Response of The MITRE Corporation to the Office of Management and Budget Request for Information Supporting Equity Executive Order Efforts

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Introduction

The MITRE Corporation is a not-for-profit company that works in the public interest to tackle difficult problems that challenge the safety, stability, security, and well-being of our nation through the operation of multiple federally funded research and development centers and labs, and participation in public-private partnerships. Working across federal, state, and local governments, as well as industry and academia, gives MITRE a unique vantage point. MITRE works in the public interest to discover new possibilities, create unexpected opportunities, and lead by pioneering together for public good to bring innovative ideas into existence in areas such as artificial intelligence, intuitive data science, quantum information science, health informatics, policy and economic expertise, trustworthy autonomy, cyber threat sharing, and cyber resilience.

In the summer of 2020, MITRE created a platform to empower decision makers with actionable resources to create and scale equitable, sustainable solutions that bring positive change for a more just society. Our Social Justice Platform provides a foundation to explore solutions to change the course of disparities due to race, ethnicity, gender, sexual orientation, socioeconomic background, education, or ability. MITRE defines platforms as a set of integrated technologies, domain knowledge, and expertise combined to rapidly build impactful strategies. Platforms provide a means to tap into—and add to—existing knowledge to create reusable solutions for current and future challenges.

Social justice is precisely the type of challenge that requires this unbiased, objective vantage point, deep technical expertise, and systems-of-systems capabilities to address. The responses below are informed by the work of MITRE's Social Justice Platform platform team and their research, engagement, and development efforts.

1. Equity Assessments and Strategies

Approaches and methods for holistic and program- or policy-specific assessments of equity for public sector entities, including but not limited to the development of public policy strategies that advance equity and the use of data to inform equitable public policy strategies.

The federal government has been charged with identifying and implementing methods for assessing whether agency policies and programs are serving those who are currently and were historically underserved. To achieve this goal, agencies must evaluate equity at each stage of program administration: from program design (e.g., program regulations, information collections) through program delivery and evaluation. As a foundation, agencies will need to create diverse and unbiased teams with broad perspectives; collect and analyze all relevant data (internal and external); perform both quantitative and qualitative analyses to both understand the meaning of existing data and augment the data with additional insights; and engage with affected communities to uncover insights not found in data and to validate analytic findings.

To support these efforts, MITRE has created an equity assessment framework that integrates leading thinking from multiple sources.[1] Inputs were compiled from local practitioners (e.g., King County, WA and Washington, D.C.); global thought leaders (e.g., United National Children's

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[1] A Framework for Assessing Equity in Federal Programs and Policy. 2021. MITRE, https://www.mitre.org/sites/default/files/publications/pr-21-1292-equity-assessment-framework-federal-programs.pdf.

Fund); and MITRE subject matter experts. We then developed a tailored approach that recognizes the unique characteristics of federal programs that reflects a systems-based, data-driven mindset, which incorporates equity and human-centered research, design, and assessment practices from the U.S. and around the world. It is designed to support the near-term directives established by E.O. 13985 and offers insights that can inform long-term incorporation of equity assessment concepts and processes into larger program management and policy making efforts. While the framework is broadly applicable to all federal programs, agencies will likely need to further tailor each step to fit the unique qualities and circumstances of policies and programs under review as well as resources and tools available to support the assessments.

Figure 1 illustrates four high-level steps of the equity framework:

- Step 1: Assessment
- Step 2: Resolution Planning
- Step 3: Program Enhancement
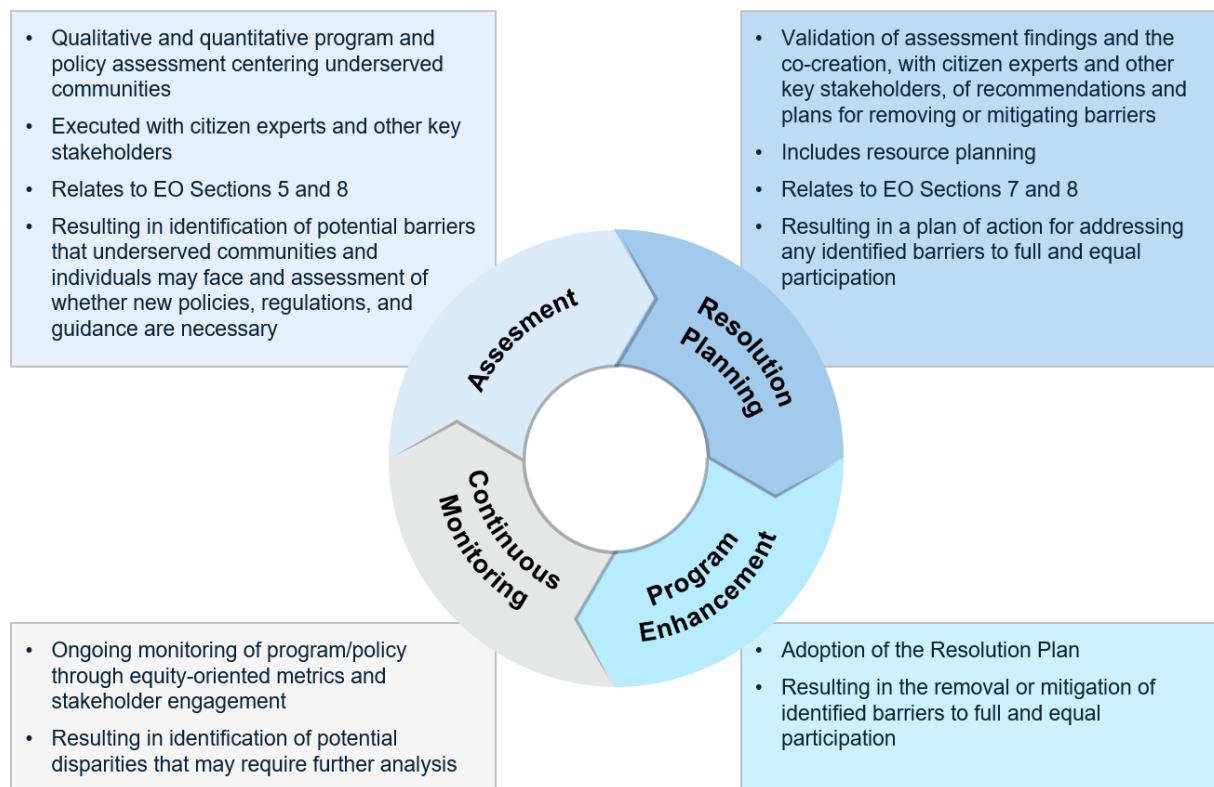- Step 4 Continuous Monitoring

