Mathematica®
Progress Together

Response to the Request for Feedback on

Draft Toolkit Outline: Broadening Public Participation and Community Engagement with the Federal Government

November 29, 2024

Submitted to:

Office of Management and Budget
Executive Office of the President
725 17th Street, NW
Washington, DC 20503

Submitted by:

Mathematica
1100 First Street, NE, 12th Floor
Washington, DC 20002-4221
Phone: (202) 484-9220
Fax: (609) 228-4958

Comment on the Proposed Outline of a U.S. Federal Public Participation and Community Engagement Toolkit

The federal government is taking critical steps to enhance how its agencies engage with communities by developing a comprehensive U.S. Federal Public Participation and Community Engagement Toolkit (Toolkit). Mathematica commends the Office of Management and Budget (OMB) for advancing this work, which has the potential to reimagine how federal agencies build trust, incorporate diverse voices, and share decision-making power with the public. This effort represents a significant shift: it centers public participation as a deliberate, collaborative process and recasts participation as more than just a simple adherence to regulatory requirements. It insists on a government-wide approach, rather than uneven agency-by-agency commitments, and provides agencies with practical resources to embed meaningful engagement into their decision-making structures.

Mathematica is a nonpartisan research and data analytics organization with a mission to improve public well-being. We have worked extensively with federal, state, and local agencies, Tribal Nations, and philanthropic organizations to co-create solutions that prioritize equity, respect community voices, and empower underserved populations. For example, our collaborations with the U.S. Department of Health and Human Services (HHS) have produced tools for community-led data interpretation, culturally responsive evaluation frameworks, and equity-focused technical assistance centers. We developed an equity assessment guide and several tools to more equitably engage with people with lived experience. In addition, we created a guide to co-interpreting data with community collaborators and another guide to enhance culturally responsive and equitable evaluation support processes that improve community engagement. This breadth of experience enables us to identify the key elements of a successful engagement strategy and understand the barriers agencies face when implementing such approaches.

This response builds on Mathematica's previous contributions to OMB's efforts to define and strengthen PPCE approaches. We offer specific recommendations to ensure the draft toolkit provides a road map for action. A process-oriented framework, tools that generate action, and a clear vision for implementation will empower agencies to develop their capacity for public engagement and embed equity into their practices. These recommendations draw on Mathematica's expertise in creating user-friendly guides and advancing collaborative methods that align with the diverse needs of communities across the country.

Notably, diverse Mathematica staff prepared this response, specifically a team that includes people who identify as Black, Indigenous, Arab, immigrants or children of immigrants, first-generation college students, and LGBTQ+. These staff members have a long history of centering equity in their careers through authentic and meaningful community-engaged and participatory approaches. Our team has extensive experience building and maintaining rich relationships with communities to support their self-determination and visions.

1. Which proposed content do you consider to be most or least helpful to Federal agencies for their participation and engagement activities?

Toolkits like the one proposed—if the material is accessible, engaging, and action-oriented—can be particularly effective for disseminating information across Federal agencies. The content we think are most helpful to Federal agency staff are the (1) explicit mention of collaborative platforms and

technologies to facilitate feedback, (2) resources to help agencies assess and measure their engagement efforts, and (3) "Stage 3" resource to assist agencies with selecting appropriate engagement activities and facilitating safe and inclusive spaces.

In addition, two extremely important parts of the toolkit receive short shrift. First, "feeding back information to participants" received only single bullet point when this topic needs its own section. When communicating back to participants is not done well, it strongly reinforces the power balance between government entities and citizens: The agency merely takes from participants (takes their time, their comments, their hopes for improved programs or government functioning) and does not return anything to participants that makes their input visible. Agencies need to develop plans to ensure participants (and interested nonparticipants) are fully aware of what the final decisions are and how the public participation process informed the decisions. Second, we are glad to see that Section 5 addresses "navigating the legal and policy environments," but the items linked here merely explain what the legal requirements of the Americans with Disabilities Act and the Paperwork Reduction Act are—the items offer no tools for navigating them. This section should explain how agencies can work within the legal requirements and provide example of how this has been done effectively.

