Such trust can only be (re)built when institutions make a conscious and intentional effort to prioritize and center folks at the margins using the methods and frameworks based in active **equity**-centered practices (Gonzalez, 2021;

McFarlane, 2001; National Equity Project, 2021; W.K. Kellogg Foundation, 2022).

Baseline requirements for CDBG center around Public Participation Plans (sometimes called Citizen Participation Plans but adjusted here to be inclusive of more residents). According to the regulations, Grantees must inform community members about opportunities to comment on potential programs and provide accessibility mechanisms for people with disabilities and people who are most comfortable speaking languages other than English. Grantees must hold a minimum of two public hearings, at different stages in the process, and must publicize these meetings in a meaningful way to engage potential program users and beneficiaries. Traditionally, publication requirements have been limited to the local English-language newspaper of record, but additional means of outreach are encouraged to maximize public participation (GMM Chapter 4).

In order to counter the impacts of historical and present-day systemic exclusion, however, government agencies must move beyond minimum public participation requirements, which only genuinely create access opportunities for subsets of the population who hold language, age, ability, and economic privilege, and who, for example, get their information from the local English-language newspaper) (Abundant Housing LA, 2021; Glimmerveen et al., 2021; McFarlane, 2001; Scott & Rodriguez Leach, 2024). Creating an intentional process that accounts for the experiences of folks who may not hold such privilege and/or who may gather information elsewhere - and ensuring that the engagement deeply informs programming - is a step towards righting these wrongs (Gonzalez, 2021; McFarlane, 2001; W.K. Kellogg Foundation, 2022).

Engagement is how jurisdictions can learn what programs would feel important, supportive, viable, and validating to the people who have been systemically erased from decision-making processes. Engagement is how jurisdictions can work to ensure that programs do not merely serve the most well-connected and resourced within priority communities. And engagement is how jurisdictions can learn whether and for whom their program is working (Abundant Housing LA, 2021; Gonzalez, 2021; McFarlane, 2001).

## Spotlight: Compensating Community Members for Sharing Their Expertise

Designing, staffing, and implementing CDBG programs takes a lot of work. Some folks create and disseminate the NOFA, and some help Grantees navigate the process from application through closeout. There are people who design and staff programs, people who support end users in applying to and benefiting from programs, builders, contractors, subcontractors, and subrecipients. Each person on the CDBG team brings a specific type of expertise and lens to the process, and every one of them is compensated for their time, by an hourly wage, or a salary. But there is one glaring exception.

HCD recognizes that local community members hold meaningful and irreplaceable expertise on their own experiences, the barriers to thriving that their communities face, and on the way that resources should be allocated within their communities. This is why engagement is

built in as a requirement for CDBG programs, and why Grantees are encouraged to engage frequently and meaningfully. But the cross-cutting federal regulations not only omit the requirement that these experts (many of whom are low income and cannot ethically be asked to do pro bono work) be compensated fairly for their time and labor, but also make it difficult to do so within the regulations.

Payments or stipends for participation in such forms as gift cards or cash, which would make it easier and more just for folks who are most impacted by **systemic inequities** to participate in engagement opportunities, are viewed as “income payments,” which are ineligible under CDBG regulations. Additionally, the most impactful time to do community engagement is before CDBG grant funding has been obtained. Engaging community members to determine what services or facilities would serve them best is key to creating **equity**-centered programs. But these efforts must be funded up-front by the jurisdiction/potential Grantee without a guarantee of funding.

So, what is a Grantee to do?

The short answer: Think outside the box. The longer answer: Consider one of the following possibilities.

- 1 *Grantees can use de-federalized program income, which is program income generated by a prior CDBG program that was de-federalized because it did not meet the threshold for Program Income (see GMM Chapter 6, Section 6.6). The use of these funds is not governed by federal regulations and can be used to further the purpose of CDBG by supporting robust and meaningful engagement prior to and throughout future programs.*
- 2 *Grantees can seek non-federal funding to provide compensation, for example, by using the general fund budget, or by seeking grants or local nonprofits that support public engagement.*
- 3 *Once funding has been awarded, Grantees can use CDBG administrative funds to provide childcare, food, or other needed services during public meeting.*
- 4 *Finally, in an effort where the Grantee contracts with a third party to do marketing, outreach, and engagement on the Grantee's behalf, the Grantee can write their RFP as a fixed/flat fee. This leaves the third party free to use their operating budget according to best practice, including compensating participants, without becoming subject to the same regulations that would apply if the Grantee were conducting the engagement.*

## Implementation Strategies and Corresponding Guiding Questions

**Equity**-centered work is always deeply contextualized. Processes that feel affirming for members of one community may feel different or may simply not resonate in a different community. And, of course, experiences and perspectives will vary within communities, just as they do across communities. Offered here are overarching strategies, an example\* of how it might look, and guiding questions that program designers and implementers can ask themselves (and their constituents) to see if they are on the right track.

*\* NOTE: When the example comes from within the GMM itself, the Chapter and Section are noted in parentheses.*

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Use a design-to-the-margins lens (App. B, 1.3) to seek out, build relationships with, and prioritize voices of historically marginalized community members.</p>	<p>Hire community members and/or partner with CBOs who are on the front lines (and who are trusted by the people the program is trying to reach) to lead engagement processes and build relationships across these bridges by holding your programs accountable to the community (GMM Ch. 4, 4.2). Create open communication lines with them so that they can come to you when they see a need, thus mitigating the power imbalances and creating reciprocity. Recognize that trust is earned, and that decades of harm and trauma can rightfully create weariness in relationship development. Patience, persistence, transparency, and walking the walk are key.</p>	<ul style="list-style-type: none"> <li>▪ Have we partnered with Community-Based Leaders or Organizations who are genuinely trusted by the potential program users we are trying to reach?</li> <li>▪ Are we honoring community members' time by incorporating feedback and designing programs around their priorities?</li> <li>▪ Are we moving past extractive relationships by genuinely showing up for the folks we want to build relationships with and by offering open-ended support and reciprocal lines of communication rather than only engaging when we need something from them?</li> </ul>
<p>Recognize and address power imbalances.</p>	<p>Be proactive and transparent about the fact that you are seeking to center the voices of the people who are the closest to the pain of the problem and people who live at the <b>intersections</b> of multiple identity markers that render them vulnerable to systemic harm. Work to ensure that they are the majority in the room and that barriers to participation are</p>	<ul style="list-style-type: none"> <li>▪ Have we critically examined our <b>positionality</b> within the DTM framework?</li> <li>▪ Are we respecting people's agency (to engage or not in a way that feels affirming) without overburdening them?</li> <li>▪ Do our practices actively center the voices, priorities, and solutions of the people who are closest to the pain of the problem?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Recognize and address power imbalances (cont'd).</p>	<p>eliminated or reduced (GMM Ch. 4, 4.2). Co-develop “<b>community agreements</b>” in your working groups that support participants in considering their <b>positionality</b> so that groups can reduce the harmful impacts of power imbalances and share space and power democratically.</p>	<ul style="list-style-type: none"> <li>▪ Have we created, implemented, and consistently revisited a set of <b>community agreements</b> that supports <b>equitably</b> distributed airtime and power sharing?</li> </ul>
<p>Meet people where they are, both to let them know about engagement opportunities, and to do the engagement itself.</p>	<p>Respectfully work with a partner organization (specifically, one that is chosen as a trusted source by the people most impacted by <b>systemic inequities</b>), ensure that reciprocity is at the center, and hold engagement activities at times that work for working families and account for food, child-care, and transportation needs (GMM Ch. 4, 4.2). When you publicize information about engagement opportunities, do so in multiple languages, and place it where people are already going to get their information (GMM Ch. 4, 4.5). Do not limit this to the local newspaper and ensure that the language matches the audience (GMM Ch. 4, 4.4).</p>	<ul style="list-style-type: none"> <li>▪ Is this at a time/place that will feel comfortable and accessible for the people we are trying to reach? (TIP: Ask them!)</li> <li>▪ Have we removed barriers to participation (for example, by providing childcare and food and by ensuring that the physical space is accessible via public transportation and/or in a central hub)?</li> <li>▪ Are we ensuring that the people we are trying to reach are actually receiving the information in a way that can be consumed and acted upon (do they have enough time to plan, are the supports communicated, etc.)?</li> <li>▪ Is there a hybrid option for folks who cannot attend in person?</li> <li>▪ Is the event recorded, posted, and findable?</li> </ul>
<p>Proactively create safe spaces for engagement.</p>	<p>Let folks of all identities and backgrounds know that they are welcomed and safe, and that if they don't feel as such, that you want that feedback so that changes can be made. Ask the folks who you are serving what they need to feel safe and comfortable. Provide a few options if they are unsure and follow their lead. Avoid using harmful language that excludes some residents. (GMM Ch.4, 4.2).</p>	<ul style="list-style-type: none"> <li>▪ Have we been building relationships to ask for feedback on our processes?</li> <li>▪ Have we asked the folks who we are serving what they need in order to feel safe and comfortable?</li> <li>▪ Are we communicating through inclusive words, like resident instead of citizen, that help people feel that they will belong?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Hold space within engagement efforts for emotions and for a variety of ways of knowing, being, and communicating.</p>	<p>Many community members have experienced harm at the hands of the government, and emotional expression may be a natural outgrowth of that. Institutions also tend to treat people differently based on the emotion being expressed and the identity of the person expressing it. Be mindful that the norms that uphold government have been deeply harmful and may be triggering. Develop healing-informed spaces, refrain from tone policing, be explicit about requirements for participation, and be flexible in recognizing participation in multiple forms. (GMM Ch. 4, 4.2)</p>	<ul style="list-style-type: none"> <li>▪ Are we insisting that people leave their emotions at the door in order to participate?</li> <li>▪ Are we doing this differently based on the emotion, how it is being expressed, and/or the person’s identity?</li> <li>▪ Are we creating space for multiple communication styles (written, oral, symbolic, individual, collective), learning styles (visual, audio, kinesthetic, etc.), and ways of knowing (traditional, cultural, lived experience, school/work)?</li> <li>▪ Are folks on our team practicing <b>cultural responsiveness</b> both in written form and in face-to-face engagement?</li> </ul>
<p>Provide inclusive and accessible engagement opportunities.</p>	<p>Guarantee language justice principles (GMM App. E, 2.4), consider and address the needs of people with disabilities and neuroatypical learning styles, and proactively advertise available support structures in the medium and location in which they are most likely to be read/heard. Provide hybrid meeting models with ways to watch the recording after. Mix up methods, offer stakeholder interviews, focus groups, and community meetings, both online and in person. Make the required meeting minutes public to increase transparency and trust and proactively offer translation assistance rather than waiting to be asked (GMM Ch. 4, 4.2 and 4.5). Plan engagement events when folks are least likely to be working, at a time when there is public transportation accessible.</p>	<ul style="list-style-type: none"> <li>▪ Do folks who have disabilities or who are most comfortable in languages other than English have to jump through burdensome hurdles to have their needs met?</li> <li>▪ Is the information we are putting out there about what is available actually reaching the people we are trying to reach? What do we need to change (medium, language, location, etc.) in order to ensure that it does?</li> <li>▪ Is the language that we are using accessible to folks who may not be familiar with government-speak?</li> <li>▪ Is this meeting in a location where potential program participants already gather? Are there safe public transportation options to access this venue that run at the same time as the gathering? Can we provide travel vouchers?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Ensure that engagement is ongoing and informs program design and evaluation in meaningful ways.</p>	<p>Build in and budget time for reflection and ongoing engagement. Ensure that program users, through a DTM lens, are naming the benchmarks and evaluating the success of processes (GMM Ch. 4, 4.2).</p>	<ul style="list-style-type: none"> <li>Are we honoring people's time, energy, and expertise on their own lives by implementing their ideas and communicating transparently when some ideas cannot be implemented?</li> </ul>
<p>Monitor and evaluate engagement strategies for successes and opportunities for shift. This evaluation should include looking at who is showing up and who is missing, who is sharing perspectives and who is not, which ideas are being incorporated and which are being ignored.</p>	<p>Monitor engagement with social media posts, ask folks who engage where they heard about the opportunity, and monitor racial (and other) disparities in participation. Check in with trusted partners as well about what they are hearing. Gather demographic data during your engagement processes in order to analyze through a DTM lens (GMM Ch. 4, 4.2). Take note if key stakeholders aren't present, follow up to ask why (HUD CPEE Toolkit).</p>	<ul style="list-style-type: none"> <li>How do we know that/if our engagement strategies are working well?</li> <li>Who are we taking feedback from?</li> <li>How are we applying the learnings?</li> <li>Did our engagement processes actually engage the communities of focus?</li> <li>Did we follow up with stakeholders who did not attend to understand why, did they not get the notice or was there another reason?</li> </ul>
<p>Be responsive to the needs and stated priorities of program users.</p>	<p>When a client chooses to move to a 'subpar' space, they likely have a reason. People make decisions based on weighing their options against their priorities. Listen to them and figure out how to support them with this program given their priorities, rather than your own. (GMM Ch. 9, 9.3)</p>	<ul style="list-style-type: none"> <li>Are we honoring the expertise that people hold on their own lives by listening to them, honoring their priorities, and working to ensure that their stated needs are met within the implementation of this program?</li> </ul>
<p>Use healing-informed processes that account for the trauma and toxic stress that many community members have experienced, including in their interactions with government entities.</p>	<p>Be mindful of the parts of the process of CDBG that can exacerbate harm and/or retraumatize folks, such as burdensome, intrusive, or exploitative data gathering, analysis and reporting, sharing citizenship status, describing neighborhoods in harmful ways, etc. Remove barriers and burdens, communicate transparently, address uncertainty quickly, and with</p>	<ul style="list-style-type: none"> <li>Are we designing space in our engagement processes (and budget) to provide flexibility, additional support, creative alternatives, and ability to respond to unexpected needs as they arise?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Use healing-informed processes that account for the trauma and toxic stress that many community members have experienced, including in their interactions with government entities (cont'd).</p>	<p>compassion and in a way that expresses trust rather than wariness. (GMM Ch. 4, 4.2; Ch. 9, 9.1)</p>	<ul style="list-style-type: none"> <li>▪ Are we hosting community engagement opportunities in spaces that are conducive to healing? I.e. spaces where communities most disproportionately impacted already gather, feel safe in, that have natural light, are well ventilated, are spacious, have outdoor space etc. Are the facilitators trained in holding healing informed spaces?</li> <li>▪ Are marketing materials for public participation, utilizing humanizing and affirming language and imagery that preserves dignity and agency of community members?</li> <li>▪ Are we putting a <b>race-conscious</b> lens on our programs so that we can better anticipate how to support folks through stressful financial processes in a healing way?</li> </ul>
<p>Provide <b>culturally responsive</b> training for staff leading and implementing the community engagement initiatives and for all staff who interact with end users.</p>	<p>Make sure that all staff involved with the project have completed training on <b>anti-racism</b> and <b>cultural responsiveness</b> and recognize the historical context, lack of trust, and systemic barriers at play, and the cultural mind shifts needed before reaching out to build relationships (HUD Exchange, n.d.b.).</p>	<ul style="list-style-type: none"> <li>▪ Have we hired Community-Based Leaders from our priority communities?</li> <li>▪ Has our staff been trained on <b>cultural responsiveness</b>?</li> </ul>

## Spotlight: Identifying Barriers to Engagement

“With a very sparse population, community outreach remains our largest focus as information dissemination and transparency remain a public concern and priority. Our agency does not have a strong online presence but hope to improve this and have collaborated with other agencies and jurisdictions for social media and online outreach. Public engagement and outreach are our biggest concern, as all of our residents do not have access to transportation (public workshops), broadband/internet services, or subscriptions to local publications. Public workshops, email press releases and traditional flier mailings are our primary outreach tools.”  
—Equity Priorities Survey

## Spotlight: Partnering to Overcome Barriers to Engagement

“We have a strong Latino, Native American and other minority populations in our community. The City is aware that a disproportionate number of minorities do not involve themselves in our public process. Upon meeting with different minority groups, staff became aware that public outreach efforts often did not make it to our minority populations. The City now has a liaison that attends local tribe meetings quarterly to provide an update on City projects and answer questions. Public meeting invites are sent to additional stakeholder groups such as Nuestro Alianza and can be provided in Spanish.”  
—Equity Priorities Survey

### **GMM References**

*Chapter 4, Section 4 - Overview*

*Chapter 4, Section 4.2 - Public Participation Requirements*

*Chapter 4, Section 4.5 - Limited English Proficiency*

*Chapter 9, Section 9.1 - Relocation and displacement*

*Chapter 9, Section 9.3 - Residential Relocation under URA*

# Marketing

## What Is Equity-Centered Marketing, and How Might It Move Beyond the Regulations?

Like with engagement, **equity**-centered marketing plans are only possible when **equity** is centered in their design. When designing Affirmative Marketing Plans, jurisdictions are asked to consider people who will not apply for programs without direct outreach or who will need direct assistance to complete necessary applications or paperwork, whether due to language differences, ability differences, familiarity/comfort with government processes, etc. Grantees are to figure out why people may not apply, including barriers to participation, and take steps to overcome these impediments (as well as recording the results of their actions) (GMM Chapter 4; GMM Appendix E).

The key difference between meeting the regulations and creating a meaningful **equity**-centered Affirmative Marketing Plan is whose perspective is being centered. Centering the government lens can show up in the following ways: (1) Making assumptions about why people are not participating or reaching out, (2) describing people as “hard to reach” rather than as “systemically ignored, erased, or under-resourced,” and/or (3) rigidly using singular approaches, such as posting one-way, print-only messages in public spheres without developing meaningful relationships, placing the burden of communication and/or assimilation on community members (Gonzalez, 2021; HUD Exchange, n.d.b.; Ling et al., 2024).

Centering community members through a design-to-the-margins lens can look as follows: (1) Asking people what they need and want and then honoring their time and priorities, (2) developing meaningful reciprocal relationships, (3) creating multiple outreach pathways, (4) acknowledging the harm done by government and owning the burden to make repair, (5) incorporating all of this into the marketing plan, and then being nimble and flexible based on successes and growth areas (Anaissie et al., 2021; Cohen, 2021; Gonzalez, 2021; HUD Exchange, n.d.b.).

## Implementation Strategies and Corresponding Guiding Questions

Identify community hubs such as faith groups, cultural organizations, parent groups, online communities, and other locations where people naturally gather and organize themselves as part of your strategy when getting started. Partner with Community-Based Organizations (CBOs) and/or Community-Based Leaders (CBLs) who already have established deep relationships with community members you want to reach.



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Prioritize authentic relationship building with Community-Based Leaders and Organizations at community hubs.</p>	<p>Build authentic relationships with Community-Based Leaders and/or Organizations. This requires reaching out in non-transactional ways, offering support without expecting it in return, offering to learn without asking to be taught, being vulnerable, curious, and humble, and generally treating people like the full human beings that they are. Work to learn cultural protocols for engaging with each organization or group, and compensate your teachers <b>equitably</b> (GMM Ch. 4, 4.3; App. B, Spotlight, p.36).</p>	<ul style="list-style-type: none"> <li>▪ Are we investing in authentic relationships or only reaching out when we need something?</li> <li>▪ Are we working to learn the cultural protocols within these groups or organizations or assuming that how we do things is the right way?</li> <li>▪ Are our goals, timelines, and processes reflective of the time and reciprocity needed for authentic relationship development?</li> </ul>
<p>Acknowledge harm and work to build trust with transparency.</p>	<p>Practice patience and don't expect community members to engage immediately. Trust takes time, and actions speak louder than words. Show up with humility, receive feedback with grace, communicate transparently about how feedback will be integrated, and respect and address people's wariness to respond to marketing by acknowledging harm and not pushing the institution's agenda.</p>	<ul style="list-style-type: none"> <li>▪ How are we showing up? Do our actions and expectations match our verbal desire for trust and partnership?</li> <li>▪ Are we acknowledging the history of harm and inherent lack of trust?</li> <li>▪ Are we being transparent with our goals and process?</li> <li>▪ Are we able to withstand the discomfort that arises when we learn about the harm we have caused in our good faith efforts to serve? Do we consistently make repair in service of relationship and trust?</li> </ul>
<p>Meet people where they are and where they get their information.</p>	<p>Work with Community-Based Leaders (CBLs) to identify the best strategies for reaching community members who have historically been harmed and/or erased by the government, and to identify how and where they prefer to receive information. Consider possible community hubs such as family resource centers, schools, libraries, sport venues or faith groups (but also respect that some hubs may be</p>	<ul style="list-style-type: none"> <li>▪ Are we making space to co-create strategies with our Community-Based Leaders, or mostly seeking their input on our ideas?</li> <li>▪ Are we flexible to change the way we "usually" do things to incorporate suggestions from the community, creating new internal systems as needed?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Meet people where they are and where they get their information (cont'd).</p>	<p>treated as sacred and not-to-be-entered by a governmental entity). Look for traditional and non-traditional media/platforms (GMM Ch. 4, 4.3).</p>	<ul style="list-style-type: none"> <li>▪ Are we asking where community members would be comfortable meeting with us, understanding that sometimes that will be directly and on their turf and other times indirectly and/or in a more neutral location?</li> <li>▪ Are we exploring non-traditional media/platforms and formats?</li> </ul>
<p>Create multiple outreach pathways.</p>	<p>Do direct outreach AND social media posting AND radio PSAs. Base the pathways on what your key partners tell you about where and how the people in their community get their information. Be willing to get creative to make the information accessible, such as through videos, graphics, cartoons, and tabling at community events (GMM Ch. 4, 4.3).</p>	<ul style="list-style-type: none"> <li>▪ Are we utilizing multiple channels of communication?</li> <li>▪ Are these decisions based on guidance from our Community-Based partners?</li> <li>▪ Are we thinking beyond the traditional outreach pathways and inviting creativity?</li> </ul>
<p>Utilize multiple languages and multiple, <b>culturally responsive</b>, forms of communication.</p>	<p>Conduct marketing in multiple languages (beyond four-factor analysis), including ASL and braille, and as a combination of written, verbal, in-person, and remote. Offer translation and interpretation support (GMM Ch. 4, 4.3).</p>	<ul style="list-style-type: none"> <li>▪ Do we offer marketing content in languages beyond the four-factor analysis?</li> <li>▪ Is our marketing available in ASL and braille?</li> <li>▪ Are we ready to offer translation and interpretation support?</li> </ul>
<p>Do direct outreach.</p>	<p>Face-to-face interactions are labor-intensive, but they are highly effective. Pay folks from within the community to do the outreach if bandwidth and/or trust is low (GMM Ch. 4, 4.3).</p>	<ul style="list-style-type: none"> <li>▪ Are we investing in direct outreach?</li> <li>▪ Is our direct outreach focused on identified community hubs through a design-to-the-margins lens?</li> <li>▪ Are we working with members of the community we want to engage?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Be overtly welcoming to people from all backgrounds and identities.</p>	<p>Be aware of biases and assumptions in interactions with applicants. Make sure folks on the margins get compassionate treatment and support needed, independent of how much support they ask for. Market these welcoming approaches as well. Signage/ icons signaling welcome to the LGBTQ+ community and BIPOC communities, for example, as well as explanations of available accommodations for people with disabilities, can signal safety and consideration.</p>	<ul style="list-style-type: none"> <li>▪ Are we offering support, not just waiting for it to be requested?</li> <li>▪ Are we treating people as human beings (by checking in with them before jumping into business, for example) rather than as simply assets or heads to be counted?</li> <li>▪ Have the people who do outreach done the internal work investigating their own biases and how they may show up when interacting with community members?</li> </ul>
<p>Provide assistance to complete necessary applications or paperwork.</p>	<p>Offer support completing applications or paperwork and be prepared to help with anything from language access to physical spaces or computer/WIFI access. Have the flexibility to help during evenings and weekends. It is important to be ready to help before offering, as empty offers will add to lack of trust. If the institution genuinely can't meet the needs of a community member, communicate why and work within your institution (be that a local government or HCD) to adjust resources accordingly (HCD listening session).</p>	<ul style="list-style-type: none"> <li>▪ Do we provide tools needed to complete applications or paperwork, such as printing, private spaces, computers, WIFI, and technical support?</li> <li>▪ Do we provide staff support needed, such as for translation and interpretation?</li> <li>▪ Do people know that we are happy to provide support, and what types of support are available?</li> <li>▪ Is it easy for folks to contact us in their preferred language for support?</li> </ul>
<p>Get feedback, reflect on it with an open mind and heart, and apply it.</p>	<p>When folks are reached successfully, find out which strategies worked for them and which did not, including feedback on outreach methods, communication style, and approachability. Shift strategies based on feedback. Include asking for feedback on their experience with the application process. Feedback is a gift. Treat it as such.</p>	<ul style="list-style-type: none"> <li>▪ Do we have methods to solicit feedback?</li> <li>▪ Do we make time to review feedback and adjust processes accordingly?</li> <li>▪ Are there channels to get clarification on feedback?</li> <li>▪ Do we collect demographic data in our feedback process so that we can disaggregate it by identity markers such as race, gender, ability, etc., and analyze it through an <b>intersectional</b>, design-to-the-margins lens?</li> </ul>



## Spotlight: Gathering Input and Elevating Marketing Support Needs

"It's important to garner public input in order to design programs that are most beneficial to the community. In the past year, the City has organized/attended monthly meetings with... the most diverse community in [our Jurisdiction], to gather input and work on solutions to the blight and challenges that surround that area. City has presented available City Programs to community leaders and received input on need. This is an ongoing conversation. The City is a small, rural community with not a lot of capacity to create and fund new programs and take on all of the new requirements. The City could use [Technical Assistance] with ideas for marketing, sample contracts, sample evaluations to better reach gaps."