- Qualitative and quantitative program and policy assessment centering underserved communities
- Executed with citizen experts and other key stakeholders
- Relates to EO Sections 5 and 8
- Resulting in identification of potential barriers that underserved communities and individuals may face and assessment of whether new policies, regulations, and guidance are necessary

- Validation of assessment findings and the co-creation, with citizen experts and other key stakeholders, of recommendations and plans for removing or mitigating barriers
- Includes resource planning
- Relates to EO Sections 7 and 8
- Resulting in a plan of action for addressing any identified barriers to full and equal participation

- Ongoing monitoring of program/policy through equity-oriented metrics and stakeholder engagement
- Resulting in identification of potential disparities that may require further analysis

- Adoption of the Resolution Plan
- Resulting in the removal or mitigation of identified barriers to full and equal participation

Figure 1 Advancing Equity in Federal Policy and Programs is a Continuous Effort

Step 1 focuses on conducting the initial equity assessments (due in August of 2021 as required by E.O. 13985) that will enable agencies to understand how well they are serving underserved communities. We provide a detailed examination of the phases that comprise this step below. Step 2 focuses on development of agency plans to address inequities identified in the initial assessment phase and transform the target programs (due in January 2022). Step 3 is focused on implementation of agency equity plans. Finally, step 4 highlights the need for continuous

monitoring of agency operations to ensure that equity is being considered and addressed in all aspects of governance.

The first step in the framework's equity assessment process (Assessment) can be further sub-divided into four phases as summarized in Figure 2 below.[2]
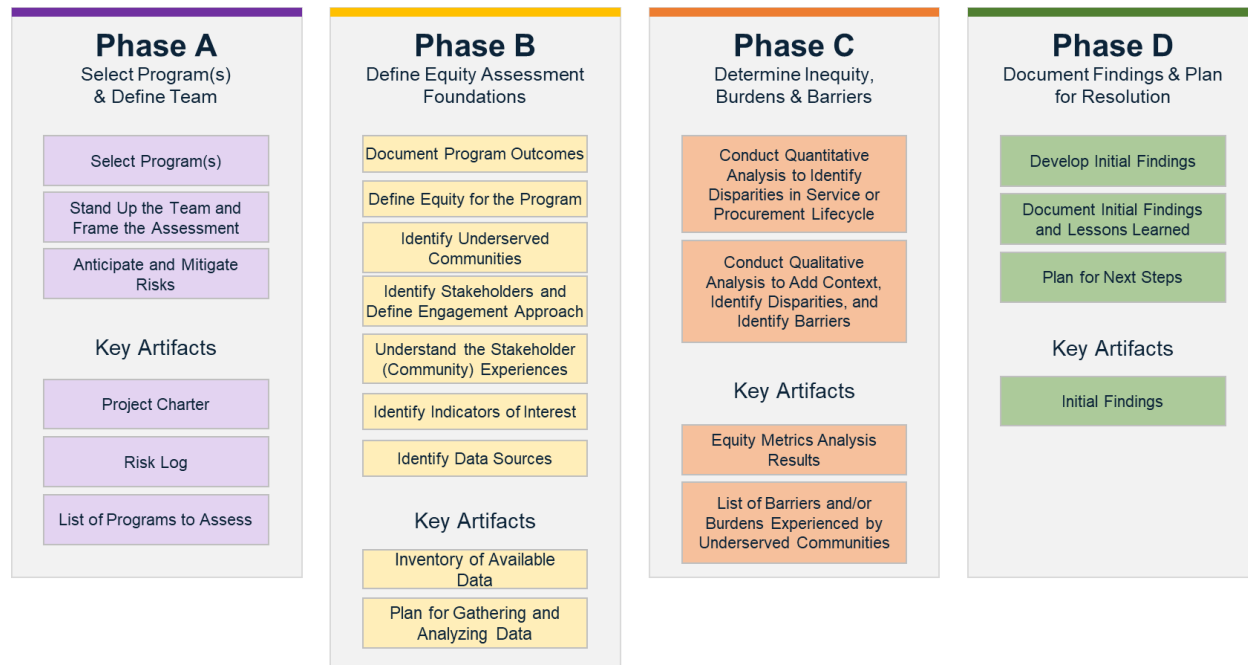