However, we think that limiting the question to *content* neglects the importance of *process:* processes agencies should follow to assess and develop their own capacity for true public engagement, processes for defining the right level of engagement for the task at hand, processes for actually implementing the public participation and community engagement (PPCE) tasks, and processes for meaningfully incorporating citizen input into government policies, programs, and research.

To that end, the least helpful content in this draft toolkit is the sheer volume of content itself. The kitchen sink approach does not give the reader any concrete guidance or direction. In its current state, the toolkit includes only links to other tools, without an endorsement of any or examples of how they have been put into action. And although the document's structure is helpful, with guiding principles at the top and sections on communication with the public and navigating the legal and policy environment later, it crams too much of the critical content into Section 3. Rather than merging all these core aspects into one mega-step (with four substages and more than 60 links to example of what other departments, cities, and organizations have created), this toolkit would be more useful if it took a step back and provided a structure for agencies to think through their *reasons* for seeking public participation, *how much* participation and community engagement is appropriate for their task at hand, and then what the *options* are to structure that participation.

A resource that OMB could develop as part of the toolkit would be a structure that maps the Spectrum of Public Participation approaches—informing, consulting, involving, collaborating, and empowering—to the types of activities in which Federal agencies seek public engagement. For instance, in Federal rulemaking, the typical approach is *consulting*—asking community members for feedback on the proposed rule—but the toolkit could demonstrate how an agency could instead take an *involving* approach: reaching out to stakeholder communities during the drafting process (not just waiting for them to respond) and soliciting contributions throughout the rulemaking process. We recognize that not all governmental activities require the most intensive types of public participation and community engagement, but more activities could use more collaborative processes than currently do. Some could also surely take a community-led *empowering* approach, and the toolkit can showcase how and where to do this.

After an agency has worked through a process of deciding what level of engagement is warranted, the next thing it needs is to understand the various ways of conducting that engagement. The toolkit could be much more explicit in offering specific strategies (meeting types, survey designs, listening session activities, and so on) for agencies to consider. Many of the links in the toolkit contain examples, but the document should include more of that content directly in a matrix that cross-lists activities with levels of engagement, describes the benefits and drawbacks to each, and links to examples of them in practice.

2. What other types of content could help agencies begin or improve outreach and engagement?

OMB has many resources in its toolkit, but we recommend that OMB provide resources to support Federal agencies in identifying the communities it wants to engage with and the specific needs of these communities. Taking a step back to identify the communities will inform the engagement strategies federal agencies use and help tailor the strategies accordingly. To achieve this, we recommend including the following type of content.

- **Community needs assessment.** A community needs assessment can help government agencies identify a community's needs, challenges, strengths, and resource needs (https://www.maptionnaire.com/blog/community-needs-assessment-process-and-tools). Conducting a needs assessment can happen through multiple strategies: The assessment can use existing data such as the American Community Survey to identify initial gaps but should also include guidance on conducting community listening sessions, community surveys, and that can happen alongside relationship building. The toolkit can provide guidance on how to conduct one of many assessment strategies, including strategies to close the feedback loop and share the feedback with community members before publishing findings. It is important to keep in mind that communities' priorities can and will change over time. The toolkit could also provide guidance on updating their needs overtime.

- **Community relationship–building.** A key part of engagement is to build relationships with relevant community members. The initial needs assessment should inform which communities Federal agencies want to start or strengthen their relationships with to then conduct additional assessments alongside the community. Depending on the issue or topic, OMB can broadly define *community* to fit into virtual or physical communities and spaces. Building trust is key to ensure that government meets needs, and it keeps government accountable. To achieve that aim, the toolkit should provide resources on how to identify community partners, trusted messengers, or champions to promote the work of the Federal agencies. At the same time, Federal agencies should work to ensure they know what is happening within communities and that the agencies engage the community regularly, essentially keeping an "ear to the ground" when possible. Messengers can be individuals or even institutions such as libraries or local government agencies who are often partners in the work. The toolkit should also include resources on how to engage those trusted community members through methods such as using asset-based language (https://www.skillman.org/blog/the-power-of-asset-framing/). This includes guidance on diversifying engagement methods by offering virtual and hybrid formats, holding meetings at varied times (including evenings or weekends), and ensuring venues are accessible to people with mobility challenges. OMB should also encourage agencies to explore innovative approaches such as asynchronous online engagement or attending existing community-hosted events to reach broader audiences.