—Equity Priorities Survey

### GMM References

Chapter 4, Section 4.3 - Affirmatively Furthering Fair Housing (AFFH)



City of King Sidewalk Improvement Project, Photo Credit: Octavio Hurtado

# From Language Access to Language Justice

## What Is Language Justice, and How Might It Move Beyond the Regulations Addressing Language Access?

Language difference is one of the most easily identifiable barriers to public participation. California is home to a diverse population, and as of 2021, 44% of Californians ages 5 and older speak a language other than English at home (Migration Policy Institute, n.d.). The most commonly spoken languages in California besides English are Spanish, Chinese, and Tagalog. At the regional and local level, there are a wide variety of languages spoken, based on the percentage of speakers in the jurisdiction, that meet the regulatory thresholds for language access. And yet there are many more that rarely or only in some cases meet these requirements (California Immigrant Data Portal, n.d.).

Language access is the government's commitment and responsibility to provide access to services regardless of the recipient's primary language. This responsibility is protected by numerous pieces of Federal and State legislation, including Title IV of the Civil Rights Act of 1964 (and its corresponding Executive Order 13166) which prohibits discrimination based on national origin, and which the Supreme Court upheld to include language (Health and Human Services Department, 2000). Additionally, the California-specific Dymally-Alatorre Bilingual Services Act of 1973 requires State and Local agencies to fund sufficient bilingual staff and to translate documents to be available in the languages spoken by at least 5% of the local population, also known as "threshold" languages (Cal. Gov't Code § 7290 et seq., 1973). The regulations require that jurisdictions create a Language Access Plan (LAP) starting with a four-factor analysis to determine which languages (if any) they must provide assistance for in their programming and communication, based on the size of language communities in their jurisdiction, the frequency with which a person who is a member of this language community will be encountered, the cost of providing assistance, and the nature of the project itself (GMM Chapter 4).

Language Justice asks that institutions go one step further and remove the idea of "statistical significance" and "threshold" from the equation. Language Justice is an institutional action promoting and defending the rights of an individual to fully participate in society, with access to services and opportunities, regardless of preferred language (Language Access Network of San Francisco, 2021).

To this end, Language Justice requires moving beyond number crunching and document translation towards working closely with communities and sub-communities to identify language needs and preferences, no matter how small the population may be in comparison to more dominant language groups. Language Justice also prioritizes providing access to high quality methods of communication in multiple languages; at different levels of literacy; written, spoken, and sign language; proactively, and not just upon request. Along with providing access as a baseline, intentional and targeted outreach to these language communities is needed in order to actually drive attendance. In other words, it is more than just providing translated fliers, but also engaging in meaningful participation methods to ensure turnout from the communities these fliers were translated for.





County of Siskiyou Christmas House, Photo Credit: Kristen Lackey

## Implementation Strategies and Corresponding Guiding Question

Language justice is interwoven with engagement and marketing in crucial ways. Moving from statistical thresholds and baseline translation requirements towards creating meaningful and high-quality access to participation for all language communities is key. It can only be done well if the institution simultaneously builds relationships and creates trust by being responsive to community needs and priorities. It often requires partnership with folks who are embedded in the community and also with governing agencies\* who can pool and provide resources to individual Grantees.

\*NOTE: It is important to name that this point in particular is an example of the **ecosystemic** nature of **equity** concerns. Grantees often do not have the bandwidth or staff capacity to provide sufficient justice to language communities who do meet threshold numbers, let alone additional language communities. Support from HCD in pooling and providing resources, and in maintaining responsive feedback mechanisms for front-facing staff members in jurisdictions is a key component. It is HCD's responsibility to act and support as Grantees identify and uplift local needs.



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Develop relationships with members and leaders of language communities.</p>	<p>Attend and help sponsor local cultural events, support the efforts of local Community-Based Organizations, amplify and resource their work, and invest in reciprocal relationship development with public-facing staff who directly engage with the community.</p>	<ul style="list-style-type: none"> <li>▪ Have we invested in developing true partnerships and meaningful relationships that go beyond the superficial and in which information and support flows both ways?</li> <li>▪ Are we building relationships with folks who reflect, and directly work with, the language communities we want to engage?</li> </ul>
<p>Provide all notices in languages reflected in the local community, beyond what four-factor analysis calls for. Pay more (not less) attention to small language groups, as they are often the most systemically marginalized and deprived of government services.</p>	<p>When providing notifications to a community member, such as Notice of Denial of Claim, this (along with interpretation services) should be offered in the preferred language of the recipient, even if not reflected in the four-factor analysis (GMM Ch. 9, 9.6).</p>	<ul style="list-style-type: none"> <li>▪ Do we know what languages are spoken in this community, including those beyond the four-factor analysis? (Do we have relationships with folks in the community who can help us ensure that we are including everyone?)</li> <li>▪ Are we providing notices and interpretation services in a recipient’s preferred language?</li> <li>▪ Are we hiring and/or partnering with people who speak these languages?</li> </ul>
<p>Pool resources with other jurisdictions and/or seek support from HCD to provide resources for community members that may not reach “threshold” numbers. In other words, build infrastructure for language access and language justice from the top down and the bottom up.</p>	<p>Grantees can share any translated documents, notices, and brochures, such as Fair Housing Posters, you have created with other Grantees. HCD can facilitate Grantee sharing and create a pool of resources available to other jurisdictions. In other words, pay it forward (GMM Ch. 4, 4.3; Ch. 7, 7.5; Ch. 9, 9.2). HCD can create a bank of template notifications in languages spoken in the state to support each jurisdiction in going beyond the four-factor analysis (GMM Ch. 4, 4.5), regardless of bandwidth.</p>	<ul style="list-style-type: none"> <li>▪ What would it take to share translated documents to create a pool of resources?</li> <li>▪ Where can we start to create this?</li> <li>▪ What do we already have translated that we can share?</li> <li>▪ What additional translations do we need that we can get from other Grantees?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Proactively provide translation and assistance, rather than placing the burden on the recipient to actively request assistance.</p>	<p>When administering notices and offering translations and assistance, make sure that offer of translation support or interpretation assistance is made in the preferred language of the community member. For example, an offer of Vietnamese translation made in English is unlikely to increase Vietnamese engagement (GMM Ch. 8, 8.3; Ch. 4, 4.2; Ch. 4, 4.5).</p>	<ul style="list-style-type: none"> <li>Do we have notices offering translation in the languages present in the community?</li> <li>Are we proactively offering and alerting language communities about translation support offerings?</li> </ul>
<p>When placing public notices, identify and utilize channels that serve systemically marginalized communities, and match the language to the channel.</p>	<p>Seek out bilingual radio stations, news media, and community-based organizational newsletters as ways to get the word out. Advertising the availability of Spanish-interpretation in an English-language newspaper will not meet the need (GMM Ch. 4, 4.2)</p>	<ul style="list-style-type: none"> <li>Have we worked to expand beyond traditional communication channels?</li> <li>Have we used information channels or partnered with sources that are trusted in the communities we want to notify?</li> </ul>
<p>Be transparent and proactive in alerting language communities to the access that is available, and place as few burdens as possible on community members to actively seek this information out.</p>	<p>When making flyers for an event saying that an American Sign Language (ASL) interpreter is available, do the outreach directly to the Deaf community to invite them and ensure their participation. Otherwise, turnout will likely not match intent, wasting resources and subjecting the interpreter to a performative act. Members of the Deaf community tend to have hubs for services and community. Identifying some of these hubs and engaging in outreach to build relationships will help build authenticity and sustainability (GMM Ch. 4, 4.2).</p>	<ul style="list-style-type: none"> <li>Have we proactively reached out to communities to alert them that language access is available?</li> <li>Have we made it easy for as many community members as possible to know what language access services are available?</li> </ul>
<p>Ensure that every service provided is available with support in the preferred language of the end user.</p>	<p>When providing advisory services, they should be provided in the preferred language of the end user. If that person is referred to other agencies, such as social services, funds for translation support should be provided by the Grantee (GMM Ch. 9, 9.3).</p>	<ul style="list-style-type: none"> <li>If we provide a flier in a certain language, do we have timely access to interpretation support in that language as well? Do we offer support in that language along every step of the process?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Partner with and compensate Community-Based Leaders and/or Organizations to do support services in their communities, and make it as easy as possible for them to collaborate with you. Compensate CBLs for their time (See Spotlight, p.36).</p>	<p>Build and maintain relationships with Community-Based Leaders and Organizations who are more likely to have people on staff who speak multiple languages. Work to find grassroots organizations that are authentically connected with their communities. Ensure offers of support like childcare, free and safe transportation, food, or other support systems are provided in the recipient’s preferred language and cultural ways. Always make sure you can actually provide the support first. (GMM Ch. 4, 4.2)</p>	<ul style="list-style-type: none"> <li>▪ Is our CBO partner authentically connected with their community?</li> <li>▪ Do they have diverse leadership and public-facing staff who speak the language(s) of the community they serve?</li> <li>▪ Are we prepared to offer, and follow through on, support to Community-Based Leaders and Organizations who are partnering with us?</li> <li>▪ Can we find a way to compensate CBLs for their time?</li> </ul>
<p>Hold engagement activities at community hubs in neighborhoods where language access is most needed, and where support systems in that language may already exist.</p>	<p>Work with Community-Based Leaders to identify and select trusted community hubs as engagement venues where the priority languages are regularly spoken. Such hubs might include resource centers, churches, local businesses, parks, or schools. Make sure they are ADA compliant and are accessible by public transportation at the time you want to hold your meeting - which is especially important for evening and weekend meetings when public transit may be more limited or unavailable. (GMM Ch. 4, 4.2)</p>	<ul style="list-style-type: none"> <li>▪ Are we asking our Community-Based Leaders for location ideas, and compensating them for this expertise (See Spotlight, p. 36)?</li> <li>▪ Are our engagement events in the hubs of the priority language communities we want to engage, at times folks can attend?</li> </ul>
<p>When documenting the effectiveness of a Language Access Plan (LAP) process, engage the people who use these services in evaluating them, based on their priorities, rather than perceived priorities through the government lens.</p>	<p>While LAPs require Grantees to certify implementation, it is also important to monitor the actual effectiveness of the LAP by gathering feedback from the people who used it, or by noticing if no one is using it and exploring why (GMM Ch. 4, 4.5).</p>	<ul style="list-style-type: none"> <li>▪ Ask at every communication step (written, spoken), have I made this accessible to the entire community?</li> <li>▪ Are community members using the LAP offerings? If not, why?</li> <li>▪ Engage prioritized language communities in learning about what is and is not working, and then apply the feedback.</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Prioritize effective communication by thinking beyond word-for-word translation.</p>	<p>Effective LAPs are not just about providing information in multiple languages, but making sure that the message being communicated is understood. Hire qualified translators who offer <b>culturally responsive</b> translation. Ensure that when notices like the General Information Notice (GIN) and Initiation of Negotiations (ION) are provided, that language appropriate assistance is available at the time of notice to ensure folks fully understand the implications of each notice. Ask if recipients understand the implications of a notice in a way that it feels safe for them to say no (GMM Ch. 9, 9.1; Ch. 9, 9.3)</p>	<ul style="list-style-type: none"> <li>▪ How do we know if what we communicated was actually understood?</li> <li>▪ Is our translator certified?</li> <li>▪ Are we able to assess the quality of our translations to ensure the meaning is translated, not just the words?</li> </ul>
<p>Ensure that there is language access within the complaints and appeals procedures.</p>	<p>While Grantees must develop and implement procedures for responding to complaints or disputes, including complaints, on public participation/public input, HCD can support Grantees with peer-sharing and/or template language that is clear, accessible, and translated into multiple languages (GMM Ch. 4, 4.11).</p>	<ul style="list-style-type: none"> <li>▪ Are our complaints and appeals procedures easy to access and navigate independent of one's preferred language?</li> <li>▪ Is there language access in how we communicate about the existence of these procedures, which starts when we first begin to engage with community members?</li> </ul>
<p>Ensure high quality access to translations and language services.</p>	<p>Language justice is more than just having translation and interpretation, but also about providing accurate and quality language services. Implement accountability measures that focus on the quality of language services, where recipients can provide feedback and share grievances when the interpretation service does not meet their needs or still perpetuates a gap in understanding.</p>	<ul style="list-style-type: none"> <li>▪ Does this translation accurately reflect the same content as the English version?</li> <li>▪ How do we know?</li> <li>▪ Are there phrases or words in this content that can mean different things depending on region, even within the same language group?</li> </ul>



## Document List for Translation

Translation of vital documents (paper or electronic written material that contains information that is critical for accessing a program or activities) is required. For instance, if a complaint form is necessary to file a claim with an agency, that complaint form would be vital. Non-vital information includes documents that are not critical to access such benefits and services.

Examples of vital documents include, but are not limited to:

- *Applications for Assistance*
- *Fair Housing Posters*
- *Notices, such as: General Information Notice (GIN), Initiation of Negotiations (ION), Notice of Denial of Claim, Move-In Notice, Sample Notice to Prospective Tenants, Notice of Eligibility - eligibility for Relocation Assistance, Notice of Non-Displacement - notice that you will not be displaced after all, Notice to Owner, Notice of Intent to Acquire, Temporary Relocation Notice - rights and conditions of a temporary move, 90-day Notice.*
- *Notices informing people of their rights (ex: per URA requirements GMM Ch. 9, 9.2).*
- *HUD brochures, such as: "When a Public Agency Acquires Your Property," "Relocation Assistance to Displaced Homeowner Occupants," and "Relocation Assistance to Tenants Displaced from Their Homes."*
- *Notice of Public Hearing*
- *Wage rate decision and Wage Rate Poster "Employee Rights under the Davis Bacon Act"*
- *Marketing Materials (fliers, posters)*
- *Bid Notices*
- *Complaint Policy, Procedure, and Forms*



County of Imperial Seeley Fire Station and Cooling Center, Photo Credits: County of Imperial

## Spotlight: Struggling to Meet the Language Needs of Community Members

“There is a small sector of the county where a small group of Hmong [people] are now residing, and we would like to be able to reach out to them but don’t have a bilingual Hmong person living in the county and outreach is where it is needed. Language line is not available for outreach efforts in remote sections of the county.”

—Equity Priorities Survey

“[Our community] has the need of translation services primarily for our Spanish speaking residents. We have had an interpreter in the past but not consistently and this makes applying for programs difficult. We would like to have our forms translated into Spanish to make the process easier. Engagement with our Hispanic residents has also been a challenge. We’ve held meetings with a translator, but they have not been widely attended.”

—Equity Priorities Survey

## Spotlight: Providing Wraparound Support

“I know cities within [a jurisdiction I work with] make extended efforts to provide materials and workshops in Spanish. Before amending their contract, [one City] conducted workshops in Spanish on how to complete the business assistance application and reviewing documentation because [the] majority of applicants only spoke Spanish and had never applied for assistance before.”

—CDBG-CV Grant Administrator

### GMM References

*Chapter 4, Section 4.2 - Public Participation Requirements*

*Chapter 4, Section 4.3 - Affirmatively Furthering Fair Housing (AFFH)*

*Chapter 4, Section 4.5 - Limited English Proficiency*

*Chapter 4, Section 4.11 - Complaints and Appeals Procedures*

*Chapter 7, Section 7.5 - Pre-Construction Requirements*

*Chapter 8, Section 8.3 - Involuntary Acquisitions*

*Chapter 9, Section 9.2 - General Relocation Requirements under URA*

*Chapter 9, Section 9.3 - Residential Relocation under URA*

*Chapter 9, Section 9.6 - Claims for Relocation Payments and Moving Expenses*

# Part III: WORKFORCE RELATIONS

## Introduction

### What Are Equity-Centered Workforce Relations, and Why Does It Matter?

Workforce relations have been historically, and remain to this day, racialized. Forced labor, which was deeply embedded in the founding of this country and its first 100 years of sovereignty, and the ensuing segregative policies, contributed to the biases and disparate outcomes that continue to manifest in employment opportunities, hiring practices, and advancement (Desmond, 2019). Progress has certainly been made, but there is still much work to do, especially around race, gender identity, and disability access. California's agricultural industry is a notorious example of how we continue to reserve the most exploitative work for people of color. The National Agricultural Workers Survey shows that 88% of California's farm workers are migrants who were predominantly born in Mexico, and that farm workers struggle consistently with living at or below the poverty line (Ornelas et al, 2022). In many ways, our current political climate enables corporations, municipalities, and wealthy business owners to leverage the Black and Brown bodies of both adults and children to endure the social cost of these jobs (Desmond, 2019; Dreier, 2023).

So how do organizations and institutions take a stance against implicitly and explicitly exploitative practices and engage in **radical, equitable**, pro-labor workforce relations? This work requires taking a fine-toothed comb to the policies and practices that are in place, looking for the ways they privilege some folks over others and distribute resources **inequitably**, and then addressing these policies and practices. In situations where existing policies are determined at the federal level, such as sealed bidding requirements that create often insurmountable barriers for small businesses owned by women and people of color, organizations may have to think outside the box or use an **inside/outside strategy** to move the needle politically.

As with the other sections in this toolkit, this relies deeply on forging relationships, engaging, and then implementing shifts based on the experiences and priorities of the people who are closest to the pain of the problem (Martin, 2017). The truth is that while there are some generalizations that can be made and places to start addressing the barriers to entering the workforce, each region, each community, and each person or business has specific needs, ways of operating, and perspectives. Understanding these barriers through the eyes of the people most negatively impacted by it is the key.

## Spotlight: Inequitable Practices in Workforce Relations

- CEOs and executive directors who are predominantly white and male bring in large salaries, while public-facing staff who are predominantly people of color are paid poverty wages in jobs that include carrying the trauma of the people they serve and (re)traumatizing themselves.
- People who are not members of the dominant culture are disproportionately penalized if they are unwilling to assimilate or if they express dissatisfaction with the status quo and make demands for change, especially if they do so in ways that express negative emotion and are not perceived to have the right amount of deference or gratitude.
- People of color are disproportionately prevented from accessing formal education channels, are subjected to hostile environments and curriculum within them, and are less likely to get jobs and fair compensation than white people with comparable credentials. All the while, the non-formally recognized forms of knowledge they possess are erased and/or extracted (as when Spanish-speaking individuals are tasked with translation without compensation or without removing other tasks).
- Built-in payment delays make contracting with small businesses and firms owned by women and/or people of color extremely burdensome on these companies, as they often do not have the resources (due to **systemic inequities**) that larger, and white-male owned firms do.

## Procurement

### What Is Equity-Centered Procurement, and How Might It Move Beyond the Regulations?

Procurement is the process by which Grantees identify, recruit, solicit bids from, and select contractors, consultants, Community-Based Organizations (CBOs), nonprofits, etc. to execute the work required for a State or Federally funded project. The regulatory components of the procurement process include designing and disseminating scopes of work, doing outreach to Section 3 businesses and minority and women owned business enterprises (MBE/WBE),\* scoring, selecting, and contracting with firms (GMM Chapter 5).

\* NOTE: MBE/WBE certification happens at the state level and is required in order to be named on a Supplier Clearinghouse. In order to qualify, businesses must be 51% owned and operated by people of color (for MBE) or women (for WBE). The owners must also be citizens (though in some locations, residents with green cards are also eligible). While a certification program ensures that people who should not be on these lists are kept off, they also create barriers for business owners who may not have the money, bandwidth, access to information, or documentation status to apply.



But these components cannot, on their own, create the conditions for **equity**-centered procurement. Small businesses and especially firms owned by women and people of color are often **gatekept** out of spaces that are easily accessed by bigger, more resourced companies led by white men (Evans et al, 2024). (And this gets even more complex when considering the **intersectional** ways in which folks actually experience the world. For example, people who identify as LGBTQ+, especially when their gender identity does not match the one that is on their identity documents, face compounding barriers that are not addressed by these policies.) Historical policies that have paved the way for the passing of intergenerational wealth for one group of people but prevented it for others also contributes to an uneven playing field in the business world (Fairlie & Robb, 2010; Sullivan et al., 2015). Opportunities to work with the government are unattainable for firms that cannot bear the burden of offering lower bids or fronting the labor and waiting for the check to come much later (Government Services Exchange, 2024).

Some procurement processes are more flexible than others when it comes to creating space for **equitable** application. Sealed bidding processes that require the selection to be made based on cost alone privilege well-resourced companies who, among other things, may have a hierarchical wage structure that can be leveraged to save money on administrative tasks of contract implementation (GMM Chapter 5).