Figure 2 Four Phases of Equity Assessment Framework Step 1 (Assessment)

A. *Select Programs and Define the Team.* Use an objective criteria-based approach to begin selecting programs for assessment. Agencies should focus their efforts on places with their portfolio where inequity may be prevalent and where programs would most benefit from an equity assessment. Potential prioritization criteria might include the number of people affected and the level of impact on target populations. When creating the assessment team, consider not only the relevant expertise (e.g., data analysis, stakeholder engagement) but also team members that demonstrate the values of diversity, inclusion, and equity, including the important ongoing work of identifying and mitigating personal biases. Where possible, begin engaging citizen experts and other relevant stakeholders as the team is being established. Risk identification and continual improvement will be key to the long-term success of the equity assessment process. Start building the risk log, including identified risks and mitigations, at the beginning of the process and continue to maintain it throughout the assessment.

B. *Define Equity Assessment Foundations.* Each equity assessment is anchored by understanding the program's intended outcomes, its designed outputs, a definition of equity, and initial hypotheses about who might be underserved. These critical elements form the foundation of both the stakeholder engagement strategy and data analysis plan. Community engagement, co-assessment, and co-creation of solutions with, and not just

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[2] A detailed breakdowns of the actions and resources available to executive these steps is available at: https://www.mitre.org/publications/technical-papers/a-framework-for-assessing-equity-in-federal-programs-and-policy.

for, those who experience the inequity is critical; inclusion of these voices is the most effective way to understand whether and where barriers exist and how to address them. Where that is not possible, the framework offers tools that can stand in until the assessment team can build the relationships necessary to enable stakeholder engagement, including working with communities who may not have been included when solutions were designed or who may be experiencing inequity today. Assessment teams also use these foundations to develop their tailored list of indicators and measures of equity, as well as potential data sources for use against those indicators. Data sources might include external data from other agencies or academic institutions (e.g., Panel Study on Income Dynamics, Opportunity Insights, or American Communities Survey); program evaluations or studies; or stakeholder feedback.

C. *Determine Inequity, Burdens, and Barriers*. Depending on the quantitative and qualitative data available and the specific analysis approach determined in the prior phase, assessment teams can select from among a collection of approaches provided in the Framework to identify inequity, burdens, and barriers. Quantitative methods might include statistical, benchmarking, or trend analyses. Complementary qualitative analysis—such as program delivery life cycle assessment, causal and logic modeling, and journey mapping–can deepen an understanding of how the quantified disparities might result from a misalignment of program design and delivery with the needs of a specific population/community. These methods compare the processes, outcomes, and strategies of the program to the needs, resources, and perspectives of the identified underserved communities. By centering the experiences of underserved communities, the assessment team exposes assumptions and gaps in understanding and identifies unique barriers and burdens that drive disparities in access and effect.

D. *Document Findings and Plan for Resolution*. Capture observations and insights and document initial findings derived from the quantitative and qualitative analyses described in Phase C. Explore not only equity in the program/policy but also lessons learned about the assessment process and risks (e.g., data gaps and data quality issues) encountered along the way so that the equity assessment process can be improved and applied more completely and consistently in the future. Finally, prepare for resolution planning, during which agencies will engage with critical stakeholders (if not already done as part of the initial assessment); verify and validate initial findings; develop solutions to address inequities; and develop the resolution plan that will address any identified barriers to full and equal participation.

As federal programs consider equity as a metric to achieve program outcomes, MITRE recommends that agencies not only assess public-facing programs but also internal-facing mission support programs and activities that support federal agency operations and the federal workforce. Government-wide efforts to support the federal workforce's diversity, inclusion, equity, and accessibility will provide the critical foundation needed for public-facing federal programs to embrace each of these characteristics in turn as they serve the public.

It is evident how equity assessments can be applied to citizen-facing programs found in civilian agencies across the federal government. At first glance, it may be not clear how such assessments apply to departments that are focused on national security matters. However, a

deeper look shows that equity is an important issue for such agencies.[3] For these programs, the recommendations provided above should be generally applicable, though they will need to be tailored (just as they need to be modified for any specific policy or program).

In summary, the framework is designed to enable equity considerations to be embedded in all relevant agency programs. By focusing on equity directly, the approach presented here augments existing program evaluation techniques to help agencies examine the needs of those who are vulnerable, historically underrepresented, and underserved; collaboratively assess the impacts of policy on their outcomes; and identify barriers and solutions that will enhance equity in program administration. Ultimately, these efforts will maximize the efficacy of programs to meet the public's needs.

