May 17, 2024

Attn: Office of Management and Budget, Executive Office of the President
Eisenhower Executive Office Building, 1650 Pennsylvania Ave. NW,
Washington, DC 20504

RE: Methods and Leading Practices for Advancing Public Participation and Community Engagement with the Federal Government RFI 89 FR 19885

As the bipartisan, national membership association representing state, county, and city human services agencies, the American Public Human Services Association (APHSA) welcomes the opportunity to share insights on how Federal agencies can better support collaboration and engagement with the American people to improve how government works for them. APHSA's members are experts in administering, overseeing, and aligning programs that build resilience and bolster well-being through access to food, health care, housing, employment, child care, community supports, and other key building blocks. Our members are increasingly invested in engaging communities to improve and innovate government policies and programs, which has therefore become a major focus of APHSA in all elements of our work.

In our response to the Office of Management and Budget (OMB) Request for Information, APHSA draws on insights from member engagement and APHSA-led initiatives to elevate the priorities of and promising practices discovered through state and local practitioners and policymakers. APHSA's responses to RFI questions most directly draw from the following APHSA initiatives that exhibit successes and lessons learned on advancing authentic and equitable engagement between community and government.

Table 1: APHSA-led Initiatives.

Initiative	Description
Coordinating SNAP & Nutrition Supports (CSNS)	CSNS is a cohort grant program administered by APHSA and funded by Share Our Strength's No Kid Hungry Campaign. CSNS aims to align the Supplemental Nutrition Assistance Program (SNAP) with other federal, state, and local nutrition supports to combat childhood hunger. Through our CSNS grant program, four funded sites – Caroline County, Maryland, San Francisco County, California, North Carolina, and Illinois are actively working to facilitate partnerships with community organizations to improve the experience of families accessing SNAP and other nutrition supports.
Aligned Customer-Centered Ecosystem of Services & Supports (ACCESS)	The ACCESS project is a two-year initiative led by APHSA and the National Association of State Workforce Agencies (NASWA). ACCESS aims to surface and align modernization efforts that organizations across the wide health, human services, and labor ecosystem are undertaking in service of promoting truly customer-centered improvements to program design and delivery. This initiative leverages a robust collaborator engagement strategy to guide its approach over the course of the project. Led by current and recent customers of health, human services, and labor programs, APHSA, NASWA, and other identified collaborators will co-design a

	roadmap for system alignment informed by cross-sectional insights garnered throughout the project period and centered on the customer's desired future state of alignment.
System Alignment for Young Families (SAYF)	The System Alignment for Young Families (SAYF) Project is a project led by APHSA and funded by the Annie E. Casey Foundation. Beginning with a Technical Working Group of parents, state and local human services leaders and national advocates, SAYF worked to map essential inroads to system alignment for young families accomplished in partnership with parents and families. Building off this work the SAYF Learning Community brought together six state and local teams made up of cross-programmatic leadership and parent leaders with lived experience. The teams are working together to form a Strategic Alignment Plan (SAP) that breaks down programmatic agency silos with the goal of better serving young families.
Lived Experience National Scan (LENS)	The Lived Experience National Scan (LENS) collected information from human services agencies, identifying successful and emerging practices that engage people with lived experience (PWLE). The scan identified how agencies partnered with PWLE to shape organizational decision-making and strategy development. The scan also asked those who participated in agency initiatives to share their first-hand account of partnering with agencies and how they would recommend engaging PWLE to make human services systems more people-centered, user-friendly, and equitable. Reports from this project will be published in the coming months.

1. What types of content (e.g., methods, tools, definitions, research on the value of participation and engagement, promising practices) could OMB include in a Federal framework for PPCE that would be effective and informative for Federal agencies to initiate or improve their participation and engagement activities, including those carried out with underserved communities? Please share any specific examples.

Based on APHSA's experience engaging people with lived experience (PWLE) in our work, we have identified the need for the following methods and tools to be included in the Federal framework:

- Recruitment & Selection Methods & Tools
- Feedback Mechanism Development Methods
- Equitable Information Collection Methods
- Community Member Onboarding & Continuous Engagement Methods
- Customizable Compensation Schematics, Methods, & Tools
- Best Practices & Tools for Equitable Engagement
- Relationship Building & Maintenance Practices
- Trauma Informed Engagement Methods & Tools
- Productive Conflict & Harm Resolution Tactics

Selection, Onboarding, & Compensation

In our work on the ACCESS and CSNS projects, APHSA created selection criteria for our community advisory councils that are made up of consultant advisors who bring their lived expertise with customer experience to the project. When selecting for these councils, we established diversity criteria for the entire group to ensure the advisories would be representative groups based on the project needs. Depending on the experience needed in an engagement, selection and diversity criteria will change, and we have seen promise in the practice of creating, tailoring, and prioritizing these criteria for each initiative.
To activate equitable engagement of community members, the framework can emphasize the importance of setting the ideal conditions for community members to fully participate in PPCE by ensuring that the engagement mechanisms used are accessible to people with disabilities, people with limited English speaking or reading proficiency, and others who may require specific resources to enable full engagement, such as translation, interpretation, closed captioning, screen readers, etc.