City of Crescent City Pacific Pantry, Photo Credit: City of Crescent City

## Implementation Strategies and Corresponding Guiding Questions

In order to embed **equity** in the procurement process then, people who write RFPs (Requests for Proposals) and RFQs (Requests for Qualifications) must use intentional strategies to lessen the impacts of these privileges. For example, they can look critically at minimum qualifications and scoring matrices and minimize the often-unnecessary **gatekeeping** qualifications (such as minimum number of years working on projects with government funding) that further marginalize already marginalized businesses. Likewise, they can amplify qualities and skills (such as **cultural responsiveness**, and/or multilingual communication skills) that are often ignored, erased, and/or unaccounted for. Simultaneously, they can bolster outreach to MBE/WBE firms (including firms that may experience additional hurdles to qualification) and adjust policies (such as expedited payment schedules) that set them up for both being selected and for being able to execute the work while sustainably running their business.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Think beyond the Supplier Clearinghouse to ensure that you are proactively working to procure businesses that are owned by folks who are harmed by <b>systemic inequities</b>. Use an <b>intersectional</b> lens that incorporates the knowledge that while race and gender are often central to the way people experience <b>systemic inequities</b>, these <b>inequities</b> compound for folks who experience additional layers of marginalization.</p>	<p>When doing outreach, scoring, selecting, and contracting with firms, proactively seek firms who are MBE/WBE and Section 3, and also take into consideration <b>intersectionalities</b> that may work to deepen the <b>inequities</b> faced by a firm AND may make them better positioned to serve the community in <b>culturally responsive</b> ways. For example, business owners who have lived experience with houselessness will bring insight that can inform programming for people currently experiencing houselessness for the better (GMM Ch. 5, 5.2).</p> <p>Think beyond the Supplier Clearinghouse for MBE/WBE to include businesses that may experience too many barriers to qualification, whether those barriers are related to finances, bandwidth, immigration status, LBGTQ+ identity, etc.</p> <p>Find creative ways to advertise procurement opportunities. Outreach to community hubs such as churches, schools, libraries, and resource centers (such as those that support people experiencing poverty, people who identify as LBGTQ+, people with disabilities, and people who have immigrated here). Advertise on social media and in multiple languages.</p>	<ul style="list-style-type: none"> <li>▪ Are we working to advertise to firms who may not be on the Supplier Clearinghouse due to layered barriers to qualification?</li> <li>▪ Have we discussed how we might add an <b>intersectional</b> lens to our outreach and selection process?</li> <li>▪ How might we offer businesses the opportunity to share about additional identities and experiences that intersect with race and gender?</li> <li>▪ How can we integrate this into our outreach, evaluation, and selection processes? For example, are we outreaching at community hubs, and have we integrated lived experience into our scoring rubrics?</li> </ul>
<p>Ensure that outreach to MBE/WBE and Section 3 businesses includes transparency around supports available, and encourage folks to share what they need in order to bid and/or contract.</p>	<p>Include in your outreach advertisements information about what support is available to navigate the bidding process (GMM Ch. 5, 5.2).</p>	<ul style="list-style-type: none"> <li>▪ Are the supports available accounting for the layers of barriers that folks may experience based on intersecting identities (such as disability, poverty, gender identity, sexual orientation, etc.)?</li> <li>▪ Are we communicating about the support available to navigate the bidding process?</li> <li>▪ Are we doing so in <b>culturally responsive</b> ways and in multiple languages?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Follow up on outreach.</p>	<p>Procuring MBE/WBE contractors, or service providers, to the 'best of your ability' is more than one-way advertisements. This looks like following up on outreach to MBW/WBE businesses, supporting them with RFP/RFQ processes as needed, and working to understand their constraints (GMM Ch. 5, 5.9).</p>	<ul style="list-style-type: none"> <li>▪ Have we followed up with MBE/WBE businesses we've reached out to?</li> <li>▪ Did we call to ask if they have questions about the bidding opportunity or process?</li> <li>▪ Have we asked if they are aware of the support available to them through this process?</li> <li>▪ Have we asked if there are additional or different supports that would work for them?</li> </ul>
<p>Choose the most <b>equitable</b> bidding process when the option is available from a regulatory perspective.</p>	<p>Use the Competitive Negotiation procurement method as much as possible in order to integrate selection factors beyond cost. Recognize the limits of the Competitive Sealed Bid process for construction work, which requires you to accept the lowest bid. This can have consequences such as low worker wages (in instances where DBRA requirements are not triggered, such as CDBG-funded housing rehabilitation programs for fewer than 7 units), safety shortcuts, and outsourcing work. Greater investment in oversight, monitoring and evaluation of labor standards will be important. All efforts should be made to avoid Non-Competitive Negotiations. If a public emergency is cited as a reason for a non-competitive negotiation, recognize there is a history of public emergencies creating a loophole for poor business actors to be selected. Similarly, if the "results of a competitive negotiation are inadequate," recognize that this can be highly subjective, and may be reflective of unconscious biases. (GMM Ch. 5, 5.2; Ch. 5, 5.5).</p>	<ul style="list-style-type: none"> <li>▪ Have we used a Competitive Negotiation process for contracts where we can, such as architectural, engineering, planning or administrative services?</li> <li>▪ Have we made all efforts to avoid non-competitive bids, including having relationships with MBE/WBE businesses established prior to a possible public emergency?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Ground truth your cost estimates with MBE/WBE firms.</p>	<p>When creating federally required independent cost estimates, ask MBE/WBE firms to weigh in, come up with a range that accounts for the distinctions between well-resourced and under-resourced firms, and make sure that the process does not exclude the businesses consulted from subsequent bidding (GMM Ch. 5, 5.9).*</p> <p>*For example, if you are doing a demolition project, rather than sharing an RFP or scope-specific details, create a hypothetical standard, such as a 1200 sq/ft home to demo, and ask firms, including MBE/WBE firms for quotes to inform your ICE. This way you can incorporate the needs of firms with varying costs/resources/ capacity without disqualifying them from applying.</p>	<ul style="list-style-type: none"> <li>▪ Have we sought input from MBE/WBE firms on our cost estimates before releasing an RFP or RFQ?</li> <li>▪ Have we created a range of cost estimates that accounts for the constraints of under-resourced firms?</li> </ul>
<p>Look through all minimum requirements in RFP/ RFQs for unnecessary ones that are more likely to demonstrate <b>positionality</b> and privilege than quality of work or skill sets, and eliminate them.</p>	<p>If your program requires firms to have multiple years of experience working with governing entities, the unintended consequence is to continue to marginalize companies that are systemically excluded from government work. When writing RFPs/RFQs, focus on desired skills that can be acquired via many pathways and use language that proactively encourages businesses that may have transferable skills to apply.</p>	<ul style="list-style-type: none"> <li>▪ Are the qualifications we are requiring broad enough to invite transferable skills?</li> <li>▪ Are we clear on what enough experience looks like, so we don't default to whoever has the most experience?</li> </ul>
<p>Eliminate procedural and financial barriers to MBE/ WBE businesses, be conscious of the barriers that not having existing governmental ties may pose to a MBE/WBE business.</p>	<p>Streamline RFP and RFQ processes and documentation requirements. Once you have selected a MBE/WBE business, provide payment every 30 days, rather than 60 or 90, to reduce the financial burden (GMM Ch. 5, 5.2). Work to proactively build relationships with MBE/WBE before the RFP or RFQ process</p>	<ul style="list-style-type: none"> <li>▪ Can we create a pathway for more frequent invoice payments for MBE/WBE businesses?</li> <li>▪ In what ways can we simplify and streamline the RFP and RFQ process?</li> <li>▪ Are we proactively building new relationships with MBE/WBE businesses before we approach them to apply?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Eliminate procedural and financial barriers to MBE/WBE businesses, be conscious of the barriers that not having existing governmental ties may pose to a MBE/WBE business (cont'd).</p>	<p>starts, steward the relationships during the processes, and maintain the relationships after; don't treat the relationships as transactional.</p>	<ul style="list-style-type: none"> <li>Are we maintaining clear and consistent communication as we work to steward these new relationships through the application process?</li> </ul>
<p>Look through all requirements/preferences of your evaluation process and add in <b>equity</b>-driven ones.</p>	<p>When evaluating services, such as during a competitive negotiation, add points for services such as <b>cultural responsiveness</b>, multilingual skills, lived experience receiving services, and existing relationships with priority communities (GMM Ch. 5, 5.5).</p>	<ul style="list-style-type: none"> <li>Have we asked our community-based partners for ideas on qualifications they see as valuable to add as well?</li> <li>Do our RFP and RFQ reflect <b>equity</b>-driven qualifications?</li> <li>Does our selection criteria and evaluation process add points for these qualifications?</li> </ul>
<p>Shift scoring matrices to account for and disrupt <b>gatekeeping</b> practices, so that they reward <b>equity</b>-centered skills and prioritize the wisdom and skills gleaned from lived experience with <b>systemic inequities</b>.</p>	<p>Make it required, instead of optional, to include MBE/WBE* criteria with additional points in your process for procurement of professional services. Integrate a lens of <b>intersectionality</b> in your weighting criteria in order to (1) reflect and disrupt the compounding <b>inequities</b> that folks experience when they hold multiple marginalized identities, and to (2) reflect that the wisdom built at these <b>intersections</b> is deeply supportive of <b>culturally responsive</b> program design and implementation.</p> <p>This strategy can be put into action by allowing for multiple points to be added for businesses at the margins. So, a business that qualifies as a MBE (only) would get one point. A business that qualifies as a WBE (only) would get one point. A business that qualifies as both a MBE and a WBE would get two points. (GMM Ch. 5, 5.2).</p>	<ul style="list-style-type: none"> <li>Have we made it required to include MBE/WBE criteria in our procurement process?</li> <li>Have we created a weighting system that allows for an <b>intersectional</b> selection process by using AND instead of OR when considering race, gender, AND income level? Have we included additional considerations, such as disability, LGBTQ+, etc.?</li> <li>Have we added additional categories such as businesses that have meaningful relationships with the communities being served by the program?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Shift scoring matrices to account for and disrupt gatekeeping practices, so that they reward equity-centered skills and prioritize the wisdom and skills gleaned from lived experience with systemic inequities (cont'd).</p>	<p>* Note: As mentioned earlier, there are many barriers to acquiring formal certification as a MBE/WBE firm, including, but not limited to cost and documentation status. There are many firms that are owned by women and/or <b>BIPOC</b> folks that are not certified. A jurisdiction or a Grantee may choose to award points to business not formally certified but meet the requirements for certification.</p>	
<p>Retain a diverse evaluation committee and get clear on the <b>equity</b>-centered values that committee is asked to uphold.</p>	<p>When you appoint an evaluation team, include systemically marginalized community members who come directly from the priority communities themselves. Provide stipends and translation as needed to remove barriers to participation, as well as mentoring about the process as needed (GMM Ch. 5, 5.7; App. B, Spotlight, p.36).</p>	<ul style="list-style-type: none"> <li>▪ Does our evaluation committee include representatives from the community we are working with?</li> <li>▪ Are we appointing trusted community-based leaders who are not already on Boards or Commissions?</li> <li>▪ Are we removing barriers to participation?</li> </ul>

## Spotlight: Juxtaposing Fiscal Responsibility With Thriving Communities

There is a tension in the implementation of CDBG and all federally funded programs that infuse money into small businesses and businesses owned and operated by people who are systemically excluded from economic opportunity. On the one hand, the government claims a responsibility to taxpayers to spend money efficiently, by, for example, granting contracts to the lowest bidders. This allows government to fund more programming for more people. But when a part of the purpose of the program, as is true with CDBG, is to invest in the businesses themselves, paying as little as possible is actually a form of disinvestment. Businesses that are small and under-resourced may need more flexible spending options and faster reimbursements than larger firms with broader capacity.

As one HCD staff member said, "It would be better to pay smaller businesses more - to help grow business and find more opportunities - don't nickel and dime small businesses."

—Equity Working Session

## Spotlight: When Well-Meaning Policy Creates the Potential for Harm

Procuring a Section 3 Business is one way that Grantees demonstrate that they are creating job opportunities for people experiencing poverty. To be considered a Section 3 Business, a business must meet one of the following criteria: (1) The business is at least 51% owned by people who are classified as Section 3 Workers, (2) More than 75% of the labor hours performed by the business are performed by low- or very low-income persons, or (3) The business is at least 51% owned by people who currently live in public housing or Section 8-assisted housing.

And while procuring such a business may result in beneficial outcomes for employees experiencing poverty, there are openings within this definition for the possibility of exploitation. Consider the second qualifier. A business that is earning large profits for its owners and/or high wages for a few employees on the top of the hierarchy while paying large numbers of people poverty wages to do most of the work would still qualify as a Section 3 Business under the second criterion (75+% of hours worked by low- or very low-income persons); all while having an impact on employees that does not align with the intent of the policy.

Grantees have the opportunity, and indeed the responsibility, to do **due diligence** in procurement of Section 3 Businesses, to ensure that they are not rewarding exploitative business practices in order to meet HUD's Section 3 benchmarks. It is better for the Grantee to proactively support and protect people experiencing poverty (even if it means missing the benchmark) than to be implicated in harming people who are already vulnerable to systemic exploitation.

### GMM References

*Chapter 5, Section 5.2 - Overall Procurement Requirements - Section 3 Benchmarks*

*Chapter 5, Section 5.2 - Overall Procurement Requirements - Minority Business Enterprises/Women Business Enterprises (MBE/WBE)*

*Chapter 5, Section 5.5 - Methods of Procurement*

*Chapter 5, Section 5.7 - Procurement of Professional Services*

*Chapter 5, Section 5.9 - Procurement of Construction Services*

Part III: Workforce Relations

# Hiring Practices

## What Are Equity-Centered Hiring Practices, and How Might They Move Beyond the Regulations?

Hiring practices are the myriad policies, practices, and accompanying documents that support organizations in identifying and hiring employees. Components of the hiring system include job descriptions and applications, interview protocols and selection panels, internship and apprenticeship programs, recruitment and marketing algorithms and processes, as well as compensation, onboarding, and mentoring support.

The minimum requirements for hiring practices in CDBG include complying with a variety of federal and state employment and labor standards requirements. Primarily, all positions hired with CDBG funding must be Equal Opportunity without discrimination and comply with the Equal Pay Act and Title I of the Americans with Disabilities Act. All subrecipients and contractors assisting in the implementation of CDBG programs must take proactive steps to prevent discrimination in hiring and in the workplace, such as advertising that they are an Equal Opportunity employer, recruiting in a way that does not limit participation from members of protected classes, maintaining demographic data around employees, and displaying Equal Opportunity posters prominently in English and in Spanish (GMM Chapter 4; GMM Chapter 7).

And yet, most normed policies and practices within the hiring process continue to replicate patterns of privilege and harm (Lobell, 2021; Weller, 2019). This happens in all sectors, including in structures such as CDBG, which is meant to prioritize community members who are often excluded from job growth, such as low- and moderate-income (LMI) individuals and families. One of the reasons this continues to happen (regardless of the intent of policy makers and implementers) is that policies often fail to account for the layers of marginalization that folks experience, and how these forms of **inequity** contribute to economic instability. For example, from November 2018 to October 2019, the unemployment rate of Black college graduates was 40% higher than among white college graduates. “Black workers, no matter their level of education, still face impediments in the labor market—employment discrimination, occupational segregation, and unequal pay” (Weller, 2019). Education and job training cannot, therefore, address wage disparities on their own. In other words, when we overlay **race-evasive** policy over a racist system, the outcomes will include racial disparities.

Moving beyond the regulations, then, is about using a design-to-the-margins lens (and specifically leaning into **intersectionality**) to examine the policies and practices that perpetuate disparities, and to shift them in order to mitigate harm. The word “**intersectionality**” describes the ways in which multiple forms of **inequity** and discrimination (around, say, race, gender, ability, housing status, etc.) intersect to create unique dynamics and effects, often compounding the harmful impacts of **inequitable** systems on individuals, families, and communities (Crenshaw, 1991).



## Spotlight: Hiring Equitably System-Wide

Hiring practices for CDBG programs are multi-layered. HCD, Grantees and subrecipients, and contractors and subcontractors may hire employees. But depending upon which layer is being considered, different regulations may apply. For example, employees of contractors performing construction work would be subject to Davis Bacon and Related Acts (DBRA), while HCD hires are subject to equal opportunity laws and standardized pay scales, some union negotiated, for each defined position, etc. It is possible to address cross-cutting regulations such as DBRA through an **equity** lens and/or in ways that create harm. For example, required interviews with employees can protect them from wage theft or they can set the stage for retaliation. The intent of the strategies and examples below is to address multiple layers of hiring practices in a way that mindfully and intentionally adheres to the regulations.

**HCD's Role:** HCD can review and shift job descriptions, interview questions and practices, and hiring rubrics to be more inclusive, by naming and inquiring about expansive types of experience/expertise (such as lived and outside-of-school experience), creating and promoting existing supports (such as **affinity space** and/or mentoring programs) available to people from marginalized communities, creating and promoting an **equity** and **belonging** statement, and developing recruiting channels with colleges that serve **BIPOC** students specifically, such as Historically Black Colleges and Universities (HBCUs) and Hispanic-Serving Institutions (HSIs).

**Grantee's Role:** A Grantee's responsibility when it comes to hiring both overlaps with HCD's and with contractors. Like HCD, Grantees can write job descriptions that prioritize existing relationships and/or relationship-building experience with communities most impacted by **systemic inequities**, bilingual/bicultural skills, **equity**-centered skills, etc. They can request recommendations from community members and accept them in a variety of formats. They can create homegrown development programs from within their communities and develop relationships with local high schools and junior colleges. They can limit their required educational/job experience in order to accurately reflect what is a prerequisite and what can be learned on the job.

When the Grantee is monitoring the work of contractors, staff can and should do so in ways that prioritizes protecting employees. When conducting on-site labor compliance reviews, ask how the worker wants to be interviewed (whether in person or on a phone follow up). Ensure that the communication happens in their preferred language, in a way that does not subject them to retaliation should a violation be noted (so, in a place that is out of ear- and eye-line of their employer), and is reported with identifiers removed.

**Contractor's Role:** Contractors are responsible to treat employees with respect and accurately classify and report the correct level of work for correct level of pay. And they are responsible for providing monitors' access to employees in ways that secure their safety.

## Implementation Strategies and Corresponding Guiding Questions

Hiring Practices that center **equity** involve considering **intersectionality** and the ways in which systems marginalize people and therefore hold the responsibility for repair. This process begins when institutions use a design-to-the-margins lens to look for harm in hiring practices (including recruitment strategies and documents, interview questions and evaluation matrices, retention and compensation policies, monitoring labor standards and mentoring and support systems). Institutions move towards **equitable** outcomes when they shift these processes to account for past and ongoing harm and reduce the likelihood and impact of future harm.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<b>RECRUITMENT &amp; HIRING</b>		
<p>Build relationships with communities served and recruit from within these communities.</p>	<p>The foundation of any hiring process starts with building relationships, which means building time into your process and devoting energy to trust building and transparency about the hiring process and timeline. Design time into the process to accommodate needs and offer flexibility (GMM Ch. 2, 2.2.4).</p>	<ul style="list-style-type: none"> <li>▪ Are we showing up with short timelines and quick turnarounds, or designing spaciousness for relationship building into our timeline?</li> <li>▪ Are we clearly communicating about the hiring process and timelines?</li> </ul>
<p>Remove barriers (around time, money, transportation, technology, required experience, etc.) to the entire hiring process.</p>	<p>Provide private places to fill out job applications, offer computers and WIFI as well as technical support as needed. Should a job site be hard to access with public transit, invest in a shuttle or other transportation offerings to remove travel barriers. Communicate about these support services in your recruitment materials (GMM Ch. 2, 2.2.4)</p>	<ul style="list-style-type: none"> <li>▪ How are we removing technical, technological, monetary, and logistical barriers to the application process?</li> <li>▪ How are we providing support as questions about the application process arise?</li> <li>▪ In what ways can we make our job site more accessible for people who rely on public transit and/or people with physical disabilities?</li> </ul>
<p>Even when not required, make every effort to prioritize people experiencing poverty in hiring, pay thriving wages, and use a design-to-the-margins lens.</p>	<p>Remove non-necessary job requirements. For example, accept job experience in place of formal education, provide special skills training or funds for needed certifications. Consider pairing an internal referral process, whereby current staff can recommend people they know (who may not find their</p>	<ul style="list-style-type: none"> <li>▪ How are we prioritizing low- and moderate-income folks in our outreach, evaluation, and selection process?</li> <li>▪ How might we remove hiring barriers for Low/Mod recruits?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<b>RECRUITMENT &amp; HIRING</b>		
<p>Even when not required, make every effort to prioritize people experiencing poverty in hiring, pay thriving wages, and use a design-to-the-margins lens (cont'd).</p>	<p>way to you through traditional recruiting channels) for jobs, with a grow-your-own program, in which you support staff in entry-level positions to move up the ladder of your organization (GMM Ch. 5, 5.3).</p>	
<p>Consider <b>intersectionality</b> (and both the identity markers that are explicitly named as protected classes in the regulations as well as the identity markers that go unrecognized by federal or state law) when complying with EEO requirements to not discriminate.</p>	<p>If working to hire more women, consider how other identities compound the harm of <b>inequitable</b> systems among women, such as race, socio-economic status, age, or ability. Work to hire folks on the margins through this <b>intersectional</b> lens. Think beyond only the protected classes, and work to include immigrants, people who have experience receiving government services, people who were formerly incarcerated, and single parents and/or guardians/ caretakers (GMM Ch. 4, 4.6).</p>	<ul style="list-style-type: none"> <li>▪ Do we have a weighting system in our hiring selection process that integrates an <b>intersectional</b> lens, giving more weight to folks who are on the margins across multiple identities?</li> <li>▪ Are we working to recruit and select impacted folks beyond the protected classes (See GMM Ch. 4, 4.3 for a list of protected classes)?</li> <li>▪ Are we using context as well such as hires who are representative of and understand the experiences of people being served?</li> <li>▪ Are there internal barriers to doing this that we need to work to remove?</li> </ul>
<p>Redefine what makes a good employee, and make hiring materials, from outreach to interview questions reflective of that definition.</p>	<p>When recruiting, expand the skills section to include non-dominant skill sets such as multilingual skills, experience receiving support from CDBG programs, lived experience, traditional knowledge, and existing relationships with priority communities. Reduce <b>gatekeeping</b> requirements such as educational attainment that don't account for alternative ways of learning, and mitigate biases such as associating an accent with someone's intelligence (GMM Ch. 2, 2.2.4).</p>	<ul style="list-style-type: none"> <li>▪ Have we audited our hiring processes and recruitment qualifications with a DTM lens to expand the skill sets we value and removed <b>gatekeeping</b> requirements?</li> <li>▪ Have we expanded how we think about 'education' to include work experience, lived experience with <b>inequities</b>, and traditional knowledge?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<b>COMPENSATION, RETENTION, SUPPORT, &amp; LABOR STANDARDS</b>		
<p>Compensate all forms of labor, including emotional labor and translation, <b>equitably</b>, and incorporate them when distributing workloads.</p>	<p>In deciding pay scales, include increased compensation for non-dominant skills, such as multilingual, relationships held, and lived experience. Recognize that integration of lived experience skills (such as the business benefiting by learning from someone about their experience dealing with racism) is significant emotional labor (which often requires rest for recovery) and should be compensated as such, and (GMM Ch. 2, 2.2.4).</p>	<ul style="list-style-type: none"> <li>▪ Are we recognizing and compensating for skills that often go unrecognized?</li> <li>▪ Do our pay scales reflect compensation for lived experience, existing relationships, and multilingual skills?</li> <li>▪ If a staff member shares personal experiences navigating <b>inequities</b>, are we prepared to offer compensation for (and rest time after) spending that time and energy to educate other staff?</li> <li>▪ If an employee offers translation support, are we financially compensating them for that labor and adjusting their workload to account for it?</li> </ul>
<p>Meet the language needs of all hires.</p>	<p>Ensure that all signage, such as wage rates, employee rights, and written and verbal communication addresses the language needs of all employees, contractors, and subcontractors (beyond 4-factor analysis thresholds) (GMM Ch. 7, 7.5). When conducting labor compliance interviews, ask how the worker wants to be interviewed. If it's in person, conduct it in their preferred language. If it's via mail, provide the survey in their preferred language (GMM Ch. 7).</p>	<ul style="list-style-type: none"> <li>▪ Are we aware of the language needs of our employees, contractors, and subcontractors?</li> <li>▪ Are we providing all signage in the language needs of all hires?</li> <li>▪ Do we have the interpretation capacity to provide verbal communication in the language needs of all hires?</li> <li>▪ Can we offer labor compliance interviews in the recipients preferred language, verbal or written?</li> <li>▪ If not, can we bring in interpretation services?</li> </ul>
<p>Build internal spaces of <b>belonging</b> that allow for shifts in culture and practices based on the needs and priorities of employees who have traditionally been asked to assimilate in workplaces.</p>	<p>Create <b>community agreements</b> that support cross-cultural communication and collaboration. Support employees to collaborate on the design and decor of workplace environments. Agency to co-create spaces is important</p>	<ul style="list-style-type: none"> <li>▪ Do we have (and frequently invoke) <b>community agreements</b> that weave together the assets of the cultures represented in our workplace?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<b>COMPENSATION, RETENTION, SUPPORT, &amp; LABOR STANDARDS</b>		
<p>Build internal spaces of <b>belonging</b> that allow for shifts in culture and practices based on the needs and priorities of employees who have traditionally been asked to assimilate in workplaces. (cont'd).</p>	<p>to create <b>belonging</b>. Celebrate the unique cultural preferences of clothing, food, style, or otherwise of your employees, and accommodate cultural needs as well.</p>	<ul style="list-style-type: none"> <li>▪ Have we invited employees from non-dominant cultures to help design and create our workplace environment?</li> <li>▪ Are we open to requests to recognize non-dominant cultural holidays, practices, or celebrations?</li> <li>▪ Do we offer flexible PTO options that support folks who participate in non-dominant holidays or practices that overlap with business hours.</li> <li>▪ Are we welcoming and non-judgmental of non-dominant cultural practices?</li> </ul>
<p>Make room for folks, especially from marginalized backgrounds, to experience and share a range of emotions in the workplace.</p>	<p>Communicate and model that a range of emotional expressions in the workplace are welcome. For example, by taking time to grieve the loss of a family member, offering time to process racial injustice, or celebrating the joy of a friend getting citizenship status. Assess the way biases do or do not manifest in your workspace. For example, is the same room for anger offered to Black women as it is to white men, or do they experience different sets of consequences for expressing anger?</p>	<ul style="list-style-type: none"> <li>▪ Are we open to witnessing and creating space for emotions that may feel slightly uncomfortable?</li> <li>▪ Are we able to embrace the celebration of experiences we may not be able to relate to?</li> <li>▪ Is the same space available to all people and all emotions?</li> </ul>
<p>Provide mentorship opportunities, specifically for folks from non-dominant backgrounds and identities.</p>	<p>Ask employees from non-dominant backgrounds and identities about their skills-development goals, and design mentorship support systems and professional development plans and budgets around that. Remember, mentorship is bi-directional, and mentors should be open to learning also from mentees. On-board mentors and mentees on</p>	<ul style="list-style-type: none"> <li>▪ Are we aware of the skills-development goals of our employees from non-dominant cultures, regardless of whether they meet the goals entrenched in the dominant culture?</li> <li>▪ Have we created a mentorship and professional development plan that reflects the needs of our employees?</li> <li>▪ Are we inviting bi-directional learning through the mentorship process?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<b>COMPENSATION, RETENTION, SUPPORT, &amp; LABOR STANDARDS</b>		
<p>Provide mentorship opportunities, specifically for folks from non-dominant backgrounds and identities (cont'd).</p>	<p><b>community agreements</b> that mitigate the harmful impacts of power imbalances.</p>	<ul style="list-style-type: none"> <li>Are we working to mitigate the harmful impacts of power imbalances?</li> </ul>
<p>When conducting interviews with employees regarding compliance, be mindful that the responsibility to protect an employee should be proportionate to the potential for exploitation (See App. B, Spotlight, p. 94).</p>	<p>Employees on the margins risk greater exploitation, and therefore efforts to protect them from exploitation must reflect that greater risk. Avoid potential risks for retaliation, for example, when monitoring worksites, interview employees without their supervisor present (GMM Ch. 7, 7.7).</p>	<ul style="list-style-type: none"> <li>Is the interview site in line with the safety needs of the person being interviewed? Have we erred on the side of protection?</li> <li>Is the interviewee able to express themselves freely and be understood completely?</li> <li>If a compliance interview is via survey, will we follow up to support completion?</li> </ul>
<p>Solicit feedback on how hires with marginalized backgrounds feel in their role.</p>	<p>Ask for feedback from your hires to understand what their experience is and what they need as support. There may be dynamics at play for them that are not obvious to leadership.</p>	<ul style="list-style-type: none"> <li>Do we know if hires from marginalized backgrounds feel supported and a sense of <b>belonging</b>?</li> <li>Are our efforts to solicit feedback repeated over time, perhaps every 3-6 months?</li> </ul>

## Spotlight: Job Description Gatekeepers

Job descriptions often include sections that list the experience, skills, and/or education required to fill a post. Sometimes, a distinction is made between “required” and “desired.” Often, formal educational benchmarks, examples of college majors, and specific previous job titles or experiences are meant to be proxies to sort the folks who are likely to have the transferable skills necessary to do the work from the folks who do not. But they are often narrow in scope and inaccurate, signifying access to pathways that are disproportionately available to some folks based on wealth and income, race, gender, national origin, etc. They also erase skill sets that are not taught or valued in formal educational and professional settings, such as bilingual/biculturalism, organizing experience, experiential knowledge, etc.

And as one HCD leader said during an Equity Working Session about a hiring barrier, “Most positions require a bachelor’s degree. It disturbs me that there are so many qualified people who don’t qualify because of that.”