A final point about data: addressing systemic disparities requires an understanding of their deeply rooted causes, and data can serve as the impartial key to unlocking this understanding. To enable data-driven decision making, our nation's leaders and those who support them must address two ongoing challenges: the lack of data granularity essential for informing equity-related decisions, as well as barriers to using existing data to better understand impacts of policy on underserved communities. The analytical framework shown in Figure 3 can be used to highlight data gaps that need to be filled before the root causes of inequities can be understood.[4] It is only through understanding these interconnected root causes to inequity that policymakers can create effective solutions.
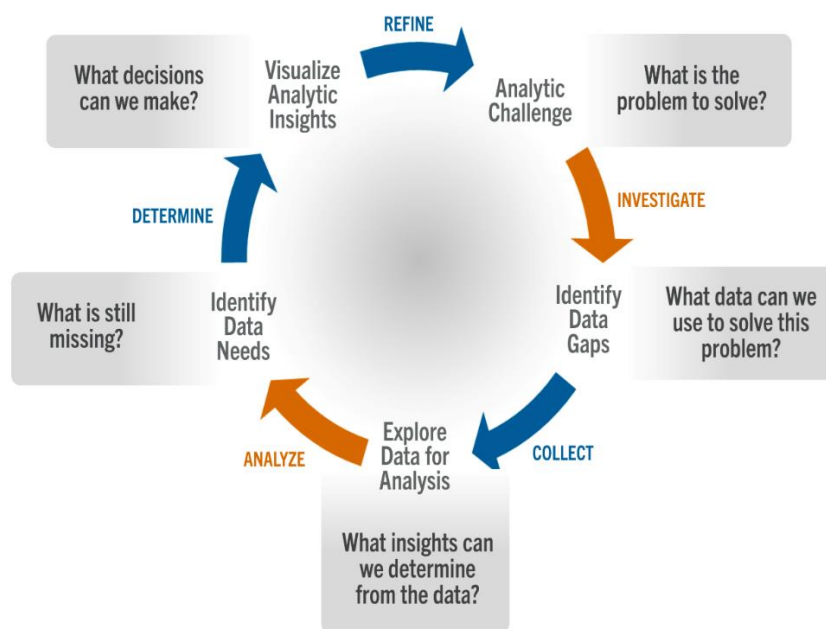

Figure 3 Analytical Framework Used for Data-Driven Decision Making

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[3] For example, the Department of Defense (DoD) runs large educational and health organizations. The DoD Educational Activity is one of only two federally operated school districts, and it supports over 160 schools across the nation. The DoD also serves as a health care provider for over 9 million people through the Defense Health Agency.

[4] J. Ungerleider, C. Fausey. The Social Equity Data Challenge. 2021. MITRE, https://www.mitre.org/sites/default/files/publications/pr-21-1151-the-social-equity-data-challenge.pdf

2. Barrier and Burden Reduction

Approaches and methods for assessing and remedying barriers, burden, and inequities in public service delivery and access.

The Office of Management and Budget (OMB) seeks comment on how agencies can address known burdens or barriers to accessing benefit programs in their assessments of benefits delivery. MITRE recommends an approach that explicitly addresses both quantitative and qualitative analyses. Specific recommendations are provided below.

Conduct quantitative analysis to identify disparities in program or procurement lifecycle

- Evaluate the current capacity for the gathered data to provide disaggregated information for each metric. Data that are unable to be disaggregated, are not representative of underserved populations, collected through a biased sample, or not otherwise representative of the program population should be documented in the risk log.

- Identify variances in equity and burden across communities. Data analysis should be used to quantify disparities based on the definition of equity and the specified indicators and metrics. For example, calculate based on community/population groups, the level of application and enrollment (those determined eligible and/or awarded) to receive program benefits and compare across community/population groups. Depending on the particular set of indicators, data, time and expertise available, techniques might include:

  o Statistical Analysis / Modeling - A form of evidence that uses quantitative measurements, calculations, models, classifications, and/ or probability sampling methods to describe, estimate, or predict one or more conditions, outcomes, or variables, or the relationships between them. The ability to disaggregate the data and stratify metrics for as many user groups as possible (by race, ethnicity, age, sexual orientation, gender identity, ability, veteran status, age, etc.) better improves the ability to identify disparities in service or procurement lifecycle.

  o Benchmarking Analysis – A benchmarking analysis uses data from the environment scan to understand the performance (effectiveness and equity) results of similar type programs. This will provide the team with a comparison of the target program performance against an industry average.

  o Trend Analysis – Trend analysis uses data from across multiple time periods and analyzes patterns to explain and interpret past events or forecast future events. Within an equity analysis, stratification and disaggregation can be applied to examine trends and changes in the rate of access, enrollment, participation, outcomes within and between community / population groups.

Conduct qualitative analysis to add context, identify disparities, and identify barriers

- Use qualitative analytic methods to compare the processes, outcomes, and strategies of the program to the needs, resources, and perspectives of the identified underserved communities. By centering the experiences of underserved communities, the assessment team exposes assumptions and gaps in understanding and identifies unique barriers and

burdens that drive disparities in access and effect. In addition, qualitative analysis will deepen an understanding of how the quantified disparities from Step 1 result from a misalignment of program design and delivery with the needs of a specific population/community. The qualitative analysis should include:

- o An assessment of the program delivery lifecycle - Document an end-to-end program delivery process diagram showing both the internal and external processes of acquiring/creating and delivering the program's benefits to the consumer. The diagram should include all inputs, outputs and process steps. For procurement and contracting opportunities, identify how the agency advertises, solicits, or otherwise informs the public of such opportunities and general criteria used to evaluate contracting proposals. Additionally, the diagram should detail how the agency advertises the service to external consumers and supports engagement with consumers throughout service delivery. To assist in documenting the process, the assessment team can leverage the Journey Map and Service Blueprint tools described in Appendix A.

- o An analysis of the system of systems for achieving the program's intended outcomes. Develop system maps 1) centering on the program's overall life outcome (identified in Phase 2 step 1) and 2) centering on the outcome of securing agency procurement and contracting opportunities (or, alternatively, successfully delivering subcontractor services). Identify all causal factors and resources that contribute to the outcomes and then assess the resources and perspectives of the user groups against the identified factors. The more decomposed the system map, the easier it will be to identify burdens and barriers. This analysis helps identify factors which may be out of the control of the government, but do create or sustain disparities.