Compensation schemas should offer a model for various levels and types of compensation depending on the tasks and projects people will do as part of their participation and engagement. The framework should encourage agencies to consider participants as subject matter expert consultants with a specific set of work and contributions based on the initiative. This means compensation models should reflect a wide range of responsibilities; for example, compensating an advisory council for ongoing work will use a different model than for a survey, which is different than compensating for an interview, which is different still than compensating for a panel or speaking engagement. The framework should include a value proposition for participants and enable agencies to clearly articulate what people get out of participation, including and beyond monetary compensation (i.e., what their input could yield, the potential impact of the project, and their piece of shaping it).

Onboarding best practices include making ample time for relationship building, especially with groups that will meet more than once. First meetings should be an introduction and opportunity for participants and agencies to get to know each other without a packed agenda. This should also be an opportunity to establish group norms together and clearly define roles, outcomes, and compensation.

Equitable Engagement & Community-Government Relationship Development

The framework should include guidance and definitions for engaging with people with lived experience (PWLE) and affected populations. Affected populations will differ based on anticipated effects and outcomes based on demographics. The framework should include guidance on trauma-informed care for participants, recognizing the effects of government policies and practices on mental and physical well-being.

Part of this framework should also offer agencies tactics for addressing historical harms that affected populations may have experienced due to government policies and actions. The Federal framework can assist agencies in building trusting relationships with community by including ways government agencies can recognize and take accountability for past harms, and advice for how to mitigate future harms. These may include a recognition of potential frustrations and effects on participants' mental health, trauma-

informed care, and know your rights guidance to ensure participants know their participation and feedback will not affect any benefits or services.

Through Cohort 1 CSNS initiatives, project teams at each site concentrated on harnessing data and technology to expand access to nutrition benefits, dismantling inter- and intra-agency silos, fostering partnerships with community organizations, and engaging the lived expertise of families accessing nutrition support programs administered by government and community organizations.[1] A key lesson learned from Cohort 1 was the value of partnering with community throughout agency initiatives rather than limiting engagement to post-implementation feedback. Cohort 2 of CSNS operationalizes these learnings in part by convening a community advisory council that guides all aspects of program administration. The council's responsibilities include:

- co-creating grantee selection criteria
- selecting applicants for funding
- co-designing grantee reporting requirements
- providing quarterly feedback on grantee projects
- planning cohort events and convenings

This engagement model is a promising practice to share decision-making power with people who have lived experience to deepen impact for the families and communities government programs serve.

2. How might OMB facilitate agencies adopting and effectively applying such practices, given the wide range of possible PPCE activities and focus areas?

OMB can work with agencies to identify challenges to implementing the Federal framework, including challenges regarding compensation, fairness, capacity, procurement, and barriers to contracting, and engagement of PWLE and communities. To facilitate agency adoption and application of promising practices, OMB can offer technical assistance sessions, webinar series, and toolkits and resources based on the framework to promote uptake and ensure widespread awareness. OMB can also offer technical assistance to agencies to identify funding mechanisms and government grant or philanthropic investment opportunities to fund work around PPCE. APHSA continues to be willing to partner with agencies to promote and share best practices among human services agencies.

3. What are effective ways for the Federal Government to provide updates to the public about the feedback it receives during, and decisions made after, PPCE activities? Please include any specific promising practices.

In APHSA's work, we have learned that it is important to update not only the general public, but also create consistent feedback mechanisms with the community being served, especially with the participants involved in discrete efforts.

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[1] Data, Tech, & Equity: How Community Engagement Bolsters Data-Informed, Tech-Enabled Nutrition Access. APHSA, Share Our Strength. https://files.constantcontact.com/391325ca001/d4918b69-88ee-4a27-b95f-38382d38d5ea.pdf

General Public

Communications can include press releases, webinars, and conferences that are co-developed and co-delivered with the people who participated in the engagement activities. Accessible public-facing resources that come out of PPCE can be powerful outputs. In a previous CSNS cohort, Mecklenburg Project Food Navigators collaborated with the County Public Information team to craft stories from their outreach work that will be shared on government websites, press releases, and news posts. [2] Public facing narrative work can weave together qualitative and quantitative data in an accessible format that is grounded in context. If these stories are co-created with the communities they highlight, they offer an important opportunity to build trust and resonate with the American public by uplifting and affirming lived expertise.

