California Department of Housing and Community Development

Division of Federal Financial Assistance

Developing an Equity and Belonging Toolkit

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Background

- Covid-19 was a wakeup call, shining a glaring spotlight on and worsening existing inequities.

- Congress responded with the CARES Act, pushing 5 billion dollars to states in the form of CDBG-CV.

- Since 2018, HCD has had a new focus on equitable implementation of policies, programs, and projects to serve communities that had long been marginalized.

- HUD also heavily signaled the commitment to advancing racial equity in delivery of CARES Act dollars.

- HCD included equity as a central tenet of its procurement of a CDBG-CV Grant Administration consultant.

Shared Language

Inequity

The inevitable outcome of a system of policies and practices that are designed to create and uphold a hierarchy along racial, gender, cultural, and other boundary lines.

Shared Language

Equity is...

A Process: Co-creating solutions for the betterment and wellbeing of the community.

A Measurement: Culturally responsive data collection, community engagement, and feedback and tracking progress in programs and systems.

A Culture: Grounded in systems change that positively impacts the day-to-day lives of individuals and communities.

Shared Language

Ecosystem of Harm

Harm functions as an ecosystem, sustaining itself and the intricate web of relationships (both harmful and healing) among institutions, people, the land on which they live, and the resources they have access to and use, regardless of the attitudes and intentions of the people who act within it.

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Shared Language

Ecosystem of Healing

If harm is the result of a web of interconnected policies and practices, then policy changes across multiple leverage points can build an alternate ecosystem of healing.


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Shared Language

Design-to-the-Margins (DTM) Framework

Equity First's Design-to-the-Margins (DTM) framework holds that the key to transforming harmful systems lies in centering the experiences, needs, wisdom, and solutions of the people who are most impacted by systemic inequities. This lens requires that the burden be placed on the system to enact changes, rather than relying on individual actions, or the emotional labor of the people who are most impacted.
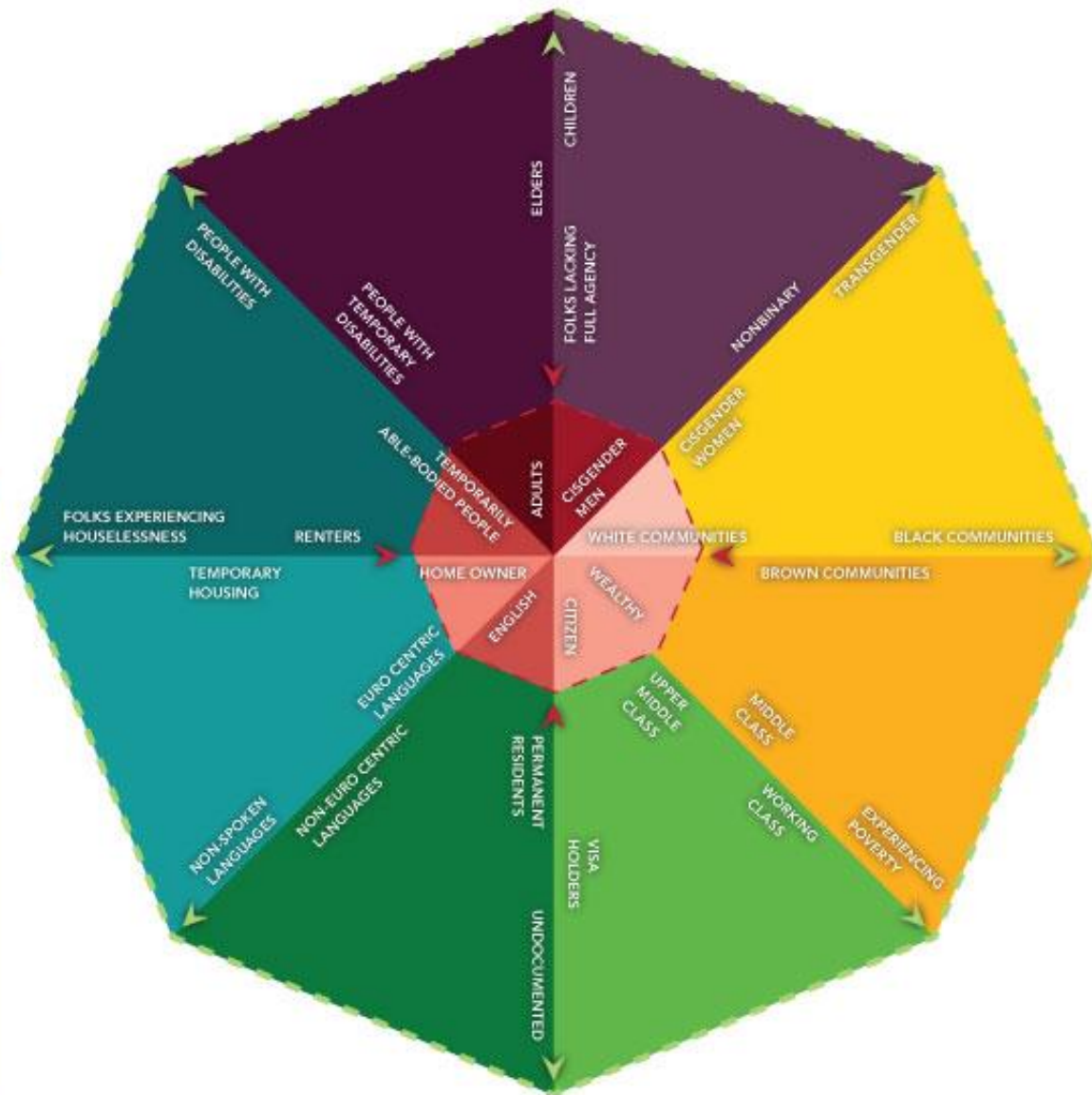
The Role of the CDBG