- o An analysis of the program policy. Consider policy and regulatory guidance relating to the program, particularly concerning eligibility and policy shaping the particular implementation of the program delivery mechanisms. This includes specific program statutes, regulations, and sub-regulatory policies and Paperwork Reduction Act (PRA) information collection requests mapped to specific points on the program lifecycle. In addition, study rulings regarding access, equity, and discrimination regarding the subject program. To support procurement/contracting equity assessment, identify the agency's policies that regulate the acquisition processes, particularly those which govern programs established to support small and disadvantaged businesses.

- Vet the aforementioned artifacts with citizen experts and key stakeholders representing the identified underserved communities. Gather citizen experts from the priority population(s) (both potential service consumers and potential subcontractors) and key stakeholders to evaluate the program delivery process, causal models, policy findings and other elements of the program through structured facilitation to provide context and identify barriers. Alternatively, these artifacts might be jointly developed/documented with citizen experts.

- Additionally, the assessment team might use this interaction with citizen experts to, through tools such as surveys and focus groups, gather more experiential data such as

throughput times to feed qualitative analysis and/or interpret the results of any earlier qualitative analysis or research findings. This context from citizen experts is critical to achieving accurate, unbiased interpretation of data and findings.

- If citizen experts are not available, the assessment team can:
    - Identify local organizations and organizations that represent the citizens to act as proxy/representatives.
    - Leverage the community perspective developed in Phase 2 Step 5 and compare concepts from those personas and journey maps to the elements of the program. This approach may be ideal due to time limitations but is more likely to result in missed insights and biases that could disadvantage underserved populations.

3. Procurement and Contracting

Approaches and methods for assessing equity in agency procurement and contracting processes.

OMB seeks information on how to achieve equity in a procurement system that must balance competing economic and social goals, including the need to conduct procurements in a streamlined and rapid manner. MITRE has deep expertise in helping Federal agencies improve acquisition practices—expertise that can be leveraged to help produce equitable outcomes.[5] The key step is to define and prioritize both equitable outcomes and high-level requirements early in project initiation and codify these requirements in the documentation that is created throughout the project life cycle, as seen in Figure 4.[6]

Figure 4 The Six-Phase Project Life Cycle Model

The procurement (acquisition) cycle has four steps: pre-solicitation, solicitation, source selection, and administration, as seen in Figure 5.[7] This procurement cycle is designed to develop, award, and manage a contract(s) with industry partner(s) to acquire the best solution to fill the capability gap addressed by the project objectives and requirements.

Figure 5 The Acquisition Cycle

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[5] Acquisition Systems Engineering. 2021. MITRE, https://www.mitre.org/publications/systems-engineering-guide/acquisition-systems-engineering. (Accessed July 1, 2021)

[6] Project Manager's Guidebook. 2015. Federal Acquisition Institute, https://www.fai.gov/sites/default/files/FAI-Project-Managers-Guidebook.pdf.

[7] *ibid*

A key approach to assessing equity in the procurement and contracting processes is to ensure the equitable outcome-related objectives, requirements, and measures are used to develop the documentation in the pre-solicitation, solicitation, source selection, and administration steps. Many agencies offer standard templates, so it is critical to ensure templates are tailored as needed. A key procurement life cycle area where the federal agencies should explore inequities in acquisition is through the market research process, which determines the acquisition strategy and the rest of the acquisition life cycle.

Market research is normally conducted through requests for information via SAM.gov or relies on the first-hand knowledge of program managers' online literature searches or symposia and conference points of contact. The chief barrier presented through these usual market research methods is that they are not meeting the businesses and individuals with inequities where they are. Market research should determine whether there is enough interest by different socio-economic groups for an acquisition to be set-aside for that particular group. It may also help to determine whether a subcontractor might fit the criteria and whether an incentive should be carved out by the government for any prime contractor who can bring an affected subcontractor to the government.

Both the solicitation and contract (or Other Transaction Agreement) can incentivize a prime contract to partner with firms that face inequities. The evaluation criteria of the solicitation might include work that is directly or indirectly subcontracted to firms in a HubZone. For example, these criteria could include a 5% pass-fail goal for subcontracting to small, disadvantaged businesses, or an assessment of resumes of Veterans with first-hand experience with the situation expressed in the Statement of Work.

Innovation hubs can address inequities with small businesses and startups because they have the unique ability to reach out early in the life cycle, usually in the applied research or commercialization stage, and lower the barriers so that the businesses can mature from small contracts into the larger, more complex production and integration contracts. The federal government is already experimenting with innovation hubs. For example, in April 2020, U.S. Department of Commerce and Minority Business Development Agency (MBDA) announced the award of two competitive grants for the launch and operation of the Minority Business Enterprise Inner City Innovation Hubs. MBDA intends to award $2.8M over two years to support and fuel economic innovation of minority-owned start-up businesses and entrepreneurs in inner cities and urban areas in any U.S. state or U.S. territory with high concentrations of minority populations and minority business enterprises.[8] We recommend that additional efforts be undertaken to explore the benefits of this approach.

