

Submitted via email - publicparticipation@omb.eop.gov

March 10, 2023

Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget
Executive Office of the President
725 17th St NW
Washington, DC 20503

Re: Broadening Public Engagement in the Federal Regulatory Process

RESULTS submits the following comments in response to the Office of Information and Regulatory Affairs' (OIRA) request for feedback on summary of learnings and potential recommendations on broadening public engagement in the federal regulatory process. Overall, RESULTS supports the Biden-Harris Administration's efforts to make it easier for the American people to participate in the federal regulatory process.

RESULTS creates the public and political will to end poverty by empowering individuals to exercise their personal and political power for change. We support a network of more than 90 chapters with over 650 active volunteers (and an additional 25,000 members in our broader email action network) across the U.S. Our grassroots advocates educate members of Congress, work with the media, and build awareness within their communities on housing programs and policies, basic nutrition and health programs, along with budget and tax policies. Our grassroots network includes a specific focus on engaging young leaders and elevating the voices of Americans who have firsthand lived experience of poverty.

RESULTS' advocacy strives to center the expertise of people with lived experience of poverty throughout the policymaking process, including but not limited to creating processes and infrastructure for policy design and prioritization, implementation, and accountability. We provide several recommendations below that respond to the Administration's request for input on (1) which recommendations would most effectively broaden public engagement from members of underserved communities; (2) which obstacles or barriers exist to greater public participation for underserved communities; (3) which materials and resources would be especially effective in revising and potentially implementing these recommendations; and (4) how intermediaries can be helpful in reaching individuals and small organizations or businesses.

Dedicate funding to asset mapping across communities to understand who exactly is getting excluded, the social structures and assets that exist in those excluded communities, and what actions are needed to connect respectfully with communities.

Key to understanding how to improve public access to federal rulemaking is knowing which communities are being ignored or excluded. We support and applaud the Administration's efforts to collect data on which barriers exist to greater public participation for underserved communities, but this should only be a preliminary step to take. Barriers and impediments to broad public participation vary across communities and there is no one-size-fits-all solution to meet members of the public where they are at. To truly connect with such communities, OMB should dedicate adequate funding to do asset mapping – understand who exactly is getting excluded, where it is that those excluded groups tend to assemble or congregate as a community; and understand the different pathways to build trust and community buy-in to get invited into those spaces where groups already assemble and/or congregate.

Provide additional support and resources to people so they can meaningfully participate in the federal rulemaking process and consider changes to the input process that make it more accessible.

A core principle that underpins this recommendation is to meet people where they are. Making the regulatory process more accessible to marginalized groups is more than just connecting with community-based organizations and generating multimedia materials. It is also about providing supports and resources to people so that they can take dedicated time away from what's otherwise occupying their lives to engage. This involves funding and infrastructure for things like childcare at in-person engagement events; deploying dedicated staff into communities to meet with them on their "turf" in ways that fit their schedules; providing meals, other incentives, and adequate and appropriate compensation, particularly for people with lived experience for their input. It is critical that federal agencies partner with culturally competent community-based organizations, industry intermediaries, and other relevant institutions to reach those who are marginalized and those who can be challenging to engage (i.e. those without a case manager, social worker or those without any level of community engagement) but who are still relevant to the conversation. This does mean that some of the existing procedures and resource allocation for gathering feedback may need updates or adjustments.

Accessibility, particularly for people with disabilities and people with limited English proficiency, is critical to improving and increasing public participation in federal rulemaking. We recommend using examples on your website that better reflect the federal government's commitment to marginalized groups with limited to no access to meaningfully participate in the federal rulemaking process. For example, the video and

PowerPoint tool examples offered online have accessibility issues under the Americans with Disabilities Act (e.g., no written voiceover texts on the videos, excessive text on each PowerPoint slide). In making regulatory materials more accessible and useable by members of the public, utilize and make available to community partners plain language resources like those from <https://www.plainlanguage.gov/>. Acknowledging the role of technology and mobile devices is important, but we must also recognize that many in rural and urban areas alike still lack access to high-speed internet. In addition to producing materials in easily accessible formats, *we recommend ensuring that such formats be made available offline too.*

Greater accessibility can also be achieved through considering all locations that these materials would be accessed. For example, accessible formats could be made available in places of worship, local welfare offices, local libraries (especially small rural libraries), schools, and childcare and day care centers (e.g. allowing access to parents who utilize government-funded childcare such as Head Start). There can be other ways to potentially get feedback from constituents in creative formats to avoid relying only on groups already engaged. For example, use forms given out by public schools for students to bring home to parents or forms available on school district home pages, or other locations that everyday people will frequently visit.

Thank you for considering our comments. We look forward to supporting OIRA's efforts to ensure greater public participation in the federal regulatory process. If you have any questions or concerns or if we can be of further assistance, please contact Michael Santos, Associate Director of U.S. Poverty Policy at RESULTS at msantos@results.org or 202-783-4800 ext. 122.

Respectfully submitted,



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