OMB should also consider sharing resources with Federal partners on how to present and share information. The easier partners can digest the information, the better informed they can be during engagements. This guidance should include information that is accessible, use community story-telling techniques (https://fairpicture.org/stories/the-power-of-community-storytelling-and-co-creation/#:~:text=They%20teach%20important%20lessons%20about,shared%20values%20and%20common%20humanity.), present materials at an 8th grade reading level, and recognize that people process information differently. OMB should consider such strategies when providing guidance on inclusive dissemination practices that can help to expand the reach of Federal agency outreach strategies. OMB should provide agencies with guidance on proactive outreach strategies, such as partnering with trusted community organizations, using local media outlets, and deploying multilingual and culturally relevant messaging. These approaches ensure that engagement efforts reach communities through the channels they trust and regularly access.

The toolkit can also include content on how agencies can engage in reflective exercises to understand the underlying needs and root causes of disparities or issues they might hear about from communities or see in community outcomes. Such content can include seriously interrogating the role of power between government officials and community members and how that manifests in engagement, through facilitated activities among Federal staff (https://mathematica.org/-/media/publications/pdfs/education/2023/engaging_communities_as_research_collaborators.pdf). These resources might also include positionality exercises that can help Federal staff examine and reflect on how their social identities shape their perspectives and experiences that they bring to work.

3. What other types of content could help the public better participate in engagement activities with Federal agencies?

To best help the public participate fully in engagement activities with Federal agencies, the toolkit ought to provide (1) specific guidelines and structure for Federal agencies on how to develop an outlook that welcomes and invites public participation and engages with citizens in ways that meet people where they are and (2) public-facing materials that demystify Federal government processes. True and robust public participation will inevitably be messy, nonlinear, multilingual, and contradictory. The Federal government must do the hard and necessary work of engaging this public. Instructions or guidance for the public should go beyond how to respond to Federal government requests or outreach and include how to demand that Federal agencies respond to their needs.

Our answers to the previous two questions describe many suggested improvements to the content and structure of the draft toolkit, including proposing tools for agencies to use in conceptualizing the right level of engagement and appropriate public participation activities for any project or initiative that seeks public input. However, these suggestions assume that Federal agencies truly want public participation and that they can communicate with people in accessible language through the channels the audience prefers.

To address the gaps in agency capacity, we recommend that the toolkit include explicit guidance on *how* to identify barriers to participation that communities and individuals might face—such as language barriers, time zone variation, gaps in formal education, work and caregiving responsibilities, and histories of trauma and distrust of government entities—and determine the most effective ways to engage them while considering these potential barriers. This starts with an insistence on using

clear, nontechnical language in written materials and public-facing presentations. The government's own plain language guidelines are a natural place to start, but OMB should adapt this resource to the public engagement context.

Second, the toolkit should provide instructions for communicating about the existence of public participation and community engagement activities through a variety of channels. This could involve posting on an array of social media channels, developing partnerships with community organizations and other associations so they can share messages on a peer-to-peer level and articulate the benefits to their communities in their own words, and holding in-person and telephonic events as well as web-based meetings. Agencies should hold any live or real-time events or meetings multiple times and at varying times of day to accommodate people across the country and with different work and caregiving responsibilities.

The *Federal Register* website and regulations.gov are uninspiring, difficult-to-use websites and redesigning them should be a priority. When Federal agencies want public participation, they must actively invite the public in, not simply post a request for comments in the *Federal Register* and wait for those with the right notification settings or professional ties to respond. We recognize that this represents a signification shift for many agencies and recommend that OMB make available trainings and technical assistance to help agencies develop their capacity and reorient their approach.