Many institutions post job descriptions requiring a bachelor’s degree, based on assumptions about what having a BA says about the applicant. These assumptions may include certain knowledge sets, work ethic, and/or soft skills. And while there may be some correlation between these degrees and these skills (depending in part on the technical requirements of the job), there are other truths as well. For example, a BA is not workable for many people economically, and four-year universities can be hostile environments for people who experience marginalization and/or whose culture is not mirrored or respected by the institution. Getting a BA is not the only way to acquire or demonstrate soft, transferable skills, many knowledge sets, or work ethic.

Institutions can do the work to broaden the reach of their job descriptions by identifying the skills they are looking for and accepting a wide range of ways for applicants to demonstrate these skills. They can also get clear about which technical skills/experiences people must have on day one and which can be taught on the job. They can shrink their “required qualifications” in favor of “desired qualifications.” When they do require a BA, they can broaden acceptable majors to include subject matters that disproportionately attract students who experience marginalization. For example, a job description that says, “majored in English or history” could be adjusted to include Ethnic Studies, Raza Studies, African American Studies, Gender Studies etc., as these are very much English and history majors with a critical lens, and also serve as a way for people who experience marginalization in to flourish in four-year settings.

HCD and CAL HR recognize these concerns and have taken steps to make a systemic shift from “required” qualification to “desired” qualifications and are taking further steps to improve hiring practices by taking into consideration these **equity**-based practices.

### GMM References

*Chapter 2, Section 2.2.4 - Low/Mod Jobs (LMJ)*

*Chapter 4, Section 4.6 - Equal Employment Opportunity (EEO) Compliance*

*Chapter 5, Section 5.3 - Economic Opportunities (Section 3)*

*Chapter 7, Section 7.5 - Pre-Construction Requirements*

*Chapter 7, Section 7.7 - Labor Standards Compliance Requirements*

# Subrecipient Selection

## What Is Equity-Centered Subrecipient Selection?

Selecting a subrecipient to implement some or all of a CDBG program is a common practice that has the potential to either promote **equity** or to cause harm. The upside from the local jurisdiction's perspective is that the subrecipient, such as a Community-Based Organization (CBO) or nonprofit may have more staff capacity to dedicate to the program, especially if it is in line with the CBO's regular daily work. If the CBO is already a trusted and known entity to prioritized communities, the grant may have a better chance to reach the people who need it most.

The potential pitfall is that the local jurisdiction's choice for the appropriate CBO may not be aligned with or representative of the priorities of the community members who are closest to the pain of the problem (Dorsey et al., 2020; Robillard et al., 2022). The CBO that partners regularly with local government or other powerful institutions may have access because (1) its leadership has meaningful relationships with government officials, (2) the CBO knows how to navigate bureaucratic systems, and/or (3) leadership uses a style that aligns with governmental or dominant cultural norms. In a segregated society like ours, this is much more likely to happen WITHIN shared identity than ACROSS differences, forcing out CBOs who may be the most trusted (by community members) and **equity**-centered, including the CBOs created and led by the community being served. In other words, the preferencing for white-led organizations where Black and brown people are limited to underpaid, emotionally taxing, public-facing positions but are left out of decision-making is **ecosystemic** (Center for Nonprofit Management, 2022; Dorsey et al., 2020; Robillard et al., 2022). (It is, of course, possible for CBOs who have close relationships with government to be doing reciprocal, meaningful work within priority communities. It is also common for these relationships to be problematic and **savior based** (DeVries, A., 2023; Naylor & Blackwell, 2022).)

CBOs that have deep, meaningful, relationships with community members, that are driven by leadership that is reflective of the communities they serve, and that are committed to fully supporting and resourcing public-facing staff, are often under-resourced for these same reasons (Dorsey et al., 2020; Robillard et al., 2022). For example, when a CBO takes the time to build trust-based relationships, this effort may be misinterpreted by donors or the local jurisdiction as slow and too time consuming, resulting in priority being given to the more 'efficient' CBO (Gauss, 2015; Goggins Gregory & Howard, 2009; Okun, 2021; Partners for Collaborative Change 2019). It is also important to be wary of CBOs who 'sell' their services because they have relationships with priority communities, because relationships are not products to be sold and this perpetuates systems of extraction.

The regulations are essentially quiet when it comes to ensuring that CBOs are chosen in accordance with community priority, focusing instead solely on the fact that subrecipients are subject to the same regulations as the Grantee. But that does not leave the Grantee powerless to choose its subrecipients in an **equity**-centered way. Quite the opposite.



## Implementation Strategies and Corresponding Guiding Questions

Local jurisdictions have a responsibility to partner with subrecipients that are invested in shifting **inequities** in meaningful, co-designed ways. This requires avoiding and/or discontinuing relationships with partners whose existence relies on continuing **inequities** in the community, and who often simultaneously contribute to these **inequities** internally with their pay structures, power distribution, and internal policies and practices. Doing so involves seeking the most responsive CBOs through the eyes of the end user rather than through the lens of governmental ease or comfort.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Seek out the best CBOs from the end-user perspective.</p>	<p>Visit a community hub such as a store, restaurant or park that reflects the priority community and ask around about CBOs folks trust and recommend. (You may have employees who are from the communities served. Offer opportunities for feedback within, but be mindful of power dynamics. Never require any employee to give this feedback, ensure that they are compensated for any expertise they bring (See App. B, Spotlight, p.36), and do not treat their perspective as representative of an entire community.)</p>	<ul style="list-style-type: none"> <li>▪ Which organizations do the people I am seeking to reach and serve trust the most?</li> <li>▪ How do I know? Are we asking a wide range of folks in the most impacted communities to gather information about which CBOs are trusted and recommended?</li> </ul>
<p>Seek out CBOs that have an <b>equitable</b> internal structure, including diverse leadership representative of the community served, and <b>equitable</b> hiring and compensation practices.</p>	<p>Ask CBOs for their staff and Board demographics and tenure. Look for racially diverse leadership (and other forms of diversity, specifically as they relate to the identities and experiences of communities being served) among staff and Board, as well as how retention trends compare by demographic. Ask how their hiring practices are <b>equitable</b>, and for the pay ranges of the staff. Ask how they measure success, if it's purely by the number of people who participated instead of how the CBO actually improved someone's quality of life. If the CBO is unable to provide this information, look elsewhere.</p>	<ul style="list-style-type: none"> <li>▪ Are the directors and managers of the organization from the priority community?</li> <li>▪ Do the demographics of the Board reflect the demographics of the community served?</li> <li>▪ How long have priority staff and Board members been with the organization?</li> <li>▪ Do we have transparency into the CBOs hiring and compensation practices?</li> <li>▪ Does this CBO actually improve people's lives, or just tally up impressive numbers of participants? How do you know?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Contract in ways that allow under-resourced CBOs to participate, such as using general funds, lines of credit, or other alternate funding sources to pay them promptly while you are still awaiting funds from HCD.</p>	<p>As much as possible, allow funds to be spent on internal capacity building so that the staff who do the external work are supported. Minimize complex reporting requirements. Create systems to allow for consistent, frequent payments every 30 days, recognizing it is a significant burden to expect under-resourced CBOs to have 90 days of capital available before reimbursement.</p>	<ul style="list-style-type: none"> <li>▪ Have we discussed with the CBO what payment process and timing are needed in order to respectfully partner?</li> <li>▪ Can we create systems to ensure prompt payment, and minimize how often CBOs have to front costs before reimbursement?</li> <li>▪ Have we minimized the complexity of our reporting and invoicing processes?</li> </ul>
<p>Understand that CBOs that have not partnered with government before may not trust government entities any more than their constituents do. Treat this distrust with respect, and work to build trust over time by walking the walk.</p>	<p>Create space for relationship and trust building. Start each meeting with some time to get to know each other personally before jumping into business. Prioritize the relationship over an arbitrarily urgent timeline by being as flexible as possible, and communicating why when you are not able to be flexible. Communicate transparently about what is, and is not possible, within the structure of the program.</p>	<ul style="list-style-type: none"> <li>▪ Are we creating space to get to know each other when meeting on the project?</li> <li>▪ Are we offering flexibility on timelines and methods, and transparency into our limitations when they occur?</li> <li>▪ Have we educated ourselves about the history of the community we are working with, and understand why there is a historical lack of trust?</li> <li>▪ If we don't get an email back right away, or even after a few attempts, can we remain curious and proactive?</li> </ul>
<p>Help CBOs that have not partnered with the government to learn the system, and have the system learn from them.</p>	<p>Be ready to give support, then ask if the CBO needs support completing documentation or other requirements to be considered as a subrecipient. Asking without being able to follow through will damage the relationship. Support might include financially supporting the staff time it takes to gather documents and data needed or providing technical assistance (GMM Ch. 11, 11.1). When you see ways in which the system could better support under-resourced CBOs, work internally to make those adjustments.</p>	<ul style="list-style-type: none"> <li>▪ Do I know if this CBO needs support to be considered as a Subrecipient?</li> <li>▪ What support are we able to provide?</li> <li>▪ How can we offer this support, and learn from the process about how to reduce barriers moving forward?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Ask for feedback, but don't expect it.</p>	<p>If a trusted CBO declines the invitation to apply as a subrecipient, ask if they would be willing to provide feedback as to why. This can illuminate what barriers under-resourced CBOs face, so you can work to eliminate those for future projects. Be mindful that if you receive feedback but make no adjustments, this can erode trust. Communicate these barriers to HCD to promote larger systems change. If a CBO doesn't want to provide feedback, don't read into it, instead keep investing in the relationship.</p>	<ul style="list-style-type: none"> <li>▪ Did we ask for feedback along the way, but not take it personally if it wasn't given?</li> <li>▪ Did we relay feedback received to people internally who could make needed changes?</li> <li>▪ Did we follow up with internal staff to check on the progress of those changes?</li> <li>▪ Did we return to the giver of feedback to share updates on efforts made to implement changes?</li> <li>▪ Were we transparent in these communications about why certain changes were not made?</li> </ul>



## Spotlight: Partnering With Embedded CBOs

"[Our] County's CDBG programs/projects are designed to meet the needs of our diverse community, providing sustainability, improving lives, addressing homelessness, curing health/safety issues, and building additional housing. The County recognizes that we do not have the capacity to meet all **inequities** that may exist within the community, so we are partnering with nonprofits who already focus on community **inequities**. These partnerships extend the community outreach and services to those most impacted, thereby proving a more **equitable** transformable impact on the community, the low-income, aging, disabled, vulnerable, homeless, and veterans."

—Equity Priorities Survey

### GMM References

Chapter 11, Section 11.1 - Monitoring



Town of Mammoth Lakes Access Apartments Rehabilitation, Photo Credits: Eastern Sierra Community Housing



# PART IV: PROGRAM DESIGN

## Introduction

### What Is Equity-Centered Program Design, and Why Does It Matter?

An **equity-** and **belonging-**centered world is characterized by self- and community-determination. Resources are distributed **equitably** based on need and with a mindset of abundance and sustainable use, and they are spent by the community on itself based on its own priorities within this framework.

But this is not how resource distribution currently works. The government holds the purse strings, and the government decides who gets how much and where this money can be spent. The reasoning behind this includes: (1) The government has a responsibility to be frugal and intentional with taxpayer money; (2) the government has created a program designed to support low- and moderate-income people and communities and invest in sustainability; and (3) the government has a responsibility to ensure that this is how the money is spent.

And while these are genuine responsibilities, there are other, less noble messages embedded in the policies that govern CDBG funding. For example, the burdensome documentation requirements deliver the message that the government must protect itself from fraud by mostly poor people (all while the budgetary impact of tax loopholes and tax evasion by the wealthy and corporations has a much greater impact on the federal government's bottom line) (Demby, 2013; Oxfam, n.d.; Sarin, 2021; USSC, 2021; USSC 2022). Likewise, the exclusion of people who have been most systemically harmed by government from decision-making processes sends the message that the government (along with a tiny segment of the public who are well-resourced, land-owning, and systemically hyper engaged) knows what's best for people and communities on the margins (Abundant Housing LA, 2021; DeVries, 2023; Glimmerveen et al., 2021; McFarlane, 2001; Naylor & Blackwell, 2022; Scott & Rodriguez Leach, 2024). It is a key pillar of **equity-**centered work to build planning processes that center the perspectives of the people who are most negatively impacted by programming decisions, such as who gets displaced and how, which buildings should be condemned and which should be restored and preserved, and who counts as part of the "public" when projects are justified as for the "public good" (Abundant Housing LA, 2021; Cervero & Wilson, 2006; Gonzalez 2021; Martin, 2017; W.K. Kellogg Foundation, 2022)

### Shifting the Lens

*People who are closest to the pain of the problem are the closest to the solution, but often the furthest from institutional power, so how are Grantees ensuring that their voices (rather than well-meaning people in power) are centered in program design from beginning to end?*

When it comes to program design, then, jurisdictions engaging in **equity-**centered work will shift the lens they use when designing, implementing, and evaluating programs. People who

are closest to the pain of the problem are the closest to the solution, but often the furthest from institutional power, so how are Grantees ensuring that their voices (rather than well-meaning people in power) are centered in program design from beginning to end? What does the “public good” mean to them? Which buildings are historically relevant and worthy of preservation to them? They are the experts on this. The educational knowledge and work experience that are systemically regarded as expertise is based on a false premise. Community members are the experts on their lives and their experience. Only they know what matters to them.

*Community members are the experts on their lives and their experience. Only they know what matters to them.*

## Redistributing Power

**Inequities** of all shapes and sizes play out in community development work every day when they are not recognized or sufficiently addressed. Displacement is not merely an economic issue. It is a severing of community, and it, therefore, cannot be made right simply with relocation assistance. Look around. It is clear that there are some communities the government would never, ever break up (because the voices of the people within them hold institutional and structural sway) (Abundant Housing LA, 2021; Zinn Education Project, 2004; Taylor, 2023). So, reduce **inequities** by intentionally assigning such sway to communities who have been systematically deprived of it, and acknowledge that systemic exclusion is the reason they have not had it before (Cervero & Wilson, 2006; Gonzalez, 2021; W.K. Kellogg Foundation, 2022). In other words, refuse to privilege one community’s priorities over another just because that is how it has always worked.

# Cross-Programmatic Considerations

## Accessibility, Relevance, and Cultural Responsiveness

At all levels of programming, an institution needs to take into consideration the relevance, **cultural responsiveness** and accessibility of their processes and programming.

**Accessibility** is designing in a way that ensures anyone can fully participate, regardless of their **positionality**. Dedicate time and resources to identify the **intersections** of transportation access, disability access, economic access, language access, race, class, ethnicity, and identity and how these **intersections** play out on the ground as it relates to your program.

**Relevance** speaks to designing a program that actually responds to the needs, priorities and desires of the community members who you are serving. An organization can come to understand what these needs are by engaging the community to understand what exactly they want, how they want it, and why it is important to them. This helps promote the sense of autonomy for folks in the program, giving freedom to make decisions for themselves.

**Cultural responsiveness** is the extent to which the organization honors and respects the beliefs, values, and customs of a community and integrates that into planning. This also

means taking the time to understand and navigate diverse cultures and values to reconcile any challenges, while being flexible and adaptable to the community's needs and ways of being that are meaningful to them.

The regulations are loudest when it comes to accessibility, vague in response to relevance, and nonexistent around **cultural responsiveness**.

When it comes to accessibility, Congress has passed several laws that are clearly and specifically designed to address accessibility and equality in the administration of federal programs such as the Civil Rights Act of 1964, Age Discrimination Act of 1973, Americans with Disabilities Act, and the Rehabilitation Act of 1973. Presidents have used their executive authority to sign Executive Orders such as Executive Order 11246 regarding Equal Employment Opportunity requirements. Such orders are enforceable within federally funded programs.

Relevance is addressed indirectly, through proxies such as the public participation requirements, and is justified similarly. Uptake is deemed a measure of relevance. But there are no regulatory levers for ensuring that what is created is based on the needs and priorities of the people who are most impacted by **systemic inequities**. **Cultural responsiveness** is simply omitted entirely. Language Access is one mechanism that can support delivering **cultural responsiveness**, but it is not in and of itself **cultural responsiveness**. In fact, when translation and interpretation are put into place without the tenets of **cultural responsiveness**, which include honoring the cultural ways and priorities of people, which might differ greatly from institutional norms and priorities, this can create further harm (Zahra & Panner, 2022).

Because the federal government is largely quiet on these two crucial points, it is up to federal agencies and their Grantees, such as HCD, to provide guidance and insight on how to make CDBG-funded programs not only accessible but also relevant and responsive to the needs and ways of the community. HUD's recently published "Citizen Participation and Equitable Engagement (CPEE) Toolkit" (HUD Exchange, n.d.b.) is one document attempting to move the needle forward in this realm.

## Implementation Strategies and Corresponding Guiding Questions

Treating people "equally" fails to account for structures and historical context that continue to create disparate outcomes (powell, 2019). The implications of using a **race-evasive** process within an implicitly racist system is that we produce unintentional disproportionate impacts along racial lines (Gotham, 2015). An institution can produce meaningful positive outcomes when the people within it take the brave step to move away from using a race-neutral lens that is rooted in the concept of "equality" and move towards **equity** by centering people at the margins, using intentional practices that resource the priorities of community members and individuals who have experienced systemic harm so that they can thrive. Key to this stance is the understanding that individuals and communities get to decide what thriving looks and feels like to them and what processes will work within their cultural norms and ways of being and knowing. Implementing this, then, cannot be driven by governmental metrics and decisions, but rather, must be rooted in self- and community-determination, and resourced by the government to shift the power dynamic and design to the margins.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Analyze the information gathered during engagement processes through a DTM lens.</p>	<p>Overlay the demographic data gathered with the insights from the engagement process to determine the most high-priority, relevant programming needed within the community, according to them, rather than to the government.</p>	<ul style="list-style-type: none"> <li>▪ What were the dreams most commonly expressed by the folks who are most impacted by <b>systemic inequities</b>?</li> <li>▪ How representative and <b>intersectional</b> were our engagement efforts, are there still gaps in our understanding?</li> </ul>
<p>Move beyond asking community members to identify the problem. Ask for their proposed solutions as well and ask for feedback on any solutions you propose.</p>	<p>Analyze the data regarding the barriers people expressed encountering, feedback on any solutions, the solutions that are already in place, and solutions that they propose. Remember to disaggregate the data by identity markers.</p>	<ul style="list-style-type: none"> <li>▪ What barriers are most pressing, and what ideas were provided to address them?</li> <li>▪ What is already working that could be amplified?</li> <li>▪ Are there any shifts in current programming that would make them more effective?</li> <li>▪ What solutions do the priority community want?</li> </ul>
<p>Design programs and communications that are readily accessible for everyone, independent of physical, emotional, or intellectual ability.</p>	<p>Create a resource bank to support accessibility needs, such as sharing translation devices, ASL translator contacts, or technological accessibility tools. Provide a list in multiple languages of what accessibility services you offer, such as microphones, visuals to accompany audio, hybrid options, gender neutral and family bathrooms, and ADA compliance. Create and publicize simple feedback systems for community members to share their additional accessibility needs (GMM Ch. 4, 4.4).</p>	<ul style="list-style-type: none"> <li>▪ Have we compiled a list of accessibility services we can offer?</li> <li>▪ Have we created and promoted ways for folks to ask for additional accessibility needs in an affirming, rather than othering, way?</li> <li>▪ Have we created a buffer in our budget and timeline to meet additional accessibility needs?</li> <li>▪ Have we proactively contacted organizations who work with differently abled folks to ask what accessibility needs exist?</li> </ul>
<p>Look at the differences in responses from people across cultural and identity groups. Seek ways to make the program inclusive of multiple ways of being.</p>	<p>Look for patterns and themes among responses and how a proposed solution might reflect the desires of multiple cultural and identity groups. If a community center is being imagined, prioritize ways for the art, design, and programming to be inclusive.</p>	<ul style="list-style-type: none"> <li>▪ Are we unintentionally valuing one culture's desires over another?</li> <li>▪ Even if only a small number of an identity group are present, are their values still reflected in our program?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Create feedback loops in communication by hiring Community-Based Leaders.</p>	<p>Hire people from within the community to create and facilitate feedback loops and transparent, <b>bidirectional communication</b> throughout the process. This could be in the form of a direct hire or providing ample funding to a CBO to add staff capacity (including overhead costs).</p>	<ul style="list-style-type: none"> <li>▪ Do we have trusted community leaders on staff?</li> <li>▪ Do we have clear communications practices that ensure transparent, <b>bidirectional communication</b> with the community throughout the process?</li> <li>▪ When we receive feedback, do we respond to it?</li> </ul>
<p>Return to the communities engaged to reflect back what you heard to ensure accuracy. This also helps build trust and relationships.</p>	<p>As you design a program based on the input from community engagement, return to the community to ask: "Did we get it right?"</p>	<ul style="list-style-type: none"> <li>▪ Did we get it right?</li> <li>▪ What still needs to change?</li> </ul>
<p>Show rather than tell: Document and communicate your commitment to accommodations available to get folks what they need.</p>	<p>Proactively, transparently document and communicate all of the available accommodations and flexibility built into the program as a way to assure folks that the jurisdiction's desire is to get folks what they need.</p>	<ul style="list-style-type: none"> <li>▪ Are we proactively communicating (verbally and written) about programmatic flexibility and supports?</li> </ul>
<p>Be flexible and nimble in response to feedback.</p>	<p>Getting this right does not necessarily mean getting everything right at every step. But it does include humility and a willingness to shift. Feedback is a gift, not something anyone is entitled to.</p>	<ul style="list-style-type: none"> <li>▪ Are we receiving feedback? If not, how can we deepen our trust with priority communities?</li> <li>▪ When we receive feedback, do we take time to pause, reflect, and determine how to respond?</li> </ul>

## Spotlight: Opportunities for Relevant, Accessible Programming

Among the activities that are eligible for CDBG funding when assisting for-profit businesses, Grantees can provide services or benefits to newly hired employees that allow them to hold the jobs, such as transportation to the jobsite or day care assistance. The company could provide subsidies or vouchers to employees to obtain such services on their own; or the company could provide these services directly for their employees (for example, operating an on-site day care center); or the company could contract with a third party to provide/operate these services (for example, contracting with a bus service to transport employees to work).

Following through on the daycare example, if the company provides vouchers, employees can find the support that feels right culturally (and in all other ways for them). In places where there is not enough childcare available to meet the need, companies can and should ensure that they are not only providing care, but providing **culturally responsive** care, and hiring and following the lead of practitioners from within the community being served.

## Spotlight: Meeting People Where They Are

"[Our] County's race/ethnicity demographics are approximately 80% white and 13% Hispanic. Therefore, other than ensuring inclusivity for race/ethnicity, the main need is based on socioeconomics. There are many individuals in the County who are struggling financially, and our Interfaith Food Bank is desperately needed. One main problem with this issue is that our County's unincorporated areas are positioned away from the Food Bank, and therefore those individuals and families do not have access without transportation. The mobile food truck that this grant is assisting to purchase will meet this need by allowing the Food Bank to take food to the upper elevations within our County and provide food to those in need without transportation."

—Equity Priorities Survey

### GMM References

*Chapter 2, Section 2.5.12 - Eligible Activities*

*Chapter 4, Section 4.4 - Accessibility*



## Displacement and Relocation

Displacement - the temporary or permanent, direct or indirect, voluntary or involuntary relocation of individuals, households, businesses, and/or communities - is an outcome of many CDBG programs. While there are certainly programs that have relocation (for businesses or households) baked into them, displacement can also be an unintended consequence of any neighborhood investment program (Hyra, 2016; Taylor, 2023, Zinn Education Project, 2004). The first step to addressing displacement is to understand how and when it happens, the way in which it is not distributed **equitably**, the impacts of it that go far beyond economic well-being, and whose priorities are centered and whose are discarded in the process (Glimmerveen et al., 2021; Zinn Education Project, 2004). The second step is to mitigate the direct and indirect harm caused by displacement, by recentering the people who are most impacted by **inequities** and resourcing their priorities (Gonzalez, 2021; W.K. Kellogg Foundation, 2022).

To understand the impact displacement can have on communities of color and vulnerable populations, we must first understand the historical context of legal and forced displacement. California's history began long before the arrival of European settlers, but the impacts of colonialism and subsequent atrocities are still felt today. White settlers enacted a continent-wide campaign of cultural genocide and systemic removal of Native people from their lands through policies and practices such as the Indian Removal Act of 1830, signed by then-President Andrew Jackson (U.S. Department of State, (n.d.)). A founding principle of the United States that remains in place today is a toxic stew that includes (1) the prioritization of private property rights over human rights, (2) the laws and policies that create the **inequitable** distribution of private property, and (3) the direct relationship between property rights, power, and wealth (Jackson, 2021; Kendi, 2016; Rael, 2016; Sullivan et al., 2015). So, while white men with economic means were able to buy property (which, in turn, allowed them to build wealth and accrue more power), practices such as enslavement, segregation, **redlining, racially restrictive covenants**, and violent forced removal ensured that residents who were not white, male, or property-owning were routinely stripped of power and wealth (Jackson, 2021; Kendi, 2016; Silverstein, 2019; Tulsa Historical Society and Museum, n.d.). The repercussions of these practices are still seen and felt in communities of color. In fact, without meaningful community engagement and designing to the margins, tools such as **eminent domain** and redevelopment still often harm poor communities and communities of color, leading to disruptions in employment, education, housing, and community cultural wealth (Georgia Public Service Commission, 2024; Institute for Justice, 2023). It all comes down to power. Who has power in their community and in their lives? Who has the power to make decisions

about the economic, cultural, and social impacts on their communities and lives?