Involved Community Members

Agencies can partner with trusted community-based organizations to engage underserved communities. Building relationships with these organizations and community members is critical to the success of ongoing PPCE efforts. Creating feedback loops with individuals and organizations involved is a critical component of building trust and communicating the value of their participation and influence. To establish feedback loops, agencies should set a regular practice of sharing updates in clear, plain language, and through various channels. Some feedback loops may be direct, person-to-person conversations. Others may look like regular digital or social media updates. There is a myriad of feedback loop arrangements that could be applied for any given effort. It is a promising practice to build these feedback loops collaboratively with the people and organizations engaged so that everyone understands expectations and can receive necessary information in the ways that work best for them.

Additionally, the framework should share tips for agencies around boundary-setting, so government leaders of PPCE efforts can be prepared to share the expectations and limits around how much community input may be acted on, and what is beyond the scope of a particular engagement.

4. What goals and objectives should OMB consider when developing a Federal framework for PPCE?

As OMB develops the Federal framework, APHSA encourages setting objectives that enable authentic and equitable public participation and community engagement. In our work, these objectives have included sharing and deferring power to community members as much as possible, advancing community-driven program design, facilitating community-led outcomes and metrics development, and operating with transparency.

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[2] CSNS Mecklenburg County Spotlight: Strengthening Community Relationships to End Child Hunger (Coordinating SNAP & Nutrition Supports Case Studies). APHSA and No Kid Hungry, Share Our Strength. https://files.constantcontact.com/391325ca001/b8fa102d-ea90-4781-bc9af16fd405428c.pdf

5. What guidance might OMB provide to agencies for developing their own goals and objectives for participation and engagement? What metrics could OMB suggest to help agencies assess the success and/or impact of their PPCE activities (e.g., participant diversity, breadth and saturation of reach, new or unique perspectives gained, engagement quality, engagement satisfaction, usability of feedback on government decision-making)?

Guidance for Developing Goals and Objectives
People with lived experience should be engaged from the start of PPCE activities, including in the identification and development of goals and objectives. Agencies should get insight from organizations and individuals during this process to ensure these goals and objectives are reflective of the needs of the public. The framework could provide guidance on the development of strategies to engage PWLE on a particular challenge or opportunity within a specific agency, identification of opportunities to improve and innovate systems and processes, identification of best practices, or identification of disparities and their root causes. These overarching goals set a path for agencies while allowing flexibility to address their specific needs.

Metrics for Success
Metrics for success should reflect the importance of both qualitative and quantitative data, support for PWLE during and after PPCE activities, and tangible outcomes from activities. The framework should also include a subset of consistent metrics across initiatives for comparison across agencies and projects.

Metrics may include:

- **Equity & Inclusion Commitments**: establishment of PPCE commitments to enhance equity and inclusion for PWLE, setting clear standards for accountability and transparency, and fostering an environment of collaboration, understanding, and growth regarding PPCE.

- **Participant Diversity**: development and application of criteria for participant diversity, including demographics such as race, ethnicity, age, location, disability, language, gender, socioeconomic status, etc.

- **Accessibility Supports**: availability of supports to increase accessibility and equity, and the number of initiatives offering these supports (e.g., Wi-Fi hotspots, childcare, technology such as laptops or tablets, interpretation services, and both virtual and in-person engagement options).

- **Project Involvement**: number or percentage of projects that incorporate PPCE activities.

- **Engagement Frequency**: frequency of engagement with PWLE.

- **Participant Retention & Satisfaction**: data on participant retention (if applicable) and satisfaction.

- **Collaborative Outputs**: number or percentage of publications and outputs with PWLE co-authors or collaborators.

- **Program & Service Improvements**: number and scale of program and service improvements resulting from engagement.

- **Compensated Initiatives:** number or percentage of engagement initiatives that include compensation for participants.
- **Timely Compensation**: measurement of whether participants are compensated promptly according to established guidelines.

6. In co-developing a Federal framework for PPCE, what specific steps should OMB take that involve the Federal Government and the public, especially engaging members of underserved communities, to ensure collaborative development of the framework? Please share any promising practices and successful examples.

One way OMB can ensure collaborative development of the framework is to establish advisory and participatory collaboratives to co-create the product. Examples and promising practices are described in response to question 1 on pages 2-4. Bringing together a group of individuals and organizations who this framework is intended to serve to co-create the purpose, use, and content of the framework will generate productive relationships and will lead to a high-quality output.

Conclusion

APHSA appreciates the opportunity to offer insights on how Federal agencies can better engage with the American people, particularly people with lived experience, to inform government decision-making. Drawing on successful examples from our member engagement and recent initiatives, we have highlighted a series of best practices, tools, resources, and recommendations that enable public participation and community engagement to solve public problems. Working across levels, agencies, and organizations breaks down silos and builds a strong foundation for sustained partnership, and APHSA is eager to see greater collaboration in the future.

For questions or to discuss further, contact Matt Lyons, Senior Director of Policy & Practice at mlyons@aphsa.org.