- CDBG's purpose is to streamline the federal government's ability to infuse resources into predominantly poor communities – providing safe and decent housing and neighborhoods and expanding access to economic opportunity.

- In practice, CDBG's track record is marked by both successes and opportunities for growth.

- An equity toolkit supports the people who implement CDBG in avoiding unintended consequences and designing programs and systems that align the purpose and outcomes of CDBG.

Project Stages

HCD partnered with ICF, Equity First Consulting, and KW Consultants

- Created an equity-centered learning community to thoughtfully and intentionally begin the process of centering equity in our work.

Project Stages

STEP 1: Ongoing Engagement

- Learned from Grantees: Best Practices, Resources Needed

Project Stages

STEP 2: Capacity Building, Technical Assistance, and Bidirectional Learning

- **HCD and ICF staff participated in Diversity, Equity and Belonging-centered capacity building**
  - How systems and institutions can either perpetuate harm or mitigate it—using CDBG specific-examples
  - How to seek ways to disrupt harmful patterns
  - Facilitators learned from participants, informing the Toolkit development

Project Stages

STEP 3: Strategic Planning

- Leveraged the wisdom of CDBG-CV Grantees and staff

- Held a series of workshops to engage Division leadership and staff

- Started creating Equity and Belonging Action Plans

Project Stages

STEP 4: Document and Policy Review and Shift

- **Changed CDBG Grants Management Manual**
  - Removed harmful language when possible; clarified and simplified language*

*What we mean by "Removed Harmful Language" in our GMM

Language has the power to preserve dignity and agency and/or to dehumanize.
We changed the GMM to use humanizing language:

- Centering people before descriptors:
  - People experiencing poverty instead of poor people

- Respecting the way people and communities self-describe, including personal pronouns, how people self-describe their background, race, ethnicity, culture, gender, etc., and giving space for folks to withhold information that they deem private.

- "Fijian" or "Mexican-American" (as self-described) instead of "minority"

*What we mean by "Removed Harmful Language" in our GMM

- "Blight" is a plant disease. Describing neighborhoods this way creates the necessary conditions for harm. People and institutions are much more likely to harm communities who are described in ways that are "less" than human.

- "Alien" is likewise dehumanizing, and the use of the word creates the conditions for harm. Even the word "citizen," while not inherently harmful, erases people who do not have citizenship, who are very much members of the community, and are served by CDBG-funded programs. The GMM has changed "citizen participation plans" to "public participation plans" to reflect this.

Project Stages

STEP 4: Document and Policy Review and Shift

- **Changed CDBG Grants Management Manual**
  - Removed harmful language when possible; clarified and simplified language
  - Inserted "design-to-the-margins" examples
  - Pointed out where harm could be created by policies
  - This wasn't quite enough!!

Project Stages

STEP 5: Infusing the Learnings into the Equity and Belonging Toolkit

- A tool dedicated to the people working hard to serve their communities equitably

Sneak Peak at the Toolkit!