Relocation is an important component of the development work of CDBG. The Uniform Relocation Assistance and Real Property Acquisition Act (URA)\*, as discussed in GMM Chapter 9, is a federal law that establishes a minimum standard for federally funded programs and projects that require acquisition of real property or the displacement of persons from homes, business, or farms. This federal law applies to all CDBG funded activities that may result in any required relocation. The law outlines the necessary steps to provide adequate notice to any persons who may be displaced or affected by a federally funded action, along with establishing relocation benefit requirements, including financial compensation for relocation to comparable units. While the URA is designed to provide households and businesses with notice and compensation, it does not prevent a federally funded project from moving forward with displacement.

\* NOTE: Compliance with the URA is not optional, and noncompliance can jeopardize the use of federal funds for a CDBG project. Because compliance with the URA can significantly increase project costs, it must be considered very early in project planning to ensure all steps and requirements are followed.

The URA addresses the economic harm that people can experience when they are displaced, but the harm of relocation is more than economic, and the harm precedes relocation and is in place even when relocation is averted. The process of relocation, starting with the General Information Notice, initiates toxic stress, which has severe health-related consequences (Stahre et al., 2015). HCD and Grantees are obligated to do good while mitigating harm. Acknowledging and mitigating the harm in this process includes considering and addressing the emotional wellbeing of people who may or may not be displaced.

When CDBG Grantees engage in the relocation of small businesses and households, these actions have the potential to deeply impact the make-up of a community, including severing access to social networks and cultural resources (Institute for Justice, 2023; Kalish, 2022; Taylor, 2023). Taking this into consideration, there are ways to keep the core elements of a community intact. This can look like giving businesses and nonprofits the **right of first return** to a redeveloped space or giving families and individuals the autonomy to decide their priorities for **reasonable accommodation** (Association of Bay Area Governments, 2021; Georgetown Climate Center, n.d.). Ultimately, it is up to the institution to do their **due diligence** to understand the **intersections** of displacement and intentionally center the affected party in the decision-making process that directly affects their lives, giving them back their power.



## Direct Displacement (Physical Relocation)

Direct displacement, which includes but is not limited to the regulatory definition of displacement, is categorized as the physical removal of a person or a business from their home or community. This happens through many mechanisms, including foreclosure, eviction, condemnation (such as when a landlord keeps a home in such poor condition that tenants are forced to leave due to substandard housing or code enforcement), involuntary relocation, and **eminent domain**.

One of the most notorious examples of this was when Los Angeles officials used **eminent domain** in the 1950s to displace and bulldoze 300 Latino/a/e/x households in what was known as the Chavez Ravine, a neighborhood created by the impacts of **redlining** and **racially restrictive covenants** that segregated the city. Community members and families were violently and forcibly removed from their homes with help from local law enforcement officers. All of this in the name of the “public good,” to make way for Dodger Stadium and replace the neighborhood with a baseball team (National Museum of American History, n.d.; Zinn Education Project, 2004).

While direct displacement is often defined specifically as the forcible removal of a household or a business, it can be more broadly understood to include any relocation, because the impacts are similar, even when the relocation is “voluntary” from a regulatory point of view. Often multiple families or businesses leave the area, replaced by the project, which changes the nature of the community, and creates the need for the displaced persons to recreate the extensive roots system they had in place elsewhere (Freeman & Branconi, 1990; Keene & Geronimus, 2011). Direct displacement, therefore, can be understood to occur within any CDBG program that includes relocation, whether of businesses or households, whether voluntary or involuntary.

## Economic Displacement (Gentrification)

Economic displacement, also known as gentrification, is the method by which speculative markets and rising housing costs push out longtime residents who no longer can afford to live in an area. Neighborhoods that are “underdeveloped” are often havens for affordable housing and for communities of color, and predatory investors typically want to capitalize on the “rent gap,” which is the difference between the current cost of housing and the rate that can be charged if the home is improved (Smith, 1987; Whitlow, 2023). When looking at economic displacement, questions to ask include: Who can afford to live here? Can people living on the minimum wage or a fixed income afford to live here? Are the people who lived here before the investment still here?

In regards to CDBG funding, the influx of investment in neighborhoods can lead to gentrification (Freeman & Branconi, 2004; Hyra, 2016). The economic displacement that occurs is exacerbated by an appraisal system that does not include a **race-conscious** real estate valuation process (see Spotlight below). The historical and present practices of biased appraisals and the devaluation of homes in traditionally **BIPOC** neighborhoods perpetuates poor outcomes for **BIPOC** homeowners (Gotham, 2015; Ludden, 2023). Grantees and contractors can use a race-forward approach and evaluate homes by comparing them to similar structures in other census tracts to ensure that these families are compensated appropriately (See Spotlight below).

## Spotlight: An Equity-Centered Appraisal Process

Standard real estate appraisal processes reinforce **systemic inequities** because they exist within the context of historical and present-day segregative policies as well as appraiser bias. John Liss is using his appraisal company, True Footage, to get creative about changing the appraisal process to minimize the impact of this **inequity**.

He uses comparable homes from multiple neighborhoods (rather than only from the same neighborhood, as is common practice). He also uses technology to measure square footage, a process that he says is deeply subjective when done by a person with a measuring tape. After the technician takes photos of the residence, evidence of race of the family (such as family photos) are blurred out. This way the appraiser never has to set foot on the property, creating a buffer that prevents bias from creeping into the bottom line (Ludden, 2023).





## Cultural Displacement (Community Characteristics)

Cultural displacement is the changing of the makeup of communities, by pushing out and/or **erasing** long-term residents to the point where the community no longer belongs to them. This type of displacement intersects with physical and economic displacement, as when a community loses (through direct relocation or gentrification) longstanding religious or cultural institutions or small businesses that provide cultural foods, hair care, and products. With the influx of newcomers, who will often have racial and economic privilege, comes a shift in who gets to decide what activities are permissible in a neighborhood (Gonzalez, 2022; Harris et al., 2020). For example, new residents may take on the role of policing the activities of people of color. This shines a light on the importance of protecting the existence of social and cultural fabrics when redeveloping a neighborhood.

## Climate Displacement

Climate displacement has been impacting California and the globe at a higher rate than ever before. From the annual wildfires that rip through our communities leaving nothing in their path, to floods and mudslides that bury and wipe out our roads and homes.

Historically marginalized communities are often most impacted by climate crisis and climate displacement, and often take the longest to recover if recovery is even an option (Gotham, 2015). For example, the community of Pajaro in Monterey County has been a victim of structural racism and segregation since its founding, and it is largely home to folks who are low-income migrant farmworkers. When unprecedented rainfall hit California in 2023, over 3,000 homes in this community were flooded due to the break in a vulnerable levee that had been ignored by local decision makers since the 1960s. In fact, the needed improvements to the levee had been long delayed, in part, explicitly because it is a largely low-income area made of farmworkers. The analysis of the cost/benefit for this community did not take into consideration the social cost of inaction. Stu Townsley from the US Army Corps of Engineers was quoted in the LA Times stating, "It's a low-income area. It's largely farmworkers that live in the town of Pajaro. Therefore, you get basically Bay Area construction costs, but the value of property isn't all that high" (Rust, 2023). At the time of writing this report, a temporary fix has been made to the levee and the community is still waiting to learn what resources and support they will be given to try and recover (Rust, 2023).

## Harm Mitigation Strategies and Corresponding Guiding Questions

Historical and contemporary forms of displacement harm people and communities of color and their effects create ripples of impact in the lives beyond those directly affected. An institution must proactively address and prevent **inequitable** impacts when implementing policies with the potential of inflicting grave harm onto communities.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Listen to community members who are most impacted by <b>systemic inequities</b>, and specifically to folks who will be impacted by relocation, to understand and mitigate the harm that displacement may cause them beyond economic factors.</p>	<p>Prior to a tenant being made to relocate due to what is deemed substandard housing, first work to make the landlord take responsibility for the poor condition of their home rather than punish the tenant for factors outside of their control (GMM Ch. 9, 9.1). Should a resident move to what is deemed a 'substandard' unit when facing relocation, first meet with them to understand why they made the decision they did and see if funds can be made available to make the housing qualify for replacement housing payments (GMM Ch. 9, 9.3).</p>	<ul style="list-style-type: none"> <li>▪ Have we worked to build a relationship with the individuals and families impacted by relocation?</li> <li>▪ Did we do everything we could to avoid relocation?</li> </ul> <p><i>If the folks impacted make decisions that don't make sense to us, do we work with them to understand why that decision was made, including factors beyond economic ones that they may have prioritized (vs making assumptions)?</i></p>
<p>Understand the priorities of folks who will be impacted and center these priorities in your relocation process.</p>	<p>Every effort should be made to ensure referrals are made to comparable units based on geographic priorities of the folks impacted. This may include referrals located outside, as well as within, communities who have been historically marginalized (GMM Ch. 9, 9.2; Ch. 9, 9.3). Knowing a business' priorities should inform how you offer flexibility in reimbursement of moving expenses, by trusting the needs of the business over the financial cost-savings to the Grantee (GMM Ch. 9, 9.5.2)</p>	<ul style="list-style-type: none"> <li>▪ Have we asked folks impacted what their relocation priorities are?</li> <li>▪ Are we flexible with how we determine eligibility of moving expense reimbursement, centering the priorities of the people most impacted?</li> <li>▪ Are we trusting the business who we are making move when they identify necessary moving expenses?</li> <li>▪ Are we integrating these priorities into our processes, such as our referral or moving expense reimbursement processes?</li> <li>▪ Are we prioritizing the financial health of the local business (vs the government) when we decide what are 'reasonable' costs incurred?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Use <b>race-conscious</b> strategies in the appraisal process, to account for the fact that homes within communities of color are undervalued compared to white communities, when controlling for variables such as size, style, and condition (See App. B, Spotlight, p. 94).</p>	<p>When hiring a third-party appraisal company, ask about how they use a <b>race-conscious</b> approach to valuing homes, make sure they are aware of, and proactively address, the history of undervaluing communities of color (GMM Ch. 8, 8.2), by using comparable houses in multiple communities as part of the appraisal process.</p>	<ul style="list-style-type: none"> <li>▪ Have we asked our appraisal company about how they implement <b>race-conscious</b> strategies, such as looking at comparable properties in a variety of neighborhoods, into their valuation process?</li> </ul>
<p>Avoid using <b>eminent domain</b> if/when possible.</p>	<p>If considering <b>eminent domain</b> for the “public good,” be clear to define who the public is who should be benefiting from the project, build relationships with organizations in that community, and ask what their ideas of “public good” might look like, before moving forward.</p>	<ul style="list-style-type: none"> <li>▪ Have we defined who we mean by the public when we say a project is for the “public good?”</li> <li>▪ Do we have relationships with the communities our project is supposed to benefit?</li> <li>▪ Have we asked them what they would like to see improved and how?</li> <li>▪ Have we asked them how we can do this work while creating the least harm?</li> </ul>
<p>Prevent severing of community at all costs.</p>	<p>Not all organizations are equal. Relocating a locally owned, <b>culturally responsive</b> business or CBO that is a hub for social cohesion, mutual aid support, and/or providing services not available elsewhere is deeply destructive to the social fabric of a community and all efforts should be made to support these microenterprises and prevent the loss of these community cultural assets (GMM Ch. 2, 2.5.14; Ch. 8, 8.8).</p> <p>Interrupting access to these hubs by changing transportation options can be equally as harmful. This can include relocating services further from those who use them (moving a business across town to use their land for a park) or modifying how folks access the service (placing a new park that closes a road, rerouting public transportation).</p>	<ul style="list-style-type: none"> <li>▪ Are we aware of the critical cultural assets and hubs of social cohesion in this community?</li> <li>▪ Are we aware of the transportation needs to access these community hubs?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Provide wraparound advisory support to households impacted by displacement beginning at the first notice.</p>	<p>When delivering a Notice of Intent to Acquire (or even a General Information Notice) during an acquisition, recognize the toxic stress this can trigger, and provide support from emotional to process to legal, either directly or through local, trusted service providers. This is especially important when the person under stress may make a decision to move that puts their relocation benefit eligibility at risk (GMM Ch. 8, 8.3).</p> <p>Minimize the duration of uncertainty between notices in the process, provide advisory support in the recipient’s preferred language, and pay for translation services if referring someone to other agencies (GMM Ch. 9, 9.3).</p>	<ul style="list-style-type: none"> <li>▪ Are we providing personalized advisory services in the language requested?</li> <li>▪ Are we minimizing the time periods of uncertainty during the process?</li> <li>▪ Are we providing accessible, culturally responsive support to meet emotional, process, or legal needs, and/or connecting folks to service providers who can do so?</li> </ul>
<p>Provide honest advisory services and transparency about data collection.</p>	<p><i>Refer to examples in Appendix B, Section 5.2 - Data Gathering and Data Analysis</i></p>	<ul style="list-style-type: none"> <li>▪ <i>Refer to questions in Appendix B, Section 5.2 - Data Gathering and Data Analysis</i></li> </ul>
<p>Create systems to support mixed-status families</p>	<p>It is deeply harmful to deny undocumented individuals benefits, and systems of support should be created to still provide resources, even when the regulations restrict certain kinds of support. This could include an anonymous support line in multiple languages to direct people to trusted community partners (Ex: UndocuFund, LegalAid, California Rural Legal Assistance) who can offer support and who are familiar with immigration law (GMM Ch. 9, 9.1)</p>	<ul style="list-style-type: none"> <li>▪ Have we created systems to provide support through trusted community partners to people who are undocumented?</li> <li>▪ Do these support systems have secure data storage processes</li> <li>▪ Have we and our partners minimized the data collected to regulatory minimums?</li> <li>▪ Have we communicated with folks impacted about resources we can connect them with?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Proactively provide flexibility and multiple options to meet documentation requirements.</p>	<p>When gathering documentation to verify eligibility, such as for replacement housing payments, make sure the folks impacted understand the multiple options to verify income, that they are supported through the verification process, and that they know self-certification is always an option to document eligibility, if other verifiable information is overly burdensome to obtain (GMM Ch. 9, 9.7).</p>	<ul style="list-style-type: none"> <li>▪ Do folks impacted know there are multiple ways to verify their income?</li> <li>▪ Are we sure that folks understand what these options are and how to fulfill them?</li> <li>▪ Have we offered income verification support in their preferred language?</li> </ul>
<p>Consider the larger context within which you make reimbursement decisions.</p>	<p>Consider impacts of extreme weather events, market crashes, or public health emergencies when calculating a Fixed Payment amount for the relocation of a business or farm, picking a 2-year time period for comparison that is closest to an 'average' year (GMM Ch. 9, 9.1).</p>	<ul style="list-style-type: none"> <li>▪ Are we selecting an <b>equitable</b> time period for comparison when calculating payment amounts?</li> </ul>
<p>Make sure folks who are most impacted know their rights.</p>	<p>Delivering notices that inform people of their rights, such as the Temporary Relocation Notice, is not the same as someone fully understanding their rights. Provide ongoing advisory support that helps recipients know their rights, including the right to support in navigating the appeals process. Consider working with Legal Aid or local service provider in addition to or instead of a relocation "expert" consultation firm (See App. B, 5.4) (GMM Ch. 9, 9.2).</p>	<ul style="list-style-type: none"> <li>▪ Did we offer ongoing advisory support in a recipient's preferred language to answer questions about a Notice we delivered?</li> <li>▪ If folks have questions about their rights after our initial outreach, is there a safe and accessible way for them to follow up to ask questions?</li> </ul>

## Spotlight: Learnings From a Housing Program to Combat Climate Displacement

A rural county was looking to use the CDBG-CV funds it received to help 20 households in a primarily Spanish-speaking, farmworker community rebuild their homes after they were lost in a fire. The Grantee had a robust plan and personal relationships with the impacted community, but limited capacity, so they tried to bring a consultant in for support. But they couldn't find anyone willing to work in their rural area. Left to themselves, and experiencing staff turnover, they struggled to get out and connect with folks where they live, to start the conversation early, to build and sustain relationships across the distrust that exists, and to enroll and keep people in the program. As the expenditure window neared its expiration date, they'd only been able to qualify five out of the 20 households.

A Grant Administrator involved in the process reflected: "Doing the work upfront is critical. Part of the program design - you can have a small staff and turnover - if you have a process to stay in touch. Understanding community is important. It's a small community within the County, but the community members themselves were (likely) not involved in the development of the program. And people just move or move in with friends or relatives, but the systems for staying in contact are not there."

Grantee strategies to reduce the likelihood of results such as this include:

- Doing community engagement upfront and in an ongoing way to deeply inform program design and pre-address barriers to participation.
- A system for knowledge transfer and warm hand-offs when staff members move on.
- Create and implement a communication system with multiple pathways to stay connected to applicants.

An HCD support strategy can include:

- Working with consultants to expand support services into rural areas and other "consultant deserts."

### GMM References

*Chapter 9, Section 9.3 - Residential Relocation under URA*

*Chapter 8, Section 8.4 - Eminent Domain*

*Chapter 9, Section 9.1 - Relocation and Displacement*

*Chapter 2, Section 2.3 - Elimination of Blight*

*Chapter 9, Section 9.7 - Relocation Assistance Requirements under Section 104(d)*

*Chapter 9, Section 9.2 - General Relocation Requirements under URA*

*Chapter 9, Section 9.5.2 - Non-Residential Moving Expenses*

*Chapter 2, Section 2.5.14 - Microenterprise Assistance*

*Chapter 4, Section 4.1 - California's Housing-Element Law*

*Chapter 8, Section 8.2 - Voluntary Acquisitions*

*Chapter 8, Section 8.8 - Section 104(d) One-for-One Unit Replacement (Project Requirements)*

Part IV: Program Design





City of Fort Bragg Parents and Friends Senior Living Facility, Photo Credit: City of Fort Bragg

## Documentation and Hyper Regulation

Documentation and hyper regulation can pose added barriers for community members to access resources and services. An institutions' responsibility is to work effectively with recipients to navigate these systems in an effort to aid them as much as possible, but sometimes that gets superseded by the structures meant to protect the government or institution from fraud. This fear of fraud in part stems from unsubstantiated rhetoric that became popularized in the Reagan era, where stories like that of the "Welfare Queen," a racialized character who cashed welfare checks and drove a Cadillac, began to circulate, and were used to drive policy shifts, cutting resources, and driving vulnerable families further into poverty. This attitude against poor communities has continued to dominate national politics despite the actual rate of social benefits fraud being low and usually due to bureaucratic errors (Demby, 2013).

Interestingly, the rules and regulations around documentation are complicated: At times burdensome, and at times allowing for low-barrier methods such as self-certification. Sometimes the guidance falls in between, allowing for self-certification, but only as a last resort, and without proactively advertising this as an option. As CDBG funding can be used for so many different eligible activities and National Objective combinations, the federal regulations for the State CDBG program (24 CFR 570.480) clearly document that States have "maximum feasible deference" in their interpretation of the federal regulations, as long as the interpretation isn't plainly inconsistent with the Housing and Community Development Act. The federal regulations for CDBG don't necessarily specify the method or level of applicant documentation, but the HUD reporting systems do require the reporting of persons and households assisted by income level along with demographic information. States establish their own rules and requirements around income verification and reporting requirements in order to provide HUD the needed information.

*...the federal regulations for the State CDBG program (24 CFR 570.480) clearly document that States have "maximum feasible deference" in their interpretation of the federal regulations, as long as the interpretation isn't plainly inconsistent with the Housing and Community Development Act.*

States establish different levels of reporting and documentation collection based on the type of activity and the national objective. For example, a public facility such as a waste-water treatment facility can be constructed and meet a national objective simply based on the publicly available census data (low-mod-area), which can be collected and reported to HUD without any documentation collected from the beneficiaries (households living in the service area of the public facility). On the other hand, programs with a more direct benefit to individuals or households such as housing down payment programs or daycares must report on the actual households served by the program, and therefore must collect detailed information about the beneficiaries to report to HUD. So, while the rules and regulations may appear to be arbitrary or inconsistent, they are directly related to the level of reporting required by HUD to document that a national objective has been met with the use of CDBG funds.

At the end of the day, an agency or institution must ask themselves, “are we gatekeepers or are we allies?” If you decide you are allies, use this opportunity to identify how you can maximize access to resources. You can do this by removing unnecessary obstacles in documentation and shifting the burden away from the user. It is important to recognize that paperwork privileges the powerful: The more paperwork that is required, the fewer people who are under-resourced will get through the process (Klein, 2023). An institution can engage in a shift of internal and external structures by taking any opportunity to advocate for these changes at the state and federal level.



City of Dorris Splash Pad (The only Splash Pad in Siskiyou County), Photo Credit: Great Northern Services

## Harm Mitigation Strategies and Corresponding Guiding Questions

Strategies that seek to reduce harm around documentation recognize that historical practices have perpetuated a lack of access to resources and have effectively pushed out people at the margins. Minimizing barriers is the goal, which can be achieved by shifting and advocating for policy changes around documentation that ease the burden on the user.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Shift the lens from protecting the government from fraud to getting people into the program. Give folks the benefit of the doubt that they are doing the best they can and are acting from a place of unmet needs.</p>	<p>When calculating the Total Tenant Payment during relocation, proactively offer the opportunity to provide notarized self-certification of income verification, do not wait until the process becomes an “undue hardship.” Support the recipient through the documentation process as needed, including offering tech support (GMM Ch. 9, 9.7).</p>	<ul style="list-style-type: none"> <li>Do we give the benefit of the doubt to folks we are working with through documentation processes?</li> <li>Do we pause and re-orient when assumptions arise about someone’s underlying motivation?</li> <li>Do we proactively remove barriers and not wait for someone to experience ‘undue hardship’?</li> </ul>
<p>Take as much of the burden as possible off of the end-user and place it on the jurisdiction.</p>	<p>For example, when helping someone impacted by displacement make an informed decision about selecting assistance through Section 104(d) of the HCDA or the URA, the Grantee must ensure the recipient is clear about the impacts of this decision by proactively providing clear information and being available for questions in the language preferred (GMM Ch. 9, 9.7).</p>	<ul style="list-style-type: none"> <li>When we are expecting impacted folks to make critical decisions in a process, are we proactively providing the support necessary?</li> <li>Are we examining our processes to identify where we can remove work for the end-user?</li> <li>Are we testing our forms to see where users or line staff who are helping users get stuck, and then redesigning as needed?</li> <li>Are we putting a critical eye on requirements and reflecting on the impact they will have and the rationale behind them before passing them along to the end-user?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Give people as many options as possible for documentation types and modes of getting it to you.</p>	<p>When requiring documentation, communicate all the forms of documentation accepted and leave the door open for new methods. Allow for screenshots AND PDFs AND paper AND photos. Hand delivered OR texted OR emailed. Pay stubs OR calling someone’s boss OR photos of checks OR screenshots of Venmo transactions. Proactively communicate that self-certification is acceptable. For all methods of document collection, be sure to have policies and safeguards in place to ensure personally identifiable data is secure. (See GMM Ch. 10 for more information.)</p>	<ul style="list-style-type: none"> <li>▪ Have we created systems to capture documentation in a wide array of formats?</li> <li>▪ Have we communicated to our end-users about all the documentation formats accepted?</li> <li>▪ Are we offering customized support should additional formats be requested that we had not prepared for? Are we proactively communicating this?</li> <li>▪ Have we ensured that we have safeguards in place to secure personally identified data regardless of how it is collected?</li> </ul>
<p>Be transparent with folks about what is NOT required.</p>	<p>When providing advisory services for folks impacted by displacement, proactively communicate that this support is available regardless of documentation status, and that documentation status does not need to be shared during the process (GMM Ch. 9, 9.2). Communicate proactively when alternative forms of identification are accepted, ex: SSN, TIN, green card, etc.</p>	<ul style="list-style-type: none"> <li>▪ Do end users understand when documentation that is commonly collected is suggested but not required?</li> <li>▪ Do we penalize folks for not submitting suggested information?</li> <li>▪ Have we communicated when there is flexibility in a requirement?</li> </ul>
<p>Be transparent with folks about what IS required, AND ensure that they know you will help them meet the requirements.</p>	<p>If gathering ‘verifiable source documentation’ as part of Limited Clientele projects for direct benefit such as tuition payment or indirect benefit such as access to a health clinic, communicate up front what documentation is needed, why, and what support is available to meet the requirements to receive these benefits (GMM Ch. 2, 2.2.2).</p>	<ul style="list-style-type: none"> <li>▪ Are we clear internally about what documentation is required and why?</li> <li>▪ Have we proactively offered support in meeting these requirements?</li> <li>▪ Have we worked to reduce the verifiable documentation required, and increase the acceptance of self-certification forms?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Require only the minimum amount of documentation required by the regulations for the program type in question.</p>	<p>Annually evaluate the documentation requirements for processes like the Total Tenant Payment (TTP) to assess how to identify barriers, remove requirements that may have changed, simplify forms, and reduce duplication of efforts (GMM Ch. 9, 9.7)</p>	<p><i>Do we have a cadence to regularly assess our documentation requirements, remove requirements no longer needed, and simplify processes that have created barriers?</i></p>
<p>Protect people’s safety in engaging with government programs (specifically for folks who are undocumented).</p>	<p>When learning about someone’s documentation status, for example when assessing Replacement Housing Payments, do not document anything that is not required. Create systems to protect, secure, and anonymize data that is gathered, and transparently communicate who the data is shared with, and how long it will be stored (GMM Ch. 9, 9.1).</p>	<ul style="list-style-type: none"> <li>▪ Can we avoid collecting Information we are not required to gather?</li> <li>▪ When developing intake documents, are we critically questioning why we need the information we are asking for?</li> <li>▪ Are we proactively communicating what documentation will be shared, and with whom?</li> <li>▪ Are we proactively providing transparency about where we cannot provide safety around documentation?</li> <li>▪ Do we have access to secure storage and processes to anonymize sensitive information?</li> </ul>

## Spotlight: Buried Under Piles of Paperwork

In reference to the frequency with which HCD's scoring and programmatic requirements shift, one Grantee shared the following: "The CDBG program does not factor in enough scoring toward critically disadvantage[d] communities, and generally adds too many layers of requirements leaving the program complicated. Changing things every year only makes it harder." - Equity Priorities Survey

The CDBG program was designed to direct resources to the people and communities that experience systemic divestment in the market economy, due to policies and practices of both the private and public sector. This is a simple goal on paper, but in practice, the act of ensuring that money goes where it was intended to go is anything but simple. In order to ensure that CDBG has the intended impact for prioritized populations, HUD and HCD have put into place numerous checks and balances, in the form of requirements and documentation. And because this is far from a perfect science, both HUD and HCD have changed methods repeatedly in order to correct inefficiencies and/or block against misuse of funds. But this has created layers of burden upon everyone who tries to implement CDBG.