Citizen-facing materials to support the public's engagement in participatory activities with Federal agencies are also critical. For too long, those with disproportionate amounts of education, organization, time, and insider knowledge have monopolized participation; it is imperative to uncover the hidden curriculum that allows some people and groups to speak in ways that are legible to Federal agencies so all citizens can have their voices heard. The instructions for how to write a federal resume offered by USAJOBS serve as one example of how to present this demystifying approach. To that end, a separate, public-facing toolkit might be a better vehicle for these resources than the toolkit for Federal agencies. OMB should compose this public-facing product with communities as the audience, not just individuals, and it should include many of the organizational capacity-building resources and training OMB suggests Federal agencies use, along with community-organizing resources. This will provide communities the information necessary to meaningfully discuss, debate, and plan to bring their needs and opinions forward. In fact, OMB could consider whether existing community organization partners could be potential co-authors on a public-facing product. We note that the resources included in Section 9 of the Toolkit outline concern public comments, not the wider array of participatory activities described in the toolkit and throughout our comments. This highlights the dearth of existing resources for citizens and communities about how to engage with the Federal government and implies there is substantial work to do in this arena.

4. How might you like to be involved in creating this Toolkit?

Mathematica welcomes the opportunity to contribute to the ongoing development of the PPCE Toolkit by drawing on our extensive experience in community engagement, equity-focused research, and capacity-building for federal agencies.

a. Providing expertise on process design and implementation

Mathematica has developed numerous resources to guide organizations in designing and implementing public engagement strategies. One way Mathematica could assist OMB is by adapting the Spectrum of Public Participation (or a similar spectrum that OMB prefers) for the Federal

context. This framework helps organizations determine the appropriate level of engagement for specific activities, from informing and consulting to empowering communities as decision-makers. Embedding this framework into the Toolkit would provide agencies with a practical decision-making tool that aligns engagement strategies with desired outcomes.

Mathematica could also assist OMB by developing and testing innovative, inclusive approaches to reach and engage underrepresented groups. These strategies could incorporate multimodal outreach methods—such as using trusted community partners, employing digital tools tailored to specific populations, and hosting culturally relevant engagement activities—that meet people where they are and encourage meaningful participation. By prioritizing outreach practices that resonate with diverse communities, agencies can foster trust, ensure broad representation, and create opportunities for all voices to be heard. Mathematica could support the design of these approaches, providing guidance on how to evaluate their effectiveness in real time and adapt strategies to maximize engagement outcomes. This focus on creativity and accessibility will help agencies build lasting relationships with communities and promote equity and inclusion in public participation efforts.

b.   Piloting toolkit applications in agency contexts

Mathematica could support this effort by applying its Learn, Innovate, Improve (LI²) framework to pilot components of the PPCE Toolkit within Federal agencies. LI² combines continuous quality improvement with evidence-building, fostering a structured approach to designing and refining strategies that meet the diverse needs of Federal agencies and their communities. For example, Mathematica's collaboration with HHS on developing learning agendas under the Evidence Act included guidance for incorporating public and partners' input into evidence-building activities.

Piloting the PPCE Toolkit could similarly integrate community engagement into learning agendas required by the Evidence Act. Doing so would help agencies identify how public input informs their evidence-building priorities and enhances their ability to create meaningful, data-driven policies and programs. For instance, the Toolkit could provide guidance on embedding public participation as a key component of an agency's learning agenda, ensuring that agencies systematically plan, implement, and evaluate these activities.

c.   Contributing to the development of inclusive metrics

Measuring the success and impact of engagement efforts is critical to ensuring accountability and continuous improvement. Mathematica's work with Federal agencies on equity maturity matrices and participatory evaluation approaches positions us to provide meaningful guidance on developing metrics that measure the quality, diversity, and outcomes of public engagement activities. In the future, reporting on community engagement and public participation could include a web-based dashboard that lists all Federal agencies' public engagement plans, metrics on public participation, and qualitative examples of them in use. This will also allow for some amount of accountability for agencies with weak or nonexistent engagement plans.

d.   Co-creating training and technical assistance resources

Many federal agencies face challenges putting public participation into operation due to limited capacity or expertise. Mathematica can support OMB by co-creating training modules, workshops, and technical assistance materials tailored to federal staff. These resources could cover topics such as cultural humility, navigating legal frameworks that apply to consultation with Tribal Nations and

Indigenous communities, and facilitating inclusive engagement practices. Our experience in developing culturally responsive evaluation frameworks and providing technical assistance to federal agencies equips us to deliver practical and effective training resources (https://www.mathematica.org/publications/engaging-communities-as-research-collaborators).