To determine what kinds of equity assessment tools agencies could use to identify inequity in their standard practices through the acquisition life cycle, consider using an assessment tool that combines participatory research methods to enable inclusion of acquisition community voices, designing to the margins, and qualitative and quantitative data collection. MITRE's equity assessment framework provides detailed guidance for repeatable and inclusive equity assessments that use both qualitative and quantitative methods to identify and explore inequity in

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[8] See U.S Department of Commerce and the Minority Business Development Agency announcement, available at https://www.globenewswire.com/en/news-release/2021/06/07/2242944/0/en/Minority-Business-Development-Agency-Announces-Grant-Competitions-in-American-Indian-Alaska-Native-and-Native-Hawaiian-Project.html.

policies and programs, as seen previously in Figure 2. The tool is sufficiently agile to enable application across the procurement life cycle.

For example, in Step 1, Phase B of the equity assessment framework, the organization conducting the assessment needs to identify data sources. For acquisition activities, data sources that identify inequities can be mined from the official project documentation such as the charters, the acquisition strategy, the stakeholders, the communications plan, the market research channels, the source selection evaluation criteria, the sources sought notice, etc. Additionally, on the contractor side, data on past performance, union grievances, Government Accountability Office reports, and protests could also help define the overall landscape.

Moving forward, the kinds of data agencies should collect and use to assess equity in their procurement practices should include administrative records, laws/regulations/policies, program evaluations (e.g., audits, compliances, inquiries, Inspector General complaints, Ombudsman complaints, protests), project performance measurement, environmental scan, and stakeholder feedback. The agency should also document the data gaps and data quality issues that will adversely impact the assessment.[9]

Agencies have several opportunities to engage with business owners and entrepreneurs who are members of underserved communities and promote doing business with the federal government. MITRE has had success using a five-phase, repeatable Bridging Innovation framework to build pathways to discover, accelerate, and deliver innovation from nontraditional sources to solve national problems. (Figure 6)

Figure 6 MITRE Bridging Innovation Framework

This model can be effectively applied to engage business owners and entrepreneurs who are members of underserved communities. For example, MITRE applied the framework when working with one of the Armed Services, which resulted in that Service developing a reusable framework for formulating open challenge statements, generating evaluation criteria to assess potential solutions, and shaping the scope of challenge events.

One benchmark technique that might support equitable procurement and contracting efforts is challenge-based acquisition (ChBA). ChBA is based on the concept that Government agencies can best perform acquisitions if they present the solution to be acquired as a need (the challenge) and potential providers are free to propose innovative solutions that fill the need. Challenges are issued in terms of operational needs and are accompanied by mechanisms for evaluating proposed solutions and contractual terms for provider participation. Typically, solutions take the form of simplified implementations, and evaluations assess how well a solution satisfies the

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[9] For detailed justification and how these data sources can best be applied, refer to the MITRE Framework for Assessing Equity in Federal Programs and Policies, pp.17-19.

need. Following the guidelines provided in this document, a well-crafted challenge, accompanied by clear, transparent, and effective assessment methodologies and appropriate contracting vehicles, leads to successful acquisitions.[10]

MITRE has created a ChBA Guidebook that provides a detailed description of the approach and an explanation of why ChBA potentially provides a superior mechanism for many acquisitions.[11] It lays out approaches for constructing challenges including the evaluation and compensation mechanisms that accompany such challenges. It also proposes acquisition strategies that fit different circumstances and provides several case studies demonstrating successful application of ChBA. We believe that a ChBA approach could be beneficial in addressing equity issues associated with agency procurements.

4. Financial Assistance

Approaches and methods for assessing equity in the administration of agency grant programs and other forms of financial assistance.

OMB seeks information on how to expand access for underserved communities and achieve equity-oriented results. Addressing the challenge of expanding financial assistance access and channeling resources to underserved communities will require two integrated efforts:

- Re-balancing financial assistance program administrative priorities with equity priorities

- Implementing a concentrated effort to proactively engage local partners in underserved communities to reach program participants and strengthen their ability to access and use financial assistance effectively.

Federal, state, and local governments have focused on financial assistance effectiveness and efficiency for years—ensuring taxpayer dollars were going to entities that were perceived to be the lowest risk of improper payment or non-compliance, those perceived to most effectively use the resources provided, and those most likely to achieve the expected program outcome. Financial assistance program managers do their best to design their programs and utilize data in their decision making to ensure these objectives are being met in addition to the mandated outcome and requirements attached to the funding source (e.g., legislation, block grant, loan funds). An unintended consequence of this focus on financial assistance effectiveness and efficiency has been that decisions (which were data-driven but also likely influenced by perception) resulted in participants in underserved communities being deemed to be more risky and therefore not the best candidates for the financial assistance.

Addressing this paradox when administering financial assistance programs—how to reduce risk and ensure desired outcomes are achieved, while also expanding access for underserved communities and achieving equity-oriented results—requires a concentrated effort to incorporate policies, program methods redesign, outreach/engagement, risk-reduction, and capability building approaches into financial assistance program mandates and design, both pre- and post-award. This includes identifying specific underserved communities with needs that match program intended outcomes, re-assessing the program's delivery methods to ensure they are not

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[10] S. Roe, R. Novak, J. Raines, P. Staresina, M. Zaharee, J. Kattman, M.Lee. Challenge-Based Acquisition: 5th Edition. MITRE, https://www.mitre.org/sites/default/files/publications/pr-20-0745-challenge-based-acquisition-version-5.pdf.

[11] ibid

based on unintentional, ethnocentric assumptions about the program's target population, and executing proactive applicant/recipient risk-reduction and capability-building actions. The specific program pre- and post-award activities would be different depending on whether the program is a grant or loan assistance program or a benefit assistance program (e.g., tax credits or food, housing, or income assistance). This is because most grants and loans are provided to organizations or businesses (many of which are sole proprietorships), while benefits are provided to individuals and families, necessitating different channels for engagement and different types of support.