So how to address this tension? How should HCD ensure that the state CDBG program is moving towards **equity** for communities without overburdening the people who implement it and/or the end users themselves?

HCD acknowledges both that CDBG implementation practices must shift in order to be delivered **equitably** AND that yearly changes are overly burdensome. So, HCD is using a new model going forward to implement changes and minimize the burden to Grantees in the long-term. The components of this approach are as follows:

- 1 Intentional, **equity**-centered design: HCD is evaluating its policies and practices holistically, and focusing on shifts that address the roots of **inequity** and can be broadly applied across programs and communities (such as a centering of community engagement in program design).
- 2 Responsiveness, rather than reactivity: HCD is engaging in **bidirectional learning** with Grantees so that it can be responsive to their needs and wisdom.
- 3 Graduated shift with support: HCD is committed to designing a tiered implementation strategy that consists of an end goal and yearly steps towards meeting the goal. This will give the Grantee the long view and time to plan, as well as a choice to either go straight to meeting the end goal (if multiple shifts feels too burdensome) or step by step (if too much change too quickly is too difficult).

For example, HCD is currently using an intentional, **equity**-centered process to revise CDBG scoring and selection rubrics to lead to more **equitable** procurement. This is meant to be flexible and responsive to the context, needs, and wisdom of Grantees and firms. When it is

## Spotlight cont'd: Buried under Piles of Paperwork

finalized, it will be introduced gradually, supported with TA, and put out first as a suggestion, before becoming a requirement.

HUD, too, is proposing changes to the regulations to streamline program delivery and better shift resources towards communities with the greatest need. In January 2024, HUD published a proposed rule in response to key Executive Orders issued by President Biden to support the call for a whole-of-government effort to advance racial **equity** and support underserved communities.

### GMM References

*Chapter 2, Section 2.2.2 - Low/Mod Limited Clientele (LMC)*

*Chapter 9, Section 9.7 - Relocation Assistance Requirements under Section 104(d)*

*Chapter 9, Section 9.2 - General Relocation Requirements under URA*

*Chapter 9, Section 9.1 - Relocation and Displacement*



City of Hollister San Benito River Park Project, Photo Credits: City of Hollister



# Program Specific Considerations

While the subsections below will offer considerations that are specific to one of the four eligible program types, remember to incorporate the cross-programmatic considerations as well. All programming should be responsive to the stated priorities of communities most impacted by **systemic inequities**, should avoid and/or mitigate harm around displacement, and work to bring the burden of implementation off of the end user.

## Housing

### *What Are Equity-Centered Housing Programs, and How Might They Move Beyond the Regulations?*

Housing programs in the CDBG world include funding the purchase (under certain conditions) or rehabilitation of a home that will be occupied either exclusively (in the instance of single-family homes) or primarily (in the instance of properties with multiple units) by low- and moderate-income households. Funds can be provided in the form of grants or loans (forgivable, deferred, or amortizing). Applicants are eligible based on household income, and the program must ensure that program guidelines do not discriminate based on race, gender, ability, family structure, etc. For any housing project that results in displacement, temporary or permanent, tenants are always covered by the URA (see Appendix B, Section 4.2, CMM Chapter 9), while homeowners may be eligible for relocation payments under certain circumstances (GMM Chapter 9).

An **equity**-centered housing program begins, as all others do, with meaningful engagement with the people who are most impacted by **systemic inequities** to understand what sort of housing assistance would benefit them the most (see Appendix B, Section 2.2). The second component is about ensuring that these community members know what is available to them (see Appendix B, Section 2.3). It cannot be overstated the extent to which the relationships developed (or not) during the engagement and outreach process will have a direct connection to the success (or failure, or **inequitable** impact) of the program itself. Leaning into these relationships and maintaining ongoing feedback loops will allow the jurisdiction the opportunity to do programmatic **equity** work, such as supporting folks as they navigate what is often a long and arduous process and minimizing the burden placed on them.

**Equity**-centered housing programs incorporate the understanding that housing is about much more than money. Housing is personal, and contracting is complicated and stressful. Providing wrap-around, start-to-finish support (including emotional) is key, as is preserving people's agency and dignity, by listening to and championing their priorities, rather than treating them as if the government knows better about what is good for them. And while state and federal regulations limit the extent to which race can be incorporated into housing programs, there is a long history of racist policy that has led us to our housing **inequities** and has likely impacted the housing experiences of many of the folks being served (Jackson, 2021; Schwartztol, 2011; Stahre et al., 2015). Understanding this will be key to serving folks **equitably**.



## Implementation Strategies and Corresponding Guiding Questions

Housing programs can be done in ways that either perpetuate **inequity** or mitigate harm. Using a design-to-the-margins approach and anticipating/being responsive to the non-economic components of housing are among the steps to take to lead towards the latter outcome.

\*NOTE: If relocation is a part of the rehabilitation project, refer to the harm mitigation strategies in Appendix B, 4.2 - Cross-Programmatic Considerations.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Ensure that engagement through a DTM lens has driven the program design.</p>	<p>Insights learned from relationships with Community-Based Leaders and Organizations have directly informed program design. For example, how Grantees can prevent the unintended consequences of folks who may anxiously move after receiving a GIN notice but before the ION process (GMM Ch. 9, 9.3).</p>	<ul style="list-style-type: none"> <li>▪ Have we built meaningful relationships with the impacted communities we are working with?</li> <li>▪ Have we asked for their input on our program design, and followed through to implement their recommendations?</li> <li>▪ Do we have feedback systems throughout the entire program design, implementation, and evaluation process?</li> </ul>
<p>Continue to nurture the relationships built during the initial engagement process to get the word out and bring people in.</p>	<p>Nurture relationships with Community-Based Leaders, who will be the most trusted sources of information when providing services to people who greatly distrust the government. Advisory services during the URA Relocation process, for example, should be promoted through these relationships to most effectively communicate that the service is offered regardless of documentation status (GMM Ch. 9, 9.2)</p>	<ul style="list-style-type: none"> <li>▪ When stewarding relationships, do we maintain consistent communication throughout?</li> <li>▪ Do we continue to solicit feedback from these relationships, and follow through on insights learned? Are we transparent about why when we can't?</li> <li>▪ Have we created a way to compensate people when they help us spread the word about resources (See App. B, Spotlight p.36)?</li> </ul>
<p><i>Be proactive in letting folks know that the government wants them in this program.</i></p>	<p>Communicate directly to specific communities you want to engage in your program instead of generalizing about 'the community.' This could look like investing in relationships with CBOs, customizing your communications, proactively</p>	<ul style="list-style-type: none"> <li>▪ Are we proactively speaking to communities on the margins to ensure that they know about the program and understand that they are welcome and encouraged to apply?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p><i>Be proactive in letting folks know that the government wants them in this program. (cont'd).</i></p>	<p>communicating about accommodations and <b>belonging</b>, working to understand cultural nuances and incorporate <b>cultural responsiveness</b>.</p>	<p><i>Are we showing we want folks in our program by how we design programs, engage, market, and hire?</i></p>
<p>Offer continuous wrap-around support for participants, including emotional support. Housing is personal, and rehab projects are stressful, even more so when you are not entirely in control.</p>	<p>Homes are very personal parts of our identity and are foundational to our sense of safety. Homes are where we care for children, care for our elderly, recover, play and/or work, so disruptions, such as inviting strangers in, can be incredibly impactful and hard. Ask folks impacted whether there are days or times when work would be least disruptive, for example if someone works a night shift, construction during the day makes it impossible to rest for their job.</p>	<ul style="list-style-type: none"> <li>▪ Have we asked folks most affected by a housing project if there are ways we can minimize the impact?</li> <li>▪ Have we offered flexibility in the timing of our work to decrease disruption?</li> <li>▪ Have we offered alternative support, like childcare, if our work prevents a resident from being able to keep their child safe?</li> </ul>
<p>Listen to, believe, and champion the priorities of the homeowner or occupier.</p>	<p>When helping someone impacted, ask what their priorities are, and then support them in meeting these priorities. For example, what they value most in rehabilitating their home or purchasing a new one may very likely be different from what you think they might or should want. Don't make assumptions. Ask first (GMM Ch. 8, 8.8).</p>	<ul style="list-style-type: none"> <li>▪ Have we built a relationship with the folks being impacted?</li> <li>▪ Have we asked about their priorities in the rehab process and trusted them to know themselves best?</li> <li>▪ Are we designing the program to allow for flexibility in order to implement the recipient's priorities?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Take a <b>race-conscious</b> and DTM approach to eligibility and support. Remember that folks are treated differently by the real estate market as a whole, and the responsibility for the history and present-day reality of this is shared by the public and private sector, and so the mitigation of this harm should be on both ends as well. Government must play a significant role here.</p>	<p>Be mindful of the fact that to this day, traditional, fixed, government-backed loans are not available <b>equitably</b>. CDBG has an opportunity to be a part of the solution. Reach out proactively to community members and trusted partners to signal safety and offer wraparound support. Be transparent and available. And when housing support comes in the forms of loans, never remove someone from their home for lack of ability to pay. Foreclosure and/or eviction is catastrophic for families. The terms of the loan can include forgiveness. That is a lever to be used.</p>	<ul style="list-style-type: none"> <li>▪ Are we considering the racialized and <b>inequitable</b> distribution of credit (and other housing considerations) when designing our housing program?</li> <li>▪ Are we infusing this knowledge into outreach, support, and communication plans?</li> <li>▪ Are we ensuring that we keep people, especially people who are most vulnerable to financial and housing systems, in their homes at all costs?</li> </ul>
<p>Prioritize the financial stability of the people you are funding.</p>	<p>Don't use amortizing loans when forgivable loans are what people need in order to thrive. (For example: Offer loan forgiveness after 5 years or upon death of the title holder)</p>	<ul style="list-style-type: none"> <li>▪ Are we centering the financial health of the people we are funding, or the banks?</li> </ul>

## Spotlight: So Much Funding, So Little Housing

One Grantee explained the barriers they were coming up against in their community as they tried to usher residents into their first homes, highlighting the ways in which CDBG cannot fix all, but also potentially demonstrating a mismatch between the program design and the reality on the ground:

“Currently we feel our community is having a great impact with procurement pertaining to first time homebuyers’ assistance programs, we have applicants pre-approved but no homes that are in their approval range.”

—Equity Priorities Survey

### ***GMM References***

*Chapter 9, Section 9.3 - Residential Relocation under URA*

*Chapter 8, Section 8.3 - Involuntary Acquisitions*

*Chapter 8, Section 8.7 - Appraisals and Just Compensation*

*Chapter 8, Section 8.8 - Section 104(d) One-for-One Unit Replacement (Project Requirements)*

*Chapter 8, Section 8.2 - Voluntary Acquisitions*

*Chapter 9, Section 9.2 - General Relocation Requirements under URA*

*Chapter 2, Section 2.5.4 - Eligible Activities*



Town of Mammoth Lakes Access Apartments Rehabilitation, Photo Credits: Eastern Sierra Community Housing





City of Willows Rumiano Cheese Factory Business Assistance, Photo Credit: HCD Staff

## Economic Development

### *What Are Equity-Centered Economic Development Programs, and How Might They Move Beyond the Regulations?*

Economic development programs can include activities such as providing direct financial and technical assistance to businesses (for profit and non-profit), assistance to microenterprises, commercial rehabilitation or expansion, which often result in jobs for low- and moderate-income workers. Additionally, economic opportunities can also be generated through CDBG-funded public facilities and improvements, public services, and planning projects that are meant to provide benefits to low- and moderate-income residents (GMM Appendix D).

**Equity**-centered economic development requires doing these activities through a design-to-the-margins lens, and centering not just the economic needs, but all of the priorities of the community members who are most impacted by **systemic inequities**. It requires thinking about more than just numbers of jobs created. In order to do this well, the CDBG program should prioritize thriving wages, **equity**-centered hiring policies, and the fit of the business with the needs, skills, and priorities of marginalized local communities. It requires mitigating the burdens required to participate in these programs and proactively marketing to prioritized communities so that the benefit does not fall to the well-resourced and connected at the expense of everyone else. It requires thinking past the project itself and anticipating harmful unintended consequences, such as gentrification and economic displacement.

## Implementation Strategies and Corresponding Guiding Questions

Implementing **equity**-centered strategies for economic development programs involves taking a more holistic approach to these projects. Rather than focusing solely on individual businesses and the numbers of jobs that will be created or retained, Grantees who consider the overall well-being (as defined by community members themselves) of the community members who are most impacted by **systemic inequities** are better equipped to make decisions about economic development that will serve, rather than harm and/or displace, these community members.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>As with other forms of programming, begin with engagement in order to identify the priorities and wisdom of community members, as well as the barriers they face to participation.</p>	<p>Meaningful engagement and relationship development with local businesses that experience barriers and the community members who rely on them early on in the process can help Grantees understand the priorities and unique needs of these businesses. These stated priorities should then inform the criteria for selecting which businesses are invested in, as well as how you can remove barriers for businesses to access the program.</p>	<ul style="list-style-type: none"> <li>▪ Have we asked for feedback during our engagement process on the economic development priorities of the impacted community?</li> <li>▪ Have we asked what barriers businesses face to access our programs?</li> <li>▪ Have these priorities informed our selection criteria and weighting when identifying businesses to invest in?</li> <li>▪ Have we worked to remove barriers for businesses to access our programs? Did we follow up to ask, 'how did we do?'</li> </ul>
<p>Screen the location for and type of business (and type of jobs being created) through the lens of community members most marginalized by systems. Does it belong? Will it support the community or take from it?</p>	<p>As relationships are built through the engagement process, hire local Community-Based Leaders to help advise on program design decisions, such as screening businesses and job creation, by the folks most marginalized by systems and most impacted by the business and/or jobs.</p>	<ul style="list-style-type: none"> <li>▪ Are we receiving input from folks within the most impacted communities on the businesses and/or jobs our program will support?</li> <li>▪ If not, how can we strengthen these relationships?</li> </ul>
<p>Use a design-to-the-margins lens to ensure that you are funding businesses and people who are from the community that are marginalized by current funding systems.</p>	<p>When providing microenterprise assistance, prioritize businesses owned by members of the local impacted community, businesses that will provide job opportunities for local residents, and that provide services valued by this community. When working to qualify a program under Low/Mod Jobs, critically analyze the ownership model and if the services being provided are valued by the local community or if they risk gentrification (ex: high end clothing store) (GMM Ch. 2, 2.5.14) When conducting such analysis and creating program parameters, these must be documented in program guidelines and applied consistently to all applicants.</p>	<ul style="list-style-type: none"> <li>▪ Are the people/ businesses we are funding local?</li> <li>▪ Are they owned by folks from systemically privileged or under resourced communities?</li> <li>▪ Do the businesses or jobs we are funding meet the stated needs and values of the existing community?</li> <li>▪ Do the businesses we are funding risk shifting the existing culture of the priority communities?</li> <li>▪ Have we asked our community-based partners their thoughts?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Market the program proactively to people/ businesses that may not have relationships with the government and/or may not seek information in traditionally used channels.</p>	<p>Ask Community-Based Leaders or Organizations you have built relationships with for suggestions of businesses to contact. Proactively research for local businesses who have not worked with the government before. Direct engagement may be most effective here.</p>	<ul style="list-style-type: none"> <li>▪ Are we proactively working to meet and build relationships with new people and businesses?</li> <li>▪ Are we prioritizing our impacted communities in this process?</li> </ul>
<p><i>Provide flexible capacity building and resources to small, local businesses. Go to them, don't make them come to you.</i></p>	<p>Provide support, such as loans, back-office help, training, etc. that can support the actual needs and capacity of small businesses, be transparent about what is available, and then navigate folks through the process.</p>	<ul style="list-style-type: none"> <li>▪ As we build relationships with small businesses, are we asking them what barriers exist within our program?</li> <li>▪ Have we provided capacity support to help remove these barriers to participation?</li> </ul>
<p>Move beyond measuring the number of jobs being created to ensure that the jobs being created pay a thriving wage that will support the community.</p>	<p>Expand the criteria used to measure programmatic success from number of jobs to include wage compared to cost of living, retention over time, and even periodic surveys of employees about if they feel a sense of <b>belonging</b>.</p>	<ul style="list-style-type: none"> <li>▪ How holistically do we measure the success of our program?</li> <li>▪ Are we shifting from number of jobs to quality and overall impact of jobs?</li> </ul>
<p>Support businesses that have or are working to put <b>equity</b>-centered hiring practices in place.</p>	<p>Businesses funded with CDBG money should remove barriers in hiring practices by ensuring job descriptions and interviews value multiple ways of knowing, such as lived experience, focus on skills rather than credentials, and have removed bias and non-essential job functions. (GMM Ch. 2, 2.2.4). Efforts to retain systemically marginalized staff should be provided, such as mentoring, support, and accounting for needs that are connected to disability, income, gender, parenthood, etc. The role of the Grantee here is to</p>	<ul style="list-style-type: none"> <li>▪ Is the business able to communicate how they have operationalized <b>equity</b>-centered hiring practices?</li> <li>▪ Is the business able to share efforts to retain and support staff on the margins?</li> <li>▪ Were we able to assess this information without adding an undue burden of documentation to under-resourced businesses?</li> <li>▪ If your program is competitive, are you using the self-assessment tool to elevate business with strong hiring practices?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Support businesses that have or are working to put equity-centered hiring practices in place.</p>	<p>include the self-assessment tool in the application process and scoring rubric (in competitive bidding processes). Making this tool optional would allow firms who want to amplify their practices to gain points the opportunity to do so without putting undue burden on firms that would not benefit. One option would be to allow for businesses to supply their employee handbook or other documentation rather than recreating the information in a form. Grantees can also refer firms to HCD’s training on <b>equity</b>-centered hiring practices.</p>	
<p>The larger the business, the more scrutiny that the Grantee should apply regarding the previous three recommendations, and the greater the impact that the company will have on the community as a whole, specifically for the people who are most systemically marginalized.</p>	<p>Sometimes, businesses that are not a fit for the skills of local folks who are unemployed. Moves into the neighborhood. In order to fill the jobs, these businesses recruit employees from outside the community, so people end up commuting in for jobs and taking their paychecks back home to fund their schools and local governments and spend in their community’s stores. This is doubly problematic when jurisdictions use tax incentives to lure the companies in.</p>	<ul style="list-style-type: none"> <li>▪ Have we done our best to resource small businesses before working with larger businesses?</li> <li>▪ Have we thought through the consequences of bringing in a large company and increased our level of scrutiny on their practices accordingly?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Ensure that all of the services you provide are available in the preferred languages of business owners and prospective business owners in your area.</p>	<p>Work with HCD to create a resource bank that can support providing language access to businesses at every step of the process, including a pre-vetted list of translators and interpreters who can help translate complex legal language as well.</p>	<ul style="list-style-type: none"> <li>▪ Do we understand the language access needs of the local businesses?</li> <li>▪ How can we prepare to provide all of our services in the preferred language of business owners?</li> <li>▪ How can we share resources internally so all Grantees can meet this need?</li> </ul>
<p>Think through the ramifications of supporting the business beyond the immediate impact on the business and employees.</p>	<p>Consider how the business may uplift local culture, such as culturally relevant food, clothing, or art shops. Or if the business may shift the local culture, such as shops focused on tourists, mass produced goods, or products out of the price range of impacted residents.</p>	<ul style="list-style-type: none"> <li>▪ Will this lead to gentrification, or will this support the current community in thriving?</li> <li>▪ Will this support or shift the existing local cultures?</li> <li>▪ Does this business meet the needs and desires of the existing priority community?</li> </ul>

## Spotlight: The Case Navigator Model

The Grantee is responsible for a lot of bureaucracy and has the responsibility to prevent passing that burden along to the participant and making it as easy as possible for them to participate in the program.

One consultant working with HCD on policy reflected: "I think we need to change the model from (1) I put out a program, (2) people apply, (3) I respond to the applications in front of me, etc. to more of a case navigator, user-focused model."

One Grantee did just that. After launching a program, the program manager noticed that local businesses who would benefit from the program were too over-burdened with overlapping disasters to do all of the documentation required. So, the program manager shifted to a version of case management (much like what is often done in disaster housing response). He physically went to the businesses with a checklist of the documentation needed and took photos of the necessary documents with his phone to help them get through the process.

### ***GMM References***

*Chapter 2, Section 2.5.14 - Microenterprise Assistance*

*Chapter 9, Section 9.5.2 - Non-Residential Moving Expenses*

*Chapter 2, Section 2.2.4 - Low/Mod Jobs (LMJ)*



City of Hollister San Benito River Park Project, Photo Credits: City of Hollister

## Public Facilities, Infrastructure, and Improvements

### *What Are Equity-Centered Public Facilities, Infrastructure, and Improvement Programs, and How Might They Move Beyond the Regulations?*

CDBG money can be used to build or improve upon existing facilities in a low-to-moderate income area that are to be used by the general public, such as libraries, cultural centers, community centers, etc., or which will be used to provide shelter for people with special needs, such as survivors of domestic violence, migrant farm workers, people with developmental disabilities, and people experiencing houselessness. Funds can also be used for new or improved infrastructure, such as sidewalks, parks, water lines, streets, utility lines, public art, and broadband (GMM Chapter 2). (Note that operation of any of these types of facilities falls under public services, which is addressed in the next subsection.)

Before looking at what an **equity**-centered version of this work might look like, it's important to remember that this is the one area of CDBG where **eminent domain** is an available strategy. **Eminent domain** has a history of **inequitable** use and creating catastrophic harm for community members who are erased from decision-making processes. Please see Appendix B, Section 4.2 regarding relocation to understand the impact of **eminent domain**, address past harms due to its use, and to minimize its use and the harmful impact of any programs that involve it moving forward.

**Equity** concerns for public services, infrastructure, and improvements revolve around who is receiving the benefits, and looking at this issue through a design-to-the-margins lens. Which neighborhood is having its potholes filled or its broadband improved? Where is the park going? If you are putting in a new sewer system, where is the waste-water treatment plant going to live? What does this project do to the neighborhood as a whole? Does it split it up in any meaningful way? The impact of these projects is not limited to the people who may be forced to relocate. It impacts the ecosystem as a whole, and which ecosystems are most impacted is not random. It's based on power and privilege.