Toolkit Outline

Example: Part 4 – Program Design

What is Equity-Centered Program Design?

- Equity-Centered Program Design centers the priorities, wisdom, lived experience, and needs of the people who are most impacted by systemic inequities.

- It is embedded with healing-informed strategies, places the burden on the system (rather than the end user) to acknowledge and mitigate power imbalances and harm (including and beyond economic dispossession), and anticipates and responds proactively to unintended consequences.

Example: Part 4 – Program Design

What is Equity-Centered Program Design?

- Its policies and practices promote the preservation of dignity, agency, and self- and community-determination.

- It does not assume to know what people value or need, and, rather, is responsive to stated values and needs.

4.2 Cross-Programmatic Considerations: Documentation and Hyper-Regulation

What is an Equity-Centered Approach to Documentation Requirements and How Does it Move Beyond the Regulations?

What the Regulations Require:

- Vary widely by state and program type. For example:

- In programs that offer direct assistance, individuals will need to provide documentation re: household income, including child support, social security benefits, etc.

- Businesses receiving assistance may need to provide documentation on the owners and/or employees, as well as steps they are taking to ensure that new jobs are filled by LMI folks.

- Information on race, gender, family size and structure are often collected

Moving Beyond the Regulations:

- Shift the lens from fraud prevention to proactive support.

- Communicate the grantee's desire to get folks enrolled in the program and follow that up with concrete supports.

- Work with prospective applicants to help them provide documentation in ways that are safe for them.

- Allow for flexibility (multiple pathways).

- Provide TA and physical spaces and resources in places and at times that work for them.

Strategies, Examples, and Guiding Questions

Key Strategies	Examples	Guiding Questions
Be transparent with folks about what IS required, AND ensure that they know you will help them meet the requirements	If gathering 'verifiable source documentation' as part of Limited Clientele projects for direct benefit such as tuition payment or indirect benefit such as access to a health clinic, communicate up front what documentation is needed, why, and what support is available to meet the requirements to receive these benefits (GMM Ch. 2, 2.2.2).	• Are we clear internally about what documentation is required and why? • Have we proactively offered support in meeting these requirements? • Have we worked to reduce the verifiable documentation required, and increase the acceptance of self-certification forms?
Be transparent with folks about what is NOT required.	When providing advisory services for folks impacted by displacement, proactively communicate that this support is available regardless of documentation status, and that documentation status does not need to be shared during the process (GMM Ch. 9, 9.2). Communicate proactively when alternative forms of identification are accepted, ex: SSN, TIN, green card, etc.	• Do end users understand when documentation that is commonly collected is suggested but not required? • Do we penalize folks for not submitting suggested information? • Have we communicated when there is flexibility in a requirement?

Strategies, Examples, and Guiding Questions

Key Strategies	Examples	Guiding Questions
Take as much of the burden as possible off of the end user and place it on the grantee.	For example, when helping someone impacted by displacement make an informed decision about selecting assistance through Section 104(d) or the URA, the grantee must bear the burden to ensure the recipient is clear about the impacts of this decision by proactively providing clear information and being available for questions in the language preferred (GMM Ch. 9, 9.7).	• When we are expecting impacted folks to make critical decisions in a process, are we proactively providing the support necessary? • Are we examining our processes to identify where we can remove work for the end user? • Are we testing our forms to see where users get stuck, then redesigning as needed? • Are we putting a critical eye on requirements and reflecting on the impact they will have and the rationale behind them before passing them along to the end user?

Additional Strategies
(See toolkit for full table with examples and guiding questions)

- Shift the lens from protecting the government from fraud to getting people into the program. Give folks the benefit of the doubt that they are doing the best they can and are acting from a place of unmet needs.

- Require only the minimum amount of documentation required by the regulations for the program type in question.

- Protect people's safety in engaging with government programs (specifically for folks who are undocumented).

HCD's Equity Toolkit Lifts up CDBG Objectives

Delivers on HUD's stated objectives in the founding of the CDBG program:

- *To develop viable urban communities by providing decent housing and a suitable living environment and through expanding economic opportunities, principally, for persons of low- and moderate-income*

- *To empower people and communities to design and implement strategies tailored to their own needs and priorities*

- *To expand and strengthen partnerships among all levels of government and the private sector in enhancing community development*

- *To build the capacity of these partners*

(Paraphrased from U.S. Department of Housing and Community Development, n.d.)

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