To successfully expand financial assistance access to underserved communities and achieve equitable results, the following approaches are recommended based on the category of financial assistance program.

Financial Assistance Grant and Loan Programs

Pre-award activities to expand grant/loan applications from underserved communities, reduce risk, and build applicant capabilities to participate in the program:

A. Utilize Department of Commerce, Small Business Administration, state and local government licensing and tax administration, chambers of commerce, and industry associations' data and do the following:

B. Identify organizations and businesses in previously underserved communities that are potential candidates for the program's grants or loans

C. Assess whether the program's methods for applying and delivering assistance and assumptions on access and use align to the target population's culture, literacy levels, and proficiency in using the methods

D. Proactively reach out to local partners in underserved communities, such as colleges and universities, chambers of commerce, and local government agencies, and do the following:

E. Provide local partners program information, including eligibility and intended outcome information

F. Provide local partners with applicant risk evaluation as well as risk-reduction and capability-building guidance

G. Request local partners' assistance (or if necessary, contract for their assistance) to execute pre-award outreach, education, and training for potential grant/loan program applicants (e.g., distributing grant/loan information, assisting with grant/loan applications, training on financial reporting)

Post-award activities to support grant/loan recipients from underserved communities, reduce risk, and continue to strengthen recipient capabilities to participate in the program:

A. Request/contract for local partner assistance in conducting post-award check-ins to reevaluate recipient risks, evaluate progress/outcomes, and if needed, provide additional education or training to achieve intended outcomes and meet award/loan requirements (e.g., completing reporting requirements, maintaining compliance with grant/loan terms and conditions)

B. Request local partners collect and report metrics on assistance provided (e.g., entities assisted, methods of assistance, topics of assistance)

C. Request local partners provide qualitative feedback to improve program application and delivery methods, reduce risk, and strengthen recipient capabilities to continue to participate in the program

D. Collect and analyze federal program metrics on underserved community awards issued and pre- and post-award actions taken, including assistance provided and results of financial, performance, and compliance reviews

E. Refine pre- and post-award activities based on program metrics analysis and local partner feedback.

Financial Assistance Benefit Programs

Pre-award activities to expand benefit applications from underserved communities, reduce risk, and build applicant capabilities to participate in the program:

Utilizing census, state, and local government tax administration, local school district, and local community service organizations' data to do the following:

A. Identify individuals and families in previously underserved communities that are potential candidates for the program's benefits

B. Assess whether the program's methods for applying and delivering assistance and assumptions on access and use align to the target population's culture, literacy levels, and proficiency in using the methods

C. Proactively reach out to underserved community local partners such as colleges and universities, local government agencies, and local community service organizations and do the following:

D. Provide local partners program information, including eligibility and intended outcome information

E. Provide local partners with applicant risk evaluation as well as risk-reduction and capability-building guidance

F. Request local partners' assistance (or if necessary, contract for their assistance) to execute pre-award outreach, education, and training for potential beneficiaries (e.g., distributing information on benefits available, assisting individuals or families with benefit applications and understanding rules for benefit use)

Post-award activities to support benefit recipients from underserved communities, reduce risk, and continue to strengthen recipient capabilities to participate in the program:

A. Request local partner assistance in conducting post-benefit issuance check-ins to reevaluate recipient risks, evaluate outcomes, and if needed, provide additional education or training to achieve intended outcomes and meet benefit requirements (e.g., reporting or activity requirements)

B. Request local partners collect and report metrics on assistance provided (e.g., entities assisted, methods of assistance, topics of assistance)

C. Request local partners provide qualitative feedback to improve program application and delivery methods, reduce risk, and strengthen beneficiary capabilities to continue to participate in the program

D. Collect and analyze federal program metrics on underserved community benefits issued and pre- and post-issuance actions taken, including assistance provided and results of compliance reviews

E. Refine pre- and post-award activities based on program metrics analysis and local partner feedback

Providers of funding sources should expect that financial assistance programs may need multiple iterations of the above activities to find the best data on potential financial assistance recipients in underserved communities and the best combination of local partners and participant support activities that yield the intended result for each underserved community. There may also be a need to increase financial assistance program administration funding to cover the costs of the pre- and post-award data analyses and, if necessary, contract awards for local partner assistance. The challenge of expanding financial assistance access and channeling resources to underserved communities is daunting, however, there are pragmatic approaches to address this challenge.

5. Stakeholder and Community Engagement

Approaches and methods for accessible and meaningful agency engagement with underserved communities.

Engaging stakeholders is the best way to gain insights into the places where inequity may exist and to understand the barriers and burdens experienced by affected populations. Ideally, federal efforts should be assessed, developed, and conducted in partnership with community stakeholders. Community stakeholders include "lived-experience subject matter experts" (those who have lived experience of problems or issues), as well as communities that will be impacted by potential solution(s).

Community engagement can also help agencies forecast and anticipate future problems or opportunities as communities are the closest to potential problems, are the first to experience inequity and can help curate opportunities. They can provide insight into burden and barriers and other happenings before data collection activities can reveal it. Often, by the time barriers and burdens come to the attention of an agency, people have already suffered the (devastating) consequences. Not only can effective, sustained community engagement correct inequity, it can help prevent it.