## Implementation Strategies and Corresponding Guiding Questions

During the entirety of this process, be mindful of the unintended consequences that improved infrastructure and new facilities can have on communities, including economic dislocation (gentrification). But do not withhold improvements from communities in order to prevent this. Rather, do the improvements in a way that responds to the stated needs of the community and put mitigation strategies into place to prevent these consequences.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Use a design-to-the-margins lens to engage community members who are most impacted by <b>systemic inequities</b> to learn what facilities or infrastructure they would prioritize bringing into their community, and implement it in a <b>culturally responsive</b> way.</p>	<p>Make it easy for communities most impacted by <b>systemic inequities</b> to engage with your design process. Go to them to learn how current infrastructure impacts their day to day lives. Walk the sidewalks, bike the roads, visit the facilities and talk to folks currently utilizing them. Ask what their priorities are and what cultural considerations are important during implementation of an upcoming project.</p>	<ul style="list-style-type: none"> <li>▪ Do our engagement efforts focus on communities most impacted by <b>systemic inequities</b>?</li> <li>▪ How can we go to the community (vs ask them to come to us) to better understand their experiences, needs and priorities and apply them in our program design?</li> <li>▪ How can we nurture these relationships throughout the entire project process?</li> </ul>
<p>Put safeguards in place to address the impact of unintended (but often predictable) consequences of these improvements (such as rising housing costs) on community members who are economically vulnerable.</p>	<p>Hire contractors from within (and who hire from within) the community being served so that they can reap the economic benefits as well and continue to thrive in their neighborhood. Couple this with job programs (that genuinely serve the most impacted community members), and put programs like direct rental assistance in collaboration with the local Housing Authority on the agenda moving forward if rents start to rise.</p>	<ul style="list-style-type: none"> <li>▪ Through conversations with impacted communities, have we identified possible unintended consequences?</li> <li>▪ Are we prepared to address these consequences in ways that support the folks who are most impacted by them?</li> <li>▪ If not, can we fund other organizations who can?</li> </ul>
<p>Ensure that anyone who is directly impacted by the project is compensated fairly economically, but also that their non-economic needs are met, such as the need for community.</p>	<p>When engaging with impacted communities, ask how they see a project impacting their lives, and ask what they need in order to account for and address potential negative impacts. If what appears to be an abandoned parking lot is used for culturally significant dance practice, efforts should be made beyond financial compensation to meet the need for public gathering spaces (GMM Ch. 8, 8.4).</p>	<ul style="list-style-type: none"> <li>▪ Do we understand the beyond-economic needs of the impacted community?</li> <li>▪ How are we creatively working to meet those needs?</li> <li>▪ What local partners can we bring in to help with this?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Notice the potential impact of the project beyond the folks most directly impacted, including the folks who live across the street and the community as a whole.</p>	<p>Brainstorm how to anticipate and address the impacts at multiple levels. For example, when building a new sewer system, think about the impact of the waste-water treatment plant in the context of the already present infrastructural burdens put on the neighbors and communities, such as existing polluting industries, infrastructure, or other environmental burdens.</p>	<ul style="list-style-type: none"> <li>▪ Is this going to have a harmful impact on communities who have already suffered disproportionately at the hands of government?</li> <li>▪ What about the neighbors across the street? Do they have the means to relocate if this impacts them negatively?</li> <li>▪ Does this impact compound existing environmental burdens?</li> </ul>
<p>Critically evaluate the impact when a project is framed as for the “public good.”</p>	<p>Avoid generalities about “public good” by instead specifically identifying and reflecting on which community members will benefit from a project and being transparent about who may be negatively impacted. Do not sacrifice one community, and specifically a community marginalized by government systems, under the guise of helping the whole. For example, when highways were built, they primarily benefited white homeowners and split communities of color apart. (GMM Ch. 8, 8.4).</p>	<ul style="list-style-type: none"> <li>▪ Does our project frame the impact as for the “public good?”</li> <li>▪ If so, have we critically analyzed who will actually benefit and who will actually be impacted?</li> <li>▪ Are we sacrificing one community, who is likely already impacted, under the false notion of helping the whole?</li> </ul>
<p>Think about meaningful access when asking about a community’s needs.</p>	<p>When engaging a community about a specific project, ask about their needs in relation to how they want to access and utilize the project. For example, a new library that lacks access to existing transit, bike or safe walking routes, or a new park that is only accessible by crossing a highway, will likely be underutilized (GMM Ch. 2, 2.5.2).</p>	<ul style="list-style-type: none"> <li>▪ Do we understand how the community intends to access this project?</li> <li>▪ Will their transportation needs be meaningfully met?</li> <li>▪ What assumptions might we be making in our project design? Have we checked these assumptions with the impacted community?</li> </ul>

## Spotlight: NIMBYism Undermines a Program for the Unsheltered

In a wealthy County in Northern California, County officials created a plan to purchase a site and dedicate it to housing for people experiencing houselessness. They got so much pushback from the well-resourced, well-connected community members, that they abandoned the program in favor of a navigation center to help unsheltered people access resources instead. The program that they are running is at capacity, demonstrating the need for the original program as well. In other words, the preferences of the people with the most resources were prioritized above the needs of the folks with the least. This happens often, especially in communities with large income/wealth disparities, as current systems (including the mechanisms by which elected officials keep their jobs) are designed to center the folks who are the most well-connected and -resourced.

### GMM References

*Chapter 8, Section 8.4 - Eminent Domain*

*Chapter 2, Section 2.5 - Eligible Activities*



County of Nevada Interfaith Food Ministry, Photo Credit: Rob Choate





City of Firebaugh Firestation, Photo Credit: Paul Ashby

## Public Services

### *What Are Equity-Centered Public Services Programs, and How Might They Move Beyond the Regulations?*

CDBG money can be spent to either create a new public service or to significantly increase the reach of an existing one for people and communities that are low-to-moderate income. It can also be used to support a nonprofit whose operating costs have gone up so that they are able to continue to provide a public service. Public services include, but are not limited to, the operations of childcare, health care, job training, recreation programs, education programs, services for a prioritized group of people such as elders and survivors of domestic violence, emergency assistance payments, and legal services (GMM Chapter 2). (Note that the creation or expansion of facilities used for these purposes falls under Public Facilities, addressed in the previous subsection.)

To provide public services in an **equity**-centered way, Grantees must begin by engaging community members who are most impacted to ask what sort of a program is in line with their priorities, their wisdom, and their ways of being, rather than assuming that the government has the answers to people's problems. It involves meaningful outreach through trusted partners and minimizing burdens of participation, including bureaucracy, language and accessibility barriers, geographical and cultural barriers.

## Implementation Strategies and Corresponding Guiding Questions

Bringing public services into an area can be critical to the lives of folks who live within the neighborhood. It also comes with a long history of harmful **saviorism**, as when institutions decide what a neighborhood needs based on values and priorities not shared by the community itself, and/or when that institution focuses on helping individuals through direct service without addressing underlying inequities (Cervero & Wilson, 2006; DeVries, 2023; Murphy, 2023; Naylor & Blackwell, 2022). Rewrite this story moving forward by ensuring that the folks who are most impacted by **systemic inequities** are not only driving the choice of the type of services, but also the method of implementation (Gonzalez, 2021; Martin 2017). Ensure that they are leading and staffing the organization selected to implement the service.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Engage the community members who are most impacted by <b>systemic inequities</b> to ask what services would meet their needs, as well as how these services should operate, where they are, etc.</p>	<p>This can happen in an open-ended way or in a targeted way (if there is a particular issue, such as mental health struggles or childcare deserts, that are arising within your community). But you can also do some work ahead of time with CBLs to develop preliminary ideas for review and feedback. Crucial to this method is to take the feedback and actively incorporate it.</p> <p>Check your assumptions in how you frame your questions.</p>	<ul style="list-style-type: none"> <li>▪ What services do impacted community members want?</li> <li>▪ What is important within these services to help people feel dignified and like they belong?</li> <li>▪ How might these services best fit into the existing assets of the community?</li> </ul>
<p>Work to ensure that the services you provide are <b>culturally responsive</b>.</p>	<p>Learn about the cultural practices and values of the impacted community while asking impacted community members what cultural values are important to them to integrate into a service, and how they would like that done. For example, providing food may be an important cultural form of respect, as is where the food comes from and how it is presented.</p>	<ul style="list-style-type: none"> <li>▪ Are we making an effort to learn about cultural values and practices outside our own?</li> <li>▪ Are we building trusting, reciprocal relationships to help us learn about cultural values and priorities?</li> <li>▪ Are we flexible in our design to give ownership to impacted communities to design their own <b>culturally responsive</b> services?</li> </ul>
<p>Ask community members what is already working and how you can resource that work (before coming in with something new).</p>	<p>The community is likely already finding ways to meet their needs, so build the trust to ask what is already working and how additional funds can support it. For example, there may already be unofficial mutual aid systems, neighborhood childcare, or a local business who offers emergency loans.</p>	<ul style="list-style-type: none"> <li>▪ How are we investing in building trust with members of impacted communities?</li> <li>▪ How might we learn about community-led services that can be supported?</li> <li>▪ Are we checking our biases about what is the “right” way to provide services?</li> </ul>
<p>Let community define success.</p>	<p>Work to understand how the impacted community already defines success, which is rarely as simple as “number of people” served and is often context specific. For example, success might be the quality of the experience even if the quantity of people served is very low.</p>	<ul style="list-style-type: none"> <li>▪ How would the impacted community define the success of this service?</li> <li>▪ How can we use this measure of success to inform shifts in this program or to guide future programs?</li> </ul>



IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Eliminate barriers to participation, such as around language and ability.</p>	<p>Notice who is not participating in a service and work to understand why by building relationships with local Community-Based Organizations and Leaders. Follow their lead in working to build trust and create spaces of <b>belonging</b> as you work to remove barriers.</p>	<ul style="list-style-type: none"> <li>Do we understand the barriers to participation? How do we know what they are, how they operate, and how their impacts can be minimized successfully?</li> <li>Are we providing language access?</li> <li>Can folks of all abilities participate?</li> </ul>
<p>Eliminate geographical barriers to participation.</p>	<p>This includes things like ensuring that services are accessible by public transportation, that they are appropriately high profile (or low profile, if need be, for safety or stigma reasons), and that they don't cross the invisible lines that exist to separate subcommunities and make accessing them dangerous or uncomfortable for marginalized folks.</p>	<ul style="list-style-type: none"> <li>How might we build trust in order to understand what physical barriers to participation may exist, before a service is already designed and located?</li> <li>Are we centering the perspectives of folks most impacted in our design process when we are working to identify and remove barriers?</li> </ul>
<p>When collecting demographic data, be mindful of the lack of trust community members rightfully have with government around their data. Treat data collected with respect as a step towards healing lack of trust.</p>	<p>Be proactively transparent about why demographic data is being collected and how it will be used. Commit to, and follow through with, separating demographic data from their names. Use the data collected to inform decision making and direct funding to impacted communities, not just to report on compliance within funding objectives.</p>	<ul style="list-style-type: none"> <li>Do we understand internally why we are collecting demographic data, how it will be used, and how we will keep it safe?</li> <li>Have we communicated this to participants?</li> <li>Are we using this data to inform decision making and/or direct funding to impacted communities, or to check a box?</li> </ul>
<p>Be mindful that many community members may feel differently about receiving direct benefits than they will about using a subsidized program.</p>	<p>The dominant culture, some non-dominant cultures, and the media often stigmatize folks who receive direct benefits. Be mindful of this in your outreach. Work with trusted partners and ask what folks need to feel dignified and safe to engage.</p>	<ul style="list-style-type: none"> <li>Do we understand how our program may be perceived in the larger cultural context?</li> <li>Are we working to understand what participants need to feel dignified and safe?</li> </ul>
<p>Ensure that marketing is done in meaningful ways, in multiple languages, to all community members, regardless of the language threshold.</p>	<p>Even if a language is only spoken by a small percentage of the local population, provide marketing materials in that language. For example, if there is a small Arabic speaking community, research local Middle Eastern and North African groups or organizations, and proactively reach out to them.</p>	<ul style="list-style-type: none"> <li>Have we marketed our services in all languages spoken in the impacted community?</li> <li>Have we proactively researched, and reached out to them?</li> </ul>

## Spotlight: An Expansive Take on Rental Assistance

During the implementation of CDBG-CV, a Grantee in Southern California expanded its emergency rental assistance program to include hotel vouchers, so that they could provide housing to the portion of their population that do work as migrant farmworkers, who do need short-term housing only. This is a great example of being responsive to the needs of community members who are most impacted by **systemic inequities**.

### **GMM References**

*Chapter 4, Section 4.4 - Accessibility*

*Chapter 4, Section 4.4 - Limited English Proficiency*

*Chapter 2, Section 2.5.7 - Public Services*

*Chapter 10, Section 10.5 - Access to Records and Maintaining Confidentiality*



County of Nevada Odyssey House, Photo Credit: Kial James

# PART V: ACCOUNTABILITY SYSTEMS

## Introduction

Accountability systems include more than simple compliance with the agency or stakeholders who fund your program. **Equity**-driven accountability means holding the institutions in which we operate accountable to the people in the communities served.

When identifying evaluation metrics, it's important to define success through the priorities and experiences of the end user. Similarly, it's important to make sure that you are asking the right questions as it relates to your program's purpose and intended outcomes (Cervero & Wilson, 2006; W.K. Kellogg Foundation, 2022). For example, in Appendix B, Section 4.2, we highlighted a housing program which used CDBG-CV funds to rebuild the homes of low-income families that had burned down in a fire. Evaluating a program like this in an **equity**-centered way goes beyond counting the number of households who completed the program. To measure the impact of the program (and make improvements for future programs), the Grantee needs to understand the experiences of the folks who successfully completed the program, and even more so the experiences of the folks who did not. We know, for example, that there are established policies that place the burden on the user to know and understand how to navigate a process, to bear the cost of legal assistance, or to endure burdensome communication systems (Ling et al., 2024).

The best way to understand how a policy or program actually impacts people at the ground level is to remove barriers and ease user access to accountability systems, include the user in the research and evaluation process, and exercise transparency with the information collected (Cervero & Wilson, 2006; Gonzalez, 2021; Office of Management and Budget, 2022; W.K. Kellogg Foundation, 2022). Ask: What parts of the processes worked for potential users and what did not? What needed to be in place for people to navigate this process in a way that was stabilizing and affirming? Asking these questions (reflecting on them internally but also asking them in real life of the people who the program missed) creates an accountability process that centers exploring the experiences of the end user to identify any unnecessary barriers that may be built into the system itself.

By establishing clear goals, metrics, and evaluating outcomes, institutions can identify areas for improvement and help build trust and transparency with the communities they serve.

## Data Gathering and Data Analysis

*The data we collect are the real stories, real lives, and real experiences of real people: People who live dynamic and complex lives filled with joy and suffering, and who likely are navigating hardships that CDBG programs are meant to alleviate.*

The data we collect are the real stories, real lives, and real experiences of real people: People who live dynamic and complex lives filled with joy and suffering, and who likely are navigating hardships that CDBG programs are meant to alleviate. To affirm someone's humanity and agency while conducting data collection,



organizations must understand that community members are the experts in their experience, and that their input is the key to better programming. Community members should be engaged and centered throughout the research and evaluation process, and it is the researcher's privilege to build the trust and relationships that may open up the space to share these stories (Cervero & Wilson, 2006; Gonzalez, 2021; Racial Equity Tools, n.d.; W.K. Kellogg Foundation, 2022).

When beginning the data collection or research process, be intentional about the purpose of data and the project, how the methods align with that purpose, and how it centers the people you serve. Understand that data collection and analysis come with decisions that have the potential to exacerbate **inequities** and erode trust. For example, when gathering data on the community, researchers face decisions about what to do with the data around small subcommunities, many of whom live their lives on the margins and are the exact people CDBG programs are intended to serve. Some researchers choose to lump demographic groups in ways that contribute to **erasure** (Monet, 2020). Others choose to omit data altogether, calling it statistically insignificant. Neither of these decisions are neutral or objective, and they have real impacts on real people.

Central to DEB-centered data usage is the acknowledgement that all data analysis is subjective, so explicitly **equity**-centered, **race-conscious** measures are needed to better understand your community and present the data effectively to inform changes that will create **equitable** outcomes for the people you serve (Gilfoil et al., 2023; Racial Equity Tools, n.d.).

## What Is an Equity-Centered Analysis of Racial Disparities Data, and How Might It Move Beyond the Regulations?

The starting point of racial disparities data analysis is, of course, gathering demographic data. Currently, HCD is requiring grantees to do a base level racial disparities analysis, using publicly available data sources to get the baseline makeup of their communities, and compare it with the data being collected during programming. This is a key starting point for understanding whether a program's benefits are being distributed **equitably**. For example, if a program is designed to provide shelter for people experiencing homelessness, and 30% of your unhoused community identifies as People of Color, but only 10% of the people in your program identify as such, this is a preliminary indicator that your program may include barriers to participation. A next step would be to work with members of the unhoused community who are also People of Color to identify these barriers and find workable programmatic tweaks.

One of the ways to better understand the community is to allow the self-assignment of identities. This practice can give a deeper and fuller look at diversity data, with more accurate results. Within CDBG, there are racial, ethnic, and gender categories that HCD must report to HUD through the eCivis system. Being transparent with community members about when demographics are being recorded in a particular way, and allowing additional space for folks to self-identify will allow grantees to be in compliance while simultaneously allowing people to feel seen and acquiring the data to do meaningful data analysis.

Similarly, institutions can improve results by disaggregating data, or breaking it down into key demographic variables (income, race, ethnicity, gender, ability, etc.) and identifying where there are disparate participation levels, impacts, and levels of satisfaction. When practicing these methods, it is important to understand both **intersectionality** and privacy concerns that may come up when



sharing or distributing data of a small or specific community (Crenshaw, 1991, Green 2.0, 2024, Racial Equity Tools, n.d.). Understanding **intersectional** identities is critical when disaggregating data because the impacts of discrimination may look different depending on what community or communities folks belong to.

Another practice for **equity**-centered data usage is thinking critically about who gets to analyze and interpret the data. The researcher, though likely trained to identify their own biases, still comes into data analysis with their own worldview and perspectives. An intentional decision must be made about who is in the room during this process and how their lived experience will impact the interpretation of this data (Cervero & Wilson, 2006; W.K. Kellogg Foundation, 2022).

Ensure that community members are able to participate in telling their own stories and are able to access this information while and after the reports are written. It is important to consider the capacity and skills of the institution doing the research, and how to best engage and make space for community members to be a part of this process. The idea is to do the opposite of what has traditionally been done, namely extracting information and alienating the “subjects” from a process and product that is meant to advocate for them.



City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams

## Implementation Strategies and Corresponding Guiding Question

Research is a strong tool for addressing disparities and disparate impacts in your communities and programs. So, it is especially important that there are **equitable** strategies for each phase of the process, including planning, analysis, interpretation, and presentation. This will help an organization gain an accurate understanding of what is happening on the ground level, while earning the trust and buy-in from communities they serve.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Address power dynamics at play.</p>	<p>The Grantee has power in this ecosystem as the funder (from the point of view of the end user). Be proactive in naming that and in using that knowledge to frame questions in ways that affirm end users and center their wisdom. Consider allowing for anonymous feedback attached to demographics as well so that data can be disaggregated while ensuring the safety of the folks giving feedback. Additionally, within the community served, there will be power imbalances. The impacts of this can be minimized by being intentional about grouping if focus groups are part of the data gathering process.</p>	<ul style="list-style-type: none"> <li>▪ Are we designing processes that allow the folks most impacted to have a main role in making decisions?</li> <li>▪ Are community members able to tell their own stories while experiencing physical and emotional safety?</li> <li>▪ Are there multiple ways for users to provide feedback based on their comfort level and <b>positionality</b>?</li> </ul>
<p>Ground the research in an <b>equity</b> framework from the onset.</p>	<p>Develop a clear and shared definition for racial <b>equity</b> (and <b>inequity</b>) that you can use to ground your research and analysis.</p>	<ul style="list-style-type: none"> <li>▪ Who is or is not in the room developing this definition or framework?</li> </ul>
<p>Address any implicit biases and how they inform the research process.</p>	<p>Reflect on your own lived experiences and framework, and how you can best amplify the voices and perspectives of the people who are impacted by <b>systemic inequities</b>.</p>	<ul style="list-style-type: none"> <li>▪ Who is developing or designing?</li> <li>▪ Who is analyzing?</li> <li>▪ How may someone's biases and lived experiences impact the results?</li> </ul>
<p>Engage in <b>culturally responsive</b> data collection.</p>	<p>Take into account language and lived experience of community members. Collaborate with community leaders to ensure that your data collection tools are culturally relevant and resonate with the population you want to research (GMM Ch. 2, 2.5.10; Ch. 2, 2.2.2).</p>	<ul style="list-style-type: none"> <li>▪ Are these questions designed in a way that is relevant and accessible? How do we know?</li> <li>▪ Does the community feel empowered to share their stories? How do we know?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Commit to engaging the community you serve throughout the data collection process.</p>	<p>Leverage your relationships with CBOs and/or consultants to expand your capacity to engage in participatory research.</p>	<ul style="list-style-type: none"> <li>▪ Who is being represented?</li> <li>▪ Who is left out?</li> <li>▪ Did impacted community members participate in the design?</li> <li>▪ What assumptions are we making?</li> <li>▪ Does this lead to impact on the ground or does it lead to divestment?</li> </ul>
<p>Analyze racial and identity disparities that may exist in your program and outcomes.</p>	<p>Use disaggregated data and/or the use of self-assignment when collecting demographic data</p>	<ul style="list-style-type: none"> <li>▪ Am I serving my community <b>equitably</b>?</li> <li>▪ Do I know who is in my community?</li> <li>▪ Who is being represented, who is not?</li> <li>▪ Are there privacy concerns when we disaggregate?</li> <li>▪ How do we protect identities?</li> </ul>
<p>Use an <b>intersectional</b> lens and <b>intersectional</b> analysis.</p>	<p>Understanding <b>intersectional</b> identities is critical when disaggregating data because the impacts of discrimination may look different depending on what community or communities the end user belong to.</p>	<ul style="list-style-type: none"> <li>▪ How do systemic barriers affect those who have intersecting identities that render them vulnerable within systems?</li> <li>▪ How do intersecting identities impact someone's experience of the program?</li> </ul>
<p>Involve the community in the interpretation of the data.</p>	<p>Create a data review committee made up of key community leaders as well as your data analysis team to reduce the likelihood that assumptions and biases may lead to harmful conclusions and application of data.</p>	<ul style="list-style-type: none"> <li>▪ Does this interpretation align with the experiences the community members have expressed to me?</li> <li>▪ Did this community have the opportunity to tell their own stories and to inform or lead the analysis of these stories?</li> </ul>
<p>Present and share your findings in a way that is accessible to the communities you serve.</p>	<p>Hold community forums to share key findings and engage in open conversations to help community members gain clear understanding and give feedback on conclusions being made.</p>	<ul style="list-style-type: none"> <li>▪ Is this information accessible to the community you extracted the data from?</li> <li>▪ How are we sharing and presenting information and why?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Present and share your findings in a way that will inform change and benefit the communities you serve.</p>	<p>Share ownership of project reports and publications with trusted CBOs so they can utilize them for their own growth and capacity building?</p>	<ul style="list-style-type: none"> <li>▪ Are other organizations able to access this data to better support their work?</li> </ul>
<p>Provide support for data collection activities.</p>	<p>Make sure to provide ample support to the organizations and people on the ground collecting the data, especially when data is being collected for the purposes of compliance without a clear connection to impact (GMM Ch. 11, 11.1) .</p>	<ul style="list-style-type: none"> <li>▪ Are we asking our community partners what support they need?</li> <li>▪ Are we taking on as much of the administrative burden as possible of data collection and entry?</li> </ul>
<p>Provide honest advisory services and transparency about data collection.</p>	<p>Collecting demographic data, especially regarding documentation status, can be very risky. Communicate what information will be gathered, why, and who it will - and will not - be shared with. Do not commit to data security if you are not able to actually keep it secure. To the extent of your abilities, do not share information gathered with the federal government or immigration officials without anonymizing it first (GMM Ch. 9, 9.1; Ch. 9, 9.2).</p>	<ul style="list-style-type: none"> <li>▪ Are we only collecting the data we absolutely need?</li> <li>▪ Do we know who has access, and who does not have access, to data collected?</li> <li>▪ Can we separate names from documentation status when storing data?</li> <li>▪ Have we communicated to the recipient our data use processes?</li> <li>▪ Do we have a policy to destroy data once HCD has notified us that the record retention period is concluded for that grant year?</li> <li>▪ Is digital data secure?</li> </ul>



## Spotlight: Using Disparity Data to Allocate Power in Decision-Making Processes

"Homelessness in [our] County disproportionately affects **BIPOC** populations at a significantly higher rate than is represented in the general Census population. According to the Census, [our] County's population make up is 1% Black and African American, however there are 5% of Black and African American people experiencing homelessness. Similarly, American Indian or Alaska Natives comprise only 1.3% of the general population but comprise 3% of the homeless population and 8% of the highest vulnerability unsheltered population. Our community and the CoC have identified the lack of data on who is being served and what populations are disproportionately experiencing homelessness, especially as it applies to LGBTQ+ and other minorities, as a major gap in the homeless system of care. As a methodology for approaching this goal, the CoC is expanding Board membership with specific Board seats dedicated to ensuring that membership and voices at the table are represented by each target group."

—Equity Priorities Survey

### ***GMM References***

*Chapter 2, Section 2.2.2 - Low/Mod Limited Clientele (LMC)*

*Chapter 2, Section 2.5.10 - Eligible Activities 2*

*Chapter 9, Section 9.1 - Relocation and Displacement*

*Chapter 9, Section 9.2 - General Relocation Requirements under URA*

*Chapter 11, Section 11.1 - Monitoring Purpose and Scope*



City of King Pro Youth HEART After School Program, Photo Credit: Steve Adams

# Monitoring and Evaluation

Monitoring and evaluation play a critical role in assessing the effectiveness and impact of programs aimed at addressing access barriers and promoting **equity** in the distribution of federal funding. By adopting an **equity** lens in monitoring and evaluation efforts, an institution can gain valuable insights into how their initiatives are reaching and benefiting the communities they intend to serve. It is also the responsibility of the organization to interpret, analyze, utilize, communicate, and share this information in a way that will improve outcomes and not perpetuate further harm. Just think, how many times has an organization extracted information from community members only to come back 10 or 15 years later and the needle has not moved, or worse, the community looks completely different because long-time residents have been displaced (Chicago Beyond, 2019; Lewis, 2021)?

Building a more just accountability system through robust evaluation and monitoring policies should be embraced as an exciting opportunity to make a positive and transformative impact in communities served. Institutions can take meaningful steps to embed inclusive and restorative practices into their process, and to uncover valuable opportunities for improvement and innovation. By intentionally integrating **equity** into your evaluation practices, you can inspire and empower your community and your team to go beyond checking the box.

## What Is Equity-Centered Monitoring and Evaluation, and How Might It Move Beyond the Regulations?

By adopting an **equity**-centered approach to evaluation and monitoring, the institution can move beyond a narrow focus on program completion and financial compliance. Weight and priority can be given to identifying the barriers to access for communities who have been historically excluded from benefiting from federal funding and programming, assessing the impact of your program, and identifying areas for improvement.