5. Do you have any additional comments or suggestions regarding this Toolkit?

Mathematica commends OMB for developing this Toolkit, which has the potential to transform how Federal agencies engage with the public by fostering more equitable, inclusive, and meaningful participation. We know documents like this are used more widely and readily than procedure manuals or policy guidance, and creating this Toolkit ensures that Federal agencies and their staff find the material accessible, engaging, and useful. Mathematica has created toolkits to guide government agencies on how to approach research, program operations, and other functions, such as a set of tools created to support capacity-building at HHS.

To maximize its impact, we encourage OMB to prioritize the following two critical considerations.

1. Resources for the public

Federal agencies must ensure the public has the tools and knowledge necessary to participate meaningfully. OMB should support agencies in developing accessible, user-friendly resources that empower the public and remove barriers to participation.

a. Developing resources for first-time participants

Public participation can be intimidating, especially for those unfamiliar with federal processes or who have not engaged with government systems before. OMB could provide guidance to agencies on how to create resources specifically designed for first-time participants, such as simple explanations of the engagement process, clear instructions for providing input, and examples of how contributions can influence decision-making. Agencies can distribute these resources widely during their outreach efforts, ensuring they are available in multiple languages and formats.

b. Addressing accessibility in public-facing resources

Federal agencies should ensure that public-facing materials are accessible to all, particularly those in rural or underserved areas. Resources should include both online and offline options, such as printed materials for communities with limited internet connectivity and in-person sessions facilitated by trusted local partners. This multimodal approach would ensure diverse groups have equitable access to information and opportunities for engagement.

c. Embracing community-centered outreach methods

Public-facing resources should reflect creativity and innovation to effectively engage diverse communities. Agencies could employ digital storytelling, interactive tools, and culturally relevant messaging to foster engagement. Guidance from OMB on using social media platforms, hosting community-based events, and collaborating with local organizations could help agencies implement these strategies effectively. Encouraging agencies to use inclusive and multimodal approaches will ensure they reach underrepresented voices that traditional engagement efforts often exclude.

d.   Public trust, transparency, and accountability

One way to build trust and invite the public in is through transparency. Not just transparency about how a process works and how to insert yourself into it, but transparency about what any Federal agency did with the information it received from the public. People who participate in the processes we have discussed here deserve to know how the government used or ignored their contributions. To this end, we recommend the Toolkit include a reporting template for agencies to use during and after any process that includes community engagement. This template should facilitate reporting on the structure of community participation, who the agency reached out to, who provided feedback, what groups were contacted but did not participate, and crucially, how feedback and input were used in decision-making processes, including what suggestions were not incorporated. The template could also involve measures reported for a public dashboard on public participation across federal agencies.

2.   An opportunity to model the Draft Toolkit's intentions

OMB has a unique opportunity to use this request for input on public participation and community engagement as a model for how other federal agencies can approach similar efforts. By stepping outside the typical federal processes—such as relying on online postings and webinars—and incorporating proactive, multimodal strategies to reach diverse communities, OMB can demonstrate how innovative and inclusive engagement practices yield richer, more action-oriented input. Clearly outlining the development process for this Toolkit and the public participation involved is an important first step. OMB might consider obtaining input from trusted community organizations, using creative outreach strategies, and paying attention to cultural diversity and accessibility to both strengthen the existing toolkit and to serve as a practical example for other agencies navigating their own public participation initiatives. Showcasing how OMB's own process aligns with the principles outlined in the Toolkit sets a precedent for reimagining public engagement across the Federal government.

Mathematica Inc.

Our employee-owners work nationwide and around the world.
Find us at **mathematica.org** and **edi-global.com**.