First, community engagement and public participation requires organizational/team readiness assessment to engage. This should include a transparent and candid assessment of the ability of the team to engage the community in ways that invite participation and does not exploit or (re)introduce trauma or harm. As part of this assessment, topics such as unconscious bias to uncover what biases or stereotypes team members hold about certain stakeholders, looking at ways in which programs or policies may have caused disparate outcomes (to include creating a plan for accountability) should be covered. Effective community engagement begins with ensuring that the individuals and teams engaging with the community are not hindered by implicit bias or legacies of historical harm to communities (actual or perceived).

Second, teams should seek to understand the communities as much as possible using data and information available from reputable sources. In many cases, it may be best to work with community partners, that is, organizations who are proximate to the community to serve as liaison and/or proxy as they have the trust and confidence of the community, which may be difficult for agencies to gain initially. Questions to support an understanding of the communities to be served include the list below:

- Who has the problem that is being solved by this policy or program?

- What community is being served (or not)?

- Who may have been overlooked?

- Who else is delivering or creating approaches (e.g., potential solutions) and what can we learn from them?

- Who needs to be involved from the community to help inform or develop the approach?

- Who needs to be involved (especially from the community) in decision-making processes?

- Who is essential to successful service delivery? Who could derail program success?

Many programs have built-in processes to engage stakeholders in the operation of the program, such as feedback surveys, periodic assessments, anonymous channels, etc. It may be helpful to assess the role that each stakeholder group has played in the program so far (e.g., provided feedback on the program, participated in the design of the program, etc.) and assess the extent to which those sources of data/information are sufficient to answer questions such as those noted above.

Third, an engagement plan for each group of stakeholders during the assessment should be developed. In addition to ensuring organizational readiness to engage stakeholders, development of this plan is a key step in identifying and understanding stakeholders. This upfront work helps teams to better understand their stakeholders, promotes empathy, and can reveal barriers stakeholders face in their daily lives and inform the best mechanisms to engage them. The goal is reach those on the margins who are often left out of the conversation even though they may face persistent inequities.

The method and manner of engagement should not only be amenable to the agency conducting the assessment but should also work for the stakeholders as well. In addition, community stakeholders should be appropriately compensated for their time and contributions.

Fourth, design an approach for community engagement to solicit stakeholder perspectives. This approach captures current stakeholder perspectives to complement past data/information already collected. There are multiple ways to capture the stakeholder experience. We highlight three human-centered design techniques that may be particularly helpful for federal agencies: personas, journey maps, and PAINstorming.

- Personas: A persona is a descriptive profile that helps to understand and articulate perspectives, attributes, and needs of the stakeholder. This technique is often used to create a visual story that enables the program to better understand the end user, demographics, needs, wants, aspirations, and other information that helps to paint a picture of who they are. Personas promote empathy, by providing a way of seeing and

understanding those who the program is designed to support. Persona development is typically based on primary research gathered through interviews, feedback, surveys, and other means of data collection to help understand the end user. Personas can also include information on education, values and beliefs, goals, thoughts, and other information to aid in understanding the end user.

- Journey Maps: A journey map can provide a "day in the life" view of an end user on their journey to realize the intended results of the program. This includes their interaction with the program itself, as well as all their peripheral actions. This activity will also help to inform activities that fill gaps in outcomes and incorporating activities into the implementation plan. There are several types of journey maps that can be created depending on the assessment needs and goals: Service Blueprint; "As-Is" or Current State Journey Map; "To-Be" or Future State Journey Map; "Day in the Life" Journey Map.

- PAINstorming: A brainstorming activity designed to help teams understand the experiences of those they serve. It combines insights achieved via the persona activities and journey mapping activities and can be used as an accelerated method of creating a persona and journey map. PAINstorming does not replace full persona development or journey mapping. It provides an "at-a-glance" view of the persona and their perspectives, needs, and wants derived via brainstorming with the team to understand how impacted communities may experience a service or program.

When developed with cultural awareness and empathy, personas and journey maps are great tools in helping to identify barriers and other insights. These become even stronger tools when the stakeholder can co-create, validate, and revise the personas and journey maps to avoid misrepresentation and tokenization. In instances where it is not possible to engage the communities to be part of this process, engage proxies and/or staff or employees who work close with end users to help create the personas and journey maps.

A central premise of community engagement is to work with communities not just for communities. Agencies will need to realign relationships and incentives so that solutions are co-created and co-owned by both the agency and the community. Community engagement is not a cookie cutter, or one-size-fits-all approach. It is adaptive, reflective, and responsive to the needs of the community and program. The approaches presented above can all be useful; however, customization will be needed to meet the specific needs of the community and program outcomes. This customization process will depend on several factors, including resources, environment (social, economic, political) and accessibility.

Conclusion

There are many challenges to achieving equity at federal, state and local levels. MITRE's approach to these challenges is built on a set of core principles. We begin by focusing on those who are affected. We believe that it is critical to understand the systems that drive societal outcomes. Finally, we seek to produce recommendations that are data-driven and evidence-based. Our multidisciplinary approach and unique vantage point working across the whole of government through the operation of six Federally Funded Research and Development Centers enables MITRE to identify patterns, share best practices, create collaborative partnerships around

social justice issues.[12] The insights, experiences, and data that we have gleaned from our activities to date have informed this RFI response. We are happy to discuss any element of this response, and our broader set of social justice activities, with the OMB team so that we can assist its efforts to expand the use of equity-assessment methods across the federal government.

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[12] To learn more about the FFRDCs that MITRE operates, see https://www.mitre.org/about/corporate-overview.