The regulations focus primarily on monitoring, ensuring that the money allocated for a CDBG-funded project is being spent appropriately and quickly on an eligible activity that meets a national objective; that federal cross-cutting regulations such as Davis-Bacon wages for construction projects and environmental review processes are being followed; that people who are being displaced are receiving the information they need in a timely fashion and are receiving the financial assistance they are due; etc. Subrecipients are expected to document their processes and Grantees are expected to monitor them. HCD monitors Grantees, and HUD monitors HCD (GMM Chapter 10; GMM Chapter 11).

When it comes to evaluation, however, the regulations are essentially quiet. If the money is spent the way it was supposed to be spent, and in compliance with the regulations, and as quickly as possible, there is no regulated way to evaluate whether this was the right project at the right time for the community members who are impacted most by **systemic inequities**. It is here where Grantees have the greatest opportunity to shift practices and design to the margins.

The regulations' lack of requirements for an evaluation process is actually an opportunity for teams to be creative and adopt **equity**-centered policies. Without rigid guidelines, you have



the flexibility to design evaluation processes that actively incorporate **equitable** principles and strategies. This means you can think outside the box, explore approaches that work best with your clients, and tailor the process to the specific needs and challenges faced by the communities you serve. An organization can establish an evaluation process that not only measures program outcomes but also serves to promote **equity**, dismantle **systemic racism**, and foster inclusive practices.



## Implementation Strategies and Corresponding Guiding Questions

Framing this process as an opportunity and giving your stakeholders the agency in deciding their futures via the outcomes of your programs can play a transformative role in your program and in the broader community.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Identify whether or not your evaluation questions are aligned with the intended outcome and purpose.</p>	<p>If your evaluation is about someone’s experience accessing a program, the research questions should include more than just output. For example, when implementing Affirmative Marketing Plans and assessing marketing effectiveness and possible corrective actions, focus on the goal of getting priority populations successfully housed, as well as their experience going through the process, not just number of housing applications submitted (GMM Ch. 4, 4.3).</p>	<ul style="list-style-type: none"> <li>▪ Whose priorities are being centered and is this what people need?</li> <li>▪ Are we focusing on the ultimate impact, or what is quickly and easily measurable?</li> </ul>
<p>Evaluate not only the outcome but also the process.</p>	<p>High output does not equal an <b>equitable</b> process. When looking at displacement, there are processes that create more toxic stress for already struggling families. Providing shelter for people experiencing homelessness can happen within exploitative and harmful programs as well.</p>	<ul style="list-style-type: none"> <li>▪ Did this person have a good experience while navigating this program? Did they feel affirmed and respected?</li> <li>▪ What questions can I ask to solicit information about their experience navigating this program?</li> </ul>
<p>Use an <b>intersectional</b> lens to determine whose voices should be centered and engaged in the evaluation process.</p>	<p>Identify and address the unique challenges faced by individuals at the <b>intersections</b> of multiple marginalized identities. This may reveal that women of color with limited English proficiency faced additional barriers to accessing housing assistance due to systemic biases.</p>	<ul style="list-style-type: none"> <li>▪ How can the intersection of some of these identities impact someone’s ability to ask for help? Receive help? Be taken seriously?</li> <li>▪ Who do we need to engage to capture and apply learnings from these experiences and make this or future programs less harmful?</li> </ul>
<p>Engage participants (and additionally folks who were prioritized but who did not end up participating) in the evaluation process.</p>	<p>Conduct focus groups, community forums, or surveys to provide valuable qualitative data into the effectiveness of programs and/or challenges faced by marginalized groups.</p>	<ul style="list-style-type: none"> <li>▪ How can we engage our prioritized communities in ways that feel accessible and affirming for them?</li> <li>▪ How do the results inform the next steps of your program?</li> </ul>
<p>Engage in an iterative evaluation process that includes continuous stakeholder feedback, before, during, and after program implementation.</p>	<p>Regularly seek input from participants, community partners, and advocates to help inform potential barriers in process and outcomes. For example, implementing an LAP is not the finish line. Monitoring its effectiveness through stakeholder feedback is essential (GMM Ch. 4, 4.5).</p>	<ul style="list-style-type: none"> <li>▪ How do the results inform the next steps of your program?</li> <li>▪ Is what we implemented actually having the desired impact?</li> </ul>



## Spotlight: Gathering Evaluation Data From Clients

"[Our] County seeks to hear the voices of Black, Latinx, Asian, Pacific Islander, Indigenous, and other minority communities on their thoughts regarding our current processes. It is only as the County and partner agencies make [these] voices central that they can undertake true change. Without [these] voices, the County and partners would be at risk of implementing patriarchal change, which would not engender the **equity** being sought for the conduct of services. In terms of housing, [our] County has previously used a Racial Equity Survey developed by the [local] Continuum of Care. In early 2021, using the CoC Racial Equity Survey as a template, [our] County and its partner agency, Community Action Partnership of [our] County surveyed 50 homeless or formerly homeless individuals in the county during the week ending January 15, 2021. Surveys were conducted with clients accessing services at [four of our programs]. Most of the clients did not report that they have felt discriminated [against] while accessing services in their program. The surveyed individuals stated they feel content, heard, understood, and are grateful for the services received."

—Equity Priorities Survey

### GMM References

Chapter 4, Section 4.5 - Limited English Proficiency

Chapter 4, Section 4.3 - Affirmatively Furthering Fair Housing (AFFH)



# Discrimination, Appeals, and Complaints

An **equitable** accountability process recognizes that systems can perpetuate discrimination and **inequitable** outcomes. Earlier in the Toolkit (See Appendix B, Section 3.3) we discussed how using **race-evasive** policies overlaid onto a historically oppressive structure perpetuates racist outcomes, regardless of individuals and intent. One way to address these outcomes is creating a clear and accessible process for feedback, review, appeals, and complaints. This also means considering the power dynamics surrounding the creation and review of the system, and recognizing how this dynamic impacts the accountability process.

## What Is an Equity-Centered Approach to Discrimination, Appeals, and Complaints, and How Might It Move Beyond the Regulations?

An **equity**-centered approach is not solely focused on enforcing rules and regulations, but also on dismantling discriminatory practices, addressing power imbalances, and promoting **equitable** outcomes. It involves actively centering the experiences and perspectives of the communities you serve, allowing for their voices to be heard and their concerns to be addressed in a fair, transparent, and just manner.

The regulations are fragmented when it comes to appeals and complaints. Some components of CDBG, and each of the federal cross-cutting requirements, mention complaints procedures within the applicable regulations. For example, the URA includes specific requirements around complaints whenever the URA is applicable. But in general, Grantees are simply required to have a process in place should complaints arise. Similarly, there is no specificity around how to address discrimination. Local governments will often refer people to their local complaints process, but most programs are not addressing actual **equity** issues. On the bright side, this means that there are no restrictions on having a robust complaints procedure should the Grantee decide to prioritize this element.

Appeals and complaints policies, especially in response to discrimination, are rife with **equity** concerns, due the power dynamics at play and the absence of (or expense required to procure) an independent third-party review. The people creating and implementing the process (and generally reviewing the complaints themselves) are often the Grantee, which is not a neutral party and may sometimes be the party accused of wrongdoing. A policy that essentially requires users - many of whom are, by design, low-income - to get outside counsel, is unusable. Being mindful of the power dynamics at play, ensuring that the policy alleviates the burden from the end users, and requiring that the reviewer not be a party to the complaint itself, are key starting points for an **equity**-centered process (U.S. Department of Defense, 2023; Yang & Lieu, 2021).

## Implementation Strategies and Corresponding Guiding Questions

An **equitable** accountability process recognizes that systems can perpetuate discrimination and **inequitable** outcomes. By intentionally incorporating **equity**, the organization can ensure that complaints and appeals related to discrimination are thoroughly and fairly reviewed.

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Create opportunities for meaningful community participation in designing a complaints process.</p>	<p>Hold accessible public forums or interviews with Community Based Leaders (CBLs). Involve priority community members to inform how to design an accessible complaints process that removes financial, legal, and/or psychological barriers to a displaced person filing a grievance (GMM Ch. 9, 9.2).</p>	<ul style="list-style-type: none"> <li>How can we better understand someone’s experience trying to navigate an appeals process when they have been harmed? Was this process difficult to navigate? Do they feel safe enough to start the process? How do we know?</li> </ul>
<p>Create community or partner oversight.</p>	<p>Establish community advisory boards. These can provide oversight, for example, when a relocation appeal is denied to determine if the decision was fair and ensure legal and financial support to the community member relocated (GMM Ch. 9, 9.8).</p>	<ul style="list-style-type: none"> <li>Who can help keep us grounded and inform our process?</li> <li>- Is this a meaningful process that allows for criticism?</li> <li>- Is there community oversight of the appeals process?</li> </ul>
<p>Address power imbalances.</p>	<p>Involve diverse stakeholders in the decision-making process. Create <b>community agreements</b> that support the <b>equitable</b> distribution of participation and power, and that work to center the voices of the folks most impacted by <b>systemic inequities</b>.</p>	<ul style="list-style-type: none"> <li>Are the people we serve represented in this process?</li> <li>Are they able to participate in ways that are comfortable for them?</li> <li>Are their voices centered or marginalized?</li> </ul>
<p>Ensure that information on opportunities to inform the process are shared in ways that people can be meaningfully informed and participate.</p>	<p>Bridge communication gaps by leveraging reciprocal relationships with CBOs. Provide multilingual and digital access.</p>	<ul style="list-style-type: none"> <li>Who can access this information?</li> <li>Do they include partners and the people we serve?</li> </ul>
<p>Involve stakeholders from marginalized communities to inform your accountability systems.</p>	<p>Include people who have lived experiences of discrimination in the design process for an accountability system, such as the Relocation Appeals or Grievance Processes (GMM Ch. 8, 8.9; Ch. 9, 9.2; Ch. 9, 9.8). Include CBOs who work directly with the communities you serve.</p>	<ul style="list-style-type: none"> <li>Do we have stakeholders from priority communities involved in our design process?</li> <li>Have we asked for feedback on our existing appeals process from end-users after a resolution has been made about how it could be improved?</li> <li>If no one is using our accountability processes, have we asked why?</li> </ul>

IMPLEMENTATION STRATEGIES	EXAMPLE	SELF-REFLECTION QUESTIONS
<p>Provide transparency on your accountability processes.</p>	<p>Once the impacted community has helped design an appeals or grievance process, make sure it is clear in all languages how to submit a complaint, what to expect from the process, what support is provided along the process, and what the oversight structure looks like. This should be integrated at the very start of the process during the public engagement (GMM Ch. 4, 4.11). Recognize that there are power dynamics at play that can prevent meaningful access to the appeals process (GMM Ch. 9, 9.1)</p>	<ul style="list-style-type: none"> <li>▪ Have we communicated about how to utilize our grievance process at every step of the project?</li> <li>▪ Have we made it easy to access this process in all languages spoken locally?</li> </ul>
<p>Include in your process a quick turnaround time for addressing complaints. Ensure that you have the infrastructure in place so that you can meet this obligation.</p>	<p>Complaints should be responded to within 10 days of receipt. This response time should also be proactively communicated to recipients so they know their rights should they not be responded to within 10 days (HUD CPEE Toolkit)</p>	<ul style="list-style-type: none"> <li>▪ What do we need to put in place so that we can process and address complaints in a timely fashion?</li> </ul>
<p>Consider complaints and grievances to be important forms of communication.</p>	<p>Any form of feedback is valuable to inform your processes and improve how you deliver work. Make sure that your grievance, appeals, or other complaint process link back to informing process design. When you implement change based on feedback received, it helps build trust (GMM Ch. 4, 4.11).</p>	<ul style="list-style-type: none"> <li>▪ Do complaints submitted inform how we design projects and processes?</li> <li>▪ Do we communicate back to the person who submitted a complaint if changes to processes were made based on that complaint?</li> <li>▪ Do we value complaints as a form of public input?</li> </ul>
<p>Provide transparency and support on your accountability processes.</p>	<p>Informing and providing support navigating the appeals process is essential. Recognize that there are power dynamics at play that can prevent meaningful access to the appeals process, including the fact that Grantees design their own appeals process. Recognize folks may fear retaliation if they choose to exercise their rights, create systems to prevent retaliation (GMM Ch. 9, 9.1).</p>	<ul style="list-style-type: none"> <li>▪ Are there anonymous ways for people to ask questions about their rights if they are worried about retaliation?</li> <li>▪ Have we proactively offered third party support for safely navigating the appeals process?</li> <li>▪ Have we communicated the safety measures in place to prevent retaliation if someone submits an appeal?</li> </ul>



## Spotlight: Removing Obstacles to the Complaints Process

Complaints Procedures are a critical safeguard against discrimination and additional types of harm within CDBG-funded programs as well as a way to settle disagreements between the Grantee and the end user. Designing Complaints Procedures, however, require deep intentionality, in order to avoid unintentionally placing barriers between program users and the justice they seek.

HCD, ICF, Equity First, and KW Consultants worked with an **equity**-centered focus to finalize the current GMM Appendix 4-8, Sample Complaints Procedure. The changes made from the original version to the final version include the following:

- Changing the word “grievance” to “complaint” to remove the undertone of resentment.
- Pointing people towards additional resources when the Complaints Procedure does not apply, rather than simply stating it does not apply. (Ex: Sending people with employment-related concerns to the California Department of Fair Employment and Housing.)
- Doubling the number of days (from 60-120) that a person has to file a complaint, which is a healing-informed strategy, based on the understanding that discrimination is traumatic, and it can take trauma survivors more time to be able to report their experiences.
- Removing the Complaints Officer from the final appeals process, so that people do not view this person, who presumably has already rejected their complaint twice, as a reason not to bother with a final appeal.

### **GMM References**

*Chapter 4, Section 4.11 - Complaints and Appeals Procedures*

*Chapter 8, Section 8.9 - Appeals*

*Chapter 9, Section 9.1 - Relocation and Displacement*

*Chapter 9, Section 9.2 - General Relocation Requirements under URA*

*Chapter 9, Section 9.8 - Appeals*

## CONCLUSION

The Equity and Belonging Toolkit, and the entirety of the process that led to its emergence, was the culmination of an intentional partnership between HCD, ICF, KW Consultants, and Equity First, grounded in deep and mutual respect for each other's expertise and skill sets. Its foundation was the understanding that much like within any ecosystem, we were interdependent, and were intentional in shifting away from the siloing that tends to happen in projects like these. HCD, ICF's Program Manager, and KW Consultants embraced the inherently uncomfortable and hard conversations that came with doing systems-change level equity work, because they trusted Equity First to facilitate conversations through a healing-informed lens that did not aim to shame but rather to foster growth, learning, and evolution. This was possible because we centered communities most impacted by systemic harm, and worked to honor them through each step of the process.



 **GLOSSARY****Affinity Space**

Intentionally designed spaces for people who have experienced marginalization based on shared identities and experiences of the world. These spaces provide structurally supported opportunities for folks to come together and share experiences, emotions, learnings, strategies, resources, and joy without having to explain, defend, or justify their experiences to people who cannot relate. They are especially important in spaces, such as workplaces, schools, and other institutions, which are primarily designed based on norms of the dominant culture, and where misunderstanding is accompanied by power dynamics that make everyday marginalization a common experience.

**Anti-Racism**

An active stance and process, whereby institutions look openly and honestly at their systems, structures, policies, and practices; to identify the connections between these and racially disparate outcomes; and to shift them so that power and resources are shared equitably.

**Belonging**

“More than just being seen or feeling included, belonging entails having a voice and the opportunity to use it to make demands upon society and political institutions. Belonging is more than having access; it is about the power to co-create the structures that shape a community.”

—The Othering and Belonging Institute

**Blockbusting**

A real estate practice that involves telling white homeowners that people of color are moving into the neighborhood in order to persuade them to sell their homes cheaply, and then reselling the homes to families of color at a higher price. At times, this fear was sparked hypothetically. In other instances, an actual family was introduced into a neighborhood to create panic. This became common practice in the post-war era when explicit segregation largely became illegal.

**Bidirectional Learning**

The process in which both parties (such as the trainee and the trainer, or the government and the community, etc.) learn from one another.

**BIPOC**

An acronym that stands for Black, Indigenous, People of Color

**Community Agreements**

A collectively created and agreed-upon set of behaviors and practices designed to allow everyone to feel safe enough and encouraged to participate equitably.

**Cultural Responsiveness**

The extent to which the organization honors and respects the beliefs, values, and customs of a community and integrates that into planning. This also means taking the time to understand and navigate diverse cultures and values to reconcile any challenges, while being flexible and adaptable to the community's needs and ways of being that are meaningful to them.



## Due Diligence

Reasonable steps taken to satisfy legal or regulatory requirements or efforts to reduce exposure to risk.

## Ecosystemic Lens

Understanding that a situation or environment exists in its current form as a result of many factors and not a single act, policy, or person. For example, poverty is not a personal failure, nor simply the result of economic policy. Poverty exists because of the way in which market-driven economic policies, housing policy and pricing/availability, political decisions, the healthcare system, food distribution, etc. interact together.

## Eminent Domain

The power of the government to take or condemn property for “public use,” without the landowner’s consent, upon paying just compensation (as determined by the government). This power has a long history of being used inequitably. It has been used sparingly in white and wealthy communities while being used to demolish or cordon off communities of color to benefit whiter, wealthier communities. The most notorious and widespread use of eminent domain was in the building of the interstate highway system, which facilitated white flight from cities into suburbs, while decimating communities of color in the cities.

## Erasing/Erasure

The removal of people and/or their cultural imprint from a neighborhood. While gentrification is typically understood as the physical displacement of one population by another; erasure refers to the removal of not only the people, but the cultural characteristics of the community, such as specific music or sounds of the neighborhood; ways of interacting with neighbors; attire worn within the community; color, font, and language of signage; graffiti, street art, or additional public art forms, etc. Such erasure exists within a deeply harmful cycle: The erasure makes it easy to strip communities of power, agency, and standing in decision-making practices. In turn, this removal of power facilitates further erasure.

## Equity

Equity is an Outcome, a Measurement, and a Process.

**Equity as an Outcome:** Equitable outcomes occur when power and resources are distributed based on need, such that communities (and individuals within them) can thrive, regardless of their race, gender, sexual orientation, family structure, profession, ability, etc. This is fundamentally different from the concept of equality, where resources are distributed to people in identical amounts and fashions, regardless of what is appropriate based on context.

**Equity as a Measurement:** Measuring equity requires disaggregating data (by race, gender, ability, language, etc.) and analyzing it through an intersectional lens, so that the compounding effects of systemic harm can be more fully understood and meaningfully addressed. For example, when we measure poverty this way, we can identify where resources (such as subsidized childcare, healthcare facilities, CDBG funding, etc.) should be pushed to minimize or eliminate disparities.

**Equity as a Process:** Equitable processes rest on the foundational principle that people are experts in their own experiences, and that true equity must shift power towards the people most impacted by systemic inequities. Equitable processes, such as culturally responsive engagement (as described in this toolkit), bring these very community members, their wisdom, and their priorities, to center of the planning processes. When institutions attempt to create equitable outcomes without creating equitable processes, they inevitably fall short, because the power remains in the hands of the planners, and because regardless of their fields of expertise, the planners do not hold the community’s wisdom.



### Framework of Interconnectivity

Recognition that concepts such as diversity, equity, and belonging, are not limited to a single area of work, but are multi-faceted and will only be meaningfully implemented if they are considered and integrated throughout the totality of our work.

### Gatekeeping

The act of limiting or controlling the flow of information, power, money, or resources so that some people have meaningful access while others do not. Gatekeeping can be intentional or unintentional, implicit or explicit. For example, gatekeeping shows up in procurement opportunities as minimum requirements for experience working on government contracts. Federal regulations acknowledge that people of color and women who own businesses have had inequitable access to such contracts (which is why Grantees are required to do outreach to MBE/WBE). But embedding past experience in Requests for Proposals/Qualifications (RFPs and RFQs) doubles down on reinforcing these inequities.

### Inclusion

Based on the recognition that systems are structured in ways that disproportionately benefit some people, steps are taken to increase access for more people to benefit within the existing system.

### Inequity

The inevitable outcome of a system of policies and practices, upheld by explicit and implicit norms, that are designed to create disparate outcomes and uphold a hierarchy along racial, gender, cultural, and other boundary lines.

### Inside/Outside Strategy

When people who work within an institution/system partner with people positioned outside that institution/system to work towards systemic change in different ways based on differing roles. An example of this is when a City Council member alerts CBOs and CBLs to an upcoming agenda item so that they can organize folks for public comment.

### Intersectionality

Describes the way inequity impacts people differently depending on how the various strands of their identities intersect with each other, requiring different interventions of support. For example, a young, white, single father experiencing poverty will be impacted differently than an elderly, Black, married woman with a disability by overlapping systems of harm. They will likely have different experiences, different needs and priorities, and may, therefore, need and feel supported by different interventions.

### Neoliberalism

A political and economic worldview that holds that unregulated, globalized, free-market capitalism is the key to prosperity and equality. The role for government in a neoliberal system is small, and primarily aimed at smoothing the path for business, by lowering corporate taxes and limiting union activity. In this ideology, most services, including schools, healthcare, and information flow should be run by for-profit companies and nonprofit organizations.

### Positionality

The understanding that our perspectives and experiences (as well as how we are perceived and treated by others) are shaped and informed by who we are in relation to our many social identities (race, gender, class, ethnicity, ability, geographic location, etc.).

**Race-Conscious**

Acknowledging and accounting for the tangible and harmful impact of systemic inequities on people of color based on the social construct of race. Regulations that support outreach to MBEs (businesses owned by people of color) are an example of a race-conscious policy.

**Race-Evasive**

Failing to acknowledge or account for the tangible and harmful impact of systemic inequities on people of color based on the social construct of race. A race-evasive policy will often result in racially disparate outcomes without ever mentioning race. Single family zoning laws are an example of race-evasive policy. They never mention race, but because people of color have been systemically deprived of equitable access to loans, education, jobs, etc., they function to systemically exclude many people of color from entry into such neighborhoods.

**Racial Steering**

A realtor practice of steering potential buyers towards or away from certain neighborhoods depending on the buyer's race.

**Racially Restrictive Covenants**

After the Supreme Court deemed explicitly racist zoning laws unconstitutional, private entities came up with creative ways to prolong neighborhood segregation. Common during the 20th century, and formally pushed by the National Association of Real Estate Boards, racially restrictive covenants were clauses inserted into property deeds, homeowners' association bylaws, and/or neighborhood policies, forbidding the sale of such property to people of color.

**Radical**

Describing a critical, systems-oriented organizing approach to addressing the root causes of inequity and injustice, rather than focusing solely on their individual or surface-level outcomes.

**Redlining**

The practice of restricting access to federally-backed mortgages in non-white neighborhoods. The term originates from the government policy in the depression/New Deal Era, when the federal government stepped in to guarantee mortgages in order to prevent foreclosures. In order to protect its investments, the government set out to determine which neighborhoods were too risky to invest in, and drew red lines around these areas, indicating that the government would not guarantee mortgages there. Private banks soon followed suit. While these neighborhoods varied in myriad ways, the commonality was that they were areas where people of color, and specifically Black people, lived. The result was a complete divestment from neighborhoods where people of color lived, depriving these communities of the mechanism (homeownership) that many white families used to build economic stability and intergenerational wealth throughout the 20th century.

**Reasonable Accommodation**

Per the regulations, reasonable accommodations are changes, exceptions, or adjustments to a program, service, or procedure that allow a person with a disability to have equal enjoyment of the housing program. According to the regulations, there must be an identifiable relationship between the requested accommodation and the person's disability. Reasonable accommodations need not be provided if they would constitute an undue financial and/or administrative burden, or if they would be a fundamental alteration of the provider's program. Applying an equity lens to "reasonable accommodations" means looking at whether the accommodation is "reasonable" and/or the burden "undue" through the lens of the person with the disability, based on their expertise on their lives, their wisdom, and their priorities, rather than based on the government's point of view. Listening and trusting is key to this shift.

**Right of First Return**

A tenant protection in which the owner commits to initially offering an opportunity to a person, household, or community that was displaced by an associated action. For example, if federal funds are used to rehabilitate rental housing units, and existing occupants are relocated as a result of the rehabilitation, the displaced occupants are given the right to return to the rehabilitated units before the units are made available to new tenants.

**Saviorism (Savior-Based, Savior Mindset)**

A set of behaviors/actions in which people "help" folks who have fewer resources or power by imposing their own values and priorities and without direction from or consultation with the people most impacted by these "helping" actions. For example, people experiencing poverty rarely have a meaningful seat at the planning table for government-funded programs combatting poverty. Rather, these programs are often designed by well-meaning people, who may have credentials or jobs that grant them expert-status, but who also bring a set of values, experiences, and priorities that may not allow them to design the most culturally or community responsive programs. Regardless of the intentions of the people designing the programs, these are savior-based because they operationalize the idea that the government (or the people running the program) can "save" the people who use the program.

**Social Predictors**

Aspects of one's social environment that create the conditions for inequitable outcomes.

**Systemic Inequities**

Outcomes, created by laws, policies, practices, regulations, etc. that distribute power and resources inequitably, protecting and reinforcing privilege for some people and communities at the expense of others.

**Systemic Racism**

Outcomes, created by laws, policies, practices, regulations, etc. that distribute power and resources inequitably, along racial or ethnic lines, and that act to protect and reinforce privilege for some people and communities at the expense of others.

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